

Kirklees Council



Council Chamber - Town Hall, Huddersfield

Tuesday 19 February 2019

Dear Member

The Extra-Ordinary Council will meet on Wednesday 27 February 2019 at 5.30 pm at Council Chamber - Town Hall, Huddersfield.

This meeting will be webcast live and will be available to view via the Council's website.

The following matters will be debated:

Pages

1: Announcement by the Mayor and Chief Executive

To receive any announcements from the Mayor and Chief Executive.

2: Apologies for absence

Group Business Managers to submit any apologies for absence.

3: Declaration of Interests

1 - 2

The Councillors will be asked to say if there are any items of the Agenda in which they have a Disclosable Pecuniary Interests, which would prevent them from participating in any discussion of them items or participating in any votes upon the items, or any other interests.

4: Kirklees Local Plan

3 - 1002

To consider the adoption of the Local Plan (incorporating the Inspector's recommended Main Modifications (relating to soundness and legal compliance) and the Council's Additional Modifications (relating to minor corrections/clarification) and, subject to this decision, delegate authority to the Strategic Director for Economy & Infrastructure to prepare and publish information required post-adoption of a development plan in accordance with relevant legislation.

Contact: Richard Hollinson, Policy Group Leader, Planning Services

Please note that any members of the public who wish to address Council must have registered by 12 noon on Monday 25th February 2019.

To pre-register, please email andrea.woodside@kirklees.gov.uk or phone 01484 221000 (ext 74993).

By Order of the Council



Chief Executive

KIRKLEES COUNCIL

**COUNCIL/CABINET/COMMITTEE MEETINGS ETC
DECLARATION
COUNCIL**

Name of Councillor

Item in which you have an interest	Type of interest (eg a disclosable pecuniary interest or an "Other Interest")	Does the nature of the interest require you to withdraw from the meeting while the item in which you have an interest is under consideration? [Y/N]	Brief description of your interest

Signed:

Dated:

NOTES

Disclosable Pecuniary Interests

If you have any of the following pecuniary interests, they are your disclosable pecuniary interests under the new national rules. Any reference to spouse or civil partner includes any person with whom you are living as husband or wife, or as if they were your civil partner.

Any employment, office, trade, profession or vocation carried on for profit or gain, which you, or your spouse or civil partner, undertakes.

Any payment or provision of any other financial benefit (other than from your council or authority) made or provided within the relevant period in respect of any expenses incurred by you in carrying out duties as a member, or towards your election expenses.

Any contract which is made between you, or your spouse or your civil partner (or a body in which you, or your spouse or your civil partner, has a beneficial interest) and your council or authority -

- under which goods or services are to be provided or works are to be executed; and
- which has not been fully discharged.

Any beneficial interest in land which you, or your spouse or your civil partner, have and which is within the area of your council or authority.

Any licence (alone or jointly with others) which you, or your spouse or your civil partner, holds to occupy land in the area of your council or authority for a month or longer.

Any tenancy where (to your knowledge) - the landlord is your council or authority; and the tenant is a body in which you, or your spouse or your civil partner, has a beneficial interest.

Any beneficial interest which you, or your spouse or your civil partner has in securities of a body where -

(a) that body (to your knowledge) has a place of business or land in the area of your council or authority; and

(b) either -

the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or

if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you, or your spouse or your civil partner, has a beneficial interest exceeds one hundredth of the total issued share capital of that class.



Name of meeting: Council
Date: 27 February 2019
Title of report: Adoption of the Kirklees Local Plan

Purpose of report

To consider the adoption of the Local Plan (incorporating the Inspector’s recommended Main Modifications (relating to soundness and legal compliance) and the council’s Additional Modifications (relating to minor corrections/clarification) and, subject to this decision, delegate authority to the Strategic Director for Economy & Infrastructure to prepare and publish information required post-adoption of a development plan in accordance with relevant legislation.

Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	Yes. The Local Plan effects all wards.
Key Decision - Is it in the Council's Forward Plan (key decisions and private reports?)	Not applicable – this is a full council decision
The Decision - Is it eligible for call in by Scrutiny?	No
Date signed off by <u>Strategic Director</u> & name	Karl Battersby, Strategic Director Economy & Infrastructure – 12/02/19
Is it also signed off by the Service Director (Finance)?	Eamonn Croston, Service Director (Finance) – 12/02/19
Is it also signed off by the Service Director for Legal Governance and Commissioning?	Julie Muscroft, Service Director (Legal, Governance and Commissioning) – 12/02/19
Cabinet member portfolio	Cllr Peter McBride

Electoral wards affected: All

Ward councillors consulted: All

Public or private: Public

GDPR: This report does not contain information that is not publicly available

1. Summary

Following the Examination in Public the council has received the Secretary of State's final Inspector's report (Appendix 1) relating to the Kirklees Local Plan. The appointed Inspectors have concluded that, with the recommended Main Modifications, the Kirklees Local Plan is sound and compliant with legal requirements. The council is therefore, now in a position to adopt the Local Plan.

The Inspectors' recommendations are binding on the Council and the Local Plan cannot be adopted unless all the Inspector's recommendations are accepted and included in the final version of the plan.

The Plan will provide a sustainable framework for an ambitious, but realistic, housing and job growth programme for the next 15 years. The adoption of the plan will provide the certainty needed to allow the council, its partners and the community to shape the future of our towns and village, boost economic growth, help create healthier communities, maximise scope to attract business investment, and help protect urban green spaces.

Once adopted, the Local Plan becomes the statutory development plan for Kirklees and supersedes the Kirklees Unitary Development Plan (adopted March 1999). Planning law requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

2. Information required to take a decision

Background

Members will recall at an extraordinary council meeting on 12 October 2016 the council agreed to approve the publication draft of the Local Plan to invite formal representations relating to legal and soundness tests and thereafter submit the Local Plan to the Secretary of State for an independent examination in accordance with the council's approved Local Development Scheme.

The publication stage consultation closed on 19th December 2016 and following completion of analysis of the comments received and completion of the Habitat Regulations Assessment and Sustainability Appraisal, the Local Plan was submitted to the Secretary of State for the purposes of an Examination in Public in accordance with the Town and Country Planning (Local Plans) (England) Regulations 2012 on 25th April 2017, in accordance with the full Council resolution made 12 October 2016.

The Secretary of State, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended), appointed Katie Child BSc (Hons) MA MRTPI and Elizabeth Hill BSc (Hons) BPhil MRTPI to undertake the independent examination of the Local Plan. (Elizabeth Hill only dealt with issues regarding minerals and waste.)

The Inspectors reviewed all the comments received on the Publication Draft Local Plan, together with the full evidence base submitted alongside, to determine whether the plan meets the tests of soundness as set out in national planning policy and guidance and to determine if legal requirements had been complied with. The Inspectors conducted a series of public hearings as part of the examination which commenced in October 2017 and concluded in April 2018. These hearing sessions involved roundtable discussions and in some cases the exchange of more detailed evidence. The hearings included council representatives, private developers and members of the public and took place in a number of venues around the district.

Following the public hearings as part of the examination of the Kirklees Local Plan, the appointed Inspectors invited the council to consult on a list of proposed Main Modifications which are considered to make the plan sound and/or legally compliant. These included amendments to some site allocations and designations, as well as changes to policy wording and supporting text. This consultation was accompanied by a Sustainability Appraisal and Habitats Regulations Assessment. The Main Modifications are incorporated into the Inspector's final report (Appendix 1).

The modifications consultation ran from 20 August 2018 – 1 October 2018. At this time the council also took the opportunity to publish some Additional Modifications (minor changes) to provide clarification, corrections, minor up-dates to text and the correction of minor mapping errors to the Policies Map. These changes do not relate to the soundness of the plan (Appendix 2 and Appendix 3). Once the modifications consultation closed the comments received were forwarded to the Inspector's for consideration prior to the final reporting on the Local Plan and a summary of the comments received on the Main Modifications, Additional Modifications and their Sustainability Appraisal/Habitat Regulations Assessment can be found in Appendices 4, 5, and 6.

Following the independent examination of the Local Plan by the Planning Inspectorate the council has received the Inspector's report (Appendix 1) relating to the Kirklees Local Plan. The appointed Inspectors have concluded that with the recommended Main Modifications the Kirklees Local Plan is sound and compliant with the legal requirements. The report concludes that the Local Plan's vision, strategic objectives and spatial development strategy provide a positive and soundly based framework for the delivery of sustainable development in Kirklees.

The council is therefore, now in a position to adopt the Local Plan.

The Inspector's recommendations are binding on the Council and the Local Plan cannot be adopted unless all the Inspector's recommendations are accepted and included in the final version of the plan. If the Council rejects any of the Inspector's modifications, the plan cannot be adopted.

Once adopted, the Local Plan becomes the statutory development plan for Kirklees and supersedes the Kirklees Unitary Development Plan (adopted March 1999). Planning law requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

Options

The council has now reached the adoption stage of the development plan preparation process as set out in Appendix 8. In accordance with Section 23 of the Planning and Compulsory Purchase Act the council can now adopt the Local Plan (together with its modifications) or resolve to not adopt the Local Plan. As it is a statutory duty for the council to prepare a development plan a decision to not adopt would trigger a process to review the reasons given for non-adoption and to re-commence development plan preparation from an appropriate stage in the process.

3. Implications for the Council

3.1 Working with People

The Local Plan provides clarity for what development is intended to happen in the area over the life of the plan, where and when this will occur, and how it will be delivered. It provides certainty for local people regarding where most new development will take place and the policies that will be considered when planning applications are determined. Policies in the Local Plan encourage the involvement of local people in land use planning and the land use framework provided by the Local Plan will allow the further development of local responses, particularly in the form of community led

masterplans, locally led place shaping/renaissance/land use initiatives and Neighbourhood Plans/Orders, where appropriate. The Local Plan focuses on key land use issues that need to be addressed and recognises the contribution that Neighbourhood Plans can make in planning to meet development and infrastructure needs in the district. The Local Plan was subject to early engagement and continuous consultation with the Public. The Inspectors' Report confirms that consultation "was extensive and wide ranging and elicited a high level of response."

3.2 **Working with Partners**

The preparation of the Local Plan has involved working with partners from the outset. Alongside formal consultation with statutory and non-statutory bodies the council has worked collaboratively with adjoining local authorities and other external partners in order to meet its obligations under the Duty to Cooperate. This places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis. The Inspectors' report confirms that, following a review of the evidence presented, that the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

3.3 **Place Based Working**

The Local Plan provides clarity for what development is intended to happen in the area over the life of the plan, where and when this will occur, and how it will be delivered. It provides certainty for local people regarding where most new development will take place and the policies that will be considered when planning applications are determined.

The land use framework provided by the Local Plan will allow the further development of local 'place based' responses, particularly in the form of community led masterplans, locally led place shaping/renaissance/land use initiatives and Neighbourhood Plans/Orders, where appropriate. The Local Plan contains place shaping, design, masterplanning policies and land allocations which can provide the basis for place based working in specific localities in Kirklees. There are a number of Neighbourhood Plans in preparation in Kirklees which are required to be in general conformity with the strategic policies contained in the Local Plan.

3.4 **Improving outcomes for children**

The Local Plan, will create thriving communities through forward planning for jobs, homes, open spaces and the necessary infrastructure to support growth. The Local Plan's vision, objectives and policies aim to help implement the aims and objectives of the council's Economic Strategy and Health and Wellbeing Strategy. There are a number of indirect benefits from the Local Plan to improve the outcomes for children, including making land available for new homes, protection and promotion of important open spaces (including those with children's play facilities), making land available for new jobs and policies, and requiring the provision of essential infrastructure, including education facilities.

3.5 **Other (eg Legal/Financial or Human Resources)**

The absence of an approved Local Plan would have significant implications for development management processes and long term impacts on jobs, homes, inwards investment and prosperity in the district due to development happening in Kirklees in an uncoordinated way, making it difficult to ensure that new homes and employment areas are created alongside public infrastructure needs. In addition, the Housing and Planning Act 2016 increases the government's powers to direct an individual authority to prepare or revise their local plan, to submit it to independent examination, and to publish any recommendations from that examination and to consider whether they should be adopted. In practical terms this means the Planning Inspectorate would produce the Plan on behalf of the council. Intervention is likely to be prioritised against

those councils in areas of high housing pressure who have made the least progress on a plan. It should be noted the Local Planning Authority cannot currently demonstrate a 5 year supply of housing in accordance with the National Planning Policy Framework.

The government requires all local councils to develop a long-term plan which sets out how and where land can be developed over the next 15 years, in order to meet the growing needs of local people and businesses. Having an up to date plan will assist in determining planning applications in accordance with the national planning policy framework, help meeting housing and job needs and assist in increasing inward investment into the district.

An Equality Impact Assessment has been undertaken for the Local Plan which is attached (Appendix 7). The Equality Act 2010 requires local authorities to have a public duty to have due regard to eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between different groups and the Equality Impact Assessment helps to ensure that the council are able to do this. During the course of the Examination in Public, the Inspectors also had due regard to the Equality Act 2010 and this is confirmed in their final report.

The Inspectors have also concluded that various other legal tests have been met, including:

- The Local Plan has been prepared in accordance with the parameters and timetable set out in the Council's updated Local Development Scheme.
- Consultation on the Local Plan and the Main Modifications was carried out in compliance with the Council's Statement of Community Involvement.
- The Local Plan includes policies designed to ensure that the development and use of land contributes to the mitigation of, and adaptation to, climate change, and this issue is covered by a number of objectives in the SA work.
- The Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.
- Sustainability Appraisal has been carried out and is adequate.
- The Habitat Regulations Assessments identify that, subject to mitigation measures in the Local Plan, as modified, no significant adverse effects on the integrity of European protected sites are likely.

4. Consultees and their opinions

Comments from a wide range of statutory and non-statutory consultees have been taken into account in preparing the Local Plan by the council and the Inspectors.

As part of the technical evidence base underpinning the policies and proposals set out in the Local Plan, a wide range of internal and external consultees have provided technical advice. This advice has been considered, taken into account, and has informed decisions for accepted and rejected policies and proposals.

As part of the statutory regulations laid out for preparing development plan documents and, in accordance with the Council's Statement of Community Involvement and other council consultation protocols, the council consulted all interested parties. Formal stages of consultation have included:

- Early engagement – 2014
- Draft Local Plan Consultation – November 2015
- Publication Draft Local Plan Consultation – November 2016
- Examination in Public – April 2017 to January 2019

- Consultation on Local Plan Modifications – August 2018

As part of the Examination in Public the Inspectors held public hearing sessions which involved roundtable discussions and in some cases the exchange of more detailed evidence. The hearings included council representatives, developers/landowners, statutory/non-statutory bodies and members of the public.

Representations received by the council at all stages of the Local Plan's preparation have been made available to the Inspectors. A summary of the comments received at the publication stage have been previously reported to Cabinet members. A summary of the comments received on the Main Modifications is attached (Appendix 4). These comments were considered by the Inspectors as they related to soundness issues. A summary of the comments received on the Additional Modifications and the council's response to these comments are attached (Appendix 5). A summary of the comments received on the Sustainability Appraisal and the Habitat Regulations Assessment of the modifications is also attached (Appendix 6) which were considered by the Inspectors in relation to any relevant legal tests.

5. Next steps and timelines

Should members adopt the Local Plan there are a number of next steps in relation to Local Plan preparation and monitoring:

- The council is required to publicise the adoption of the Local Plan in accordance with planning legislation.
- Following adoption, legislation allows for a six week period to lodge a legal challenge against the Council's decision to adopt. Such challenges need to relate to the legislation and regulations for preparing, submitting and examining Local Plans. The adoption of a Local Plan can only be overturned by a successful challenge in the High Court on a point of law.
- The council is required to publish a Sustainability Appraisal/Strategic Environmental Assessment post adoption statement.
- The council is required to monitor the effectiveness of the Local Plan policies and the sustainability appraisal objectives. The Planning Service is committed to the production of an Annual Monitoring Report.
- The council is required to continue its Duty to Co-operate activity as an ongoing exercise with adjoining local authorities and other prescribed bodies.

6. Officer recommendations and reasons

- 1) That Council notes the Report of the Inspectors and their recommended Main Modifications as set out in the appendix to the report.
Reason: To comply with planning legislation the plan can only be adopted together with the recommended Main Modifications.
- 2) That Council adopts the Kirklees Local Plan incorporating the Main Modifications recommended by the Inspector (set out in Appendix 1) and further Additional Modifications proposed by the council (set out in Appendix 2 and Appendix 3). In doing so this will replace with current statutory development plan (Kirklees Unitary Development Plan).
Reason: To ensure that the council has an up-to-date development plan and to ensure the Local Plan is adopted in accordance with the timeline set out in the Council's Local Development Scheme.
- 3) Subject to recommendation 2 above, Council delegate authority to the Strategic Director for Economy & Infrastructure to prepare the Policies Map to illustrate geographically the

application of policies in the Kirklees Local Plan (incorporating the modifications which relate to the Policies Map) as set out in the Appendices to the report.

Reason: The Policies Map which accompanies the Local Plan is not a development plan document but the Council is required to update the Policies Map to comply with planning legislation.

- 4) Subject to recommendation 2 above, Council delegate authority to the Strategic Director for Economy & Infrastructure to make any further Additional Modifications to the Kirklees Local Plan that relate exclusively to factual updates, grammatical and formatting corrections for the purposes of publishing the plan.

Reason: To ensure that the council has an up-to-date development plan, to ensure statutory development plan is as accurate as possible and to ensure the Local Plan is adopted in accordance with the timeline set out in the Council's Local Development Scheme.

- 5) Subject to recommendation 2 above, Council delegate authority to the Strategic Director for Economy & Infrastructure to publicise adoption of the Kirklees Local Plan and to prepare and publicise the post-adoption sustainability appraisal/strategic environmental assessment statement in accordance with the regulations governing such matters.

Reason: To comply with planning legislation for preparing a development plan.

7. **Cabinet portfolio holder's recommendations**

The Portfolio Holder has been briefed on the implications of the final Inspector's Report, the process of adopting the Local Plan and the next steps which would follow. The Portfolio Holder supports and agrees with the officer recommendations set out in this report.

8. **Contact officer**

Richard Hollinson - Policy Group Leader, Planning Services
richard.hollinson@kirklees.gov.uk
(01484) 221000

9. **Background Papers and History of Decisions**

Appendices to this report:

- Appendix 1 - Inspectors' Report (including schedule of recommended Main Modifications)
- Appendix 2 - Kirklees Local Plan (Strategy and Policies) – Additional Modifications
- Appendix 3 - Kirklees Local Plan (Allocations and Designations) – Additional Modifications
- Appendix 4 - Summary of representations received on Main Modifications
- Appendix 5 - Summary of representations received on Additional Modifications
- Appendix 6 - Summary of representations received on Sustainability Appraisal and Habitat Regulations Assessment of the Modifications
- Appendix 7 - Equality Impact Assessment
- Appendix 8 – Plan making flowchart (source: NPPG)

Background Papers:

- Local Development Scheme
- Statement of Community Involvement
- Publication Draft Local Plan
- Sustainability Appraisal Addendum - April 2017
- Sustainability Appraisal – Modifications - August 2018
- Habitat Regulations Assessment – March 2017
- Habitat Regulations Assessment – Modifications – August 2018

PLEASE NOTE - HARD COPIES OF THE BACKGROUND PAPERS ARE AVAILABLE FOR COUNCILLORS TO VIEW AT THE CABINET OFFICE - OR GOVERNANCE AND DEMOCRATIC SERVICES - CIVIC CENTRE III.

PLEASE NOTE - HARD COPIES OF THE BACKGROUND PAPERS ARE AVAILABLE FOR MEMBERS OF THE PUBLIC TO VIEW AT HUDDERSFIELD CENTRAL LIBRARY (REFERENCE SECTION) AND DEWSBURY TOWN HALL.

History of Decisions

Extraordinary Council meeting on Wednesday 12 October 2016
(<https://democracy.kirklees.gov.uk/ieListDocuments.aspx?CId=534&MId=5200>)

10. **Service Director responsible**

Naz Parker – Service Director for Housing Economy and Infrastructure
naz.parkar@kirklees.gov.uk
01484 221000

APPENDIX 1

This section contains the Inspector's report.

The Appendix referred to within the Inspector's report (containing the Main Modifications) can be viewed online via the Council's website at <http://democracy.kirklees.gov.uk> or a hard copy can be viewed at the following locations:

- Huddersfield Customer Service Centre, Civic Centre III, Huddersfield
- Huddersfield Central Library (reference section), Huddersfield
- Dewsbury Town Hall, Dewsbury

Additional hard copies will also be made available to Councillors and reference copies will be provided at the Council meeting.



Report to Kirklees Council

**by Katie Child B.Sc. (Hons) MA MRTPI and Elizabeth Hill B.Sc. (Hons) B.Phil
MRTPI**

Inspectors appointed by the Secretary of State

Date: 30 January 2019

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Kirklees Publication Draft Local Plan

The Plan was submitted for examination on 25 April 2017

The examination hearings were held between 10 October 2017 and 26 April 2018

File Ref: PINS/Z4718/429/9

Abbreviations used in this report

AAP	Area Action Plan
BAP	Biodiversity Action Plan
BGS	British Geological Society
C&I	Commercial and Industrial Waste
CIL	Community Infrastructure Levy
DCLG	Department for Communities and Local Government (now the Ministry for Housing, Communities and Local Government)
DtC	Duty to Co-operate
EfW	Energy from Waste
GTAA	Gypsy and Traveller and Travelling Showperson Accommodation Assessment
HGV	Heavy Goods Vehicle
HIA	Heritage Impact Assessment
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
ITA	Interim Transport Assessment
KES	Kirklees Economic Strategy
LACW	Local Authority Collected Waste
LCR	Leeds City Region
LEP	Leeds City Region Local Enterprise Partnership
LCR SEP	Leeds City Region Strategic Economic Plan
LDS	Local Development Scheme
LGS	Local Green Space
MHLG	Ministry for Housing, Communities and Local Government
MM	Main Modification
MUGA	Multi Use Games Area
NPPF	National Planning Policy Framework
NPPW	National Planning Policy Waste
OAN	Objectively assessed need
PEA	Priority Employment Area
PDLP	Publication Draft Local Plan
PPG	Planning Practice Guidance
PROW	Public Right of Way
REM	Regional Econometric Model
RIS	Road Investment Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SIGI	Strategic Green Infrastructure project
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SRN	Strategic Road Network
UGS	Urban Green Space
UDP	Unitary Development Plan
UPC	Unattributable Population Change
WNA	Waste Needs Assessment
WYCA	West Yorkshire Combined Authority

Non-Technical Summary

This report concludes that the Kirklees Publication Draft Local Plan provides an appropriate basis for the planning of the district, provided that a number of main modifications [MMs] are made to it. Kirklees Council has specifically requested us to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings the Council prepared schedules of the proposed MMs, carried out sustainability appraisal of them, and updated the Habitats Regulations Assessment. The MMs were subject to public consultation over a six-week period. We have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them. In some cases we have amended their detailed wording.

The Main Modifications can be summarised as follows:

- Insertion of mitigation measures relating to assessing and addressing impacts on the South Pennine Moors Special Protection Area.
- Updates to the housing supply table, housing and delivery phasing table and housing trajectory, based on realistic assumptions regarding capacity and rates of delivery.
- Modifications to the employment supply table to update the figures and methodology.
- Applying the Liverpool approach in calculating five year housing land supply.
- Setting out the five year housing land supply position and methodology.
- Amending the gypsy and traveller pitch target to reflect identified needs in the Gypsy and Traveller and Travelling Showperson Assessment.
- Insertion of references to the production of Area Action Plans for Huddersfield and Dewsbury Town Centres.
- Insertion of new policies in Part 2 of the Plan which specify that the identified sites are allocated for development.
- Deletion and insertion of a number of employment, housing and mixed-use allocations.
- Adjustments to the indicative capacity of allocations, based on realistic and justified assumptions.
- Amendments and updates to requirements and criteria in the site-specific policies.
- Revisions to the wording of development management policies to ensure they are effective, justified and consistent with national policy.
- Amendments and updates to the minerals and waste sections of the Plan, in accordance with national policy.
- Various other changes to ensure the Plan is up-to-date, internally consistent, justified, effective and consistent with national policy.

Introduction

1. This report contains our assessment of the Kirklees Publication Draft Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. Paragraph 182 of the National Planning Policy Framework (NPPF) (2012) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. A revised NPPF was published in July 2018. However, the transitional arrangements in paragraph 214 of this document state that the 2012 NPPF will apply for the purpose of examining plans submitted on/before 24 January 2019 (ie the Kirklees Local Plan). Therefore, unless otherwise stated, references in this report are to the 2012 NPPF. In addition, references to the Planning Practice Guidance (PPG) are to the previous versions in place before publication of the revised NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Kirklees Publication Draft Local Plan, published for consultation in November 2016 and submitted in April 2017, is the basis for the examination. The Plan comprises two documents – Strategy and Policies (Examination Document SD1) and Allocations and Designations (SD2). In this report they are referred to collectively as 'the Plan', and as Part 1 and Part 2 respectively. Together the documents set out strategic policies, development management policies and a series of site allocations and designations that will replace saved policies of the Kirklees Unitary Development Plan (UDP) (1999 as revised). The list of superseded and replacement policies in Part 1 of the Plan contains several errors which are corrected through modification **SD1-MM145**, and is necessary to ensure the Plan is effective.
4. Part of Kirklees lies within the Peak District National Park, which is covered by a separate Local Plan produced by the National Park Authority. Therefore references in this report to the Plan area relate to the part of Kirklees which is outside the National Park.

Main Modifications

5. In accordance with Section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and/or not legally compliant and thus incapable of being adopted. This report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, with the prefix of either SD1 or SD2, and are set out in full in the Appendix.
6. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of them where necessary. The MM schedule, contained in two documents relating to Parts 1 and 2 of the Plan, was subject to public consultation for six weeks, alongside the other updated documents.

We have taken account of the consultation responses in coming to our conclusions in this report. We have made some amendments to the detailed wording of the MMs where necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory process and Sustainability Appraisal that has been undertaken. Where necessary these amendments are highlighted in the report.

Policies Map

7. The Council must maintain an adopted Policies Map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission Policies Map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission Policies Map comprises the set of plans identified as:
 - Kirklees Publication Draft Local Plan – Allocations and Designations Appendix 1 Town Centre Maps (November 2016)
 - Kirklees Publication Draft Local Plan – Allocations and Designations Appendix 2 Policies Maps (November 2016)
8. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. Accordingly, the Council's published proposed modification SD2-MM334 has been omitted from the schedule of MMs in the Appendix as it only relates to a change to the Lindley District Centre boundary within the Policies Map.
9. A number of the published MMs to the Plan's policies require further corresponding changes to be made to the Policies Map. In addition, there are some instances where the geographic illustration of policies on the submission Policies Map is not justified and changes to the Policies Map are needed to ensure that the relevant policies are effective. These further changes to the Policies Map were published by the Council for consultation alongside the draft MMs, either embedded within the Part 2 Main Modification document alongside a linked MM, or within the separate Part 2 Additional Modifications document. Although the embedded maps are shown within the MM schedules in the Appendix to this report they are not a formal part of the MMs.
10. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted Policies Map.

Habitats Regulations Assessment

11. The Council's HRA (March 2017), including Appropriate Assessment, sets out the assessment results of the submitted Plan. It identifies that the plan may have some adverse impact on the South Pennine Moors Special Protection Area (SPA), relating to habitats for bird species, which requires mitigation. This mitigation can be secured through modifications to the plan in the form of additional text in Policy PLP 30 (**SD1-MM91, SD1-MM92**) and a number of site allocation policies, as referenced under Issue 7 below. The Council's HRA of the MMs (August 2018) has not altered these findings.

12. The updated assessment of in-combination effects, as set out in the HRA on the MMs, indicates that it is not yet possible to conclude whether there may be adverse effects on the integrity of European protected sites in relation to the Leeds Core Strategy Review, Calderdale Local Plan and Greater Manchester Spatial Framework in combination with the Kirklees Local Plan. However, although these authorities will need to consider the matter through their HRA work, there is currently no evidence that the Kirklees Local Plan would have adverse effects in-combination with other plans, providing mitigation measures are implemented.
13. The HRA of the MMs, including new/amended policies and allocations, does not alter any of the other findings in the HRA 2017. Overall, having regard to the Council's HRA work and the position of Natural England, it is concluded that the Kirklees Plan is unlikely to have an adverse effect on the integrity of European protected sites, either alone or in-combination with other plans or projects, subject to mitigation in the Local Plan and the identified MMs. The Council has confirmed that it considers that the HRA work is legally compliant, taking account of the recent EU Court of Justice judgement (12 April 2018).

Consultation

14. The adequacy of the Council's consultation on the Plan has been questioned. However, public consultation on the Draft Local Plan (2015) and the Publication Draft Local Plan (PDLP) (2016) was extensive and wide ranging, and elicited a high level of responses. The hearings provided a further opportunity for comment and were well attended by community groups and other participants. A significant number of comments were submitted on the MMs. Overall, we consider that there has been adequate opportunity for people to express their views on the Plan.
15. The process has been supported by a wide range of evidence documents. Although some documents were issued after publication of the PDLP, representors have been provided with a variety of opportunities to respond, at the hearing sessions and in written form. Accordingly, we are satisfied that consultation on the Plan has not been compromised by an absence of evidence.
16. Overall, consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement (SCI) and the relevant regulations.

Assessment of Duty to Co-operate

17. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by Section 33A in respect of the Plan's preparation. The Council has prepared a Duty to Co-operate (DtC) Statement which sets out the nature of cooperation and joint working undertaken with other Local Planning Authorities and additional bodies prescribed in the Regulations.
18. Kirklees is part of the Leeds City Region Local Enterprise Partnership (the LEP) which incorporates eleven planning authorities and provides a forum for cooperation on planning matters. Kirklees is also a member of the West Yorkshire Combined Authority (WYCA). The Council's DtC Statement sets out

evidence relating to regular meetings within these groupings, and extensive engagement on strategic planning matters, including housing, employment, Green Belt, infrastructure and transport. Bespoke engagement has also taken place on an individual basis with these and other authorities, and DtC bodies as part of Plan preparation. This includes a Statement of Common Ground with Calderdale Council.

19. Kirklees has cooperated with authorities in the Leeds City Region (LCR) in establishing the Housing Market Area (HMA) for Kirklees and the wider functional economic market area. A shared methodology for demographic and job change scenario testing has been applied. The Council is proposing to meet its identified housing needs within Kirklees, as a single housing market area. Other adjoining authorities are at varying stages of Plan preparation, but there are no active requests from these authorities to meet unmet housing needs within Kirklees.
20. Jobs growth and employment land requirements in Kirklees over the Plan period have been calculated using the Regional Econometric Model (REM), and the use of this joint evidence base has allowed effects on the wider City Region functional economic area to be tested. A joint employment land availability assessment for functional parts of the city region including North Kirklees has not been carried out. However, the submitted evidence indicates that city region authorities are proposing to meet their objectively assessed employment needs in full, and there are no active requests from Bradford, Calderdale or any other authority to accommodate any shortfalls within Kirklees. In this context, and taking account of the extensive engagement on economic matters that has taken place, we are satisfied that the Council has complied with the duty to cooperate in relation to this matter.
21. The Council has demonstrated constructive and on-going engagement with local authorities and other organisations on strategic matters. Kirklees Council has sought to effectively resolve issues, and there are no concerns before us from other authorities and prescribed bodies regarding compliance with the duty to cooperate. The LEP has confirmed that the Kirklees Local Plan complies with the LCR Statement of Cooperation for Local Planning.
22. Overall we are satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

23. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings we have identified 15 main issues upon which the soundness of the Plan depends. Under these headings our report deals with the main matters of soundness rather than responding to every point raised by representors.
24. Issues 1 and 15 are matters covered by both of the Inspectors, and our joint conclusions are presented below. Issues 2 to 10 have been dealt with and reported on by Katie Child. Issues 11 to 14, relating to minerals and waste, are dealt with and reported on by Elizabeth Hill.

Issue 1 – Does the vision, strategic objectives and spatial development strategy in the Plan provide a positive and soundly based framework for the delivery of sustainable development in Kirklees?

25. The vision and strategic objectives in the Plan provide a broad framework for the delivery of sustainable development in the district. The vision and objectives seek to promote the regeneration of the towns whilst safeguarding their distinctiveness, and support the expansion of the local economy through employment and housing growth. They are supported by more detailed place-shaping principles for the four sub-areas of Huddersfield, Dewsbury and Mirfield, Batley and Spen and Kirklees Rural, which highlight the strengths, opportunities and challenges in each area. The sub-areas are extensive and based on Committee boundaries. However, locations within these areas exhibit a range of similar characteristics and features, and in broad terms they provide a reasonable basis for identifying constraints and opportunities.
26. Both minerals and waste are defined as an Issue (numbers 16 and 17) in the Plan and the strategic objectives cover these issues at objective 10. The delivery of the vision, objectives and strategy for minerals and waste is set out in section 6 of the Plan. Whilst minerals development is not specifically mentioned in the vision, there is sufficient reference in the Plan for future needs and the type of development required to enable the safeguarding of minerals and to ensure their sufficient supply. Although the vision has been interpreted differently by some, in order to meet the aspirations of the district the winning and working of minerals is required to supply materials for infrastructure, the historic environment and other works which will help to meet its economic and social needs.
27. The spatial development strategy in section 6 of the Plan seeks to focus most growth in the main urban areas of Huddersfield and Dewsbury, in line with the vision. Huddersfield and Dewsbury are the largest and most sustainable settlements in Kirklees. The LCR Strategic Economic Plan (LCR SEP) refers to these towns as priorities for regeneration, and identifies the Huddersfield and North Kirklees areas as key locations for sustainable economic growth, taking advantage of synergies and connections in the M62/M1 corridors. As such the 'urban focus' in the strategy is justified and consistent with the delivery of sustainable development. The Council's 'Additional evidence relating to distribution of growth between settlements' document (EX38) indicates that nearly 55% of housing growth is likely to take place in Huddersfield and Dewsbury within the Plan period.
28. The Plan identifies a number of strategic housing allocations in Huddersfield and Dewsbury and employment allocations in North Kirklees to realise this strategy. The suitability and deliverability of these and other individual allocations are discussed later in this report. Some capacity reductions are recommended, but are not sufficient to significantly alter the broad distribution and detract from the urban concentration.
29. Beyond this the Plan does not identify a settlement hierarchy, but seeks to distribute growth based on a range of factors, including settlement size and function, local character, place shaping constraints/opportunities and existing and planned infrastructure. This approach promotes sustainable patterns of

development but recognises environmental constraints and other factors relating to the suitability of a settlement to accommodate growth.

30. The strategy also seeks to maximise development on previously developed land within settlements and protect valued open spaces within settlements, whilst allowing some growth on greenfield sites on the settlement edge. Much of the district outside the main settlements is covered by the Green Belt. Elsewhere in this report it is concluded that in principle there are exceptional circumstances to justify the release of Green Belt land for housing and employment, and that the protection of valued urban open spaces is justified.
31. The proposed distribution of growth between different settlements, and the identification of settlement boundaries, is adequately articulated and justified in the Council's Settlement Appraisal Paper (BP17) and EX38. The distribution has been informed by a wide range of information, including the results of the Council's Green Belt Review, Open Spaces Study and settlement appraisal work. Overall, we consider the distribution is robustly based, and would facilitate development in sustainable locations whilst protecting the district's character. This includes the approach to small 'washed-over' settlements in the Green Belt which have limited services or other constraints, and are therefore not designated for growth. A degree of infilling is permitted in these settlements in accordance with the NPPF and modified Policy PLP 59, as set out later in this report.
32. The absence of specific housing targets in the Plan for sub-areas or settlements provides flexibility and does not render the Plan unsound. However, additional information on the approximate number of allocations likely to be delivered within each settlement are necessary to clarify the strategy and make the Plan effective (**SD1-MM8**).
33. The spatial development strategy is worded as a 'key statement on the Local Plan strategy' rather than a policy. It is considered that, in conjunction with other detailed policies and site allocation policies, it will provide an appropriate basis to guide development. Neighbourhood Plans may follow with additional detail and strategy for individual settlements, but we are satisfied that the broad principles and strategy in the Local Plan provide a suitable framework.

Conclusion on Issue 1

34. In conclusion, subject to the afore-mentioned modification, the vision, strategic objectives and spatial development strategy in the Plan provide a positive and soundly based framework for the delivery of sustainable development in Kirklees.

Issue 2 – Is the overall housing requirement in the Plan soundly based and capable of delivery over the Plan period? Will the Plan help to provide a five year supply of housing sites?

Objectively Assessed Housing Need

35. The Council's Strategic Housing Market Assessment (SHMA) (2016) identifies the objectively assessed need (OAN) for housing in Kirklees. It provides an update to the 2015 version of the SHMA which informed the Draft Local Plan (2015).
36. The SHMA 2016 identifies Kirklees as a relatively self-contained HMA. This is supported by the HMAs Report (2016) produced by the LEP. Based on the evidence before me regarding migration and travel to work patterns, I am satisfied that the identified Kirklees HMA is a credible and robust basis for assessing housing needs.
37. The OAN is informed by the 2014-based national household projections produced by the Department for Communities and Local Government (DCLG). The SHMA applies a vacancy rate of 4.2% to the DCLG household projection for Kirklees, which is prudent on the basis that it is linked to vacancy rates in the 2011 census and is higher than recent estimated rates. The demographic starting point is identified in the SHMA as an increase in 27,321 households or 1,584 dwellings per annum (dpa) over the period 2013-31. In line with the NPPF and PPG, the SHMA also considers whether adjustments to the DCLG household projections are necessary to take account of local demographic trends and household formation rates, employment trends, and market signals.
38. The application of alternative migration assumptions based on 10 year trends and excluding Unattributable Population Change (UPC) produces broadly comparable dwelling numbers to the 2014-based household projections. UPC was not explicitly included in the 2012-based or 2014-based population projections, and the effect of UPC would be less marked in 2014-based population projections as recent years of trend data are not affected by this issue. The 2014-based headship rates are not markedly changed from the 2012-based rates, and the Council's evidence shows that dwelling requirements under 2012-based headship rates fall within the range arising from 2008 and 2011-based headship rates, and are higher than the average of the 2008 and 2011 rates. There is no substantive evidence before me that headship rates will return to higher 2008-based trends. Accordingly, as established in the SHMA, I concur that no uplift is necessary in relation to alternative demographic trends and household formation rates.
39. The Plan is informed by a series of economic forecasts, and identifies a preferred jobs growth target of about 23,200 over the Plan period based on a 75% employment rate. As set out later in this report I consider this jobs target and the linked employment rate are realistic and justified. The SHMA identifies a number of jobs-led housing projections using this jobs growth target, and concludes that scenario 'SENS1', which produces an annual requirement for 1,730 dwellings, is appropriate and justified. I concur with this position, and the associated uplift in OAN, for the following reasons. Firstly, although the population is ageing, changes in state pension age and

initiatives such as flexible working may encourage people to work for longer and there are clear trends in Kirklees for increased female labour force participation. Accordingly the maintained base-year level economic activity rate of 68% for 16-74 year olds in SENS1 is reasonable. The lower unemployment rate of 4% in SENS1 is aspirational but credible, given that the rate has declined significantly in recent years and is predicted to decline to 4.2% based on trends alone. Secondly, in conjunction these assumptions produce an overall employment rate of 74% for 16-64 year olds which broadly aligns with objectives in the KES to achieve an employment rate of about 75%. The associated uplift in OAN will therefore help to support future economic development in the district, and facilitate a clear link between housing and economic growth.

40. Market signals indicate that the housing market in Kirklees is relatively stable, with house prices below regional and national averages, modest house price increases between 2005 and 2015 well below the national average, and reasonable and broadly consistent levels of affordability between 2010 and 2015. There are some signs of pressure, as private rents have risen faster than regional and national rates, and overcrowding levels are slightly above the national average. However, private rent increases in Kirklees are similar to several comparator districts and affordability is still good. Levels of overcrowding in Kirklees may also be partly due to higher levels of ethnicity and the existence of multi-generational households. There is evidence of under-delivery against housing targets, but this may be related to market conditions at the time. Furthermore any under-delivery since 2013 has been accounted for in the housing requirement calculations below, whilst prior under-delivery is dealt with as part of the household projections. Overall, it is reasonable for the SHMA to conclude that no uplift should be applied on the basis of market signals.
41. The SHMA does not propose a further uplift to OAN to increase affordable housing delivery. The Council's evidence shows a net shortfall of 108 affordable homes per year over the Plan period, and that this shortfall would be met through the provision of more than 250 additional affordable dwellings per year from outstanding permissions and new allocations, linked to the percentages sought in Policy PLP 11. The SHMA indicates that the net shortfall would be higher if backlog was dealt with more quickly. However, the PPG does not specify a particular time period for dealing with backlog, and the Council's updated affordable housing trajectory shows significant variation in annual rates, with high levels of delivery in the next five years. Accordingly, I concur that an uplift to OAN in order to deliver more affordable housing and within an earlier timeframe is not necessary or justified.
42. The SHMA 2016 concludes that, based on the uplift required to support jobs growth, the OAN for housing in Kirklees is 1,730 dwellings per annum, equating to 31,140 new dwellings over the period 2013 to 2031. Given the uncertainties at this stage surrounding the likely impact of Brexit on the Kirklees housing market, I conclude that no associated changes are required to OAN. Overall OAN in the SHMA 2016 is based on robust evidence and takes account of local circumstances.
43. Since the Local Plan hearings the Ministry for Housing, Communities and Local Government (MHLG) has published new 2016-based household projections

which indicate lower household growth for Kirklees compared to the 2014-based projections. However, this does not automatically mean that OAN should be revised downwards, as the projections represent a starting point and the case for uplifts linked to market signals, affordability and economic growth would need to be assessed. The Government's recent consultation paper indicates that Council's applying the standard methodology should continue to use 2014-based figures, but the Kirklees Plan is being considered under transitional arrangements. Nonetheless, the Council has confirmed that it wishes to continue to pursue the OAN identified in the SHMA 2016 in order to support economic growth and the delivery of jobs. Taking these factors into account, in the case of Kirklees I conclude that a revision to the demographic starting point and the approach to OAN is not necessary at this stage.

Housing requirement and Green Belt

44. Kirklees is a HMA for the purpose of plan-making, and the Plan seeks to deliver OAN for housing in full within the district in line with national policy. The Plan does not rely on other authorities to meet any shortfalls, and there are no active requests before me from nearby authorities to accommodate any of their unmet housing needs within Kirklees.
45. Most of the district outside the built-up area lies within the Green Belt. The Council has carried out an assessment of urban capacity as part of the Local Plan process, based on evidence in the Strategic Housing Land Availability Assessment (SHLAA), reviews of employment land and Urban Green Spaces, and other sources.
46. The assessment has been thorough, and where bespoke evidence was not available, involved the application of a reasonable rate of 35 dwellings per hectare (dph) to estimate capacity of potential housing options. Historical evidence demonstrates that a rate of 35 dph applied to developable areas is achievable, as an average gross rate of 36 dph was achieved on new build sites (excluding apartment-only schemes) in Kirklees between 2006 and 2016. The assessment also sought to protect open spaces and facilities within built-up areas with identified recreation, landscape character and/or biodiversity value. This approach is consistent with the NPPF as whole, which seeks to protect green infrastructure, biodiversity and landscape character, as well as formal open space and sports provision, and promote healthy communities. As concluded under Issue 9, the Council's Open Spaces Study is robust and fit for purpose. Further details of the site assessment methodology are set out under Issue 7 below.
47. The assessment work shows that, although there are a range of potential housing sites within towns and villages, there is insufficient capacity to deliver the identified housing requirement on non-Green Belt land. The Council's Green Belt Review Supporting Document indicates that the shortfall amounts to some 11,500 dwellings.
48. The NPPF states that alterations to Green Belt boundaries should only be made in exceptional circumstances. The delivery of OAN within Kirklees would help to provide sufficient homes to meet local needs, and facilitate the delivery of additional affordable housing. The provision of much needed additional housing would bring related social benefits. Population growth coupled with

new housebuilding could also help to boost the local economy and support the Council's aspirations for economic growth and jobs delivery. It would also make an important contribution to the wider LCR economy and support aims in the LCR SEP. As identified in the SA work, additional housing growth could potentially have a greater impact on the environment than lower levels of provision, and create demands for services and infrastructure. However, as set out elsewhere in this report I am satisfied that suitable mitigation and support measures could be put in place and sustainable growth could be achieved. The DtC work indicates that other nearby authorities are seeking to meet their own housing requirements, and many of these areas also contain land in the Green Belt or the Peak District National Park.

49. Without the release of Green Belt land in Kirklees a substantial level of new dwellings, potentially amounting to about one third of identified need, would not be delivered. Therefore, in the absence of reasonable alternatives, and given the benefits associated with local housing and economic growth, I conclude that exceptional circumstances exist in principle to justify the release of land from the Green Belt to deliver OAN for housing in Kirklees. This is supported by the Council's Green Belt review and site assessment work, as detailed in Issue 7 below, which illustrates that the release of land to meet OAN needs could be accommodated without significantly harming the overall integrity of the Green Belt in Kirklees. However, it is subject to an assessment of environmental capacity and demonstration of exceptional circumstances on a site by site basis, as covered later in this report.
50. The housing requirement of 31,140 dwellings over the Plan period, or 1,730 dwellings per year, is expressed in the Plan's spatial development strategy as 'about but not less than'. Modifications are necessary to clarify that it represents a minimum figure, and to refer to it in the Housing chapter (**SD1-MM6, SD1-MM33**).

Overall housing supply

51. Table 5 in the Plan identifies the estimated supply of housing over the Plan period from range of sources, including completions, commitments, windfall and allocations. The supply figures includes a 10% lapse rate on current permissions (excluding those on Local Plan allocation sites) and an allowance for homes lost through demolition, change of use or conversion, so in this regard are pragmatic and incorporate an element of flexibility. A lapse rate for allocations is not included, but on the basis that the suitability, capacity and deliverability of sites has been thoroughly assessed through the Local Plan process, and in light of flexibility elsewhere, this approach is sound.
52. A sizeable windfall allowance of 450 dpa is included. Much of this rate is based on estimated supply from small sites (less than 0.4 hectares) as the Plan allocates large sites for development, and therefore double counting is avoided. The rate of 450 dpa is similar to the average rate of about 453 dwellings per year achieved on small sites in Kirklees between 2006/7 and 2015/16, and does not account for declining opportunities as sites are built out. However, recent small-site completion rates have been strong, and the district has extensive urban areas and regeneration opportunities. There is also no clear correlation between the age of the Plan and small site windfall rates, and on this basis I am not persuaded that the rate since 2005-6 has

been significantly affected by the age of the UDP. Further, it is reasonable to assume that additional large windfall sites will come forward over the Plan period, in addition to available sites already allocated in the Plan. Whilst the Plan seeks to safeguard business uses in Priority Employment Areas, it does not seek to protect employment sites elsewhere which do not meet the needs of business. Other sites, including a number of safeguarded sites deleted under Issue 8, may also come forward if constraints are resolved or circumstances change.

53. The historical small site completions rate of 453 dpa is based on completions over a suitably long timeframe, and I am therefore satisfied that use of a mean average rather than a median figure is reasonable.
54. For the reasons above, I consider that the windfall rate of 450 dpa is justified and soundly based. However, in order to allow time for current outstanding commitments to be built out the rate should be applied from 2021 onwards rather than 2020. This is reflected in the modified housing supply table (**SD1-MM39**).
55. The supply figures also need to be amended to take account of completions and commitments data for 2015/16 and 2016/17, and to reflect changes in capacity on individual site allocations which are detailed under Issue 7 and are necessary for reasons of soundness. This also includes the deletion of a number of allocations, and the insertion of new ones. In some cases modifications to phasing of sites, as set out in the sub-section below, has reduced estimated capacity within the Plan period and resulted in adjustments to overall supply.
56. Modified Table 5 (**SD1-MM39**), taking account of site-specific changes detailed under Issue 7, indicates that some 31,012 dwellings can be delivered over the Plan period. Overall this represents a reasonable projection, which takes account of a range of sources and likely capacity. Consequential changes to housing supply figures elsewhere in the Plan are also necessary for reasons of effectiveness (**SD1-MM7, SD1-MM34, SD1-MM35, SD1-MM36, SD1-MM37, SD1-MM38**).
57. The estimated supply of 31,012 dwellings represents a slight shortfall against the identified housing requirement of 31,140 dwellings. However, the supply calculations include an element of flexibility, and density assumptions are suitably modest. Further, as set out below, the phasing rates as modified are achievable. The Plan proposes a significant amount of development across a wide area, and taking account of the small size of the shortfall I consider that the most appropriate way forward would be to monitor housing delivery and respond accordingly. The new legislative requirement to carry out Plan reviews within five years, and therefore before the shortfall occurs, lends support to this position. It would also be a pragmatic response in the context that identifying and releasing additional sites from the Green Belt would delay adoption of the Plan and delivery of the current allocations, and be contrary to the Government's priority to boost the delivery of housing to meet current needs. The Delivery and Implementation section in Chapter 8 of the Plan provides a clear framework and a range of actions for dealing with insufficient delivery. However, modifications **SD1-MM40** and **SD1-MM159** are necessary to clarify the position regarding supply and make the Plan clear.

58. I recognise that in some cases 'buffers' have been included in overall housing supply calculations in Plans elsewhere, to a varying degree. However, for the reasons set out above, in the case of Kirklees I consider that the absence of a buffer does not render the Plan unsound.
59. The annual rate of 1,730 dwellings per year represents a significant step-up from previous delivery rates in Kirklees. However, the Plan identifies a wide range of allocation sites and provides an up to date framework for assessing and supporting development proposals. The Council also has a clear commitment to the identified programme, including the delivery of Council-owned sites, and has invested in resources to increase capacity and assist in timely delivery.

Phasing and delivery

60. The estimated timescales for delivery of outstanding commitments and allocations are set out in Appendix 3 of the Plan and reflected in the housing trajectory.
61. Standard lead-in times and build rates have been used for many sites, with bespoke figures used where developers have supplied information or there is other evidence. Given the number of allocations in the Plan, this approach is reasonable in principle.
62. Since submission of the Plan, the Council has put forward an extended lead-in period to allow additional preparation time for outline planning applications and lead-in times for Green Belt sites, and has rolled forward the start date to take account of the passage of time since the start of the examination. The updated standard lead-in times and phasing are set out in Table 2 in the Council's Phasing and Delivery Options Paper (EX45.1). The table shows a lead-in period of between 2 and 2.5 years for sites which do not yet have a planning application submitted, and a shorter period where sites have gained outline and/or full permission or where there are undetermined applications.
63. The Council's analysis of all permissions granted between 2009/10 and 2012/13 shows an average lead-in period of 21.8 months between validation of a planning application and commencement of development on-site. Alternative evidence has been submitted which indicates that longer lead-in times and phases have been achieved elsewhere, particularly on strategic sites. However, the Council's evidence on lead-in times is based on extensive local analysis of data. Furthermore, the Council's standard lead-in times have not been applied to the main strategic sites. Based on the evidence before me, I consider that the updated standard lead-in times and phasing periods in Table 2 in EX45.1 are justified and take account of different stages leading to delivery. Some schemes may take longer and others less time to reach delivery stage, but I am satisfied that, overall, the applied lead-in times represent a reasonable average estimate.
64. In many cases a period of about 1.5 years has been allowed between disposal of Council-owned housing and mixed use sites to a housing developer and commencement of dwellings. Although early preparation work may have been undertaken prior to disposal, this period would, in many cases, be insufficient to enable a housing developer to revisit this work and take forward a scheme to full permission/reserved matters and commencement. I therefore conclude

that the phasing rates for Council-owned housing and mixed-use allocations likely to be sold to a housing developer should be altered to allow a minimum of 2 years between disposal and initial completion of dwellings. This does not apply in the case of sites with full planning permission and/or where disposal to a Registered Provider is anticipated, or strategic sites where bespoke rates are applied.

65. Standard build rates of 30 dpa for sites with less than 200 dwellings and 50 dpa for sites of 200-499 dwellings have been applied. The small site rate is supported by the SHLAA Working Group and is reasonable. The larger site rate is higher as on many larger sites, albeit not all, two or more developers may be involved in delivery. Evidence from the limited number of large sites that have recently come forward in Kirklees indicates that this rate is capable of being delivered.
66. I am not persuaded that the phasing of brownfield sites prior to greenfield releases is an appropriate or realistic approach, given the scale and urgency of housing delivery required in Kirklees. It is clear that unless greenfield sites are delivered alongside brownfield sites, the Council will not be able to provide a five year supply of housing land as required by national policy.
67. Modifications to the delivery and phasing tables in Appendix 3 and the housing trajectory are needed to capture the changes to lead-in times and start times referenced in this sub-section, and ensure the Plan is robustly based and can be effectively monitored (**SD1-MM160, SD1-MM41**). The modified tables and trajectory also capture bespoke changes to delivery timescales for individual allocations which are covered elsewhere in this report. Overall, I am satisfied that the tables and trajectory as modified are based on realistic lead-in times and build rates, and represent achievable rates of delivery.

Five year housing supply

68. Evidence on historical completions in the SHMA shows that there has been recent and persistent under-delivery of housing against Local Plan targets. Therefore, in accordance with paragraph 47 in the NPPF, a 20% buffer needs to be applied to the housing requirement figure when calculating five year housing supply.
69. The Council's Phasing and Delivery Options Paper (April 2018) (EX45.1) shows 4.87 years of deliverable housing supply between 2018/19 and 2022/23 applying the 20% buffer and using the 'Sedgefield' approach proposed in the submission Plan. The Sedgefield approach is based on shortfall since the start of the Plan period being delivered within the next five years. Additional changes to site allocations and lead-in times covered under Issue 7 below would reduce this level of supply further.
70. The PPG indicates that the Sedgefield approach should be used where possible. The alternative 'Liverpool' approach, based on past under-delivery being recovered over the remainder of the Plan period, is not ruled out in the PPG, and would be a pragmatic approach in the context of a large number of strategic allocations in the Plan which will take a while to come forward. Furthermore, maintaining a five year supply using the Sedgefield approach would require additional allocations in the Plan, and this would be likely to involve the further release of Green Belt land. Overall I consider that making

up the shortfall more quickly in Kirklees does not justify the additional harm to the Green Belt that would result from allocating additional sites, or amount to exceptional circumstances.

71. Accordingly I conclude that, in the case of Kirklees, the Liverpool approach is necessary to deal with the shortfall and ensure the Plan is sound. The updated five year supply calculations in modifications **SD1-MM42** and **SD1-MM43** indicate 5.51 years of supply based on the Liverpool approach, and provide necessary detail on the course taken and the workings. On this basis there would be a deliverable supply of housing land on adoption which exceeds the five year requirement.

Conclusion on Issue 2

72. In conclusion, the overall housing requirement in the Plan is soundly based and subject to modification is robustly expressed. A slight shortfall of supply against requirement over the Plan period is predicted, based on the updated supply figures, but this is marginal and capable of being dealt with through the monitoring and review process. The Plan will, based on the updated supply figures and subject to the above-mentioned modifications, provide in excess of the minimum five year supply of housing land on adoption.

Issue 3 – Have affordable housing needs, traveller accommodation needs and the housing needs of other groups been satisfactorily assessed and addressed in the Plan, in line with national policy?

Affordable housing

73. The definition of affordable housing in the Plan's Glossary does not fully accord with that in the revised NPPF (July 2018). Although the Plan is being examined under transitional arrangements and against the 2012 NPPF, it is sensible to future proof the text and simplify it for reasons of effectiveness. This would be facilitated through modification **SD1-MM139**.
74. Policy PLP 11 states that 20% affordable housing should be provided in residential schemes of more than 10 units. As detailed in Issue 2 above, the provision of additional affordable housing through this route would make an important contribution to meeting identified shortfalls and would help to deliver affordable housing early in the Plan period and deal with backlog. The Council's viability work indicates that 20% affordable housing is deliverable on schemes of 10 or more units in most parts of the district, and the policy provides sufficient flexibility to deal with situations where viability is an issue. I therefore consider that the proportion and approach in Policy PLP 11 is justified. However, in order to facilitate effective monitoring an affordable housing trajectory should be included in the Plan through **SD1-MM52**.
75. Policy PLP 11 supports exception sites for affordable housing in 'small free standing settlements' which are 'well away from the larger urban areas'. However, this approach is insufficiently justified and would not be effective in meeting local affordable housing across the district as many settlements would be excluded. Accordingly, modifications **SD1-MM45** and **SD1-MM51** are necessary to widen this requirement and allow exception sites across the district.

76. Affordable homes can now include starter homes and the phrase 'where appropriate' therefore needs to be inserted in Policy PLP 11 in relation to securing affordable homes in perpetuity (**SD1-MM45, SD1-MM51**). In the context of identified needs for other forms of specialist housing, and the Council's desire to facilitate this provision, **SD1-MM50** is necessary to clarify that in certain circumstances specialist housing may be accepted in lieu of affordable housing.

Traveller accommodation

77. The Council's Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) (2015) identifies a need for 10 new pitches for gypsies and travellers in the five year period 2014/15 to 2018/19, and a need for 2 pitches between 2019/20 and 2033/34. A need for four plots for travelling showpeople is identified between 2014/15 and 2033/34. Eight transit pitches are also required in the short-term. The GTAA is based on a wide range of quantitative and qualitative data, survey work and analysis of short and long term needs, and was subject to sensitivity testing of alternative household numbers. Overall I am satisfied that it applies a robust methodology.
78. The national planning definition of gypsies and travellers altered in 2015. Although it is referred to in the GTAA, the Council did not carry out a full reassessment of needs, including the requirement for alternative forms of caravan accommodation (as set out in the Housing and Planning Act 2016). As such the alternative pitch requirement of zero for years 0-5, which appears in brackets in Table 6 in the Plan, is not justified. The Plan should be based on the objectively assessed needs in the Council's GTAA, and the figure of zero should be deleted through modification **SD1-MM54**. In order to make the Plan effective and sound, modification **SD1-MM53** is also necessary to link the requirements in Table 6 into Policy PLP 12 itself. Subject to these modifications, Policy PLP 12 sets out a clear and robust framework for meeting accommodation needs and assessing windfall applications.
79. The Plan allocates two sites for traveller accommodation. A wide range of site options were identified and assessed and I am satisfied that the process was substantive and robust. The sites are located on non-Green Belt land within or adjoining urban areas, and make sufficient provision to meet needs over the Plan period. The Council, as landowner, has indicated the sites are likely to come forward within five years, and as such five year supply is achievable. The sites are in the north of the district in sustainable locations, and would help to meet local needs.
80. The sites are listed in text boxes in Part 2 of the Plan, but are not incorporated within an actual policy. In order to provide sufficient weight and clear direction for developers and the community, a new policy should be inserted which specifies the sites are allocated and identified on the Policies Map (**SD2-MM292**).
81. Site GTTS1957 involves extending an existing travelling showpersons site in Ridings Road, Dewsbury. Modification **SD2-MM293** is necessary to specify the area allocated, in order for the Plan to be effective. The requirement for a low emission travel plan is onerous given the modest scale of the extension,

and should be deleted (**SD2-MM294**). The site is a logical extension in a sustainable location.

82. Site GTTS2487 in Birstall would provide 12 permanent and 8 transit traveller pitches. The site adjoins a business park, and is within reasonable walking distance of retail and leisure facilities. The gross site area is large, but allows scope for the provision of landscaping, the division of permanent and transit pitches, and open areas in the vicinity of the on-site pylon and power lines. Taking account of the intervening road and scope for landscaping, I consider that any potential impacts on nearby businesses, or conversely impacts on the residential amenity of the occupants of the traveller site from nearby businesses, could be ably mitigated. Detailed matters such as landscaping, layout, footpath provision and surface water flooding could be dealt with at planning application stage. The allocation is soundly based and capable of delivery within the anticipated timeframe.

Other housing needs

83. The provision of older person housing is a key issue facing the district. Modification **SD1-MM3** in Chapter 3 is necessary to make this clear and set out the strategy for delivering additional accommodation. The Plan does not allocate specific sites for older person housing, but other forms of housing may be suitable, and the Council allows older person housing in lieu of affordable provision. The significant uplift in housing provision in the Plan should help to provide additional homes that will be needed for older persons, and other groups in the community. Subject to the above modification I am satisfied that the Plan makes suitable provision for the housing needs of older persons.
84. The Council has confirmed that, through Policy PLP 11, a mix of housing in terms of size and tenure would be sought on schemes of more than 10 units and encouraged on all. Modifications **SD1-MM44**, **SD1-MM46**, **SD1-MM47** and **SD1-MM49** are necessary to clarify this position and ensure the policy is effective. Whilst the SHMA would normally be the key evidence document on needs, additional and more up to date local evidence may be available and should be referred to for reasons of effectiveness (**SD1-MM47**). The policy does not specify provision for custom build housing but there could be opportunities through allocations or on windfall sites. Policy PLP 11 also requires development to make provision for different types of housing, based on the latest evidence of need.
85. The Council has confirmed that additional technical standards relating to access are not proposed. Accordingly, in order to be effective, modifications to Policy PLP 11 are necessary to clarify that design elements relating to adaptation will be encouraged rather than sought (**SD1-MM44**, **SD1-MM48**).

Conclusion on Issue 3

86. In conclusion, subject to the aforementioned modifications, affordable housing needs, traveller accommodation needs and the housing needs of other groups have been satisfactorily assessed and addressed in the Plan, in line with national policy.

Issue 4 – Is the employment land requirement in the Plan and the approach to employment justified, effective and consistent with national policy?

Employment land requirement

87. Kirklees forms part of the wider functional economic area of the LCR. As set out above, the evidence indicates that each authority in the region is aiming to meet its own employment needs. As such, the Kirklees Plan area forms an appropriate basis for assessing objectively assessed needs for employment.
88. The use of the REM by LCR authorities allows Local Plan proposals to be tested and wider economic impacts assessed. Three scenarios were tested for Kirklees to determine the likely future jobs growth forecast; firstly a baseline scenario, secondly a scenario based on KES objectives and a 75% employment rate by 2031, and thirdly a variation involving an 80% employment rate. The updated testing in 2016 was based on a revised REM methodology which factored in the potential impact of the Brexit vote.
89. The Plan's selection of the second scenario reflects the Council's ambition to increase jobs growth above baseline trends, achieve expansion of the manufacturing and engineering sector, and attain an employment rate of about 75% by 2031. Whilst the Council acknowledges that the resultant jobs growth of about 23,000 over the Plan period will be challenging, an employment rate of about 75% has been achieved in the past. There are also positive signs of recovery with a marked recent increase, up from 68.6% in 2013 to 71.1% in 2017. The Council has set out a coherent strategy for jobs growth ambitions based on assisting growth in manufacturing and engineering and building on existing strengths, developing business hubs and skills, and promoting strategic development sites. Overall, based on the evidence before me I consider that an employment target of around 75%, although stretching, is reasonable and capable of being delivered. The LCR SEP indicates there is capacity to build on manufacturing strengths in Kirklees whilst allowing other authorities to focus on other sectors. However, to be effective, the Plan should be modified through **SD1-MM19** to clarify that the jobs figure of 23,000 specified in paragraph 7.8 is approximate.
90. Based on a jobs forecast of some 23,000 over the Plan period, the Plan identifies an OAN for 175 hectares of employment land. Job density assumptions used to derive this OAN are based on an analysis of rates achieved in the Yorkshire and Humber region, as set out in the Roger Tym Report 'Planning for Employment Land, Translating Jobs into Land' (2010). Although the Homes and Communities Agency has produced more recent figures, they are nationally based. I therefore conclude that the jobs density assumptions applied in the Plan are reasonable.

Employment land supply

91. Table 3 in the Plan indicates that employment land would be delivered through a mix of permissions, commitments, potential supply from identified Priority Employment Areas (PEA) in the Plan, and allocations.
92. The PEAs are based on a wide ranging assessment of the suitability of existing employment sites for continued business and industrial use. The assessment

criteria cover a broad range of factors, and overall the work is appropriate and proportionate. Notwithstanding this, corrections to the site area of two PEAs listed in Part 2 of the Plan are necessary for reasons of effectiveness (**SD2-MM40, SD2-MM41**). The potential employment supply of 48 hectares from PEA sites is a broad estimate, but is supported by PEA work which shows potential capacity for business expansion within identified PEA sites. Whilst some changes to non-employment uses may be experienced on PEAs over the Plan period, the approach in Policy PLP 8 in the Plan seeks to retain established business uses, and there is no substantive evidence to demonstrate that there would be significant losses from this source.

93. The allocation sites include a range of different sizes and types that should cater for range of needs. Site capacities are based on floorspace ratios from the Roger Tym report and reasonable assumptions on a mix of B uses, whilst bespoke figures are applied where details are known.
94. A number of allocations involve the release of Green Belt land. As set out under Issue 2, the Council has carried out a thorough assessment of urban capacity which has incorporated an assessment of employment sites, and evidence from other sources of supply shows there is insufficient capacity to deliver OAN for employment on non-Green Belt land. Green Belt releases would enable the Council to meet local needs for economic growth and its aspirations for the delivery of some 23,000 additional jobs over the Plan period. Additional large sites, particularly in strategic locations in the north of the district, would help to boost the manufacturing and engineering sectors and make an important contribution to the economy of the wider region and in meeting the aims of the LCR SEP. It would also support housing growth in the district.
95. In the absence of reasonable alternatives, and given the benefits associated with local economic and housing growth, I conclude that exceptional circumstances exist in principle to justify the release of land from the Green Belt to deliver OAN for employment. As with housing, this is supported by the Council's Green Belt and site assessment work, detailed in Issue 7 below, which illustrates the release of land to meet OAN needs could be accommodated without significantly harming the overall integrity of the Green Belt in Kirklees. However, it is subject to an assessment of environmental capacity and demonstration of exceptional circumstances on a site by site basis, as covered later in this report.
96. The employment land supply figures in Table 3 in the Plan need to be amended to take account of recent completions and commitments data, and to reflect changes in individual site allocations detailed later in this report and are necessary for reasons of soundness. This includes site capacity changes and the deletion of a number of allocations. The updated figures, as set out in **SD1-MM25**, show that overall supply from the identified sources would total 193 hectares, against the requirement of 175 hectares. An oversupply of 18 hectares provides sufficient flexibility to allow for an element of non-delivery from commitments and allocations or deal with changing circumstances, and allows for some market choice. As further allocations would be likely to involve the release of Green Belt land, I consider it represents an appropriate balance between meeting employment needs and protecting the Green Belt. On-going monitoring will take place, and if there is future undersupply it could

be dealt with by Plan review. The submitted Plan includes a 10% flexibility allowance, but I consider that a specific figure is not necessary when an oversupply of 18 hectares is demonstrated. Modifications **SD1-MM5, SD1-MM19, SD1-MM20, SD1-MM21, SD1-MM22, SD1-MM23** and **SD1-MM25** are necessary to update the supply figures and methodology, and ensure the Plan is effective and can be adequately monitored.

97. Employment land requirement and supply in the Plan are based on the B use classes. However, this is not clarified in the Plan, and insertion of a clear definition of 'employment uses' in Part 1 of the Plan is necessary to make the employment strategy and policies effective (**SD1-MM141**).

Employment policies

98. Policy PLP 8 sets out the Council's approach to safeguarding employment land and premises in PEA's. It recognises the important role PEAs play in providing local employment opportunities and contributing to the local economy, whilst allowing flexibility for change of use if certain criteria satisfied. Nevertheless, modifications are necessary for reasons of effectiveness to clarify 'employment generating uses' (**SD1-MM140**), and that Policy PLP 13 will also apply where PEAs are out of centre and proposals involve main town centre uses (**SD1-MM26**). For the same reason modification **SD1-MM27** is necessary to provide additional information on the evidence applicants would be expected to show to justify change of use.
99. Policy PLP 9 requires new developments to contribute to local employment skills and opportunities. However, the policy does not specify the thresholds that would apply or the amount/form of contributions. Further, the viability work does not identify specific costings, despite evidence of training costs in EX83. As such the policy is not sufficiently justified or effective, and is contrary to national policy on viability and plan-making. Altering the requirement to 'encouragement' through modification **SD1-MM28** is necessary for soundness reasons. The insertion of a threshold through **SD1-MM28** is needed to make the policy effective.
100. Policy PLP 10 sets out the Council's approach to economic development in rural areas, and on the whole establishes an appropriate balance between rural development and protection of the countryside. However, modifications are needed to delete the first sentence of section 2 relating to new buildings in the Green Belt in order to be consistent with national policy (**SD1-MM29**), and to clarify that Local Plan and national policy will apply (**SD1-MM30**). Modifications are also required to section 4 to clarify that exceptions relate to farm shops and other businesses that require a rural location, and the circumstances when sequential and impact tests will be sought (**SD1-MM29, SD1-MM31, SD1-MM32**). This should ensure the policy is effective and consistent with paragraph 25 in the NPPF.

Conclusion on Issue 4

101. In summary I conclude that the employment land requirement in the Plan is justified, and, subject to aforementioned modifications, is capable of delivery over the Plan period. The employment strategy and policies, subject to the above modifications, are justified, effective and consistent with national policy.

Issue 5 – Does the Plan set out a positively prepared strategy and policies for retail growth and supporting town, district and local centres, which are justified, effective and consistent with national policy?

Retail needs and requirements

102. The Council has signalled its intention, through the updated Local Development Scheme (LDS), to produce Area Action Plans (AAPs) for Huddersfield and Dewsbury town centres. The AAPs will set out more detailed policies and proposals that will complement those in the Local Plan, and will be an important vehicle for delivering growth and vitality in these centres. Modifications to the Local Plan text are necessary to make this position clear (**SD1-MM2, SD1-MM70, SD1-MM71**).
103. The Council's Retail Capacity Study (September 2017) identifies a need for an additional 8,200-12,700 square metres (sqm) of convenience floorspace and 42,500-85,000 sqm of comparison floorspace over the Plan period up to 2031. The Council's post hearing Retail Needs and Delivery Note (EX35) indicates that a significant proportion of this need, at least up to 2026, is satisfied through planning permissions, pre-applications schemes in the pipeline, and the Southgate mixed use allocation on the edge of Huddersfield town centre (site MX2101). Additional supply over the Plan period is anticipated through new local centres proposed in the Local Plan and through windfall development and the re-use of vacant floorspace in designated centres. The forthcoming AAPs may also allocate further sites for retail use. Town centres remain the focus of retail development and wider needs over the Plan period, and important community hubs. Based on the evidence before me I consider that there is a reasonable prospect of delivering retail requirements over the Plan period, in terms of overall need and by sub-area.

Retail policies

104. Policy PLP 13 defines a hierarchy of town, district and local centres which is supported by evidence and in line with national policy. Retail parks are omitted from this list, but they do not have the same wide functional role as the identified centres. As such, and taking into account the priority the Council places on town centre and urban regeneration, this approach is justified.
105. Policy PLP 13 refers to defined centres as shown on the Policies Map. However, Local Centre boundaries are not clearly established. The Council therefore consulted on Local Centre boundaries alongside the proposed MMs and intends to incorporate these into the Policies Map. This will ensure that Policy PLP 13 can be effectively applied.
106. Clarification in Policy PLP 13, for reasons of effectiveness, is also necessary to refer to the locations of the new local centres proposed in the Plan (**SD1-MM59**). As the size of the local centres is not defined I am satisfied that the reference to impact assessment is justified, and that a sequential test would be proportional in its scope and content as specified in part B of Policy PLP 13.
107. The main part of the sequential test outlined in section B of Policy PLP 13 accords with national policy and is justified. However, modifications are necessary to delete the detailed bullets (**SD1-MM55**) as they seek to impose

additional requirements which are not specified in the NPPF, whilst inserting broad guidance in the supporting text to ensure the policy is effective (**SD1-MM58**).

108. For reasons of effectiveness and to ensure the needs of businesses and local communities are satisfied, modifications to Policy PLP 13 are necessary to clarify that the sequential test would be applied flexibly in the case of schemes with a locational requirement such as farm shops (**SD1-MM56**), or small shops serving localised needs (**SD1-MM57**).
109. The impact assessment thresholds in part C of Policy PLP 13 are supported by detailed local analysis relating to the form and type of defined centres, unit sizes and current vacancy levels in Kirklees, as set out in the Council's Impact Threshold Advice Note (Appendix B to the Council's Hearing Statement on Matter 18). I am satisfied that the thresholds are proportionate and justified, and should help to protect the vitality of defined centres. A bespoke/higher threshold specifically for proposals in retail parks could undermine the purpose of the policy and the regeneration of key centres in Kirklees, and accordingly would not be justified.
110. Policy PLP 14 seeks to ensure a strong retail core is retained within town centres. As a key main town centre use which adds to the vibrancy and vitality of centres, this approach is justified and in line with national policy, whilst allowing some flexibility for change. However, modifications are necessary for reasons of effectiveness, to clarify the definition of retail uses (**SD1-MM62**). For the same reasons, modifications are necessary to clarify the approach within Primary Shopping Frontages and Secondary Frontages (**SD1-MM60, SD1-MM61**), with 'predominant use' and 'dominance of non-retail uses' being clearly defined (**SD1-MM63, SD1-MM64**). The minimum proportions set out in the modified text are supported by local evidence of current proportions in retail frontages across Kirklees. Clarification of the approach to Local Centres is also necessary for reasons of effectiveness (**SD1-MM65**).
111. Criterion a in Policy PLP 15 states that residential uses in town centres will only be permitted on upper floors. In order to provide sufficient flexibility to deal with varying circumstances and be effective, the insertion of the word 'normally' and linked supporting text (**SD1-MM66, SD1-MM67**) is necessary for soundness reasons.
112. Modifications for reasons of effectiveness are necessary to Policy PLP 16 to clarify the definition of food and drink uses (**SD1-MM68**), and to ensure that the policy sets out a clear approach for dealing with food and drink and entertainment uses outside, as well as within, defined centres (**SD1-MM69**).

Conclusion on Issue 5

113. In conclusion, subject to the above main modifications, the Plan sets out a positive strategy and policies for retail growth and town centres which are justified, effective and in line with national policy, and will be supported by additional policies/proposals in the forthcoming AAPs.

Issue 6 - Does the Plan provide a robust framework for the delivery of infrastructure and viable development?

Infrastructure

114. The Council's Infrastructure Delivery Plan (2015) and Addendum (2016) (collectively the IDP) identify a range of infrastructure needed to support proposals in the Plan. The documents include estimated timings, costs and funding sources, and demonstrate on-going dialogue with infrastructure providers.
115. Key transport schemes required to support growth in Kirklees are detailed in Part 1 and Part 2 of the Plan. Policy TS8 also generically captures local highway network efficiency improvements. Delivery of transport schemes and improvements will rely on a range of funding sources including the Government's Road Investment Strategy (RIS), the West Yorkshire Transport Plus Fund, the Local Transport Fund, Network Rail, developer contributions or Community Infrastructure Levy (CIL) and other transport bidding opportunities. The Council has submitted a CIL Charging Schedule for examination, but until it is adopted developer contributions would continue to be sought through legal agreements.
116. Government RIS funding for improvements to junction 26 of the M62/M606 (Chain Bar) has been postponed. Highways England has indicated that, as a result, modifications to housing allocation policy H69 are necessary relating to the assessment of highway impacts and potential mitigation measures including developer funding and phasing are necessary. There is no substantive evidence to demonstrate that immediate effects would be wider, and Highways England modelling shows that site H69 would have a less than significant impact on the Strategic Road Network (SRN) until 2027 at the earliest, based on commencement in 2020/21. Funding may be secured through future RIS bid rounds, and Highways England is investigating interim improvement measures and alternative funding including the Government's Congestion Relief Programme. Overall, I consider that the proposed modification is a pragmatic approach, allows flexibility to deal with insufficient capacity where it is demonstrated, and is necessary for the Plan to be effective. This would be instigated through **SD2-MM161**.
117. The same modified wording in SD2-MM161 is also necessary in the case of other allocations which have potential for a significant effect on the SRN elsewhere. This is covered under Issue 7 below.
118. Modifications are required to the list of SRN improvements in Policy TS11 in Part 2 to reflect the full updated list of schemes in Part 1 (**SD2-MM337**). The text in Policy TS5 in the Plan should be modified to highlight improvements to the A644, including potential provision of a new highway to the south of Dewsbury (**SD2-MM335**). This will reflect the latest position and ensure the Plan is effective.
119. Key improvements to Dewsbury Rail Station and Batley Rail Station are included in the IDP but missing from the Plan. Modification **SD2-MM336** is necessary to insert this detail and ensure the Plan is effective.

120. The Kirklees Transport Model was used to assess the likely cumulative effect of the Plan's proposals on the highway and public transport network. The model takes account of potential growth in other nearby local authorities. Impacts on the local network, including key congested junctions, are identified, and mitigation schemes set out in the IDP. The modelling work indicates that subject to mitigation measures, the overall level of growth proposed in the Plan is capable of being accommodated. Modelling of the SRN was also undertaken by Highways England and related mitigation schemes included in the IDP. Further detailed modelling will be required for specific sites at planning application stage, but the Plan allows for this in Part 2. Overall, I am satisfied that the transport modelling work undertaken to date is robust and proportionate to the preparation of the Local Plan.
121. The IDP includes an extensive assessment of education infrastructure requirements relating to school places and early learning/childcare. Existing vacancies and shortfalls are taken into account, and the applied pupil yields and projections are informed by local trends and other established data. The methodology is robust, and the assessment provides a suitable broad overview for Local Plan preparation. Further assessment may be necessary at planning application stage and contributions via legal agreements and/or CIL sought through Policy PLP 4. Specific new schools/early years facilities required to support growth are listed against site-specific allocations in Part 2 of the Plan.
122. Policy PLP 4 indicates that both essential and desirable infrastructure will be sought, but that essential infrastructure should be operational no later than the appropriate phase of development for which it is needed. This approach is reasonable and will ensure that new developments are sustainable, suitable and attractive environments in which to live and/or work. However, in order to make the policy effective, the categories of 'essential' and 'desirable' infrastructure should be clearly explained (**SD1-MM10, SD1-MM142**).

Viable development

123. The Council's Viability Study (2015) and Viability Addendum (2016) provide a broad assessment of Local Plan viability, taking account of the types of development likely to come forward over the Plan period together with the requirements of national and Local Plan policies. Housing development is viable across most of the district and affordable housing policy PLP 11 is flexible enough to deal with situations where viability is more marginal. Commercial development is shown as more marginal. However, the Kirklees Employment Market Strength Assessment (2015) concludes that key strategic employment allocations are likely to be viable, and identifies on-going demand from businesses for additional employment land provision. A range of funding sources may be available for more marginal sites.
124. Overall, the evidence credibly indicates that the cumulative impact of national and Local Plan policies would not put implementation of the Plan at serious risk.

Conclusion on Issue 6

125. In conclusion, subject to the above modifications, the Plan provides a robust framework for the delivery of infrastructure and viable development.

Issue 7 – Are the proposed employment, housing and mixed use allocations justified, effective and consistent with national policy?

126. The Plan includes more than 230 employment, housing and mixed use allocations. My conclusions on the overall site assessment process are set out in the first sub-section below. The second sub-section highlights generic matters relating to a number of the allocations where I consider that modifications to policy wording are necessary for reasons of soundness. Any additional soundness matters relating to specific allocations are covered in the remaining sub-sections (divided by sub-area, as defined in the Plan).
127. For the avoidance of doubt, not all employment, housing and mixed use allocations in the Plan are referred to in the following sections. In such cases, having taken into account all the evidence and representations before me, I am satisfied that the proposals are soundly based and capable of being developed, and that the policies identify suitable constraints and mitigation measures to allow detailed impacts to be ably assessed and addressed at planning application stage.

Site assessment process

128. As set out in Issue 2 above, the Council has carried out a comprehensive assessment of urban capacity on non-Green Belt land. In these areas the Council has sought to allocate suitable and deliverable sites of 0.4 hectares or more for housing, employment and other uses, and has made reasonable assumptions regarding windfall supply. However, as demonstrated in Issues 2 and 4 above, there is insufficient capacity to accommodate OAN for housing and employment on non-Green Belt land, and a Green Belt review was therefore instigated.
129. The Council's Green Belt Review (2017) involved a comprehensive assessment of the Green Belt edge and adjoining land to determine the degree of constraint to development. Land without severe constraints was also subject to an evaluation of its Green Belt function.
130. The results of the Green Belt Review were fed into the Council's assessment of development site options. This captured potential options of 0.4 hectares or more on Green Belt and non-Green Belt land from a range of sources, including the call for sites process, UDP sites, and Council asset review. Notwithstanding the results of the Green Belt edge assessment, all site options in the Green Belt were assessed at this stage in terms of their Green Belt function to produce an edge rating where relevant and an overall Green Belt rating. Site options proposed by representors after production of the PDLP were also subject to this assessment process. Whilst the assessment process focused on sites in the Green Belt that have been proposed for development or where there is other planning history, I consider this approach is reasonable and not unusual, given the extent of the Green Belt in Kirklees and time/resources available. The availability of sites is a key factor in determining suitability for allocation.
131. Test 2d in the Council's Green Belt Review, preserving the setting of historic assets, does not feature in the Green Belt purposes identified in the NPPF. The Council has carried out a re-assessment of edge ratings in the Green Belt Review based on neutralisation of this element, which identifies adjusted edge

rating scores relating to a very small number of areas and site options. However, the site option Green Belt ratings and overall site option assessment conclusions were not affected by this adjustment.

132. The Council's site assessment methodology, incorporating detailed assessment of Green Belt functions on a site basis, is robust and credible. Site options were assessed against a wide range of criteria, including those relating to sustainable development. The results of the Council's Open Space Study (2016) and other evidence documents were fed into the process. The assessment process also sought to protect open spaces and facilities within built-up areas with identified recreation, landscape character and/or biodiversity value. I am satisfied that the Open Space Study is robust and the approach to protection of open spaces is sound, as established under Issue 9 and Issue 2 respectively.
133. Call for sites information and other evidence indicates that site allocations are available for development. Whilst the availability of parts of sites H768, H706 and H684 are not confirmed, given the existence of promoters for certain sections and other planning history, I consider there is a reasonable prospect of delivery within the Plan period.
134. Representors have commented on the accuracy and consistency of the scoring of individual criteria in the site options assessment process. However, assessments need to be read a whole, and overall, notwithstanding the MMs, I am not persuaded that the process is fundamentally flawed or has led to an inappropriate selection of allocations. The site assessment summaries and conclusions, albeit fairly short, are clearly presented in supporting evidence.
135. Potential site options were also subject to SA, through the SA (2016), SA Erratum (2016) and SA Addendum (2017). The MMs have also, where necessary, been subject to SA. Representors have commented on the accuracy and consistency of scoring against individual objectives, in relation to specific sites. Some differences may be due to different interpretations in the meaning/aims of the objectives. However, SA is one part of the evidence base which informs the process of site assessment and selection. There is no evidence that scorings are inaccurate to the degree that would have impacted on option selections. Overall I am satisfied that the Council's SA work is fit for purpose and provides a sufficiently robust high-level assessment, proportionate to Local Plan preparation.
136. All of the suitable, deliverable and available 'accepted options' are allocated in the Plan. As shown on map 4 in the Council's Green Belt Review Supporting Document, the location of the Green Belt releases shows a reasonable correlation to the main centres of population in the district, therefore contributing to a sustainable pattern of development. The distribution of growth also aligns with the spatial development strategy in the Plan.
137. Employment, housing and mixed use allocations have, in some cases, resulted in further consequential changes to the Green Belt boundary to allow more logical and defensible Green Belt boundaries to be created. These consequential changes, as shown on the Policies Map and as amended through further changes illustrated in the MM and Additional Modification documents, are logical and justified.

General site allocation matters

138. The employment, housing and mixed use allocation sites are set out in text boxes in Part 2 of the Plan, but are not incorporated within an actual policy. In order to provide sufficient weight and clear direction for developers and the community, new policies are required which specify that sites are allocated and identified on the Policies Map, and establish the general approach that will apply (**SD2-MM1, SD2-MM3, SD2-MM42, SD2-MM295**). For the same reason a new policy is also required in relation to land at Storthes Hall (**SD2-MM367**). The allocation policies will provide part of the framework for determining planning applications.
139. In order for the allocations to be effective it is necessary to clarify that employment uses relate to B use classes (**SD2-MM2**). The allocations do not specify a particular type or mix of B use class, and I consider this provides appropriate flexibility to respond to changes in economic circumstances and support economic growth in the district. At the hearing the Council confirmed that proposals for non-ancillary B1 offices on employment allocations would also, as a main town centre use, have to satisfy the sequential and impact tests in Policy PLP 13. For reasons of effectiveness it is necessary to clarify this position through modifications **SD2-MM2** and **SD2-MM3**.
140. The mixed use allocation policies provide insufficient detail regarding the type of uses envisaged on the site. The Council has confirmed that in many cases mixed use is based on a 50/50 assumed split of employment and housing. However, alternative mixes are envisaged on a number of sites, in some cases linked to existing planning permissions and including retail, and were tested through the site assessment process. With the exception of site MX1930 the evidence before me indicates that the proposed uses are suitable and capable of being delivered over the Plan period. In order to be effective, clarity should be provided on the type of uses sought on each site, through the following modifications; MX1903 in **SD2-MM296**, MX2101 in **SD2-MM299**, MX1911 in **SD2-MM303**, MX1906 in **SD2-MM309**, MX1929 in **SD2-MM312**, MX3394 in **SD2-MM314**, MX1905 in **SD2-MM316**, MX1907 in **SD2-MM319**, MX3349 in **SD2-MM321**, MX1919 in **SD2-MM324**, MX1920 in **SD2-MM327**, MX1912a in **SD2-MM330**. The suitability of MX1930 is dealt with in the Huddersfield urban sites sub-section below.
141. The housing, employment and mixed use allocations refer to 'indicative capacity' in terms of dwelling numbers/floorspace. This is a suitably flexible approach which allows some variation in numbers through the planning application process, depending on circumstances.
142. The allocation proposals set out details of specific constraints, reports required, and other site specific considerations including mitigation measures to aid developers and other stakeholders. A number of amendments are necessary to reflect updated constraints and requirements for specific sites, or provide additional information to aid effectiveness.
143. In the case of allocation sites owned by the Council, the Plan refers to 'enhanced' standards of provision required in terms of open space, affordable housing and/or design, above those established in the Part 1 policies. This fails to provide sufficient clarity and is imprecise, and could be dealt with on a

case by case basis to be determined by the Council. In order to be effective, modifications are needed to remove this wording from the site-specific proposals in Part 2 of the Plan; site E1836 in **SD2-MM4**, E1837 in **SD2-MM6**, E1899 in **SD2-MM9**, E1876 in **SD2-MM20**, H1679 in **SD2-MM51**, H734 in **SD2-MM54**, H809 in **SD2-MM55**, H1647 in **SD2-MM58**, H1656 in **SD2-MM59**, H1657 in **SD2-MM61**, H790 in **SD2-MM88**, H1694 in **SD2-MM89**, H101 in **SD2-MM95**, H1811 in **SD2-MM100**, H1731a in **SD2-MM102**, H1935 in **SD2-MM104**, H813 in **SD2-MM112**, H1937 in **SD2-MM114**, H776 in **SD2-MM117**, H1664 in **SD2-MM118**, H1754 in **SD2-MM123**, H46 in **SD2-MM128**, H794 in **SD2-MM135**, H758 in **SD2-MM138**, H1938 in **SD2-MM139**, H1696 in **SD2-MM144**, H1702 in **SD2-MM145**, H762 in **SD2-MM166**, H1704 in **SD2-MM168**, H2667 in **SD2-MM189**, H763 in **SD2-MM201**, H1709 in **SD2-MM204**, H780 in **SD2-MM231**, H730 in **SD2-MM269**, H128 in **SD2-MM278**.

144. A number of site policies refer to the need to assess the impact of schemes on the SRN. However, Highways England has indicated that some of these allocations are unlikely to have significant adverse effects on the SRN, and as Policy PLP 4 allows cumulative effects to be assessed has advised that these references are not required or justified. I concur that this would be a pragmatic approach, and accordingly, the following modifications are proposed to remove this requirement; site E1836 in **SD2-MM4**, E1831 in **SD2-MM15**, E1985a in **SD2-MM17**, H519 in **SD2-MM53**, H809 in **SD2-MM55**, H94 in **SD2-MM64**, H102 in **SD2-MM67**, H481 in **SD2-MM69**, H1783 in **SD2-MM74**, H758 in **SD2-MM138**, H138 in **SD2-MM147**, H508 in **SD2-MM164**, H222 in **SD2-MM212**, H502 in **SD2-MM217**, H688 in **SD2-MM219**, H690 in **SD2-MM221**, MX1903 in **SD2-MM297**, MX3349 in **SD2-MM323**.

145. In the case of other schemes which have potential to significantly impact on the SRN, Highways England has indicated that inclusion of the modified wording discussed under Issue 6 above (in relation to H69) would provide sufficient mitigation. I concur with this position, and therefore in order to be effective the additional wording should be inserted in the following policies: H559 (**SD2-MM111**), H1747/H351 (**SD2-MM63**), H2089 (**SD2-MM130**) and MX1905 (**SD2-MM317**).

146. The Council's Flood Risk Technical Paper demonstrates that a sequential approach has been suitably applied in the case of the accepted site options. Developable site areas have been reduced to exclude areas of Flood Zone 3. A small number of housing sites contain areas of Flood Zone 2, but the extent of these areas is limited and there is capacity for these areas to be used for landscaping or open space within scheme layouts. As allocations have been subject to the sequential test there is no need for an additional test at planning application stage. Accordingly, reference to this within the site-specific proposals should be deleted for reasons of effectiveness (MX1903 in **SD2-MM297**, MX2101 in **SD2-MM300**, MX1911 in **SD2-MM306**, MX1906 in **SD2-MM311**, MX1929 in **SD2-MM313**, MM3394 in **SD2-MM315**, MX1905 in **SD2-MM317**). Related modifications are also necessary to Policy PLP 27, as set out under Issue 10 below. The text for allocation site H85 should also be corrected to specify that part of the site is in Flood Zone 2 (**SD2-MM119**) and the text for site H1647 should refer to flood risk constraints (**SD2-MM56**).

147. As referenced in the HRA section above, modifications are necessary to refer to avoidance and mitigation measures in relation to a number of allocations in proximity to the SPA (E1866 in **SD2-MM33**, H356 in **SD2-MM195**, H67 in **SD2-MM233**, H200 in **SD2-MM237**, H342 in **SD2-MM238**, H343 in **SD2-MM239**, H288a in **SD2-MM251**, H626 in **SD2-MM260**). This reflects the findings of the Council's HRA work, and is necessary for the proposals to be clear and therefore effectively applied.

148. A number of sites have gained planning permission. In order to be effective and facilitate appropriate monitoring the indicative capacities in the site policies should be amended to reflect these consents, as well as being captured in the updated supply calculations through **SD1-MM160**. This relates to the following sites, and others referenced in the later site-specific sub-sections; site E1837 in **SD2-MM5**, H754 in **SD2-MM48**, H755 in **SD2-MM49**, E1899 in **SD2-MM7**, E1876 in **SD2-MM18**, H297 in **SD2-MM252**, H313 in **SD2-MM279**. An adjustment to the site boundary to reflect the planning permission should also be made in relation to site H356, with consequent reductions in gross and net site areas (**SD2-MM194**).

149. Modifications are needed to a number of allocation policies for reasons of effectiveness to specify new requirements for transport, ecology and flood risk/drainage reports, based on the latest Council evidence. The list below captures many of these changes, whilst some are referenced in the following site-specific sections.

- Transport Assessment - site E1899 in **SD2-MM8**, E1879 in **SD2-MM10**, E1873 in **SD2-MM11**, E1876 in **SD2-MM19**, , E1829 in **SD2-MM31**, E1900 in **SD2-MM37**, E1871 in **SD2-MM39**, H616 in **SD2-MM47**, H780 in **SD2-MM230**, H47 in **SD2-MM248**.
- Transport Statement – site H1647 in **SD2-MM57**, H216 in **SD2-MM75**, H215 in **SD2-MM77**, H790 in **SD2-MM87**, H1731a in **SD2-MM101**, H1935 in **SD2-MM103**, H367 in **SD2-MM109**, H1937 in **SD2-MM113**, H2148 in **SD2-MM115**, H776 in **SD2-MM116**, H85 in **SD2-MM120**, H192 in **SD2-MM122**, H197 in **SD2-MM134**, H1696 in **SD2-MM143**, H796 in **SD2-MM154**, H162 in **SD2-MM156**, H49a in **SD2-MM158**, H1983 in **SD2-MM169**, H2645 in **SD2-MM170**, H567 in **SD2-MM178**, H2627 in **SD2-MM187**, H2667 in **SD2-MM188**, H221 in **SD2-MM193**, H356 in **SD2-MM195**, H763 in **SD2-MM199**, H17 in **SD2-MM211**, H549 in **SD2-MM229**, H178 in **SD2-MM235**, H200 in **SD2-MM237**, H342 in **SD2-MM238**, H343 in **SD2-MM239**, H784 in **SD2-MM245**, H785 in **SD2-MM246**, H786 in **SD2-MM247**, H130 in **SD2-MM250**, H297 in **SD2-MM253**, H626 in **SD2-MM260**, H728 in **SD2-MM264**, H2585 in **SD2-MM271**, H44 in **SD2-MM274**, H70 in **SD2-MM275**, H120 in **SD2-MM276**, H128 in **SD2-MM277**, H339 in **SD2-MM280**, H538 in **SD2-MM281**, H583 in **SD2-MM282**, MX1919 in **SD2-MM325**, MX1920 in **SD2-MM328**.
- Ecological Assessment – site H481 in **SD2-MM68**, H439 in **SD2-MM76**, H3350 in **SD2-MM105**, H199 in **SD2-MM228**, H664 in **SD2-MM243**.
- Drainage report – site H730 in **SD2-MM270**.
- Flood Risk Assessment – site H85 in **SD2-MM120**.

- Deletion of requirement for Flood Risk Assessment - site H597 in **SD2-MM257**, H1774 in **SD2-MM287**.

Huddersfield urban sites (non-Green Belt)

150. H1656, south of St. Thomas Gardens, Bradley - The site contains a multi-use games area (MUGA) and the policy refers to replacement provision as part of redevelopment. The policy wording needs to be adjusted to refer to equivalent or better quantity or quality in order to be consistent with paragraph 74 in the NPPF (**SD2-MM59**).
151. H1657, north of Deighton Road, Deighton - In order to be effective the policy should be amended to refer to Public Right of Ways (PROW) which adjoin the site to the north and west (**SD2-MM60**).
152. H764, west of Sunningdale Road, Crosland Moor - The Council has carried out an open space assessment of the site since publication of the Plan, which identifies that the site has medium value as open space used for informal play and use of the public footpath as a route to school. In order to retain this facility and accord with the Plan's spatial strategy the housing allocation should be deleted (**SD2-MM73**) and the site designated as Urban Green Space (UGS) by extending site UGS1199.
153. H1783, east of Thewlis Lane, Crosland Hill - Given the scale of the proposal a masterplan is necessary to deliver quality and well planned development. This should be referenced in the policy for reasons of effectiveness (**SD2-MM74**).
154. H202, north of New Hey Road, Salendine Nook - Outline planning permission has been granted for 22 rather than 19 dwellings, and the site capacity in the policy should be amended accordingly (**SD2-MM79**). The existence of an overland drainage route and provision of a buffer should be included in the policy, in order to allow for effective planning (**SD2-MM78, SD2-MM80**).
155. H623, east of Weatherhill Road, Birchencliffe - The site adjoins listed buildings at Warren House Lane. The Council's Heritage Impact Assessment (HIA) identifies much of the site as an area of moderate significance, where mitigation is required to retain the open agricultural setting. However, the site is modest in size, contains a pylon and is crossed by electricity lines and a PROW. As such there is insufficient capacity to provide appropriate mitigation, and the proposal would cause harm to the heritage asset. Whilst harm would be less than substantial, I consider that public benefits linked to provision of additional housing on the site would, having regard to the modest dwelling numbers, be insufficient to outweigh harm. Accordingly I conclude that the allocation is not justified or consistent with national policy, and should be deleted (**SD2-MM81**).
156. H706, east of Halifax Road, Birchencliffe - The Council's HIA identifies that part of the site is of high significance to the setting of nearby listed buildings, where loss of openness would cause substantial harm to the assets. Other areas of moderate significance are identified beyond this. The indicative site capacity does not appear to take account of these constraints, and as such, there is a risk of considerable harm to the heritage assets. Whilst harm would be less than substantial in planning terms, I consider that public benefits linked to modest provision of additional housing within the area of high

significance would be insufficient to outweigh harm. Accordingly, in order to be justified and consistent with national policy, the policy should specify that the areas of high significance should not be developed (**SD2-MM85**), and accordingly the net site area and indicative capacity should be reduced to 11.39 hectares and 243 dwellings (**SD2-MM82, SD2-MM84**). Related heritage constraints and mitigation should also be inserted (**SD2-MM83, SD2-MM85**).

157. H789, west of Tanyard Road, Salendine Nook – The landowner has confirmed that the site is not available for development within the Plan period. Accordingly, the allocation is not effective and I conclude it should be deleted from the Plan (**SD2-MM86**).

158. H790, east of Fern Lea Road, Lindley – The site is a sloping area of scrubland adjoining a play area and informal open space. It has limited value as open space, and it could be sustainably developed for housing. Based on its size a Transport Statement is necessary through modification **SD2-MM87**.

159. H101, north of Jackroyd Lane, Newsome – The site is located close to Castle Hill Scheduled Monument (SM), and is identified in the Council's Castle Hill Setting Study as an 'important' undeveloped area which contributes to the significance of the hill's setting. The site consists of a series of attractive sloping fields, and contains a well-used PROW which provides a key route up the hillside towards the SM. As seen on my site visit, much of the site is clearly visible from the hill, and there are views across large sections of the site towards the hill and tower.

160. Taking these factors into account, I consider that the proposed allocation would erode the rural character of the site and cause considerable harm to the setting of Castle Hill. The Council's HIA fails to recognise the full extent of views to and from the SM and underplays the significance of the site to the asset. Whilst harm would be less than substantial in planning terms, Castle Hill is a heritage asset of high significance and a key feature in this part of Kirklees. Given this significance I consider that benefits arising from additional housing would not outweigh harm. However, a small section of the western part of the site is partially obscured by surrounding residential development, and does not afford clear views to or from the SM, and could be developed without harming the rural setting of Castle Hill. As such, in order to be justified and consistent with national policy, the allocation should be modified to relate to this discrete area only, as shown in EX89.1, with consequential reductions in the gross and net site areas and a reduced indicative site capacity (**SD2-MM90, SD2-MM91, SD2-MM93**). The policy should also be modified to specify the need for sensitive design and layout which avoids harm to the significance of Castle Hill. I have amended the wording in the Council's published modification to clarify this position and remove reference to the Council's HIA (**SD2-MM95**).

161. There are also consequential modifications in terms of constraints and mitigation measures associated with the reduced area, including deletion of reference to Biodiversity Action Plan (BAP) Priority Habitats (**SD2-MM91**), public sewers across the site (**SD2-MM92**), and the requirement to submit a Transport Assessment and Travel Plan (**SD2-MM94**).

162. H1811, south-east of Blue Bell Hill, Newsome – The Council's HIA identifies part of the site close to Taylor Hill Working Mens Club as moderate significance, which should be retained as an open landscaped setting to the listed building. The site also contains extensive woodland area which is a BAP Priority Habitat. These constraints are not reflected in a reduced net developable area or indicative capacity. Potential harm to the heritage asset would be less than substantial but would not be outweighed by benefits arising from the modest amount of additional housing. In order to avoid harm to the heritage asset and ecology, and ensure consistency with national policy, the net area and indicative site capacity should be reduced, and the policy should list related constraints and mitigation measures (**SD2-MM96, SD2-MM98, SD2-MM100, SD2-MM97, SD2-MM99, SD2-MM100**).
163. H1728a, Plantation Drive, Newsome – The site is located close to Castle Hill SM, and is identified in the Castle Hill Setting Study as an 'important' undeveloped area which contributes to the significance of the hill's setting. Most of the site is clearly visible from Castle Hill, and there are views from the site of the SM. Based on my observations and evidence from Historic England, I consider that the Council's HIA under-estimates the impact of the proposed development on the SM, and that the scheme would erode its rural character and cause considerable harm to the setting of Castle Hill. Whilst harm would be less than substantial in planning terms, Castle Hill is a heritage asset of high significance and a key feature in this part of Kirklees. Taking account of this significance and the scale of development I consider that benefits arising from additional housing would not outweigh identified harm. A small section in the south-east of the site is not clearly visible from the SM, and could be potentially developed without harm to the asset. However, it falls below the Council's size threshold for allocations. Therefore, for the above reasons, I conclude that the proposal should be deleted from the Plan through modification **SD2-MM106**.
164. MX1930, north of Blackmoorfoot Road, Crosland Moor - The site is allocated for a mix of housing and employment land. However, the site is accessed via the local road network and is located at a distance from the strategic road network. This poor connectivity means that access by Heavy Goods Vehicle (HGV) may be difficult, and affect the site's attractiveness to the commercial market. The market review evidence submitted by the landowner after publication of the Plan indicates that there is a high level of existing supply of employment land and a low employment demand in the Crosland Moor area, and that rental values for the site would be low, affecting viability. At the time of the hearing a planning application for residential only development on the site had been submitted.
165. Taking account of the site's locational constraints, coupled with the market review evidence, there is considerable uncertainty regarding the viability and delivery of the employment element of the allocation. Current and previous industrial uses and the sloping topography of the site may also involve remediation costs. Based on the evidence before me, I therefore conclude that the allocation for employment and housing should be amended to be for residential use. This would be realised through the deletion of the mixed use allocation (**SD2-MM298**) and insertion of a new housing allocation (H3397 in **SD2-MM107**).

166. The site appears to have reasonable capacity for some 700 dwellings, albeit the latest projections indicate that 16 of these would be delivered beyond the Plan period. In order to be effective the new policy should include reference to ecology and heritage constraints/mitigation, and a requirement to provide an access link between the north-east section and the rest of the site which is in different ownership (**SD2-MM107**).
167. MX1911, south of Lindley Moor Road, Lindley – Much of the site already has planning permission and has been developed. In this context reference to the need to assess impact on the SRN is not necessary and should be deleted (**SD2-MM306**). It has been confirmed that a small section of the site is no longer available for development, whilst a further area is not developable on account of its topography. The site area and housing and employment capacity should be adjusted accordingly (**SD2-MM301, SD2-MM302, SD2-MM304, SD2-MM305**).
168. MX1906, north of Trinity Street, Huddersfield – An indicative employment capacity should be inserted to provide clarity and ensure the policy can be effectively monitored (**SD2-MM310**). The developable area should also be increased to reflect discussions regarding an emerging masterplan for the site (**SD2-MM307**).
169. The site contains Grade II listed buildings and a statue. This constraint and associated mitigation measures should be inserted in the policy in order to provide adequate protection for the historic environment in line with the NPPF (**SD2-MM308, SD2-MM311, SD2-MM311**).

Huddersfield Green Belt sites

170. H31, north-west of Woodsome Drive, Fenay Bridge – The site is identified in the Council's Green Belt Review and site assessment work as having a less important Green Belt role and where development would have limited impact on Green Belt function. Having regard to its containment I concur with these findings, and recognise that adjacent roads would provide a strong and defensible new Green Belt boundary. As such, and in the context of the need for additional housing identified in Issue 2, I conclude that exceptional circumstances exist to justify removing the site from the Green Belt.
171. H2684a and H2730a, Woodsome Park/Hermitage Park, Lepton – These adjoining sites are identified in the Council's Green Belt Review and site assessment work as performing a moderately important Green Belt role and where development may potentially have a detrimental impact on Green Belt function. However, the sites are well contained by physical features, including residential development, Penistone Road, Lepton Great Wood and Beldon Brook and field boundaries. Despite the size of the sites, strong defensible Green Belt boundaries could be achieved, helping to safeguard the adjoining countryside from encroachment. A clear boundary does not exist at the point adjoining the disused railway line; however, as this area is small it would be possible to facilitate a new defensible boundary with suitable landscaping linking the existing field boundaries. The sites can be seen from Penistone Road and in longer distance views, but tree cover and topography provides an element of screening, and development would be seen from the south as an extension of the urban area. Although there would be some reduction in the

gap between Huddersfield and Highburton, Beldon Brook and field boundaries provide a clear defensible boundary, and existing tree cover coupled with appropriate scheme landscaping and layout could achieve an attractive edge.

172. Initial highway work indicates that primary access to both sites is required and achievable through site H2684a, potentially via a new roundabout on Penistone Road. Education needs have been modelled and there is no immediate need for additional school places in the area. Noise assessment work is required in policy H2684a and should ensure that any impacts linked to nearby employment uses and other sources are appropriately dealt with.
173. The Council's HIA identifies that part of site H2730a is of moderate significance for the setting of the listed building 'Crow Trees'. Site capacity allows scope for this area to be retained as open land. Accordingly, in order to avoid harm to setting the policy should be modified to specify that no development should take place in this area (**SD2-MM46**) and require the retention of the historic field boundaries, public footpath and protected trees to the south of Crow Trees which are also identified as significant to the asset (**SD2-MM45, SD2-MM46**).
174. Neither site is identified in the Castle Hill Setting Study (2016) as significant to its setting. As seen on my site visit, and as shown in submitted photographic evidence, the sites are visible from the grounds of the listed building of Woodsome Hall. Historic England has indicated that the allocation sites can also be seen from rooms within the Hall. However, there is a considerable distance between the Hall and the Lepton sites, and the sites are viewed as part of a wide vista which includes developed and open areas. Trees also provide some screening. Evidence from Historic England does not identify a clear connection between the Hall and Capability Brown. Taking account of these factors I conclude that any harm to the Hall or its setting would be limited, and could be mitigated through appropriate landscaping and layout. In reaching my conclusions I have taken account of comments received after the hearing session, in response to the submitted photographs. In order to provide appropriate protection for the historic environment I have amended the wording of published **SD2-MM46** to refer to heritage assets, rather than just Crow Trees.
175. Ecology reports on the sites indicate that further survey work will be required, and that mitigation measures may be necessary to protect ecological habitats within and nearby. Reference to potential avoidance, mitigation and compensation measures is therefore necessary within the policies, in order to ensure the Plan is effective (**SD2-MM43**). The site capacity provides scope for potential retention of habitats and provision of buffer zones, including in the vicinity of Lepton Great Wood. Ecology and protected trees would also be afforded protection through Policy PLP 30.
176. Due to inter-connections between the sites, a joint Masterplan is required and should be referenced in the policies (**SD2-MM43**). A slight adjustment is necessary to the gross site area for site H2730a to correct an error (**SD2-MM44**).
177. The site assessment ratings and SA scores have been disputed for both sites, However, I am satisfied that they broadly reflect the site's characteristics and

constraints, and there is no evidence to justify significant changes that would affect overall conclusions on suitability and sustainability. The assessment of rejected options covering parts of the sites is reasonable and shows that some of the smaller areas were unable to achieve defensible Green Belt boundaries or suitable access.

178. I recognise the level of local concerns regarding the allocation of Green Belt land on the edge of Lepton. However, sites H2864a and H2730a are in sustainable locations on the edge of the wider urban area, and subject to the aforementioned modifications the policies contain appropriate mitigation measures. Overall, in the context of identified housing needs and limited harm to the Green Belt, I conclude that exceptional circumstances exist to justify their removal from the Green Belt. Defensible boundaries can be achieved, and there are no exceptional circumstances to make further Green Belt boundary adjustments in this vicinity.
179. The evidence indicates that both sites are deliverable and available, albeit taking account of joint masterplanning and other technical work I consider that completions are unlikely to be achieved until 2021/22, to be identified in the updated phasing table in Part 1 of the Plan (**SD1-MM160**).
180. H1679, north of Fenay Lane, Almondbury – This site is identified in the Council's Green Belt Review and site assessment work as performing a moderately important Green Belt role and where development may potentially have a detrimental impact on Green Belt function. However, the site is well contained by built development, treed areas and roads, and its links to the wider Green Belt are constrained by the presence of Fenay Lane. Development on the site would not extend south of Fenay Lane, and would not result in significant encroachment into the countryside. Strong new defensible Green Belt boundaries would be provided by Fenay Lane and Penistone Road. Although the site is sloping, development would be seen from the south and east against an urban backdrop, and suitable landscaping and layout would help to mitigate visual impacts.
181. Areas of Flood Zone 3 and BAP Priority Habitat have been removed from the developable area. Further ecological investigation is necessary, and the policy should be amended to refer to this requirement in order to be effective (**SD2-MM50**). Overall, in the context of identified housing needs and limited harm to the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt. Defensible boundaries can be achieved, and there are no exceptional circumstances to make further Green Belt boundary adjustments in this vicinity.
182. Taking account of the need to undertake technical work and appoint a development partner, I consider that completions are unlikely until 2022/23, as identified in the updated phasing table in Part 1 of the Plan (**SD1-MM160**).
183. H351/H1747, Bradley Road, Bradley - Sites H351 and H1747 adjoin each other and would form a significant area of new housing development on the edge of Huddersfield. The sites are located in part of the strategic Green Belt gap between Huddersfield and Brighouse. However, notwithstanding potential development in Calderdale, a clear gap would remain and Bradley Wood and the M62 motorway would form part of this division. The sites are well

contained by existing features, and extensive enough to provide buffers and landscaping mitigation. The sites are in a sustainable location on the edge of the town, with a range of local services and facilities close by.

184. Development of site H1747 would involve the loss of an 18 hole golf course, 9-hole par 3 course, driving range and associated facilities. The Council's Golf Needs Assessment (2015) and other technical reports indicate that there is an oversupply of golfing provision in the area, with available capacity on other courses and scope to absorb future population/participation increases over the Plan period. However, Bradley Park is the only pay and play course in Kirklees, and is an active and well used facility. Although other golf clubs in the area allow visitors and may have similar pricing, the flexibility and informal nature of the pay and play facility means that it is likely to attract a particular market, including those without a golfing handicap, and is a different form of provision. On this basis I conclude that Bradley Park is an important local sporting facility which meets particular needs, and is not surplus to requirements. Sport England and England Golf support this position. As such the first bullet in paragraph 74 in the NPPF is not satisfied.
185. The second bullet in paragraph 74 states that the loss of sporting facilities may be permitted where loss resulting from development is replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Bullet 3 also allows for loss where the development is for alternative sports and recreational provision, the needs for which clearly outweighs the loss. However, as the proposal is for housing development I consider that bullet 2 rather than bullet 3 applies.
186. The Council's latest draft Masterplan shows the re-provision of a 9-hole golf course and driving range on-site as part of the development scheme, alongside two full-sized 3G pitches, two junior football pitches linked to a new school, walking/cycling facilities and other open space. The Masterplan proposes clusters of high density development, and there is scope to amend this further as the scheme evolves. Accordingly, taking account of the range of other facilities required, I am satisfied there is sufficient capacity within the site to deliver the scheme, and scope to amend the precise hectareage of the 9-hole course if necessary.
187. A 9-hole golf course with a larger driving range does not represent a like for like golfing replacement in terms of quantity or quality, and would accommodate fewer users. However, as set out in the Council's report, a 9-hole course could provide an important entry point into the sport. The proposed facility is supported by England Golf and Sport England, and there are other 9-hole courses in operation. Masterplanning work is still evolving, and overall I consider there is a reasonable prospect that a 9-hole course and associated facilities could be viable and deliverable on the site. There is some uncertainty as to whether the junior pitches would be made available to the public. However, the other new sports facilities would support a high throughput of users, and the two 3G pitches would help to meet an identified shortfall in Kirklees for this form of provision.
188. Therefore, notwithstanding that the residential development itself may create additional needs for sports and open space, taken as a whole I consider that the proposed new sporting facilities would go a significant way towards off-

setting the loss of the 18-hole course and current facilities. Bullet 2 in paragraph 74 in the NPPF does not specify that replacement provision should be for the same type of sport. Furthermore, as set out below the allocation would deliver a significant number of new homes in Huddersfield, as well as affordable housing. This would provide social benefits, boost the economy, and help to support the Plan's spatial strategy and objectives for employment growth.

189. Taking account of benefits arising from the proposed replacement sports provision, the identified needs for additional homes in the area, the lack of alternative options for provision and the sustainability of the location, I consider that, on balance, the benefits arising from the modified proposal would outweigh the loss of current sports facilities on the site. Therefore, although paragraph 74 in the NPPF is not met, I am satisfied that in this case there are particular circumstances which justify this departure. In order to secure replacement facilities the policy would need to be modified to specify the provision of a 9-hole course, driving range, clubhouse and two 3G pitches, and aim to ensure no gap in golfing provision on the site (**SD2-MM63**). The design process relating to the 9-hole course is a detailed matter that will be determined by the Council in consultation with stakeholders.
190. Technical transport work indicates that there is capacity to deliver 520-560 dwellings from three access points into the site, or up to 750 if signals are provided at Tithe House Way. Beyond this point the Cooper Bridge Link Road scheme would be required to provide additional access. The Cooper Bridge scheme is timetabled for completion in 2024/25, utilising an allocation from the West Yorkshire Plus Transport Fund, although the Council is seeking to accelerate this process to secure completion earlier. The housing phasing table, as modified through **SD1-MM160**, shows that an estimated 370 dwellings would be completed by 2024/25, and as such it seems unlikely that delivery would be constrained. Technical work on alignment options is being progressed, but there is no evidence that there are fundamental constraints that cannot be mitigated and would prevent the link road scheme coming forward.
191. The Council has indicated that there are no other identified fundamental constraints on the local highways network that would prevent the scheme being delivered. Highways England has not objected to the allocation, subject to the inclusion of additional policy wording requiring the impact of the scheme on the local highway network and the SRN to be assessed. The Council's evidence indicates that land ownership issues at the three initial access points have been or are capable of being resolved, and that suitable geometry and safety standards can be provided. I have had regard to alternative highways and access evidence submitted by representors. But as they are the Local Highways Authority I attach significant weight to the Council's findings, and on the balance of the evidence before me I consider that there is a reasonable prospect that the scheme is deliverable in highway terms. Further assessment will take place through the planning application process and provide an opportunity to address issues and identify necessary mitigation measures. The additional wording sought by Highways England and reference to the link road and connection to the site, as set out in modification **SD2-MM63**, would help to ensure the policy is effective.

192. In conclusion, the proposal would deliver a significant number of dwellings in a sustainable and strategic location, and involve limited harm to the Green Belt. I recognise that the existing golf facilities on site are a valued local facility. Nevertheless, on balance I consider that a range of benefits arising from the modified scheme would outweigh the loss of existing golf facilities. Taking account of the above factors, including identified housing needs and lack of suitable alternatives, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt. There is evidence that the landowners of H351 and H1747 are engaged in joint working and are committed to collaborative delivery. There are no other identified fundamental constraints that would prevent development coming forward, and detailed matters could be investigated and dealt with through the planning application process.
193. As the delivery of H351 and H1747 are inter-connected it is necessary for the separate policies to be amalgamated, in order for the Plan to be clear and effective. Policies H351 and H1747 would be deleted through modifications **SD2-MM52** and **SD2-MM62**, and replaced by a combined policy (**SD2-MM63**). In addition to modifications listed above, the combined policy should specify the production of a joint Masterplan and the provision of a local centre, and clarify school provision, in order to ensure effective planning. The policy should be amended to specify retention and reuse of the nearby listed barn at Shepherds Thorn Farm, provide additional clarity on measures to protect the wider setting of the building, and seek sensitive design and layout. These measures will help to protect heritage assets. Subject to the above modifications I am satisfied that the proposal is soundly based.
194. Taking account of the need for joint delivery and the large scale of the scheme I consider that completions in a number of zones are likely to come forward later than anticipated by the Council. The phasing table in Part 1 of the Plan should be adjusted as set out in **SD1-MM160**, to show the delivery of a small number of dwellings within the five year supply period, and a total of 1,460 dwellings within the Plan period. A further 498 units would be delivered after 2031.
195. H519, north and west of Gernhill Avenue, Fixby - The site is identified in the Council's Green Belt Review and site assessment work as having a less important Green Belt role and where development would have limited impact on Green Belt function. I concur with this, having regard to the site's containment by buildings to the south and east, and strong field boundaries to the west. Development would reduce the gap between Huddersfield and Rastrick/Brighouse, within Calderdale district. However, even if additional development occurs in this part of Calderdale, a clear physical gap would remain, and a strong new defensible boundary could be achieved along the northern edge of site H519 and prevent sprawl.
196. There are a number of listed buildings in the vicinity of the development site, including Upper Cote Farm. However, the submitted evidence indicates that, due to the distance from the site, topography and vegetation, development would not harm the setting of these designated heritage assets. The policy provides suitable mitigation measures to ensure that heritage is protected.

197. Infrastructure and transport impacts have been modelled, account has been taken of traffic impacts arising from growth in Calderdale, and there are no identified fundamental constraints to development of the site. Overall, in the context of identified housing needs and limited harm to the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
198. H94, west of Henry Frederick Avenue, Netherton – The site is identified in the Council's Green Belt Review and site assessment work as performing a moderately important Green Belt role and where development may potentially have a detrimental impact on Green Belt function. However, the site is well contained by built development and field boundaries. Development would not extend any further west than existing housing on Church Lane, and would be seen in this context. Although the development would narrow the gap between Netherton and South Crosland, a clear physical gap would remain, and strong new defensible Green Belt boundaries could be provided by existing trees and field boundaries.
199. The Castle Hill Setting Study identifies the wider area around Netherton as a 'dominant area' where there may be potential to harm the setting of the SM. However, views of the site from the hill form part of a wide vista of developed and undeveloped areas, and development would be seen as part of the built-up area of Netherton. Historic England has indicated that there are no significant heritage issues that would prevent allocation of the site, and taking account of the vista and intervening distance to Castle Hill I concur with this position. The policy requirement to undertake a HIA as part of a planning application would provide an opportunity for any impacts on heritage assets to be adequately mitigated.
200. No other fundamental constraints to development have been identified, and the policy provides necessary mitigation measures. In the context of identified housing needs and limited harm to the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
201. H102 and H660, land west and east of Netherton Moor Road, Netherton - These adjacent sites are identified in the Council's Green Belt review as performing a less important Green Belt role where settlement extension could have limited impact on Green Belt function. The sites are open sloping fields, but are well contained by residential development to the north/west, Netherton Road, and field boundaries. Development would reduce the gap between Netherton and Honley, but a reasonable divide incorporating woodland would remain. Additional landscaping on the south/south-east side and in the vicinity of Number 35 Lavender Court could strengthen the existing field boundaries, and also help to mitigate the impact of development on the Honley Conservation Area to the south. Accordingly, in order to be effective the policies should be amended to require a landscaping buffer on the south/south-eastern edge (**SD2-MM67, SD2-MM72**).
202. References to heritage constraints and related design and layout mitigation measures should be inserted, to provide sufficient protection for the historic environment (**SD2-MM67, SD2-MM72, SD2-MM65, SD2-MM70**). The Council's HIA indicates that, due to distance and adjoining urban areas, development is unlikely to harm the setting of Castle Hill, albeit there may be

some loss of views of Castle Hill from Nethererton Moor Road. The policy requirement to undertake further HIA at application stage would allow impacts on Castle Hill and other heritage assets to be fully assessed and addressed.

203. Additional mitigation may be required on the local highways network, and in order to be effective the policies should be amended to refer to this (**SD2-MM67, SD2-MM72**). Constraints relating to ecology and ancient woodland should be inserted, in order to provide appropriate protection for the natural environment (**SD2-MM70, SD2-MM65, SD2-MM66, SD2-MM71**).
204. There are no identified fundamental constraints to development, and subject to the aforementioned modifications the policies provide an appropriate range of mitigation measures. Overall, in the context of identified housing needs and limited harm to the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the sites from the Green Belt.
205. H3350, south-east of Knowle Road, Kirkheaton – The site is an open sloping field, predominantly located within the Green Belt. It adjoins built development, and is contained by a landscaped edge to the south-east. This edge limits the relationship of the site to the wider Green Belt, and would form a strong new defensible Green Belt boundary. The current Green Belt boundary across the field is not marked by physical features, and the proposal would, in this regard, present an improvement. Dwellings on the upper slope would be visible from within the village and in other views. However, there is existing built form on Cockley Hill Lane and development would be viewed within this context. On this basis, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.

Dewsbury and Mirfield urban sites

206. H95, east of The Combs, Hall Lane, Thornhill – The site is located in the Thornhill Conservation Area and the listed buildings of Thornhill Hall and cottages lie to the south. The site provides an open agricultural setting to the listed buildings, and there are attractive views of the buildings in this setting as seen from the adjoining recreation land. I consider that the Council's HIA does not sufficiently recognise the contribution the site makes to the setting of the listed buildings or Conservation Area, and underplays the harm that development would cause to the significance of these assets. I concur with Historic England that the proposal would erode the rural character and harm the setting of these designated assets. Harm would be considerable, albeit less than substantial in planning terms, and development would fail to protect and enhance the historic environment. Although 18 dwellings would provide some social/economic benefit this modest amount would be insufficient to outweigh the identified harm. As such I conclude that the allocation is not justified or consistent with national policy, and should be deleted from the Plan (**SD2-MM121**).
207. H1660, east of Heckmondwike Road, Dewsbury Moor – The reference to the existing play area on the site should be strengthened to require the retention of the facility or its replacement with an equivalent or better facility. This will ensure recreation facilities are protected and the policy is consistent with the NPPF (**SD2-MM127**).

208. The site contains protected trees. In order to be effective and support their protection, the policy should refer to this constraint (**SD2-MM126**). The net site area should be amended to take account of this area, and the site capacity reduced from 62 to 53 dwellings (**SD2-MM124, SD2-MM125**).

Dewsbury and Mirfield Green Belt sites

209. H307, east of Long Lane, Earlsheaton – The site is well contained and lies between built development which limits its relationship with the open countryside. The site is small and clear defensible boundaries would be provided by the field boundaries. Therefore the integrity of the gap between Dewsbury and Wakefield would be retained and sprawl would be prevented. On this basis, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.

210. H559, east of Leeds Road, Chidswell – The site is identified in the Council's Green Belt Review and site assessment work as performing a moderately important Green Belt role and where development may potentially have a detrimental impact on Green Belt function. However, the site is contained by built form on three sides and its relationship to the wider countryside is limited. The gap between Chidswell and Wakefield would be narrowed but a physical break would remain, and a clear new defensible Green Belt boundary would be formed by field boundaries on the south-east edge. In order to further strengthen this boundary and deliver a soft attractive edge to the development, the policy should be amended to require a landscaped buffer in this vicinity (**SD2-MM111**).

211. Overall, taking account of housing needs and the limited impact on the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt. The access road through the site to MX1905 would be provided via a new roundabout on Leeds Road, and the potential impact on the SRN should be assessed. The preparation of a masterplan is also necessary, given the scale of the scheme. These key constraints should be inserted in the policy in order to provide clarity and be effective (**SD2-MM111**). The number of potential dwellings should be adjusted from 279 to 280 to reflect the latest capacity work (**SD2-MM110**). Joint work will be necessary to deliver a roundabout and spine road, and therefore completions are unlikely to take place until 2020/21. The phasing table should be adjusted accordingly, as set out in **SD1-MM160**.

212. H661a, east of High Street, Batley – The site is identified in the Council's Green Belt Review and site assessment work as performing a moderately important Green Belt role and where development may potentially have a detrimental impact on Green Belt function. However, it is well contained and its relationship to the open countryside is limited by roads and built form on three sides. The site relates well to the settlement edge, and I consider that development would not harm the overall role and function of the Green Belt in this area. As such, and taking account of identified housing needs, I conclude that exceptional circumstances have been demonstrated to justify removal of the site from the Green Belt.

213. H46, Owl Lane, Shaw Cross – Planning permission has been granted for residential development on this site and building has commenced. Land which is not necessary to keep permanently open should not be included in the Green Belt. Therefore exceptional circumstances to justify the release of the site from the Green Belt have been demonstrated.
214. H2089, south of Ravensthorpe Road/Lees Hall Road, Dewsbury (Dewsbury Riverside) – The scheme involves a major urban extension to the south side of Dewsbury, providing some 4,000 dwellings and associated facilities. Part of the site lies within the Mirfield ward boundary and close to the settlement of Thornhill. However, the site adjoins the wider urban area of Dewsbury, and is separated from Mirfield and Thornhill by open countryside. As such it is reasonable to regard the site, both physically and functionally, as an extension to Dewsbury.
215. The site consists of an extensive series of fields, predominantly located in the Green Belt. Development would extend the built form of Dewsbury towards both Thornhill and Mirfield. However, a clear physical gap would remain, with rising ground to the south/south-west, and with woodland and existing field boundaries providing clear defensible boundaries. Development would, by virtue of its extent, be visible in the landscape and alter the rural and open character of the area. However, the site has a degree of containment on its southern and western boundaries, and is well related to the edge of Dewsbury. Development on the site would be seen against this urban backdrop. Existing pockets of woodland and vegetation would help to provide screening and mitigate visual impacts. This could be augmented by sensitive scheme layout, landscaping and buffer zones, particularly in the more prominent rising south/south-west section.
216. Technical work indicates that about 2,000 dwellings could be accommodated before strategic highway intervention is necessary. This may involve the provision of a strategic road link on the south side of Dewsbury, passing through H2089, although option testing is underway to identify a preferred solution. The revised phasing rates for H2089, as set out below, indicate that 1,868 dwellings are likely to be delivered up to 2031. On this basis strategic highway intervention may not be required within the Plan period, and there is a reasonable period of time to assess options, identify funding and secure delivery.
217. The initial transport work indicates that, up to the 2000th dwelling, impacts on the local highways network would not be severe and could be mitigated through off-site junction improvements and other work. The same conclusions are reached beyond the 2000th dwelling, assuming a link road or other strategic highway intervention is in place. Access is achievable from a number of points. The evidence before me is reasonable and proportionate to the Local Plan process. Highways England has indicated that, subject to the inclusion of wording in the policy which specifies that potential impacts on the SRN are assessed and addressed and impacts on the wider highway network are mitigated, they consider the proposal is sound. I therefore conclude that this wording, and reference to the 2000th dwelling position, is necessary to ensure the policy is effective (**SD2-MM130**). The potential strategic road link should also be referenced in Policy TS5 (**SD2-MM335**).

218. The site is in a sustainable location on the edge of the urban area, and close to Ravensthorpe railway station. Enhancement of the railway station and bus, walking and cycling links are proposed as part of the scheme. The provision of a new local centre, primary school provision and early years/child care provision would help to reduce the need to travel and meet the needs of new residents. The policy should be amended to specify provision of these facilities and other key services, in order to be effective (**SD2-MM130**). The requirement to undertake a sequential and impact assessment test in association with the new local centre provides protection for existing centres in absence of an indicative floorspace/hectarage within the policy.
219. Initial masterplanning work indicates there is sufficient capacity for 4,000 dwellings and necessary supporting facilities/infrastructure, including a potential link road, based on a net density of about 41 dph. This rate is reasonable in the context of historical completions evidence that a gross density of 36 dph has been achieved, as discussed in Issue 2.
220. A range of technical work and studies have been carried out, including ecology assessment, ground investigation, and flood risk and drainage work, and masterplanning work is progressing. This represents a suitable level of information for the Local Plan process, and has not identified any fundamental constraints that are likely to be incapable of resolution. The policy provides a framework for on-going masterplanning and the development of planning applications, and refers to further assessments and a range of mitigation measures.
221. Although the policy does not specify an Ecology Assessment, initial work has already been undertaken, and the policy refers to ecological constraints and related mitigation measures. As such I am satisfied that the policy, in conjunction with generic Policy PLP 30, provides a suitable framework for taking account of ecology issues and facilitating appropriate mitigation.
222. In conclusion, the site is sustainably located on the edge of Dewsbury and would deliver a significant number of new homes and jobs to meet identified needs. The scheme would, by virtue of its scale, support regeneration of the local area and transformational change in Dewsbury and help facilitate delivery of the Plan's vision and spatial strategy. Details of the initial viability work have not been released due to commercial sensitivities. However, there are positive signs as the first phase already has outline permission with active developer involvement. The scheme will result in the loss of an extensive area of countryside and alter the character of the locality. However, taking account of the above factors, identified housing needs, and the absence of suitable alternative options, on balance I conclude that there are exceptional circumstances to justify the release of the site from the Green Belt, and allocate the site for the proposed use. Masterplanning is a critical part of delivery and should be referenced in the policy, along with the need for a landscape buffer in the sensitive elevated southern section of the site (**SD2-MM130**). Subject to the above modifications through **SD2-MM130** I consider the proposal is soundly based.
223. Taking account of the scale and complexity of the scheme and the mix of landownerships, I consider that completions in a number of zones are likely to come forward later than anticipated by the Council. The phasing table in Part

- 1 of the Plan should be adjusted as set out in **SD1-MM160**, to show the delivery of a small number of dwellings within the five year supply period, linked to initial phases which have outline planning permission, and a total of 1,869 dwellings within the Plan period. A further 2,131 units would be delivered after 2031. In order to be effective the policy should clarify these figures through modification **SD2-MM129**. Although these rates will be challenging, the site is well connected and based on the evidence before me I am satisfied that there is a reasonable prospect of delivery. Detailed phasing and delivery issues would be subject to on-going monitoring by the Council.
224. H40, Granny Lane, Mirfield – The site lies between existing built development and within an area of sporadic development on Granny Lane. The southern boundary adjoins the wider countryside. However, a new defensible boundary would be provided by existing hedgerows, thereby preventing sprawl, and the loss of this site would not significantly harm the role and function of the Green Belt in this area. A new north-eastern boundary would be facilitated by an existing hedgerow and access road.
225. The net site area should be reduced to exclude a small section within Flood Zone 3 and an area identified as high significance to the setting of the adjoining listed building of Sheep Ings Farmhouse (**SD2-MM131**). Accordingly, the site capacity should be reduced from 74 to 70 dwellings (**SD2-MM132**). This is necessary to ensure flood risks and heritage matters are adequately taken into account, and align with national policy. For the same reason, the policy should be amended to include mitigation measures relating to heritage (**SD2-MM133**).
226. Overall, taking account of housing needs and the limited impact on the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
227. H205, east of Slipper Lane, Mirfield – The site is well contained by planting and field boundaries and is separated from the wider Green Belt by Slipper Lane. Removal of the site from the Green Belt would not harm the function and role of the Green Belt in this area, and Slipper Lane would provide a strong new defensible Green Belt boundary. As such, and taking account of identified housing needs, I conclude that exceptional circumstances have been demonstrated to justify removal of the site from the Green Belt.
228. H333, east of Northorpe Lane, Mirfield – The site is contained by residential development to the south and west, and a former railway line to the east. Development would be located in part of the gap between Mirfield and Ravensthorpe. However, it would not extend any further towards Ravensthorpe than existing built form, and encroachment would be prevented by the railway line forming a new defensible Green Belt boundary. Overall, taking account of housing needs and the limited impact on the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
229. MX1905, east of 932-1110 Leeds Road, Shaw Cross (Chidswell) - The site is allocated for a mix of housing and employment uses. The site lies in the M62 corridor and development of a major employment site in this strategic location

would help to meet the identified needs of businesses and generate new jobs. Chidswell is identified as an Employment Growth Area in the LCR SEP.

230. The site covers an extensive area of fields to the north-east of Dewsbury, and forms part of a strategic Green Belt gap between Dewsbury, Wakefield and Tingley. Although development would reduce this gap, a clear physical divide would exist. The eastern and southern site boundaries are marked by existing field boundaries and woodland, and are capable of providing defensible Green Belt boundaries, thereby preventing encroachment. The southern boundary appears on historic maps and therefore has a degree of permanence, and is distinguished by a stream and other existing features.
231. Development would, by virtue of its extent, be visible in the landscape and alter the rural and open character of the area. However, the site has a degree of containment on its southern and eastern boundaries, as described above, and adjoins residential development. Development on the site would be seen from open land to the north and east against this urban backdrop. Existing pockets of woodland and vegetation would help to provide screening and mitigate visual impacts, and could be augmented by sensitive scheme layout and landscaping.
232. The Interim Transport Assessment (ITA) for the proposal concludes that access can be achieved via a number of points, and some off-site mitigation measures are likely to be required to support future traffic levels. The ITA takes account of a significant range of data, and is based on extensive survey work and cooperation with neighbouring authorities. The method has been disputed but I am satisfied that the ITA is not fundamentally flawed to the degree that access cannot be achieved or future mitigation could not be provided. A full Transport Assessment would be required as part of the planning application process, and detailed mitigation matters would be addressed at that stage. In order to be effective, the policy should be amended to refer to potential mitigation relating to the wider highway network (**SD2-MM317**), the requirement to assess potential impacts on the SRN as identified above (**SD2-MM317**), and the need to achieve a key access point via site H559 (**SD2-MM318**).
233. A number of other modifications are necessary in order to provide further clarity and ensure effective delivery. This includes reference to the need to provide a buffer between built development and ancient woodland at Dum Wood/Dogloitch Wood, monitor the delivery of secondary school places, provide a new Local Centre, and prepare a masterplan (**SD2-MM318**).
234. The evidence before me indicates that there are no significant constraints that would prevent the site being delivered. This includes the Council's Air Quality Assessment (2017) which concludes that the overall effect of the Plan on local air quality will not be significant. The policy seeks further technical site work through the planning application process relating to issues such as ecology, drainage, flood risk and contamination and refers to mitigation measures. The site is sustainably located on the edge of Dewsbury and would deliver a significant number of new homes and jobs to meet identified needs and help facilitate the Plan's vision and spatial strategy. Overall, taking account the above factors and in the absence of suitable alternatives, I conclude that there are exceptional circumstances to justify the release of the site from the Green

Belt, and that subject to the aforementioned modifications the proposed allocation is soundly based. Due to the scale of the proposal I consider that on-site completions are unlikely to take place until 2021/22, and the phasing table should be amended as set out in **SD1-MM160**.

235. MX3394, Lees House Farm, Leeds Road, Dewsbury – The site is contained by built form and field boundaries, and development would not overly encroach into the open countryside. Taking account of identified housing and employment needs, I conclude that there are exceptional circumstances to justify its release from the Green Belt. In order to ensure effective connectivity and delivery, the policy should be amended to specify provision of access to adjoining site MX1905 (**SD2-MM315**).

Batley and Spen urban sites

236. H323, Lady Anne Road, Soothill – In order to be effective, the policy should be amended to refer to on-site protected trees and a noise source near the site (**SD2-MM140**).

237. H2647, Spafield Mill, Upper Road, Batley – In order to be effective, the policy should be amended to refer to the constraint of potentially contaminated land (**SD2-MM141**).

238. H760, Halifax Road, Staincliffe – The site frontage consists of a small grassed area which provides a break in the urban frontage and has some informal use. In order to be effective and consistent with the Plan's spatial strategy the policy should be amended to refer to the potential retention of this area (**SD2-MM142**).

239. H527, Staincliffe Hall Road, Staincliffe – Traffic safety issues have been identified on the surrounding network which would need to be assessed as part of a planning application. The policy should refer to this position, in order to be effective (**SD2-MM146**).

240. H138, south of Mill Street, Birstall – The policy seeks replacement provision of the on-site football pitch and associated facilities, and options are currently being investigated in the vicinity. In order to be consistent with paragraph 74 in the NPPF and ensure suitable mitigation, the policy wording should be amended to refer to the need for equivalent or better facilities in terms of quantity and quality (**SD2-MM147**).

241. The site is in a sustainable location on the edge of Birstall, and there are no identified fundamental constraints to development. Detailed Transport Assessment, Ecological Survey and other technical work would be required at application stage and direct any necessary mitigation measures. Taking account of the need to provide replacement facilities I consider that completions are unlikely to take place until 2021/22 and the phasing table should be amended as set out in **SD1-MM160**.

242. H172, Bradford Road, Birkenshaw – Part of the site contains an area of protected trees. In order to provide appropriate protection for these assets, the net site area should be amended to exclude this section (**SD2-MM148**) and the indicative capacity reduced from 55 to 30 dwellings (**SD2-MM149**).

243. H761, Raikes Lane, Birstall – The site adjoins and is close to a number of listed buildings, and is partly within the Birstall Conservation Area. Two sections of the site are identified in the Council's HIA as areas of moderate significance to the setting of heritage assets. The central section provides an open agricultural setting next to Birstall Old Hall, whilst the northern section of open space provides attractive views within the Conservation Area. The developable area has not been reduced to take account of these constraints, and as such I consider that the proposal would fail to facilitate sufficient areas of open land and cause considerable, albeit less than substantial, harm to the historic environment. Although additional housing would provide benefits it would not outweigh identified harm. Accordingly, in order to be effective and consistent with national policy the net site area and indicative site capacity should be reduced to allow the retention of open areas (**SD2-MM150, SD2-MM152**), and related constraints and mitigation referenced in the policy (**SD2-MM153, SD2-MM151**).
244. Subject to the above modifications I conclude that the policy is soundly based and provides scope to deal with detailed matters at application stage. Given the scale of the scheme and progress to date I consider that completions are unlikely to take place until 2020/21 and the phasing table should be amended accordingly through **SD1-MM160**.
245. H509, Brook House Mill, Balme Road, Cleckheaton – The Council has identified an error in the application of the standard density of 35 dph, which requires a reduction in the indicative site capacity from 25 to 21 dwellings (**SD2-MM165**). Drainage and other detailed matters could be appropriately addressed at planning application stage.
246. H810, Moorfield Avenue, Scholes – The landowner has confirmed that the site is no longer available for development within the Plan period. The allocation is therefore not developable and should be deleted (**SD2-MM167**).
247. H783, Dale Lane, Heckmondwike – The Council's assessment work indicates that the site has high value as an existing amenity greenspace, in terms of its qualitative function. This includes trees along the frontage, which provide an attractive vista when travelling along Dale Lane. In order to protect this facility and align with the Plan's spatial strategy the site should be deleted as a housing allocation (**SD2-MM171**) and identified as an extended part of adjoining UGS UGS1056.
248. H1772, Boundary Street, Heckmondwike – The Council has identified an error in the net site area which requires adjustment through modification **SD2-MM172**. The site capacity should also be amended, although as part of the site lies within a HSE Middle Zone site the capacity should be limited to 30 dwellings, in line with the Health and Safety Executive's (HSE) Land Use Planning Methodology (**SD2-MM173, SD2-MM174**). The policy requirement that no development should take place in Flood Zone 3 is superfluous and should be removed for clarity (**SD2-MM175**).
249. MX1907, Moorlands Business Centre and MX3349, Westgate, Cleckheaton – The sites contain existing employment premises that would be retained in development of the site. In order to provide clarity and ensure effectiveness,

the policies should be amended to refer to this position (**SD2-MM320, SD2-MM322**).

Batley and Spen Green Belt sites

250. E1831, Whitechapel Road, Cleckheaton – The site lies in the M62 corridor and development of a major employment site in this strategic location would help to meet the identified needs of manufacturing businesses and generate new jobs.
251. The site forms part of a strategic Green Belt gap between Scholes and Cleckheaton. However, although development would reduce this gap, a physical divide would remain to the west of the site. A landscaped buffer in the southern section of the site could help to provide mitigation and soften the edge of the development in this vicinity. The gap between settlements in Kirklees and Bradford would also decrease, but the remaining gap would be significant. Development would, by virtue of its extent, be visible and alter the open agricultural character of the site. However, the site is bounded by existing roads on three sides, including the M62 motorway to the east and the A58 to the north, which provide it with containment and limit its relationship with the open countryside. The sloping topography of the site curtails views of the open countryside beyond the site, as seen from the M62 and A58.
252. Highways England has confirmed that, notwithstanding postponement of the RIS scheme at junction 26 on the M62, the proposal is not considered to have potential to significantly impact on the SRN, based on a predominant B2/B8 mix of uses. Policy PLP 4 can be used to seek contributions towards mitigation measures linked to cumulative impacts, and relating to the local highway network. Air quality in the local area may be affected by the development, but this could be dealt with through appropriate mitigation measures at the planning application stage.
253. Overall, I consider that the proposal could be accommodated without harming the overall role and function of the Green Belt in this area. There are no identified fundamental constraints that would prevent development, and the policy refers to mitigation measures and detailed assessment as part of the planning application stage. The site would help to meet identified employment requirements. I therefore conclude that exceptional circumstances exist to justify removal of the site from the Green Belt.
254. The net developable area of the site and indicative capacity should be reduced in order to allow for provision of the landscaped buffer, and to take account of a gas pipeline across the site (**SD2-MM13, SD2-MM14**). The location of the landscaped buffer also needs to be clarified for reasons of effectiveness (**SD2-MM15**). The gross site area should be slightly adjusted to correct an error (**SD2-MM12**). The scale of the allocation necessitates the preparation of a Masterplan, and in order to be effective this should be referenced in the policy (**SD2-MM15**). The masterplanning process will provide an opportunity to finalise the precise position of the landscape buffer and developable area, and any adjustments which are necessary to the site boundary in the south-eastern corner adjoining land not within the Green Belt. Subject to the aforementioned modifications the proposal is soundly based.

255. E1985a, former North Bierley Waste Water Treatment Works, Cleckheaton – The site is brownfield land and has now gained outline planning permission for redevelopment for employment uses. The site is located in the M62 corridor, and development in this strategic location would help to meet the needs of businesses and generate new jobs. The site lies in part of the Green Belt gap between Hunsworth and Woodlands. However, the site is previously developed land which contains existing buildings and structures, and a clear physical gap would remain. The site is also contained by woodland and slopes to the east and by the M62 and the M606 to the west and south, and therefore has a limited relationship with the wider countryside. Taking account of these factors I conclude that exceptional circumstances exist to justify removal of the site from the Green Belt. In order to be effective, the policy should be modified to refer to the site capacity in the recent planning permission (**SD2-MM16**) and to require the preparation of a Masterplan (**SD2-MM17**).
256. E1832c, Leeds Road, Mirfield (Cooper Bridge) – The site comprises two distinctive areas. The northern part of the site is a series of open fields located in the Green Belt and adjoining the registered historic parkland of Kirklees Park. The section to the south of Leeds Road is brownfield land.
257. Kirklees Park contains the Grade I listed building of Kirklees Hall, and a number of other Grade I, Grade II* and Grade II listed buildings/structures and SMs, and other non-designated assets. The Park also contains a deer park and pleasure grounds, and has associations with the death of Robin Hood. Despite its location close to the M62 motorway and urban areas the setting of the Park has a rural character, with views of fields and woodland, particularly to the east. There are other designated and non-designated assets in the vicinity of the allocation site, including the Grade II listed Mock Hall and barn on Leeds Road.
258. The northern section of the proposal site adjoins the Park on its eastern and southern edge. As demonstrated in the Heritage Overview Report (2018), and as seen on my site visit, the site is visible from a number of points from within the Park and in views towards the Park from the east and south. The accuracy of the submitted visualisations and photomontages has been questioned but I am satisfied that they are adequate to inform the Local Plan process. Development of the site would introduce large industrial buildings and urban form within the rural setting of the Park. The loss of an extensive area of countryside adjoining the Park would harm the appreciation of the Park in its wider setting, and introduce urban form in views from the east, south and north. This includes from a number of PROWs including the Luddite Way, the Kirklees Way, and the Spen Heritage Trail. Overall I conclude the development would cause considerable harm, albeit less than substantial in planning terms, to the rural setting of the south part of the Park and the significance of the asset. Although landscaping and buffer areas could be provided, development would still be in close proximity to the asset and the visualisations, including over time, show that the scheme would still be clearly evident in the landscape. Similarly I consider that other mitigation measures relating to scheme design and layout may lessen impact but would not be sufficient to prevent considerable harm.
259. The Grade II listed Mock Hall and barn are located close to the southern boundary of the site. Mock Hall was previously a farmhouse, and the open

agricultural fields to the rear form part of its historic setting. There are attractive views of the buildings in their wider countryside setting as seen from Leeds Road. The proposed development of the northern part of the site would erode this rural setting and sever the listed buildings from the wider countryside. As such the proposal would cause considerable, albeit less than substantial, harm to the designated assets. Again, impacts may be lessened through landscaping, layout and design, but would not be sufficient to prevent considerable harm.

260. If the Grade II listed Roman Watchtower is restored and surrounding trees removed, there may be intrusive views of the development from the walkway. As such there could be potential for future harm to the significance of this asset, although the exact extent is unknown.
261. The open fields in the northern section of the site form part of a wider area of pleasant rolling countryside between Mirfield and Hartshead. Although the site is contained by woodland and existing field boundaries, there are clear attractive views of the site in its wider countryside setting from the south, east and north, and it forms an important belt of open land within an intensely developed part of Kirklees. As such I consider the scheme would encroach on the countryside and cause significant harm to Green Belt purposes. The submitted photomontages show that although landscaping and buffers would provide some mitigation, the scheme would still be clearly evident in the rural landscape, and detract from the open agricultural quality of the area.
262. Highway access would be required across an adjoining field in the Green Belt within Calderdale. There is industrial development on the west side of the A644, but the field to the east is open and provides an attractive rural setting for Kirklees Park as seen from the A644. Although building form is not proposed in this field, I consider that highway works would detract from its rural character, and cause considerable, albeit less than substantial, harm to the setting of the designated Park. Views across the field to the wider Green Belt are limited by adjoining woodland, but the field is an integral part of the structural Green Belt in and surrounding Kirklees Park. As such I consider that an access road in this highly visible location would harm its integrity, cause encroachment, and conflict with Green Belt purposes.
263. The site lies in the M62 corridor, and development would bring a range of economic and other public benefits. This includes meeting the needs of manufacturing businesses, boosting the economy, delivering new jobs and bringing related social benefits, and potentially facilitating investment in and management of heritage assets within Kirklees Estate. Cooper Bridge is identified as an 'Employment Growth Area' in the LCR SEP, and the scheme would help to deliver LCR SEP, KES and Local Plan objectives. In the context of identified harm I consider that additional landscaping would be a mitigation measure rather than benefit per se, and I have attached limited weight to this. The Council has indicated that the development would bring benefits in the form of investment in major transport infrastructure in this part of Kirklees, and linked air quality improvements. However, congestion in the area is a long-standing issue, and there is no evidence before me that the business case for major road improvements is wholly dependent on the Cooper Bridge site, or that removal of the northern part of the allocation from the Plan would

mean highway improvements cannot be delivered. As such this benefit is unclear and I have attached limited weight to it.

264. Kirklees Park, with its range of historic buildings and features, is an important heritage asset. Overall, having regard to the considerable harm to heritage assets outlined above, I consider that public benefits arising from the development would be insufficient to outweigh this harm. The scheme would also cause significant harm to the character and appearance of the countryside and Green Belt function. Therefore, notwithstanding identified benefits I conclude that exceptional circumstances have not been demonstrated to justify the release of the northern part of the allocation site from the Green Belt. The proposed development of the northern part of the site is therefore not justified or consistent with national policy.
265. There are no identified fundamental constraints that would prevent the southern section of the site being developed, and detailed matters would be assessed and addressed at application stage. The southern section is previously developed land, and development would provide economic benefits and jobs in a key strategic location. I therefore conclude that the proposed allocation should be reduced to exclude the northern part of the site, and be based on land to the south of Leeds Road. The reduced gross site area and net developable area should be reflected in the policy (**SD2-MM22, SD2-MM23**) and the indicative floorspace capacity lowered from about 162,000 sqm to some 15,000 sqm (**SD2-MM25**). Modifications are also necessary to alter the name of the allocation and omit constraints, report requirements and site-specific considerations which relate to the northern section (**SD2-MM21, SD2-MM24, SD2-MM26, SD2-MM27**). Consequential amendments are necessary elsewhere in the Plan to delete references to Cooper Bridge as a major employment site (**SD1-MM1, SD1-MM4, SD1-MM24**).
266. The scale of the proposal necessitates the preparation of a Masterplan, and modification **SD2-MM27** is necessary to refer to this.
267. H662, rear of 52 Upper Batley Low Lane, Batley – The site is screened by existing vegetation and has a different character to the adjoining open agricultural fields. The modest site size and contained character would limit encroachment. Accordingly, taking account of identified needs for housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt. There is no evidence before me that the site is subject to a restricted covenant preventing development. The reference to a drainage masterplan in the policy is not substantiated and should be deleted (**SD2-MM137**).
268. H193, Oxford Road, Gomersal – The site is partly screened by trees along the road frontage, is well related to the urban edge, and is different in character to the adjoining open fields to the north. As such its relationship with the wider countryside is limited. Development would be in a key gap between Gomersal and Birkenshaw but a physical gap would remain, including the M62 motorway. The northern edge of the site follows a clear field boundary and would provide a new defensible Green Belt boundary. Accordingly, and taking account of the identified need for housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.

269. H531, Soureby Cross Way, East Bierley – The site is located in part of the strategic gap between East Bierley and Birkenshaw. However, it would follow the existing south-eastern edge of the village and not encroach onto Birkenshaw. Accordingly, and taking account of the identified need for housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
270. H218, Bluehills Farm, Birkenshaw – The site has a limited relationship with the open countryside due to nearby farm buildings and the adjoining M62 motorway. Recent development to the south of the road has further urbanised the character of the locality. The northern part of the site is elevated but nearby built development exists at this level, and sensitive scheme layout and landscaping could provide mitigation. Taking account of these factors, and the identified need for new housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt. The site contains a PROW and in order to be effective the policy should include reference to this constraint (**SD2-MM155**).
271. H49a, Oddfellows Street, Scholes – The site is well related to the settlement edge, and is contained by dwellings on several sides. As such its relationship with the wider countryside is limited. There is existing built form on the opposite side of Oddfellows Street, and the eastern site edge is capable of forming a defensible Green Belt boundary. Taking account of these factors, and the identified need for new housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt. There are a number of PROWs in the vicinity and in order to be effective the policy should include reference to this constraint (**SD2-MM157**).
272. H69, Merchant Fields, Cleckheaton – The site is contained by built development on three sides, and is well related to the settlement. Its rural character is reduced by containment and overlooking. The site has clear field boundaries along its eastern edge which would be capable of forming a new defensible Green Belt boundary and preventing sprawl. This could be augmented through a landscape buffer which would also provide an appropriate visual, ecological and amenity setting for the BAP Priority Habitat of Nann Hall Beck. In order to be effective the policy should be modified to refer to this buffer (**SD2-MM161**) and the PROW (**SD2-MM160**), and clarify the area to be removed for BAP Priority Habitat (**SD2-MM159**).
273. Transport modelling on the Local Plan has looked at cumulative effects and no fundamental constraints are identified. A detailed Transport Assessment for the site would be required at application stage. As specified in modification **SD2-MM161** above, this should include assessment of the scheme's impact on the SRN and the need for potential mitigation measures. Overall, taking account of the above factors and the identified need for new housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
274. H508, Whitechapel Road, Cleckheaton – The site's relationship with the wider countryside is restricted due to the presence of the nearby M62 motorway and local roads to the north and south. The motorway and existing buildings to the east would create strong new defensible Green Belt boundaries.

275. The Council's HIA identifies areas of high and moderate significance within the site which provide an important open setting to the adjoining listed Whitechapel Church. There are clear views of the listed building from these areas, with attractive vistas across the fields. I consider that built development in these areas would erode the rural character and open setting, causing considerable, albeit less than substantial, harm to the significance of the heritage asset. Mitigation through sensitive design and layout would not be sufficient to retain openness and ameliorate considerable harm. Although additional dwellings in these areas could provide social/economic benefits the modest amount would not outweigh the identified harm to the heritage asset. In order to protect the historic environment and accord with national policy, the policy should specify the retention of the Council's HIA areas of high and moderate significance as open, with only the provision of an access road across the area of high significance. These constraints and related mitigation measures should be included in the policy through **SD2-MM164**. Based on the retention of these areas as open, and having regard to average densities and other site constraints, the net site area should be lowered to 3.12 ha and the indicative site capacity reduced from 170 to 122 dwellings (**SD2-MM162, SD2-MM163**).
276. Due to the proximity of the site to the M62 it will be important to ensure noise and air quality issues are assessed and addressed through the planning application process. The policy refers to these constraints and related requirements, and there is scope for mitigation.
277. Taking account of these factors, including limited harm to the Green Belt and the identified need for new housing, and subject to the above modifications, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
278. H2066, Warren Cottage, Halifax Road, Scholes – The site contains residential development, and has a distinctly different character to the adjoining open agricultural fields. The outer edge is well planted and would provide a strong new defensible Green Belt boundary and prevent sprawl. Accordingly, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
279. H198, south of Second Avenue, Hightown – The site was previously occupied by a school which has since been demolished. The southern section of the site is currently in the Green Belt. On my site visit I was unable to discern a clear boundary between the south and north sections of the allocation. As such the two parts of the site are well related, whilst links between the southern section and the wider countryside are limited by a field boundary on the south-east edge. The proposal would provide an opportunity to strengthen the Green Belt boundary in this locality.
280. The site lies close to the listed building of Thornbush Farm, which has connections with the Bronte family. However, the site does not immediately adjoin the farmhouse, and there is an intervening open field between the allocation site and the asset. As such, I consider that the proposal would have little effect on the significance of the designated asset. Nonetheless, given its proximity potential mitigation measures relating to sensitive scheme design and layout and protection of an adjacent trackway should be included in the

policy, for reasons of effectiveness. The retention or replacement of the existing on-site MUGA should also be referenced, in order to ensure effective protection for community facilities and accord with paragraph 74 of the NPPF. These changes would be achieved through modification **SD2-MM176**.

281. Taking account of the above factors, and identified housing needs, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt. Based on progress to date I consider that completions are unlikely to take place until 2020/21 and the phasing table should be amended accordingly through modification **SD1-MM160**.
282. H242, Peep Green Road, Hartshead – The site is well contained, well related to the settlement and development would be small-scale. The northern boundary would provide a strong new defensible Green Belt boundary, thereby preventing sprawl. As such, and taking account of identified housing needs, I conclude that exceptional circumstances justify the release of the site from the Green Belt.
283. H278, Lands Beck Way, Liversedge – The site is on the edge of Liversedge and adjoins built-form on several sides. It is contained by existing hedgerows and planting, which limit the links to the wider countryside and would help to screen development on the slope from wider views. As such development would cause limited harm to the Green Belt, and taking account of identified housing needs I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt.
284. H442, Richmond Park Avenue and Sunnyside Avenue, Roberttown - The settlements of Roberttown and Liversedge are already merged, in the vicinity of Huddersfield Road/Leeds Road. However, the pinch point at the Lumb Lane/Norristhorpe Lane junction is narrow, with intervening fields providing a clear separation either side, and the two settlements retain a separate and distinct identity. Roberttown, although significantly expanded during the 20th century, is smaller with development focused around a historic elevated village core. Whilst some ribbon development exists along Roberttown Lane, this is partly dispersed and there are clear visual links to the wider countryside. As such I consider that coalescence has not occurred here.
285. The allocation site is located in part of the open gap between Roberttown and Liversedge, along one of the main roads between the settlements. The open sloping site can be clearly seen when travelling along Roberttown Lane, and provides a clear sense of physical and visual divide between the settlements. As such, notwithstanding the 'amber' rating in the Council's Green Belt edge review, I consider the site performs an important strategic Green Belt function, helping to prevent Roberttown and Liversedge merging into one another.
286. The site consists of attractive open agricultural fields, which despite the intervening presence of Roberttown Lane, are visually connected to the wider countryside by virtue of the topography and more dispersed pattern of development on the north side of the road. There are clear views from the site of the wider countryside. As such, and notwithstanding the presence of pylons and overlooking dwellings in the south/east sections, I consider that the site plays a role in preventing encroachment into the open countryside.

287. The proposed development would substantially erode a strategic and visually prominent gap between Roberttown and Liversedge, and detract from the setting and separate identity of the settlements. There would also be some harm to the character of the countryside arising from encroachment. Although additional housing would be provided this would not outweigh harm to the Green Belt. Accordingly, I conclude that exceptional circumstances to release the site from the Green Belt have not been demonstrated. The southern and eastern existing Green Belt edges are clearly marked by field and property boundaries and provide a reasonable defensible boundary. Taking account of these sensitivities, and all of the submitted evidence and representations before me, I conclude that the allocation should be deleted from the Plan for reasons of soundness, and the land retained as Green Belt (**SD2-MM177**).
288. Part of the site is identified in the Council's updated HIA as high significance to the setting of the adjacent listed building of Old Hall Farmhouse. The evidence shows the site had historical links to the building, and there are clear views of the designated asset across the open fields. Accordingly, I consider that development of the site for the density proposed in the policy would erode this open setting and cause considerable, albeit less than substantial, harm to the heritage asset. In heritage terms there may be some scope to reduce the site capacity in order to limit harm to the designated assets. However, this does not alter my overall conclusion regarding the site's deletion, as set out above.
289. H489, Church Lane, Gomersal – The site is identified in the Council's Green Belt Review as part of a strategic area separating Gomersal and Birstall. However, the site is small and well related to the urban edge, and is bounded by trees and vegetation which separates it from the wider countryside. As such development would not compromise the strategic role of the Green Belt in this vicinity. Accordingly, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify its release from the Green Belt. No fundamental constraints relating to matters such as highways, access, biodiversity or subsidence have been identified, and the policy allows for mitigation measures.
290. H567, Stubble Farm, Leeds Road, Heckmondwike – The site is identified in the Council's Green Belt Review and site assessment work as having a less important Green Belt role and where development would have limited impact on Green Belt function. I concur with this, having regard to the site's containment by surrounding development and therefore limited links with the wider countryside. Accordingly, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify its release from the Green Belt.
291. H591, Cliffe Mount, Ferrand Lane, Gomersal – The site is well contained, with built development to the east and south, and Ferrand Lane to the north. Although there are views to and from the adjoining countryside, the site's containment and strong hedgerows on the northern edge limit this relationship. The northern and western site edges are marked by planting and would provide new defensible Green Belt boundaries.
292. Ferrand Lane is a pleasant rural road which contributes to the appearance of the nearby Gomersal Conservation Area and the setting of the nearby listed Methodist church, and forms part of the Spennings Heritage Trail. In order to

protect these special qualities and the significance of designated heritage assets the site policy should be modified to specify sensitive design and landscaping which maintains the rural character of Ferrand Lane (**SD2-MM181**). Hedgerows, field boundaries and other trees on the site would also be afforded protection under generic Policies PLP 30, 32 and 33.

293. At the hearing the Council confirmed that suitable access and visibility splays can be achieved from Cliffe Lane, through control of adjacent land. Changes to clarify this position should be included in the policy, for reasons of effectiveness (**SD2-MM179, SD2-MM181**). Although there will be some increase in traffic on nearby roads, the evidence indicates there is network capacity subject to suitable mitigation measures being identified at planning application stage. No nearby noise source was identified, and therefore the reference to this constraint should be deleted from the policy (**SD2-MM179**). The Council has confirmed that the site is located within a Coal Mining Risk Area, and accordingly, in order to be effective the policy should refer to this constraint (**SD2-MM180**).
294. On the basis of limited harm to the Green Belt and taking account of identified housing needs, I conclude that there are exceptional circumstances to justify the removal of the site from the Green Belt. The policy provides necessary mitigation, and subject to the above modifications is soundly based.
295. H2537, Halifax Road, Hightown, Liversedge – The site is a well contained small parcel of land on the edge of the settlement which is partly previously developed. As such, and due to planting on the south and west boundaries, its relationship with the wider countryside is limited. Although the site is sloping, any development on the upper slopes would be viewed in the context of a back-drop of surrounding development along the ridgeline. As such, the site could be removed from the Green Belt with minimal impact on its openness, or impact on the gap between Liversedge and Hightown and Roberttown. In conclusion, taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
296. A small adjoining area to the south is well contained, screened by trees from the wider countryside, and its removal would facilitate access to safeguarded land SL2181. The need to avoid prejudicing development on safeguarded sites and facilitating access to adjoining undeveloped land is highlighted in Policies PLP 6 and 7. There are no identified fundamental constraints, including access, that would prevent the overall scale of the development. Taking these factors into account, and having regard to identified housing needs, I conclude that exceptional circumstances exist to release this small additional area from the Green Belt for residential development. The site area for H2537 should be increased accordingly (**SD2-MM182, SD2-MM183**) and capacity raised from 23 to 42 dwellings (**SD2-MM185**). In order to ensure effective delivery the policy should specify provision of a linkage to SL2181 (**SD2-MM186**) and maintenance of a PROW crossing the site (**SD2-MM184**). Linked modifications relating to the adjoining safeguarded site are covered under Issue 8 below.
297. H2667, former Gomersal Primary School – The rear part of this former school site is located within the Green Belt, and in the strategic gap between

Gomersal and Birstall. However, the site is well related to the settlement form, has a different character to the open agricultural fields to the rear, and is separated by clear boundaries. As such I consider the area could be released from the Green Belt with minimal impact on openness, and new defensible boundaries would prevent encroachment. Accordingly, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify its release from the Green Belt.

298. The original school buildings on the site are located within the Gomersal Conservation Area. Although not listed they are an attractive historic feature, and a key part of the streetscape along Oxford Road. As such, they make a significant contribution to the character and appearance of the Gomersal Conservation Area. A modification to the policy is necessary to specify the retention of the original buildings, walls and railings in order to protect the historic fabric and quality of the local environment. Mitigation measures relating to protection of the boundary wall and footpath to the adjoining listed church are also necessary for the same reasons. The amended wording refers to some flexibility, which is consistent with Policy PLP 35 and the NPPF. The site contains a previous playing pitch, and therefore mitigation measures consistent with paragraph 74 in the NPPF should be referenced for reasons of soundness. These changes are captured under modification **SD2-MM189**.

Kirklees Rural, Colne Valley urban sites

299. H738, west of Heathwood Drive, Golcar – The site adjoins a terrace of weavers cottages which are listed. The cottages are in an elevated position and prominent in the landscape as seen from the south/south-west. The cottages were occupied by weavers/farmers, and the site forms part of the open agricultural setting to the buildings. There are clear views across the site towards the cottages from Heathwood Drive, and longer distance views of the cottages and their setting from the south-west. I concur with Historic England that the undeveloped allocation site makes an important contribution to the setting of the cottages, and that the loss of the open site would erode the rural setting and cause considerable, albeit less than substantial, harm to the significance of the assets. Mitigation measures in the Council's HIA relating to height restrictions would do little to ameliorate harm to the open setting. I conclude that additional housing and other benefits arising from the scheme would, taking account of modest numbers, be insufficient to outweigh harm. Accordingly I conclude that the allocation is not justified or consistent with national policy, and should be deleted (**SD2-MM196**).
300. H763, Gordon Street, Slaithwaite – The site adjoins listed chapels to the north and west and is close to a Conservation Area. Subject to sensitive layout and landscaping the site could be developed without harming the designated assets. However, in order to allow sufficient capacity for mitigation and ensure effective protection for the historic environment, the site area should be reduced and the indicative number of dwellings lowered from 28 to 25 (**SD2-MM197, SD2-MM198**). The policy should also be amended to refer to related mitigation measures (**SD2-MM200**).
301. H1709, Upper Clough Linthwaite – The site is bounded by an attractive stone wall on its western edge. The policy should be modified to require the re-positioning and retention of this stone wall, in order to protect the character

and appearance of the streetscape (**SD2-MM204**). The listed noise and odour constraints no longer exist and therefore the policy should be amended to remove reference to these constraints and the need for associated reports, for reasons of effectiveness (**SD2-MM202, SD2-MM203**).

302. H2649, Victoria Terrace, Marsden – The site is in the Marsden Conservation Area and opposite the listed building of the New Inn. The Fire Station building within the site is identified in the Marsden Conservation Area appraisal as a key unlisted building of merit. The Council's HIA advises that the eastern area of the site should be developed sensitively with areas of landscaping, and the Fire Station and PROW within the site should be retained as part of a redevelopment scheme as they are of high significance to designated heritage assets. I concur with these conclusions. However, the net site area and indicative capacity do not provide sufficient scope to deliver these requirements. Accordingly, in order to avoid harm to the historic environment the net site area should be reduced and the indicative capacity lowered from 35 to 28 dwellings (**SD2-MM207, SD2-MM209**). The policy should also be amended to refer to heritage constraints and mitigation measures, including retention of the Fire Station and PROW (**SD2-MM208, SD2-MM210**).
303. MX1919, Bank Bottom Mills, and MX1920, New Mills, Marsden – The mill buildings on these sites are identified in the Marsden Conservation Area Appraisal as focal buildings, and contribute to the distinct identity of Marsden. New Mills is located within the Marsden Conservation Area and Bank Bottom Mills is close to it. Accordingly, in order to protect the historic environment and character of the town, and accord with Policy PLP 35 in the Plan, the policies should be modified to seek the retention of the mill buildings (**SD2-MM326, SD2-MM329**).

Kirklees Rural, Colne Valley Green Belt sites

304. H213, Black Rock Mills, Linthwaite – The site has planning permission and is under construction. As such the part of the site in the Green Belt no longer performs a clear Green Belt function. Accordingly exceptional circumstances are demonstrated to release this section from the Green Belt. In order to be effective the indicative site capacity should be amended to reflect the planning permission (**SD2-MM192**).
305. H1776, south of The Lodge, Linthwaite – The site is well contained, with built development to the north, west and south. Church Lane and field boundaries would provide defensible Green Belt boundaries. However, the south-east part of the site is steeply sloping and prominent, and I consider that the indicative capacity of 209 dwellings could not be accommodated without harming long distant views and character. Nevertheless, mitigation is capable of being provided through provision of an open buffer and a reduction in site capacity to 170 dwellings. Subject to modifications **SD2-MM205** and **SD2-MM206**, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt. The proposed wording in SD2-MM205 is suitably flexible to allow the exact position of the buffer and open areas to be determined through the planning application process.

Kirklees Rural, Denby Dale urban sites

306. H358, east of Wentworth Drive, Emley – The site is contained between dwellings off Wentworth Drive and Warburton Road, and is well related to the built-up form of the village. The Council's highways evidence indicates the main site access can be achieved from Wentworth Drive, and no other fundamental constraints to development have been identified. The site contains a PROW and provides access to the adjoining Millennium Green, and this should be referenced in the policy for reasons of effectiveness (**SD2-MM213**). Subject to this modification, I am satisfied that the proposal is sound.
307. H454a and H498, west of Manor House Farm, Clayton West – The sites adjoin Clayton West Cricket Club, and mitigation in the policies relating to protective measures should help to ensure the operations of the club are not unduly affected and protect residential amenity. Site H454a contains the cricket club car park and access road. The policy for H454a should be amended to specify the retention of these features as part of any redevelopment scheme, in order to protect a valued community facility (**SD2-MM214**). The cricket ground itself is identified as UGS in the Plan.
308. At the hearing it was confirmed that land for the provision of visibility splays on Manor Road is within the control of the owner of site H498. As such, reference in the policy to access being required via site H454a should be corrected (**SD2-MM215**).
309. H690, Cliff Hall, Leak Hall Crescent, Denby Dale – The site is contained by dwellings on three sides and is well related to the core of the village. At the hearing the Council indicated that access may be facilitated via Leak Hall Lane, and this should be clarified (**SD2-MM220**). No fundamental constraints relating to heritage and other matters have been identified and, subject to the above modification, the allocation is soundly based.
310. H768, Willow Close, Skelmanthorpe – The site adjoins the village Conservation Area and the listed building of St. Aidan's church. The Council's HIA identifies an area of moderate significance close to the heritage asset and concludes that loss of open land immediately adjoining the church boundary would cause less than substantial harm. Additional housing in this area would not outweigh harm, and accordingly, the policy should be amended to specify the provision of open space in this area and the retention of protected trees on the western boundary to safeguard the character of the Conservation Area (**SD2-MM223**). The policy should also refer to the presence of the Conservation Area (**SD2-MM222**).
311. H1784, land east of Denby Dale railway station – The site adjoins the railway station and small station car park, and is a sustainable location on the edge of the village. Given its proximity to the station, the policy should seek to secure the provision of additional cycle and car parking for the station through the scheme (**SD2-MM224**).

Kirklees Rural, Denby Dale Green Belt sites

312. E2333a, east of Park Mill, Clayton West – The site is in the Green Belt on the eastern edge of the village, and straddles both sides of the A636. The open

fields provide an attractive green setting for the village, and form part of a wider verdant river valley. The proposal would introduce industrial buildings at this key entrance point, and would significantly extend the built-up form of Clayton West into the open countryside along both sides of the road. The site is bounded by built development to the south/south-west and by the River Dearne and existing field boundaries, with only a short undefined section in its northern boundary. Some visual mitigation could be provided through measures such as landscaping, buffer zones and terracing. The settlement is also a sustainable location with a range of services and facilities. However, an industrial estate in this open location, particularly on the prominent sloping northern section, would be highly visible on the approach towards and out of the village, the nearby Kirklees Way, and in longer distance views from the surrounding countryside. The proposal would appear incongruous and encroach into the countryside, resulting in significant harm to the character of the area and the setting of the river and the village.

313. Development would provide a number of economic and social benefits, as outlined in the submitted Public Benefits Statement. This includes meeting the needs of local businesses, boosting the economy, and providing jobs. I consider that environmental benefits linked to the provision of landscaping and buffer zones and connections to the PROW network are mitigation measures rather than benefits. Notwithstanding this, I conclude that the identified benefits would not outweigh the significant harm to the Green Belt, local character and the setting of the village identified above, and therefore exceptional circumstances do not exist to justify the release of the site from the Green Belt. As such the proposal is not justified or consistent with national policy. Accordingly, I conclude the allocation should be deleted from the Plan and the site retained within the Green Belt (**SD2-MM28**). The reference to employment allocations in the Dearne Valley should consequently be deleted from Part 1 of the Plan (**SD1-MM9**) and the allocation removed from the key diagram (**SD1-MM162**). In the context of this harm there is no justification for an extension to the northern boundary of the site.
314. The site is visible from several points within the Registered Park and Garden of Bretton Hall, located to the north-east. However, the distance of the site from the asset would limit the visual impact, with development seen from a distance within a wide area of countryside. As such I consider that harm to the significance of the designated asset would be limited and less than substantial, and could be partly mitigated by landscaping, terracing and layout. However, my views on this matter do not alter my conclusions above regarding the deletion of the site. The distance and lack of visibility from the nearby SM at Bentley Grange means that the impact on this designation and its setting would be negligible.
315. H17, Park Mill House, Clayton West – The site adjoins the village, contains built form and is separated from the wider Green Belt by Kiln Lane. As such it has a markedly different character to the surrounding countryside. Although the upper part of the site is more prominent, screening is provided by trees and hedgerows, and I consider the site could be developed without causing encroachment. Kiln Lane would form a new strong defensible Green Belt boundary. In this context, and taking account of identified housing needs and the sustainability of the village, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt.

316. H72, Station Road, Skelmanthorpe – The site is well related to the settlement and contained by residential development to the west and part of the northern and southern boundaries. Field boundaries to the east/north-east would provide new defensible Green Belt boundaries. In this context, and taking account of identified housing needs and the sustainability of the village, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt.
317. H233 and H634, Barnsley Road, Denby Dale – The sites are identified in the Council's Green Belt Review and site assessment work as having a less important Green Belt role and where development would have limited impact on Green Belt function. Taking account of their containment and the urban fringe character of Barnsley Road, I concur with these findings. In this context, and taking account of identified housing needs and their proximity to the village, I conclude that exceptional circumstances exist to justify the release of the sites from the Green Belt.
318. H502, Huddersfield Road, Skelmanthorpe – The southern part of the site is located within the Green Belt. It is an open field on the edge of the village, and is visible on the approach to the village from the west. However, the site is well related to the built-up part of the village, and development represents a modest extension and would be seen against an urban back-drop. Much of its western boundary is marked by a hedgerow, and could be continued to the road to provide a clear new defensible Green Belt boundary. In this context, and taking account of the site's sustainable location and identified housing needs, I conclude that exceptional circumstances exist to justify the release of the southern section from the Green Belt. In order to secure suitable landscaping on the sensitive western edge the policy should specify provision of a landscaped buffer in this vicinity (**SD2-MM217**).
319. At the hearing the Council indicated that access to the site may be deliverable from Bedale Drive and Heather Fold, and via Cumberworth Road subject to changes in speed limits. A full Transport Assessment would be required through the planning application process, and detailed access and highway matters would be dealt with at that stage. The reference in the policy to suitable visibility splays is incorrect and should be deleted to provide clarity and effectiveness (**SD2-MM218**). The indicative dwelling capacity should be adjusted to take account of the latest layout and design work, with a reduction from 203 to 189 dwellings (**SD2-MM216**). Subject to the above modifications I am satisfied that the policy is soundly based.
320. H3325a, Park Mill, Manor Road, Clayton West – Most of the site is currently in employment use, and is not within the Green Belt. The building stock is old, and redevelopment of the site for employment use is constrained by the junction of Manor Road and Wakefield Road which has insufficient width to facilitate safe HGV access. Options to widen the junction are limited by the presence of nearby buildings, a listed bridge and an adjoining watercourse. The Council's site assessment work indicates that suitable access is capable of being achieved for residential development, albeit the planning application stage would provide an opportunity to explore this matter in detail. In this context, I consider that the proposed allocation for residential use is reasonable and pragmatic.

321. A small section of the site, to the north of the employment land, is undeveloped and within the Green Belt. The open field is highly visible as you drive towards Clayton West on the A636, and provides part of an attractive setting to the village. It is separated from the main allocation site by the River Dearne. Taking account of the deletion of allocation E2333a, as set out earlier in this section, I consider this part of H3325a plays an important Green Belt role in preventing encroachment and has visual and physical links to the wider countryside. As such I conclude that exceptional circumstances have not been demonstrated to justify releasing this area of the allocation from the Green Belt. This area should therefore be excluded from the site and retained within the Green Belt. The gross and net site area in the policy should be reduced accordingly (**SD2-MM225, SD2-MM226**) and the indicative site capacity lowered from 122 to 91 dwellings (**SD2-MM227**).

322. At the time of the hearing the business was still on the site. Taking account of proposed re-location plans, I consider that completions are unlikely to take place until 2021/22, and the phasing table should be amended accordingly in **SD1-MM160**.

Kirklees Rural, Golcar urban sites

323. H814, Grove Street, Longwood – The site is an attractive sloping area of woodland along the edge of Grove Street. The site is identified as BAP Priority Habitat and contributes to the character and appearance of the valley. The previous planning permission on the site for 12 dwellings has expired. Development would result in the loss of trees and habitat and significantly harm the character of the area. Accordingly, I conclude that the allocation is not justified, and should be deleted from the Plan (**SD2-MM232**).

Kirklees Rural, Holme Valley North urban sites

324. E1829, New Mill Road, Brockholes – The site contains a playing pitch and the policy refers to replacement provision as part of redevelopment. The policy wording needs to be adjusted to refer to equivalent or better quantity or quality in order to be consistent with paragraph 74 in the NPPF (**SD2-MM32**). A slight reduction in the net area and indicative site capacity is necessary in order to provide sufficient protection for the adjoining River Holme and BAP Priority Habitat (**SD2-MM29, SD2-MM30**).

325. E1900, west of Honley Business Centre, Honley – In order to be effective the adjoining BAP Priority Habitat should be referenced in the list of constraints (**SD2-MM35**), and the net area and indicative capacity should be adjusted to take account of a recent planning permission (**SD2-MM34, SD2-MM36**).

Kirklees Rural, Holme Valley North Green Belt sites

326. H48, Travel Station Yard, Honley – The site lies between the settlement edge and the railway line, and has a limited relationship with the wider Green Belt. The site already contains built form, and could be developed without causing harm to Green Belt purposes. As such, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt.

327. H178, Southwood Avenue, Honley – The north-western part of the site is located in the Green Belt, and would provide access to the remainder of the site from Southwood Avenue. The north-western section is elevated and sloping, but is well related to the settlement edge and does not extend down the hillside. The existing trackway could provide a new defensible Green Belt boundary.
328. The topography of the site means engineering solutions may be required to achieve access via Southwood Avenue, potentially involving construction of part of the access road in the Green Belt. This would be close to the edge of the site, and subject to sensitive design could be capable of being accommodated without significant visual harm. Conversely, dwellings in this area and further down the hillside would introduce buildings onto a prominent slope, be clearly visible from the surrounding countryside, and cause encroachment.
329. Taking account of the above factors and identified housing needs, I conclude that exceptional circumstances exist to justify the release of the allocation site from the Green Belt. However, due to the topography of the site, I consider that a lower density would be more realistic and achievable. Accordingly, the indicative site capacity in the policy should be reduced from 23 to 17 dwellings (**SD2-MM234**). The policy should also refer to the potential extension of the access road outside the site boundary, in order to be clear and effective (**SD2-MM236**).
330. H2586, Thirstin Mills, Honley – A narrow strip of the site on the western edge is located in the Green Belt, forming part of the retaining wall for the mill development. As such its Green Belt role is limited and it could be released without harm to the Green Belt function. Accordingly, I consider that exceptional circumstances exist to justify the release of this area from the Green Belt. The mill site has planning permission for residential development.
331. H584, Gynn Lane, Honley – The site is contained by built development, woodland and a railway line, thereby limiting its relationship with the wider countryside. Development would reduce the gap between Honley and Hall Ing. However, a physical gap would remain, and the railway line, woodland and field boundaries to the south would form strong new defensible Green Belt boundaries, preventing encroachment.
332. Two Grade II listed weaver cottages are located close to the north-west corner of the site. In order to avoid harm to the historic environment the policy should be amended to require suitable mitigation measures, as referenced in the Council's HIA. This includes the retention of the northern woodland belt and stream, and retention of open land adjoining the tree belt and in the north-west corner (**SD2-MM241**). Reference to the existence of protected trees on the northern boundary should also be included, for reasons of effectiveness (**SD2-MM240**). The policy refers to appropriate mitigation measures relating to the loss of trees in order to achieve suitable access.
333. In the context of limited harm to the Green Belt and identified housing needs, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt. The SA results have been disputed but I am not persuaded that significant changes to the scores are justified to the extent

that would alter overall conclusions regarding the sustainability and suitability of the site. I therefore conclude that, subject to the above modifications, the policy is soundly based.

334. H664, Scotgate Road, Honley – The site adjoins residential development to the south and east, and is contained by sloping woodland to the north. It therefore has limited visual relationship with the wider countryside, and new defensible Green Belt boundaries could be formed.
335. The site contains a listed farmhouse and barn. The open fields adjoining these buildings are of particular significance to the setting of these assets. In order to avoid harm to the historic environment the policy should be amended to clarify that no development takes place in the areas of 'high' and 'considerable' significance, as identified in the Council's HIA. Reference to mitigation measures relating to design and layout should also be inserted. These changes would be effected through modification **SD2-MM244**. The areas of moderate significance in the HIA are located further from the listed buildings, and I am therefore satisfied that any impacts could be mitigated through sympathetic layout and landscaping. The policy adjoins rather than contains a Habitat of Principal Importance, and this should be corrected for reasons of effectiveness (**SD2-MM242**).
336. In the context of limited harm to the Green Belt and identified housing needs, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt. Subject to the above modifications, the policy is soundly based.

Kirklees Rural, Holme Valley South urban sites

337. E1871, north-east of Bottoms Mills, Holmfirth – The existing use is listed as 'UDP allocation'. Deletion of this reference through **SD2-MM38** is necessary to avoid confusion and ensure effectiveness.
338. H50, Bridge Mills, Holmfirth – The mill buildings are part of the district's industrial heritage and contribute to the distinct character and identity of the locality. Accordingly, in order to protect the historic environment and character of the area, and accord with Policy PLP 35 in the Plan, the policy should be modified to seek the retention of the mill buildings (**SD2-MM249**).
339. H597, Sandy Gate, Scholes – The site consists of a series of open sloping fields on the edge of the village, divided by traditional stone walling. There are views across the site towards the nearby listed building of Sandy Gate Farmhouse and to the wider countryside, and the site provides an attractive setting to the village.
340. The Council's HIA identifies areas of moderate significance within the site which form part of the agricultural setting of Sandy Gate Farmhouse and another nearby listed building (The Olde House). I concur with Historic England that the HIA underplays the significance of other parts of the site, as these form part of the historic field system, and there are clear views towards Sandy Gate Farmhouse from along much of Scholes Moor Road. The HIA indicates that views towards the asset are of 'high significance'. I therefore conclude that development across much of the site would cause considerable,

albeit less than substantial, harm to the listed farm, and detract from the character and setting of this part of the village. Although additional housing would provide public benefits, this would be insufficient to outweigh harm to heritage assets. The southernmost field adjoining Moorlands could, however, be developed without causing undue harm to the assets or setting of the village, by virtue of the intervening distance to the asset and its containment by residential buildings to the south and west. The allocation area should therefore be reduced accordingly, and the indicative site capacity lowered from 141 to 28 dwellings (**SD2-MM254, SD2-MM255, SD2-MM256**).

341. The boundary walls of the site are key features of the field system, and therefore the policy should specify their retention, with access being provided via Moorlands (**SD2-MM258**).
342. H626, west of Bankfield Drive, Holmbridge – The highway network in the local area has a number of constraints, including narrow carriageways, steep topography and the presence of buildings close to the road. I recognise the concerns of local residents regarding highway safety in the locality. However, the Council's site assessment work indicates that access can be taken from Laithe Avenue, and that additional traffic arising from this scale of scheme is capable of being accommodated on the highways network. Detailed assessment would be undertaken through the planning application process.
343. Views towards the wider countryside and National Park can be seen from across the site. However, the National Park boundary is over half a kilometre away and there is intervening development. The site is well related to the settlement edge, contained by dwellings to the north and east, and is not located within the Green Belt. The National Park Authority has not objected to the proposal. Detailed matters relating to landscaping and layout could be dealt with at planning application stage and could help to ensure a sympathetic form of development. I am satisfied that development of this modest sized site would not have a detrimental visual impact in terms of views to or from the National Park.
344. Overall, taking account of all the evidence and representations before me, I conclude the site is capable of being developed for housing without resulting in significant highway safety issues, or harming the National Park. The planning application stage would provide an opportunity to consider detailed matters relating to ecology, transport, drainage, design and layout, and potential mitigation measures. Accordingly, the proposal is soundly based. In reaching this conclusion I have had regard to an appeal that was refused in the early 1990s on the site. However, it also covered adjoining land and was larger than the allocation. A PROW adjoins the site, and should be correctly referenced in the constraints section for reasons of effectiveness (**SD2-MM259**). The insertion of mitigation relating to the nearby SPA is also necessary, as referred to earlier.
345. H715, Wesley Avenue, Netherthong – The site adjoins the Netherthong Conservation Area. The northern section of the site, as identified in the Council's HIA, is elevated above Miry Lane and provides an attractive landscaped aspect which contributes to the character of the locality. In order to avoid harm to the heritage asset and the appearance of the streetscape, the policy should be amended to require retention of this area as open land

(**SD2-MM263**). The site area should be reduced accordingly and the number of dwellings lowered from 43 to 38 (**SD2-MM261, SD2-MM262**).

346. H729, Tenter Hill Road, New Mill – Options for providing upgraded football/rugby facilities are currently being explored in the Holmfirth area, including on playing fields adjoining the allocation. Access to upgraded facilities may need to be facilitated via site H729 and the policy should be modified to refer to this position (**SD2-MM265**).
347. H730, Royds Avenue, New Mill – The site adjoins the Wooldale Conservation Area. The Council's HIA identifies open areas of high and moderate significance in the northern part of the site which contribute to the setting of the Conservation Area and views along key historic approaches. I concur with this assessment. As such the policy should be amended to require retention of the northern part of the site as open land, and existing walls within the site (**SD2-MM269**). The net site area should be reduced accordingly, and the site capacity lowered from 74 to 53 dwellings (**SD2-MM266, SD2-MM268**). The presence of nearby listed buildings and protected trees in the north part of the site should also be referenced (**SD2-MM267**). These modifications should help to avoid harm to the historic environment, in line with national policy, and ensure effectiveness.
348. H2587, former Midlothian Garage, New Mill Road, Holmfirth – The site contains an area of trees which are BAP Priority Habitat. In order to protect these features the policy should be amended to exclude the habitat from the developable area (**SD2-MM273**). The site capacity is based on the outline planning permission and takes account of constraints.

Kirklees Rural, Holme Valley South Green Belt sites

349. H727a, Miry Lane, Thongsbridge – The far western section of this site is located within the Green Belt. However, the site is largely contained by urban form on three sides and adjoins a cricket ground to the west. Its containment limits the relationship of the western section to the open countryside. The current Green Belt boundary in this vicinity is poorly defined on the ground, and the proposal would provide an opportunity to create a new defensible boundary. On this basis, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify releasing the western part of the site from the Green Belt.
350. H2585, Water Street, Holmbridge – Part of the site is in the Green Belt and was occupied by an industrial building. It is separated from adjoining agricultural land by changes in topography. The allocation site has planning permission for residential development. Overall I consider that removing this small area from the Green Belt would have minimal impact on openness. As such, and taking account of identified housing needs, I conclude there are exceptional circumstances which justify its removal from the Green Belt.
351. The remaining mill buildings on the site form part of the industrial heritage of the district and contribute to the distinct character and identity of Holmbridge and the Conservation Area. In order to protect the historic environment and character of the settlement and accord with Policy PLP 35 in the Plan, the policy should be modified to seek the retention of the mill buildings (**SD2-MM272**).

352. MX1912a, Dobroyd Mills, Hepworth – Part of the site is in the Green Belt and contains substantial mill buildings. Redevelopment is therefore capable of being accommodated without impacting on openness or increasing the urban appearance of the locality. There is a clear separation between this site on the edge of Hepworth and Jackson Bridge to the north. Taking account of these factors, and identified housing and employment needs in the area, I conclude that exceptional circumstances exist to justify the removal of this area of the site from the Green Belt.
353. The site has recently gained outline planning permission for up to 75 dwellings and 880 sqm of employment floorspace. In order to be effective the policy should be modified to refer to these amended quantities (**SD2-MM331** and **SD2-MM332**). The mill buildings are part of the district's industrial heritage and contribute to the distinct identity of Hepworth. In order to protect the historic environment and character of the settlement and accord with Policy PLP 35 in the Plan, the policy should be modified to seek the retention of the mill buildings (**SD2-MM333**).

Kirklees Rural, Kirkburton Green Belt sites

354. H2576, south of Red Deer Park Lane, Bristfield – The site adjoins residential development to the south and is contained by a tree belt to the east. It has a different character to the open agricultural fields to the east, and its containment means that sprawl would be prevented. As such, the site could be released without harming the strategic function of the Green Belt in this locality. On this basis, and taking account of identified housing needs and the sustainability of the settlement, I conclude that exceptional circumstances have been demonstrated to justify removal of the site from the Green Belt.
355. H120, Park Farm, Farnley Tyas – The site is largely located within the built-up part of the village, and only a small strip of land is located in the Green Belt. The site has planning permission for housing and was under construction at the time of my site visit. The strip is included within the scheme, does not protrude into the open countryside, and new defensible Green Belt boundaries will be created through the permitted scheme. As such, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify its release from the Green Belt.
356. H339 and H652, Abbey Road North, Shepley – Site H339 is occupied by industrial buildings. The woodland area to the rear is excluded from the developable area, and therefore development on this site would have little impact on openness. Adjoining site H652 mainly comprises a series of open fields, but is contained by development on three sides, and by a railway line and strong field boundaries to the north. As such its relationship with the open countryside is limited. In this context, and having regard to the sustainability of the location and identified housing needs, I conclude that exceptional circumstances exist to justify the release of these sites from the Green Belt. The employment uses on H339 are not identified as a PEA.
357. H518, Yew Tree Farm, Farnley Tyas – A small area of the site, currently occupied by a farm building, is in the Green Belt. The impact of development on openness would be limited, and the scheme would provide a clearer and more defensible Green Belt boundary. As such, and taking account of

identified housing needs, I conclude that exceptional circumstances exist to justify the release of the small area from the Green Belt. The new boundary would be in line with other development on the south side of Butts Road. The inclusion of further land beyond this would intrude into the countryside and detract from the setting of the village.

358. The policy provides sufficient mitigation to ensure that development could be accommodated without harming the significance of the listed buildings on the site and the village Conservation Area.
359. H638, Tinker Lane, Lepton – The site is identified in the Council's Green Belt Review and site assessment work as having a less important Green Belt role and where development would have limited impact on Green Belt function. The site is well contained by field boundaries, Tinker Lane and residential development, and I concur with these findings. Clear defensible Green Belt boundaries could be achieved, thereby preventing sprawl. On this basis, and in the context of identified housing needs, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
360. H1774, east of Manor House Farm, The Village, Thurstonland – The site is located in the village Conservation Area, and is partly within the Green Belt. The Conservation Area comprises the historic core of the village, and is characterised by a mix of urban form surrounded by open fields which contribute to its agricultural history.
361. The southern section of the site adjoining The Village provides a gap in the built-up frontage, and despite the presence of a wall, affords extensive views towards the surrounding countryside and to the church. These views extend over the middle section of the site which lies within the Green Belt. These open areas allow the agricultural setting of the village to be appreciated, provide a visual link to the countryside, and make an important contribution to the setting of the Conservation Area. The attractive traditional stone wall on the southern boundary contributes to the historic appearance of the streetscape. Development in the open southern and central parts of the site would erode the rural setting, detract from Green Belt function, sever key views, and cause considerable, albeit less than substantial, harm to the character and appearance of the Conservation Area. Additional housing would provide public benefits, but would not outweigh the identified harm to heritage assets. Taking account of these factors I conclude that exceptional circumstances do not exist to justify the release of the section within the Green Belt.
362. The eastern section of the site adjoining Marsh Hall Lane also provides views to the adjoining countryside, but these are less extensive due to topography and include views of more modern housing off The Green. Marsh Hall Lane is characterised by dwellings set back in larger plots and has a mix of older and more modern development. I therefore consider that sympathetic landscaping, layout and design could help to mitigate the impact of new dwellings, and that development in the eastern section of the site could potentially be accommodated without causing harm to the significance of heritage assets. This area corresponds to 'Area 1' as shown in figure 10 in the Council's HIA.

363. Taking account of the above factors I conclude that development in the southern and middle sections of the site is not justified. The site allocation area should be reduced to correspond to Area 1, and the number of dwellings lowered from 42 to 14 dwellings (**SD2-MM283, SD2-MM284, SD2-MM286**). In order to provide suitable protection for the historic environment the policy should also refer to the site's location within the Conservation Area (**SD2-MM285**), and specify the retention of existing boundary walls (**SD2-MM288**). Thurstonland has some services and facilities, and is a sustainable location for this scale of development.
364. MDGB2134, Storthes Hall, Kirkburton – The site is previously developed land in the Green Belt. The southern section has planning permission for 300 dwellings and a care home. The northern section is currently occupied by student halls of residence, and as such may provide an opportunity for redevelopment without having a greater impact on openness or Green Belt purpose, in line with Policy PLP 59 in the Plan and paragraph 89 in the NPPF.
365. Storthes Hall is located in the countryside south of Huddersfield, and does not adjoin a settlement. However, the northern section of the site is already in residential use and the proposal for its redevelopment to provide 205 dwellings would make use of brownfield land. Additional housing and affordable housing would also contribute towards identified needs. Taking account of the above factors, I conclude that the proposal for potential redevelopment of this Green Belt site is soundly based. However, the policy should be amended to refer to additional constraints and mitigation measures, including the retention and protection of BAP Priority Habitats and heritage assets, and the production of Masterplans (**SD2-MM368, SD2-MM369, SD2-MM370**). This should ensure the policy is effective and help to avoid harm to ecology, the historic environment and the Green Belt. Evidence in EX64 indicates that completions in the southern section are likely to take place from 2018/19.

Conclusion on Issue 7

366. The site assessment process has been reasonable and robust. Exceptional circumstances have been demonstrated to release the individual site allocations from the Green Belt, subject to the aforementioned modifications. Therefore, taking account of my conclusions on the principle of release in Issues 2 and 4, I am satisfied that exceptional circumstances have been fully demonstrated to release land from the Green Belt for employment, housing and mixed use allocations as modified. Overall, the housing, employment and mixed use allocations are justified, effective and consistent with national policy, subject to aforementioned modifications. In this context, and having regard to my conclusions reached under Issues 2 and 4 on housing and employment supply, I have not considered it necessary to give further consideration to any additional site allocations (omission sites) within this report.

Issue 8 – Are the safeguarded land designations justified and consistent with national policy, and does the Plan make appropriate provision for longer-term housing needs beyond the Plan period? Are other adjustments to the Green Belt boundary justified and consistent with national policy?

Approach to safeguarded sites

367. The Plan identifies a total of 51 safeguarded sites that, through application of Policy PLP 6, would be considered for development via a future review of the Plan. Given the extensive Green Belt coverage in Kirklees, the designation of safeguarded land could be particularly beneficial in helping to provide Green Belt boundaries with a degree of permanency beyond the Plan period and limit the scale of future review. There is some uncertainty regarding the extent of future housing needs in Kirklees beyond the Local Plan period, but it is reasonable to surmise that there may be some future land requirements and a need to review Green Belt boundaries at some point in time, as permitted by the NPPF. I therefore consider that the designation of safeguarded land in the district is, in principle, an appropriate and pragmatic approach.
368. The safeguarded sites in the Plan are proposed on the basis of identified site-specific constraints which are unlikely to be resolved within the Plan period, but where solutions in the longer term have some prospect. Eight of the sites involve the release of land from the Green Belt. The sites have been assessed using the Local Plan site assessment methodology and subject to SA, and the Green Belt release sites have also been informed by the Green Belt Review.
369. A number of safeguarded sites are on land within the built up urban areas of Kirklees, rather than between the urban area and the Green Belt. This is not consistent with paragraph 85 of the NPPF which states that safeguarded land may be identified between the urban area and the Green Belt. Furthermore, if constraints are overcome before 2031, preventing the release of such sites for development could fail to accord with the Plan's strategy to deliver additional housing in sustainable locations and support urban regeneration. Accordingly, in order to be effective and consistent with national policy, modifications are necessary to delete the safeguarded sites that are located in the built-up urban areas of Kirklees (site SL2177 in **SD2-MM372**, SL2193 in **SD2-MM373**, SL2292 in **SD2-MM375**, SL2194 in **SD2-MM376**, SL2268 in **SD2-MM377**, SL2271 in **SD2-MM378**, SL3363 in **SD2-MM379**, SL2273 in **SD2-MM380**, SL2201 in **SD2-MM381**, SL2198 in **SD2-MM382**, SL2302 in **SD2-MM383**, SL2171 in **SD2-MM384**, SL2202 in **SD2-MM385**, SL2169 in **SD2-MM388**, SL2187 in **SD2-MM391**, SL2188 in **SD2-MM392**). Site SL2271 is designated for housing (H641a in **SD2-MM108**), as planning permission has been granted for residential development subject to resolution of a S.106 agreement, and it appears that access constraints are capable of being overcome. At this stage there is no firm evidence before me to confirm that the site is unavailable for this use. It is not wholly clear whether the constraints relating to the other sites are capable of being resolved within the Plan period, and therefore alternative allocations for these sites are not justified.

Specific safeguarded sites between the urban area and the Green Belt

370. Turning to the remaining safeguarded sites, evidence indicates that constraints relating to several are capable of being resolved within the Plan period. This includes site SL2181 in Liversedge, where the adjoining landowner has confirmed access can be made available via an extension to H2537. As set out under Issue 7, the adjoining area is within the Green Belt but is well contained and I have concluded that exceptional circumstances are demonstrated to justify its release from the Green Belt. SL2181 is in a sustainable location on non-Green Belt land, and should be deleted as safeguarded land (**SD2-MM386**) and allocated for housing (H709 in **SD2-MM191**).
371. Outline planning permission has also been approved for residential development on SL3396 in Golcar and SL2186 in Meltham, and on part of site SL2161 at Upper Quarry Road in Huddersfield where it appears that access issues may be capable of resolution. These safeguarded land designations should therefore be deleted for reasons of soundness (**SD2-MM389, SD2-MM390, SD2-MM374**). The allocation of SL3396 and SL2186 for housing is justified on the basis that planning permission relates to the whole site (H119a in **SD2-MM290** and H628 in **SD2-MM291**).
372. Site SL2284 at Lower Busker Farm in Scissett is an attractive sloping open field on the edge of the village. Although there is nearby built development the site is well connected to the open countryside, and is visible from a distance due to its elevation and sloping aspect. As such I consider that development could harm the character and appearance of the wider countryside and cause sprawl, and that exceptional circumstances have not been demonstrated to justify release from the Green Belt. The site also has potential constraints linked to a presence of a Listed Building which is likely to constrain capacity. The site should be deleted as safeguarded land and retained as Green Belt land (**SD2-MM387**).
373. In other cases I am satisfied that the safeguarded land designations, including consequential changes to ensure robust Green Belt boundaries, are soundly based. The safeguarded sites have identified constraints which are unlikely to be resolved within the Plan period, but where solutions in the longer term cannot be wholly ruled out and sites have some prospect of delivery. The Green Belt release sites have individually demonstrated exceptional circumstances to justify the alteration of the Green Belt, as set out below. There is no evidence before me that other constraints would wholly prevent development coming forward, and prior to allocation detailed matters relating to site capacity and issues such as heritage, landscape character, biodiversity, and infrastructure capacity would be appraised and addressed. However, in order to provide clarity and ensure the Plan is effective, reference to this assessment process should be inserted in Policy PLP6 (**SD1-MM14**) and a cross reference to Policy PLP 6 included in Part 2 of the Plan (**SD2-MM371**). An overview of my reasoning in relation to the Green Belt release sites, and a small number of other sites, is set out below.
374. SL2277, Snelsins Road, Chain Bar (Green Belt release) - The site adjoins built development and its relationship to the wider countryside is significantly curtailed by the presence of the M62 motorway and associated sliproads. As

such I am satisfied that any impact on views from the Green Belt would be limited and largely mitigated through landscaping and tree planting, and that overall the site does not perform a strong Green Belt function. I conclude that exceptional circumstances have been demonstrated to release the site from the Green Belt. The highway network in the vicinity has constraints but there is a reasonable prospect that solutions may be found beyond the Plan period.

375. SL2290, Cambridge Chase, Gomersal (Green Belt release) - The site is well contained by the built-up area of Gomersal, does not appear part of the wider countryside, and development would have limited effect on the strategic gap between Gomersal and Birstall as other parts of the two settlements are closer. I conclude that exceptional circumstances have been demonstrated to release the site from the Green Belt. The removal of long gardens in Summerbridge Crescent is also necessary to create a new defendable Green Belt boundary. There is a reasonable prospect that access issues relating to SL2290 are capable of being resolved beyond the Plan period.
376. SL2297, Mill Lane, Flockton (Green Belt release) – The site is open farmland on the edge of the village, with visual links to the wider countryside. However, the site is well contained by development to the north, a trackway to the east, and field boundaries to the south, and I consider that development on the site would not cause significant encroachment and that the resulting Green Belt boundary would be defendable. I conclude that exceptional circumstances have been demonstrated to release the site from the Green Belt.
377. The Local Highways Authority has indicated that, despite a number of properties on The Paddocks being in the same ownership as the site, it would not be possible to facilitate development of the site as a whole via this point, due to visibility issues and conflicting movements. On the balance of evidence before me I consider there is some uncertainty regarding deliverability in the short term, but a reasonable prospect that third party land and solutions may be secured beyond the Plan period.
378. SL2173 and SL3356, Far Bank, Shelley (first site non-Green Belt release, latter site Green Belt release) – The sites are contained by built development to the north and west. Although they slope, the relationship to the wider countryside is limited and development would be well related to the built form of the village. As such, I conclude that exceptional circumstances have been demonstrated to release site SL3356 from the Green Belt. It is unclear whether access to either site is capable of being resolved during the Plan period, but in the longer term it may be possible to secure third party land. There is no firm evidence before me to suggest that sites in their entirety are undeliverable on the basis of other matters, including heritage and biodiversity. Therefore designation as safeguarded land is robust.
379. SL3357, Fulstone Road, Stocksmoor (Green Belt release) – The site is contained and well related to the built-up framework of the village. There would be minimal impact in terms of encroachment or impact on the character and function of the Green Belt, and I conclude that exceptional circumstances have been demonstrated. Third party land is needed to provide access but there is a reasonable prospect of securing this beyond the Plan period.

380. SL3358, Shepley Road, Stocksmoor (Green Belt release) – The site is extensive in size and sloping, but is well contained. Therefore development would not cause significant encroachment or sprawl, and I am satisfied that impacts on the nearby wood could be dealt with as part of the process of option assessment in the next Local Plan review. Exceptional circumstances have been demonstrated to release the site from the Green Belt. Third party land is needed to provide access but there is a reasonable prospect of securing this beyond the Plan period.
381. SL2163, Balderstone Hall Lane, Mirfield (non-Green Belt) - The north-western part of site was subject to a pending planning application for housing at the time of the hearing and has since been refused. However, this related to a small section of the site, and notwithstanding the proposal, there is considerable uncertainty whether highway network and access constraints can be resolved within the Plan period to enable delivery of the site as a whole. Nevertheless, highway solutions cannot wholly be ruled out in the longer term. The site is partly surrounded by built development and relatively well-contained, and there is no evidence that the presence of Balderstone Hall and other nearby heritage assets would wholly prevent development. Overall I consider that the safeguarded land designation is soundly based.
382. SL2166 and SL2331, Holmbridge (non-Green Belt) - The highway network in Holmbridge has a number of constraints, including narrow carriageways, sloping topography and the presence of buildings close to the road. However, whilst solutions to enable housing development on the sites are unlikely to be readily forthcoming, I am unable to wholly rule out potential highway solutions being found at some point beyond the Plan period. The impact of development and highway works on landscape character and heritage assets would be assessed as part any allocation process in a future Plan review. Overall, although there is some doubt regarding deliverability, I am satisfied that, on balance, designation as safeguarded land is justified.
383. SL2170a and SL2170b in Hade Edge, SL2191 in Holmfirth and site SL3359 in Scholes (non-Green Belt) – Odour issues relating to site SL2170a may be capable of resolution if the nearby chicken farm ceases operation. There is no evidence of this occurring in the short term, but there may be some prospect beyond the Plan period.
384. In the same vein I consider that identified constraints relating to land availability and highways issues for site SL2170b, highways issues for SL2191, and access for SL3359 may be resolvable at some future point. The HRA identifies that impacts on the SPA are capable of being mitigated through additional wording in policies. This matter, along with infrastructure capacity, sustainability and other issues, would need to be assessed when looking at options in the next Plan review. Although Hade Edge and Scholes are modest in size they have a number of amenities. Overall I consider the safeguarded land designations are justified.

Provision for longer-term needs

385. The Plan as modified identifies a total of about 2,300 dwellings on the remaining safeguarded sites. Whilst this represents less than 2 years of housing supply, the Plan as modified identifies a further 2,900 or so dwellings

that would come forward on allocated sites beyond 2031 and help to meet longer-term development needs. It is also reasonable to assume that additional windfall supply is likely to be realised. Accordingly, and in the absence of national guidance on the amount of safeguarded land that should be identified, I am satisfied that the scale of safeguarded land identified in the Plan, based on the revised total, is sound. Based on longer term needs and individual assessment above, I conclude that exceptional circumstances have been demonstrated to justify the release of the Green Belt sites for safeguarded land, as modified.

386. The revised total supply from safeguarded sites and allocations beyond the Plan period should be clarified for reasons of effectiveness through modifications **SD1-MM15** and **SD1-MM16**.

Other Green Belt alterations

387. A number of minor changes to the Green Belt boundary have been proposed to take account of mapping errors, planning permissions, and changes in physical features. These are detailed in the Green Belt Boundary Changes document (2017) and shown on the Policies Map, and would ensure the boundary is logical and robust. Consequently exceptional circumstances exist to justify these boundary changes.

388. An extensive area of additional Green Belt land is proposed at New Laithe Hill, Newsome. The land is an open and undeveloped series of fields, and when viewed from nearby residential areas appears an integral part of the open elevated countryside south of Huddersfield. A strong new defensible Green Belt boundary could be formed by residential development to the north and west, and would prevent further encroachment of the built-up area. The area also forms part of the foreground to the Castle Hill SM, and is identified in the Castle Hill Setting Study (2016) as critical to the historical legacy and setting of the SM. Whilst this study focuses on the SM, it has highlighted the importance of the openness of these fields to the wider landscape and setting of the town. Overall, the area performs an important Green Belt function, and the Council's Local Plan evidence represents a material change of circumstances since the last Green Belt review was undertaken. I therefore conclude that exceptional circumstances have been demonstrated to justify altering the Green Belt boundary, as shown on the Policies Map, to include this site within the Green Belt.

Conclusion on Issue 8

389. Subject to the above modifications, including the deletion of a number of sites, I am satisfied that the safeguarded land designations in the Plan are justified and consistent with national policy. The Plan, subject to the above mentioned modifications, makes appropriate provision for longer-term development needs beyond the Plan period. Other alterations to Green Belt boundaries referenced in the above sub-section are justified and consistent with national policy.

Issue 9 – Are the open space designations in the Plan justified, effective and consistent with national policy?

Assessing Urban Green Space

390. The Plan designates a number of UGS within towns and villages, which are identified as providing an important function for sport, recreation, wildlife and/or visual amenity. This includes some extensive tracts of natural/semi-natural greenspace which are surrounded by built-up development and which have identified value as UGS. The Council's approach has focused on potential UGS sites in built-up areas, rather than the open countryside. This appears reasonable and proportionate, in the context that sites in the open countryside benefit from Green Belt protection.

391. Some of the UGS allocations in Kirklees are not publicly accessible, or have limited access via a PROW(s). However, the NPPF does not specify that open space should have public access, and the Council's evidence indicates that some sites have other UGS values linked to wildlife, visual amenity or landscape function. As such these sites may contribute to the quality, character and appearance of the district and/or to the health and well-being of local residents. In the case of Kirklees the designation of UGS sites without public access is therefore justified in principle.

392. The UGS are based on an extensive review of sites, informed by the Council's Open Space Study (2016), Playing Pitch Strategy (2015) and other evidence documents. The process has involved looking at both qualitative and quantitative data, and assessing whether a site is important in meeting local needs. In addition to ward level benchmarking against quantity and accessibility standards, the 'scarcity value' of a site has been assessed, based on distance to other open spaces of the same typology. Although open countryside (Green Belt) has not been factored into the benchmarking of natural/semi-natural greenspace, the Council's evidence in EX42 shows that designation of natural/semi-natural greenspace is based on other determinative factors including the qualities and UGS function of a site and its setting.

393. Overall I am satisfied that the Council's UGS site assessment process and general methodology, including the applied open space standards and typology definitions, has been appropriate and robust. The Council's approach is also consistent with the NPPF as whole, which seeks to protect green infrastructure, biodiversity and landscape character, as well as formal open space and sports provision, and promote healthy communities. In reaching my conclusions I have had regard to recent Inspector decisions relating to the loss of open space in Kirklees¹ Specific UGS allocations are considered below.

Urban Green Space designations

394. Since the Plan was submitted a number of housing developments have been approved on UGS. The following changes to Part 2 of the Plan are therefore necessary; deletion of UGS at Rumble Road, Dewsbury (UGS2151 in **SD2-MM398**) and allocation of the site for housing (H357 in **SD2-MM136**);

¹ APP/Z4718/W/16/3147937, APP/Z4718/W/16/3162164.

deletion of UGS on land south of Lancaster Lane, Brockholes (UGS909 in **SD2-MM402**) and allocation of the site for housing (H331 in **SD2-MM289**).

395. Other small changes in area size are necessary to correct errors, including a slight reduction in the size of sites UGS1264 (**SD2-MM395**), UGS948 (**SD2-MM400**), UGS884 (**SD2-MM403**) and UGS914 (**SD2-MM404**). Part of site UGS1251 in Meltham includes land used as a tree surgery business and private garden land, which does not perform an open space function, and a reduction in site area is therefore necessary for the Plan to be sound (**SD2-MM401**).
396. Elsewhere in this report I have recommended that housing allocation sites H783 in Heckmondwike and H764 in Huddersfield are deleted, on the basis that they have value as open space. Accordingly, adjoining UGS sites UGS1056 and UGS1199 respectively should be extended to include these areas (**SD2-MM396, SD2-MM399**). I have also recommended that housing allocation site H442 in Roberttown is deleted, and consequential changes for the Green Belt boundary place the cricket ground UGS (UGS3333) outside the built-up area in the Green Belt. The Plan seeks to identify UGS within towns and villages, and therefore a modification is needed to delete the UGS designation of the site (**SD2-MM397**).
397. Having regard to the evidence before me, I am satisfied that the other UGS designations in the Plan are justified. An overview of my reasoning in relation to a number of these is set out below. In order to be effective a link should be inserted alongside the list of UGS sites in Part 2 of the Plan to clarify that they are designated sites under Policy PLP 61 (**SD2-MM393**). Whilst UGS designations may be revisited as part of the next review of the Local Plan, Policy PLP 61 also provides some flexibility to deal with changing circumstances and proposals as they arise. Policy PLP 61 is covered later in this report.
398. UGS1240 (part of), Celandine Avenue Recreation Ground, Huddersfield – Although the University playing field section of the UGS is not currently in active University use, the Council's evidence shows a shortfall in playing pitches in the area. On this basis, and in the context that there is no proposal before me for replacement sports provision to mitigate loss, I conclude that its designation as UGS is justified. Policy PLP 61 provides some flexibility to respond to changing circumstances.
399. UGS851, Thewlis Lane, Crosland Hill – The Council's evidence shows that the site has high value on the basis of its recreational, biodiversity, landscaping and visual amenity function. Although nearby housing allocation H1783 is proposed, it would be possible to ensure that the UGS value is not unduly diminished through appropriate mitigation measures at planning application process.
400. UGS1219, Ballroyd Clough and Cliffe Road, Quarmby - The Open Space Study shows that the site overall has high value in terms of wildlife and its contribution to the character and appearance of the area, and on this basis I conclude it is justified as UGS.
401. UGS1804, south of the Beeches, Birkenshaw – The Council's evidence shows the site has high scarcity value as natural/semi-natural greenspace with

protected trees on its northern boundary, and is one of only two areas of natural/semi-natural UGS within the built-up area of Birkenshaw. On this basis I conclude it is justified as UGS.

402. UGS1477, land adjacent to Victoria Street allotments, Birstall – The natural/semi-natural section of this site is rated as low value in the Open Space Study. However, further assessment by the Council identified that the site has value as part of a larger open space and in providing a connection between existing allotments and grassland to the north. I am therefore satisfied that the site's designation as UGS is justified.
403. UGS1068, Springfield, Upper and Lower Blacup Farms, Cleckheaton – Housing has been approved on a small part of the UGS and therefore modifications to reduce the UGS area (**SD2-MM394**) and insert new housing allocation H2590a (**SD2-MM190**) are required. The remainder of the site is an attractive mix of fields and grassland, and makes an important contribution to the landscape and the character and appearance of the local area. The site is surrounded by built development and does not immediately adjoin the Green Belt, and does not appear to perform a Green Belt function. I am satisfied that the UGS designation, as modified, is robust and justified.
404. UGS973, land at Field Head Farm, Batley – The site consists of several typologies of open space, including natural/semi-natural greenspace and amenity greenspace, and provides a large tract of open land within a built-up and highly urbanised area of the district. The site includes attractive open fields which can be seen from the surrounding area, contribute to the character and appearance of the locality, and are partly crossed by a number of public footpaths. The site is surrounded by built development and does not immediately adjoin the Green Belt, and does not appear to perform a Green Belt function. Although some of the site is classed as medium UGS value in the Open Space Study, these areas form part of a wider open space and the bulk of the site is high value UGS with important recreational, landscaping and visual amenity functions. Accordingly, the overall rating of 'high' is justified. In conclusion, based on the evidence before me and observations from my site visit, the designation of the site as UGS and the boundaries of the site are justified and effective. In reaching this conclusion I have had regard to a recent Inspector's decision appertaining to part of the UGS.²
405. UGS1214, Golcar Flatts, Moorcroft Avenue, Golcar – The site comprises a mix of playing fields, natural/semi-natural greenspace, amenity greenspace and allotments, and forms an attractive open area within this part of Golcar. The natural/semi-natural section provides opportunities for informal recreation via a PROW on part of its western boundary and other informal paths, whilst the site as a whole provides visual, recreation and health benefits within a dense urban area. The northern section of the natural/semi-natural greenspace is grassland and is less open as the site is narrower in this locality. However, despite the presence of housing on two sides the grassland provides an open setting for the nearby allotments and amenity greenspace, an attractive visual break in the urban area, and despite the presence of boundary treatment forms part of a wider area of natural/semi-natural habitat to the south.

² APP/Z4718/W/16/3162164.

Although it does not contain a PROW, there is evidence of informal paths crossing the site from adjoining residential areas. Taking account of the above factors and setting aside the issue of open space deficiencies, the UGS designation of the northern natural/semi-natural section of the site, and the UGS designation as a whole, is justified.

406. UGS886, Sands Recreation Ground, Holmfirth – Part of the UGS site is within the private curtilage of residential properties and has a 'low' rating in the Open Space Study. However, as covered above, UGS can be in private ownership, whilst the Council's evidence indicates that this section forms an integral part of a wooded embankment which adjoins woodland, and contributes to the Kirklees Wildlife Habitat Network, the River Holme corridor and is part of the Holme Valley Strategic Green Infrastructure Network. Taking account of the evidence before me, I am satisfied that this section of the UGS, and the UGS as a whole, is justified and soundly based.
407. UGS936, Clayton West Cricket Ground – The site includes an area of grazing land and access track on its eastern side, which is identified as natural/semi-natural habitat in the Open Space Study. Although this area is not part of the current cricket ground or adjoining play area, it is part of a wider green space which contributes to the character and setting of the locality. Accordingly the designation of the UGS is justified.

Other open spaces

408. The Plan designates a small number of Local Green Spaces (LGS). The Council's evidence indicates that potential LGS sites were subject to a robust assessment, in line with criteria in paragraphs 76 to 78 of the NPPF. I am satisfied that the allocated LGS sites are demonstrably special with particular local significance, and consistent with national policy. However, in order to be effective a link should be inserted alongside the list of LGS in Part 2 of the Plan to clarify that they are designated sites under Policy PLP 62 (**SD2-MM405**).
409. The Plan identifies a Strategic Green Infrastructure project (SGI), Mirfield Promenade, in a text box in Part 2 of the Plan. The project is an on-going project with community involvement, and the boundaries take account of intended environmental improvements and footpath routes. There is an overlap with housing site H2089, but the allocation box for H2089 recognises that development would need to take account of the SGI. However, in order to provide suitable protection and be effective, a new policy in the Plan is required which specifically allocates the SGI site, provides a link to the Policies Map, and establishes the general approach to development proposals in this area (**SD2-MM406**).

Conclusion on Issue 9

410. On the basis of the evidence before me, and subject to the above modifications, I am satisfied that the open space designations in the Plan are justified, effective and consistent with national policy.

Issue 10 - Does the Plan set out positively prepared detailed policies on growth delivery, sustainable travel, design, climate change, the natural and historic environment, community facilities, environmental protection, Green Belt and open spaces which are justified, effective and consistent with national policy?

Growth delivery

411. Policy PLP 3 sets a broad framework to secure a sustainable pattern and form of development in the district. Whilst some aspects of the policy could be more precise and measurable, overall I am satisfied that it provides sufficient clarity and clear links to the spatial strategy, and that the general aims are in line with the Plan's vision and objectives. Although the policy refers to the re-use of brownfield land early in the Plan period, this is a broad aspiration rather than a requirement and is qualified by reference to the need to deliver five year housing supply and overall housing and job requirements.

412. Policy PLP 5 recognises that Masterplans can provide important detailed design and planning for some schemes, but may not be appropriate for all developments. However, additional wording to clarify this position, provide some general examples of when masterplans will be sought, and highlight responsibilities, would ensure the policy is effective and sound, whilst providing flexibility (**SD1-MM11, SD1-MM12, SD1-MM13**). The policy is complemented by site-specific policies in Part 2 of the Plan as modified which specify when Masterplans are required for specific allocations. I am satisfied that other aspects of the policy are suitably flexible, and do not impose specific standards or unreasonable requirements. The submission of an indicative phasing and implementation plan and a management plan would allow early consideration of these matters and assist in infrastructure planning and securing local involvement in running community assets.

413. Policy PLP 7 seeks to make efficient and effective use of land and buildings. In order to allow adjoining undeveloped land to be developed in the future, the policy should be modified to require proposals to factor in potential access (**SD1-MM17**). Reference in the supporting text to a 'brownfield first' approach in the policy should also be deleted, as this does not accurately reflect the policy approach and is inconsistent with the priority that national policy places on housing delivery and the need for both greenfield and brownfield developments in Kirklees (**SD1-MM18**). These changes are necessary for reasons of effectiveness and to make the policy sound. The minimum net density requirement of 35 dph incorporates suitable flexibility to respond to local circumstances. It is also supported by evidence which shows that an average gross density of 36 dph was achieved on new build sites in Kirklees between 2006 and 2016 (excluding apartment-only schemes), indicating that a minimum of 35 net dpa would be deliverable.

Sustainable travel

414. Changes are necessary to Policy PLP 20 to highlight that Travel Plans will be sought where a development has potential to generate significant amounts of transport movement (**SD1-MM72**). Modifications are needed to Policy PLP 21 to clarify that new development will only be prevented on transport grounds where cumulative impacts of development are severe (**SD1-MM73**). These

changes are needed for reasons of effectiveness and to ensure consistency with the NPPF.

415. The Plan does not establish specific parking standards and the Council has confirmed that it seeks to promote sustainable travel and ensure the efficient use of land on a case by case basis. This is a reasonable approach which is capable of achieving sustainable development. Nevertheless, in order to be effective the Council's position should be specified in Policy PLP 22 through modification **SD1-MM74**.
416. In order to effectively protect PROWs across the district Policy PLP 23 should be amended to seek the protection and enhancement of the PROW network (**SD1-MM75**). To ensure consistency with paragraph 10.103 of the Plan I have suggested a slight re-wording of the Council's published draft proposed modification to refer to all PROWs, in addition to those within the Council's 'core walking and cycling network'. As this position is already established in paragraph 10.103 this does not significantly alter the Council's approach.

Design

417. The Council has confirmed that it is not intending to impose additional local technical standards relating to the construction, internal layout and performance of new dwellings. Accordingly, modifications **SD1-MM76, SD1-MM77, SD1-MM78** are necessary to Policy PLP 24 to clarify that particular sustainable design features are encouraged rather than required, and to establish a positive and proportionate approach. This will ensure the policy is justified, effective and in line with national guidance.
418. The provision of electric charging points, as established in Policy PLP 24, is supported by the Council's viability evidence. However, adjustments to the wording are necessary to clarify these are required rather than encouraged (**SD1-MM79, SD1-MM81**), and thereby ensure the policy is effective. Additional detail on the Council's approach to design in the Green Belt is also needed to ensure effectiveness and appropriate protection (**SD1-MM80**).

Climate change

419. Policy PLP 26 establishes a criteria-based approach to renewable and low carbon energy proposals. However, the Plan does not identify areas of suitability for wind energy development. Therefore, in order to comply with national policy³, Policy PLP 26 should be amended to exclude its application to this form of development (**SD1-MM82, SD1-MM83, SD1-MM84, SD1-MM85, SD1-MM86, SD1-MM87**).
420. The Plan does not include a specific carbon reduction target. However, this is not a requirement, and the Plan provides a range of measures to reduce carbon including the renewable energy policy, the sustainable spatial strategy and other policies.
421. In order to be effectively applied and consistent with national policy, Policy PLP 27 on water management should be amended to clarify that not all

³ Written Ministerial Statement – 18th June 2015.

development proposals will be required to undergo a sequential test in relation to site location (**SD1-MM88, SD1-MM89**). In the case of Local Plan allocations the locational sequential test has already been applied, but other aspects of flood risk management in Policy PLP 27 would need to be satisfied.

Natural environment

422. Policy PLP 30 establishes the Council's approach to biodiversity and geodiversity, and provides protection for a range of habitats, sites and species. However, in order to be consistent with the NPPF and sound, the test for locally designated sites should be based on whether benefits outweigh the need to safeguarded conservation value, rather than on whether development is of 'overriding public interest'. The modifications in **SD1-MM90** will ensure a clear distinction in the hierarchy of international, national and locally designated sites. To ensure consistency with the NPPF, modifications are also needed to clarify that compensatory measures are a last resort after avoidance and mitigation (**SD1-MM91**).
423. The environmental designations listed in Part 2 of the Plan also need to be updated to reflect the latest evidence from West Yorkshire Ecology Service's records on quality and boundaries. This necessitates the deletion of Local Geological Site LGS12 (**SD2-MM338**), and amendments to the size of the following Local Wildlife Sites; site LWS8 in **SD2-MM339**, LWS10 in **SD2-MM340**, LWS29 in **SD2-MM341**, LWS36 in **SD2-MM342**, LWS39 in **SD2-MM343**, LWS47 in **SD2-MM344**, LWS57 in **SD2-MM345**, LWS60 in **SD2-MM346**, LWS64 in **SD2-MM347**, LWS73 in **SD2-MM348**, LWS77 in **SD2-MM349**, LWS87 in **SD2-MM350**.
424. Amendments are also required to Policy PLP 30 to clarify that, for development proposals within 2.5 kilometres of the SPA, further surveys will be required at planning application stage to assess detailed impacts on SPA birds and necessary avoidance and/or mitigation measures will be sought (**SD1-MM92**). This reflects the findings of the Council's HRA work, and is necessary for the policy to be clear and therefore effectively applied. The associated issue of legal compliance is covered later in this report.
425. Policies PLP 31, 32 and 33 provide a positive framework for protecting the Strategic Green Infrastructure Network, landscape character and trees.
426. Policy PLP 34 seeks to conserve and enhance the water environment, including all forms of watercourses and water bodies. A number of modifications are needed to make the policy effective and sound, including the insertion of the words 'where practicable' in relation to seeking enhancements to water courses/bodies, recognising there may be circumstances where this is difficult to achieve. The Council has confirmed that other improvements to water quality and efficiency would be encouraged rather than required, and modifications are needed to reflect these positions (**SD1-MM93, SD1-MM94**). Additional text relating to groundwater protection is also necessary to provide clarity and ensure effectiveness (**SD1-MM95**).

Historic environment

427. Policy PLP 35 seeks to protect and enhance the historic environment. A number of changes are needed to ensure consistency with the NPPF and make

the policy sound. This includes reference to the enhancement of historic assets, clarification of when substantial harm or loss may be permitted, and clearer distinction between and strengthening of the approach to designated and non-designated heritage assets. The approach to Conservation Areas also needs to be widened to enable the conservation of significant elements in all Conservation Areas, and not just those where Conservation Area Appraisals have been undertaken. Subject to these changes (**SD1-MM96** and **SD1-MM97**) I am satisfied that the policy would be sound and provide an appropriate framework for protecting the range of heritage assets in Kirklees.

428. Historic designations are listed in Part 2 of the Plan, including SMs, historic battlefields, historic parks and gardens, and archaeological sites. However, a modification to the supporting text is necessary to make it clear that the list and the Policies Map are not definitive, and do not, for example, include listed buildings (**SD2-MM351**). This is necessary in order for the Plan to be effectively applied. West Yorkshire Archaeology Advisory Service records are referenced within Part 1 of the Plan.

Communities

429. Chapter 17 includes a range of positive policies which seek to protect and enhance the provision of community facilities and sports facilities and open space, and support healthy communities. A number of changes are needed to make the policies effective and sound. Firstly, modifications to avoid overlap and provide a clear distinction between Policy PLP 48 on community facilities and PLP 50 on sports facilities and open space (**SD1-MM107**, **SD1-MM108**, **SD1-MM109**, **SD1-MM111**). Secondly, amendments to the supporting text in Policy PLP 48 to clarify the need to protect facilities which are critical to the role and function of a centre (**SD1-MM107**). Thirdly, adjustments to Policy PLP 48 to ensure that options for alternative community uses and compliance with Community Asset regulations are considered when assessing proposals for the loss of a community facility (**SD1-MM106**). New wording in Policy PLP 50 referring to replacement facilities in terms of 'quantity and quality' is also needed to ensure compliance with paragraph 74 in the NPPF (**SD1-MM110** and **SD1-MM112**).

430. Although criterion c in Policy PLP 50 refers to 'an alternative sport use', I am satisfied that, in the context of the plural reference in the supporting text and the Council's past application of policy, that the criterion is broadly consistent with paragraph 74 in the NPPF and would be reasonably applied to schemes involving more than one alternative sport use. Overall, despite other slight differences in wording and subject to the above modifications, I am satisfied that Policy PLP 50 is broadly consistent with the NPPF.

Environmental protection

431. The policies in chapter 18 provide a positive framework for protecting and improving environmental quality. In order to be effective Policy PLP 51 should be amended to refer to the West Yorkshire Low Emission Strategy 2016 to 2021 and associated Technical Planning Guidance, as these documents provide key details on the assessment of impact and evidence required to support applications (**SD1-MM114**). Wording relating to 'nuisance' and 'unsafe levels' should also be removed for reasons of soundness (**SD1-MM113**). Nuisance is

not a measure of air quality, and focusing on development which reaches unsafe levels would fail to improve air quality across the district or accord with the Low Emission Strategy (**SD1-MM113**).

432. The Council's Air Quality Assessment document indicates that the Plan could have a moderate or slight adverse effect on air quality in some areas. However, the assessment concludes that the overall effect of the Plan on air quality will not be significant, and that effects would be negligible in identified Air Quality Management Areas in Kirklees. Furthermore, there are policies and measures embedded in the Plan that will help to provide mitigation, including transport and design policies and the spatial strategy. Policy PLP 51 also requires development schemes to demonstrate that they will not result in air pollution increases that cause unacceptable impacts, and seeks sustainable mitigation measures.

Green Belt

433. Chapter 19 includes a range of detailed policies relating to different forms of development in the Green Belt. These policies, in conjunction with national policy and subject to the modifications below, will enable the Council to effectively deal with proposals that come forward.

434. In order to be effective, modifications are needed in Policies PLP 54 and 57 to provide a clearer approach to design which seeks to avoid harm to Green Belt function (**SD1-MM115, SD1-MM116, SD1-MM120**). Other changes are needed to ensure consistency with Green Belt policy in the NPPF, including substitution of the word 'buildings' in Policy PLP 56 with the term 'appropriate facilities' in association with outdoor sport and recreation proposals, and requiring schemes to preserve openness and ensure no conflict with Green Belt purposes (**SD1-MM117** and **SD1-MM118**). References to 'host building' in Policy PLP 57 also need to be replaced with the term 'original building' (**SD1-MM119, SD1-MM121, SD1-MM144**). The impact of outdoor areas on openness would be assessed as an integral part of the decision-making process on applications for extensions/alterations, and consequently this aspect of Policy PLP 56 is sound.

435. Policy PLP 59 deals with infill and redevelopment of brownfield sites in the Green Belt. Criterion c which seeks to restrict the height of new structures is insufficiently flexible to allow the effect on openness to be considered on a case by case basis. It is also unclear how the requirement to avoid cumulative impacts on openness in criterion e would be measured or achieved. These criteria therefore need to be deleted to make the policy effective (**SD1-MM124**), whilst clarification on the definition of 'infill' is required (**SD1-MM125**). Other changes are needed to bring the policy in line with the approach established in paragraph 89 of the NPPF. This includes deleting reference to 'environmental improvements' and other circumstances in criterion b (**SD1-MM124, SD1-MM126**), and amending the wording on Storthes Hall to clarify key tests (**SD1-MM124, SD1-MM127**).

436. Reference to infilling in villages in the Green Belt (overwashed settlements) in the supporting text to Policy PLP 59 should be placed in a separate section, to provide a clear distinction with between this matter and the purpose of Policy PLP 59 (**SD1-MM122, SD1-MM123**). To make the new section effective and

allow for changing circumstances, amendments are needed to allow the assessment of whether a settlement is a village to be made on a case by case basis (**SD1-MM122**). The definition of 'limited infilling' as comprising up to two plots within a continuously built-up frontage is reasonable and should be inserted for the policy to be effective (**SD1-MM122**).

Urban Green Space

437. Policy PLP 61 seeks to protect UGS identified on the Policies Map, and also applies to small open spaces (less than 0.4 hectares) identified as valuable in the Council's Open Space Study (2016) or Playing Pitch Strategy (2015). In order to provide sufficient clarity and make the policy effective, these valuable small sites should be referenced in the Plan (**SD1-MM161**). A number of small sites in the Open Space Study were not assessed, and the Council has confirmed that it would undertake an assessment of value at the time of a planning application. This position needs to be inserted into the policy to make it effective and sound (**SD1-MM129**).
438. Criterion a in the policy states that loss of UGS will only be permitted where a site does not meet local needs for open space, sports or recreational facilities, in line with the first bullet in paragraph 74 in the NPPF. However, the Council's evidence shows that, in addition to recreational value, some sites in Kirklees have significant visual, landscape and/or biodiversity value, and/or may not have public access. As established elsewhere in this report, these sites can contribute to the quality, character and appearance of the district and contribute to the health and well-being of local residents, in line with aims in the NPPF. Accordingly, in order to be effective, word changes are needed to recognise these other contributions, extend beyond the issue of open space standards and deficiencies, and clarify the Council's approach in relation to the full range of UGS in Kirklees (**SD1-MM128, SD1-MM130, SD1-MM143**).
439. Other changes are needed to Policy PLP 61 to ensure consistency with paragraph 74 in the NPPF, including deletion of the requirement that replacement facilities are equivalent or better in terms of accessibility and type (**SD1-MM128, SD1-MM131**). Criteria d and e should also be deleted as these are additional exceptions which go beyond paragraph 74, and would be appropriately assessed through the planning application process (**SD1-MM128, SD1-MM132, SD1-MM133**).
440. The remaining exceptional circumstances where loss of UGS may be permitted, as set out in criteria a, b and c, are expressed as options. As such, although not all criteria may be applicable in every case, I am satisfied that the policy as modified provides some flexibility for all forms of UGS, and allows for changing circumstances or replacement/alternative provision. In reaching this conclusion I have had regard to a number of recent Inspector decisions in the district relating to proposals on UGS, which have been drawn to my attention⁴.

⁴ APP/Z4718/W/16/3147937, APP/Z4718/W/16/3162164, APP/Z4718/W/16/3162164, APP/Z4718/W/16/3147937.

Open spaces – other aspects

441. Policy PLP 62 seeks to establish the circumstances in which development on Local Green Spaces may be permitted as an exception, but does not cover the full range of Green Belt exceptions in paragraphs 89 and 90 in the NPPF. In order to be clear and consistent with national policy, the text should be simplified to specify that proposals on these sites will be assessed having regard to Green Belt policy (**SD1-MM134, SD1-MM135**).
442. Policy PLP 63 seeks the provision of new open space in association with development proposals. However, although a standards table is contained in the Plan, a link to the table is required within Policy PLP 63 itself in order to clarify these standards will apply (**SD1-MM136**). The open space standards in the table have been informed by a range of local and national evidence and are broadly robust. However, in order to provide sufficient information and ensure effectiveness, standards for play provision and the amount required per dwelling for different typologies should be included (**SD1-MM137**).

Conclusion on Issue 10

443. In conclusion, subject to the above modifications, the Plan's detailed policies relating to growth delivery, sustainable travel, design, climate change, the natural and historic environment, community facilities, environmental protection, Green Belt and open spaces are justified, effective and consistent with national policy.

Issue 11 – Does the plan make appropriate provision for the steady and adequate supply of minerals?

444. Minerals of importance found in the district are: aggregates, sandstone and clay/shale. Coal is also present in the east of the district and provision also needs to be made for hydrocarbons, in accordance with the NPPF and PPG.
445. In terms of aggregates, regional guideline supply figures have been set by Government, most recently in 2009. Although the Yorkshire and Humber Regional Aggregates Working Party was dissolved in 2011 for a temporary period, it was reinstated in 2013 and aggregate supply continues to be monitored through the annual West Yorkshire Local Aggregates Assessment, which is the level at which assessment is set. The NPPF requires a minimum landbank of 7 years for sand and gravel and 10 years for crushed rock. Sand and gravel supplies in the district are limited, although a further allocation is proposed, and, on 2015 data, there is a landbank of 8 years 3 months for sand and gravel and 30 years and 2 months for crushed rock.
446. The supply of crushed rock is relatively healthy, being a by-product of the sandstone block/dimension stone but I accept that the quality is generally quite poor which results in the import of aggregates to Kirklees and therefore the larger landbank indicated for crushed rock is not unreasonable. The calculation of the 10 year sales supply figures has been uplifted by 25% to reflect growth in demand and a return to the levels prior to the economic downturn in 2008, considered by some to be an overestimate. However, the increase reflects the Council's economic and housing aspirations for the area, reflected in the other areas of the Plan. With the minerals allocations in place,

there could be a large landbank of 80 or so years for crushed rock but it is unlikely that all this would be worked at any one time but would depend on the market. In any event, it is dependent on sandstone/ dimension stone working, for which no specific targets for landbanks have been set in the NPPF. The Council has taken into account the opportunities for recycling of aggregate but these are often not recorded in construction, demolition and excavation waste data since the recycled material does not leave the site but used for redevelopment. Whilst the national and regional guidelines envisage greater use of recycled material (up to 31%), local data estimates that this is much lower, at about 7.5%, although I consider that the Plan allocates sufficient recycling sites for processing at higher rates.

447. The current estimated landbank for sandstone block/ dimension stone is about 18 years in the Council's estimate. The stone in this area is considered to be of national and local importance in new building projects and the restoration of older buildings and areas. Paragraph 143 of the NPPF states that Councils should plan for the continued supply of such minerals and this would contribute to the maintenance of the many listed buildings in the area as well as prestige projects nationally. Whilst some of the stone might not be used locally, the NPPF recognises national resources need to be reserved since minerals can only be worked where they occur. Given the local variability of the quality of the stone, even on the same site, a significant allowance needs to be made for the quality stone required. The Minerals Site Methodology (LE100) recognises that there are sufficient blockstone allocations for the plan period but that further allocations for sites and areas need to be made as the current reserves would be severely depleted by the end of that period. As such, I consider that the various allocations made allow for a reasonable reserve of the resource.
448. Clay and shale has a landbank of 18 years and the NPPF says that this needs to cover 25 years, since the use for clay pipes makes it similar to the use of brick clay, which the NPPF defines as a national resource mineral. Two large production plants blend the mineral from more than one source to produce the pipes and the location of the resource is important in respect of the plants. As such, further sites need to be allocated in the Plan to ensure a 25 year landbank over the Plan period.
449. The policies of the Plan are consistent with those in the NPPF and the minerals section of the PPG. Policy PLP 36 sets out criteria against which applications for the exploration and extraction of minerals will be scrutinised. This includes heritage repair which I consider important in site selection. The Council has taken the view that minerals development is not inappropriate in the Green Belt. However, consideration has to be given to the openness of the Green Belt and the reasons for including land in the Green Belt when determining whether this is the case. In examining the allocated sites I have taken these criteria into account. A MM (**SD1-MM98**) is required to ensure that landscape character is taken into account in assessing the impact of the development. In addition, a MM (**SD1-MM99**) is needed to the policy to ensure that it includes an assessment of need for the mineral concerned, which would be looked at in the light of the allocations in the Plan and the size of the landbank at the time of the application.

450. Policy PLP 37 concerns site restoration and aftercare. A MM (**SD1-MM100**) is needed to ensure that landscape character is assessed as part of any proposals for restoration and aftercare. The policy also needs to be split into two parts to ensure that mineral working will only be allowed where the site can be restored and aftercare managed to a high standard, including a reference to landscape character, and a second part which covers the criteria for site restoration, including enhancement benefits. Although concerns have been raised that the original character and biodiversity of sites could not be restored, since they are rarely the same in terms of their appearance, there are good examples of sites where biodiversity has been improved and landscape character is not adversely affected after restoration.
451. Policy PLP 38 covers minerals safeguarding areas. The background papers, especially Minerals Safeguarding Report and Policy Options paper (LE102), set out the reasoning and the policy options available on safeguarding. Paragraph 143 of the NPPF requires Councils to adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by new non-mineral development, whilst not creating a presumption that resources defined will be worked. The Council has chosen to use British Geological Society (BGS) mapping and DCLG resources to define the mineral resource and follows BGS guidance in safeguarding the whole of the resource, on which consultation will take place when non-mineral applications are received. This ensures that the whole of the known mineral resource is safeguarded and does not need to be site specific, which has been suggested as an alternative. The exemption of various types of minor development works from consultation is also a sound approach to safeguarding the resource.
452. The Safeguarding Report also covers buffer zones around sites. However, this is within the context of preventing new, sensitive development from sterilising mineral development, rather than defining the minerals allocations for the Plan, when constraints are considered when allocating sites. Whilst other minerals authorities might have accepted buffer zones around sites, this is a broadbrush approach which might lead to sites not being permitted when constraints could be overcome.
453. Policies PLP 39 and PLP 40 cover the protection of minerals infrastructure, and alternative development on these sites, with a 100m buffer is drawn around them. The buffer has been drawn to prevent any problems with noise and dust from these sites which might occur if there were any sensitive uses nearby. Whilst some developers might want to build closer to these sites than the buffer would allow, 100m represents a point at which such problems would decline. The policies are intended to be flexible and PLP 40 sets criteria for alternative development on these sites.
454. Policies PLP 41 and PLP 42 cover the exploration, appraisal and production of hydrocarbons. The processes that are covered by these policies can involve the transportation of large volumes of water and equipment, which result in high volumes of HGV traffic. As such I consider that a MM (**SD1-MM101**) is necessary to PLP 41 to ensure that the highway impacts of such development are taken into account when decisions are made on planning applications. The wording of PLP 42 is such that it refers to impacts in general, which would include the highways impacts and impacts on designated areas.

Conclusion on Issue 11

455. Therefore I conclude that, subject to the afore-mentioned modifications, the plan makes appropriate provision for the steady and adequate supply of minerals, as required in the NPPF and PPG.

Issue 12 – Are the proposed minerals site allocations effective, deliverable, justified and soundly-based and do they properly address site and infrastructure requirements, mitigation measures and environmental, traffic and other considerations in accordance with national policy?

Site selection process

456. The Council has allocated sites in accordance with the PPG paragraph 27-008-20140306 in respect of each specific type of mineral. The sites have been categorised as minerals extraction sites, Preferred Areas or Areas of Search, depending on whether there was evidence of supportive landowners, mineral presence and the viability of the reserve. They were the subject of SA and reasonable alternatives were considered and consulted on, including through the Site Options report. Buffer zones were used around constraints in earlier iterations of the plan documents. However, the Council has chosen to take a more site specific approach in setting out the constraints for each of the sites in the submitted Plan. In accordance with NPPF, extensions were sought to existing sites, which might increase the length of working in certain areas, but which reduces the need for other areas to be brought forward.

Minerals site allocations policies

457. The minerals site allocations are set out in text boxes in Part 2 of the Plan, but are not incorporated within an actual policy. In order to provide sufficient weight and clear direction for developers and the community, new policies (PLP 68-71) are required which specify that sites are allocated and identified on the Policies Map, and establish the general approach that will apply. These modifications relate to sites in Areas of Search – Policy PLP 68 (**SD2-MM352**), Minerals Extraction sites – Policy PLP 69 (**SD2-MM353**), Minerals Preferred Areas Policy PLP 70 (**SD2-MM360**), in addition to Minerals Infrastructure sites – Policy PLP 71 (**SD2-MM362**). The new policies for the allocation of the minerals sites are positively-worded and set criteria for their development in the box below the policy.

Minerals sites in the Green Belt

458. A number of non-operational minerals sites are in the Green Belt. In Plan order these are: ME1965b, ME2248a, ME2259 ME2267a, ME2312a&b, ME2314, ME1965a, ME2248c, ME2263, ME2265, ME2568, ME1966, ME1975 and ME3324. In examining these sites I have taken into account the effects on the openness of the Green Belt and the reasons for including land in the Green Belt, in accordance with the relevant paragraphs of the NPPF. In all of the cases I have found that there would be no harm to the openness of the Green Belt or the reasons for including land in the Green Belt. Any built ancillary development could be controlled through any subsequent planning

application and the proposal would not encroach on the countryside, since it would be restored following the quarrying to an appropriate use.

Areas of Search

459. These are sites with a likely resource which is relatively unconstrained, which have not been promoted by landowners or the quantity and quality of the mineral has not been confirmed through evidence.
460. ME1965b - This site has been identified as being likely to have viable quantities of sandstone block, which is a nationally significant resource. It is close to an existing operational quarry (ME2263), through which it could be worked and processed, although improvements would be required to the access. There are residential properties nearby and any application would need to assess the impacts on the occupiers, and appropriate mitigation, where necessary.
461. ME2248a - This site has been identified as being likely to have viable and significant quantities of clay and shale. It is close to an existing operational quarry (ME2248b) and would effectively be an extension to it. There are residential properties nearby and any planning application would need to assess the impacts on the living conditions of their occupiers as well as the other identified constraints on the site, with mitigation where appropriate.
462. ME2259 - The site is for sand and gravel extraction in the Calder valley from river gravels, which are relatively scarce in this area, and therefore the site would perform a useful role, despite being on higher quality agricultural land. There are a number of constraints on the site including the management of flood risk and the impact on wildlife and heritage assets. However, any impacts would be assessed as part of the planning application and at that stage it would be considered whether any mitigation would be required.
463. ME2267a/ME2312a&b - The site was previously safeguarded and is considered to contain good reserves of clay and shale, being next to an active clay and shale quarry (ME2247), to which it would be a large extension, along with sites ME2312a&b. The sites are within an area of open countryside with scattered dwellings and it will be necessary to assess the impacts on both of these when any planning application is submitted for their development. However, the character of the local area ensures that there is scope for mitigation measures to protect the local landscape and the amenities of local residents, if necessary.
464. ME2314 - This is a large site close to an existing minerals operation for clay and shale (ME2248b) and known reserves at ME2248c and would continue existing working in the area. Whilst the site is large, the allocation of sites in this area would help to provide reserves for a mineral of national importance. There are residential properties nearby and any planning application would need to assess the impacts on the living conditions of their occupiers, as well as the other identified constraints on the site, together with mitigation where appropriate.

Mineral extraction sites

465. These are sites which likely to be acceptable in planning terms, with a willing land owner in place, and minerals operators having also supplied the Council with evidence demonstrating the existence of the mineral in sufficient quantity and quality, providing a greater degree of certainty to the viability of the mineral resource. Only those sites which are not already operational or did not have planning permission at the time of the examination are assessed in this section.
466. ME1965a - would be a large new site close to an existing quarry with processing facilities (ME2243) and would produce blockstone, a nationally significant resource. The need for this mineral has already been discussed under the need for a steady and adequate supply of minerals and that need remains despite the recent planning permission on site ME2568 and a small windfall of blockstone at Peace Wood. The site is close to an Area of Search (ME1965b), but this is a much smaller site, which contains only a little of the reserve. It could not compensate for this site in terms of production and is properly allocated as an Area of Search, rather than a mineral extraction site.
467. There are a number of constraints on the site. There are residential properties nearby at Park Head and Deane Grange and the large site is open, with a traditional agricultural landscape, including dry stone walls. The landscape would be changed by the quarrying operation but the Council would need to assess whether the proposed restoration and aftercare scheme for the site was appropriate, in terms of landscape and biodiversity, when considering any planning application. There are currently some views of the site uphill from Park Head and across Park Head Lane and the visual impact of the proposal, together with the impact of dust and noise on the occupiers of these properties, would also need to be addressed in any future planning application.
468. The River Dearne is on one side of the site and the Park Dike also crosses it. A document used to inform the former Core Strategy suggested a buffer zone of 250m should be drawn around watercourses. However, no justification for this distance is offered in the document, which, in any event, has not been used to inform this Plan. The Environment Agency's latest consultation response requires only an 8m standoff from these watercourses. In order to inform the size of the working areas and pollution prevention measures necessary in this case, a hydrological assessment is required. This would also examine other water environment impacts, including any wells in or near the site, and the protection of water infrastructure, such as that belonging to Yorkshire Water. MMs **SD2-MM354** to **MM357** would be necessary to address these matters and correct the name of the site. The nearby archaeological site would be the subject of an assessment prior to the determination of any planning application and Historic England has no objection to this approach. Other impacts, such as those on the users of nearby footpaths and long distance trails, would also need to be taken into account in the assessment of any subsequent application.
469. ME2248b&c - Site ME2248c is in the Green Belt and was previously a minerals safeguarded site in the UDP. The site is adjacent to an existing quarry at ME2248b and to proposed extensions to the north (ME2314) and to the west (ME2248a), both of which are Areas of Search. Two MMs (**SD2-MM358** and

SD2-MM359) are required to correct the gross and net sizes of site ME2248b to 28.69ha. Together these sites, for clay and shale, represent a national reserve for material for clay pipes. There are residential properties nearby and these sites might be worked over long periods of time. Any planning application for the sites would need to assess the impacts on the living conditions of their occupiers, as well as the other identified constraints on the site, together with mitigation where appropriate.

470. ME2265 - This site is for the extraction of clay and shale and is in the Green Belt. The site is close to an existing operational quarry for clay and shale (ME2249) to which it would form an extension and the allocation of the site would ensure that sufficient reserves are available for this important mineral. Any planning application for the sites would need to assess the impacts of the proposed development and the matters identified in the policy box, together with mitigation where appropriate.
471. ME2568 - At the time of the hearings the Council had resolved to grant planning permission for the site, subject to a suitable S106 agreement being agreed. Full planning permission was subsequently granted on 18 October 2018 for the quarrying of blockstone. However, this matter and any other constraints have been considered as part of the planning application process.

Preferred Areas

472. The Preferred Areas represent known, relatively unconstrained sites with a viable quantity of reserve for the target mineral, but with no willing landowner. Once these sites are allocated then it becomes more likely that the landowner would allow quarrying.
473. ME1966 - This site is immediately adjacent to site ME2246, which includes high quality blockstone stone and processing facilities. It could be accessed through the existing quarry and use the existing facilities there. MM (**SD2-MM361**) is required to ensure that reports are produced on the impacts on the habitats which are important for off-site foraging by South Pennine Moors SPA qualifying bird species birds in accordance with policy PLP30. The site has a number of other constraints, including recreational uses, and site specific considerations which will require reports and further information, should a planning application be made to work the site.
474. ME1975 - The site is next to an existing operational quarry (ME2251), which produces good quality blockstone, a nationally significant resource. This site would represent an extension to it and would be able to use existing processing facilities. The site has a number of constraints and site specific considerations which will require reports and further information, should a planning application be made to work the site.
475. ME3324 - The site has a good quality viable blockstone reserve, which is a nationally significant resource, and is adjacent to site ME2568, to which it would form an extension. The access to the site would use the junction of Black Lane/Intake Lane/Nopper Road and Arborary Lane. Although six accidents were reported over a 5-year reporting period at this junction, only one of these was reported as serious. The allocation notes the need for

highways improvements as well as the assessment of other impacts, including those on heritage assets, hydrology and noise.

476. There are a number of areas which have been the subject of quarrying in the past and at present and where further allocations are being made in the plan. Residents in and around these areas, for example, around Shelley, Upper and Lower Cumberworth and Crosland Moor, are concerned about the concentration of minerals development and the cumulative impact on them over the years. However, it has to be borne in mind that minerals can only be worked where they occur and these areas are likely to represent the best reserves of relevant minerals which operators wish to develop.

Minerals infrastructure sites

477. The safeguarding of minerals infrastructure sites, including those for processing and distributing the minerals is important and assists in the use of sustainable means of transport for minerals, in accordance with the NPPF and PPG.

478. Site MI3403 is an area of sidings and other railway land owned by Network Rail. However, they have said that the site is operational railway land and is not available for minerals infrastructure uses. Therefore, MM **SD2-MM363** is required to delete this undeliverable site from the plan.

479. There are a number of minerals infrastructure sites which have been safeguarded in the Dewsbury and Ravensthorpe area, notably sites MI3398, MI3399 and MI3404, which are near to areas proposed for regeneration. Under policies PLP39 and PLP40 these sites have 100m buffer zones around them to protect any new development proposed. It would be for a developer to show through a submitted planning application that mitigation for any adverse impacts could be provided, to ensure the continued operation of these minerals infrastructure sites.

Conclusion on Issue 12

480. Therefore I conclude that, subject to the afore-mentioned modifications, the proposed minerals site allocations are effective, deliverable, justified and soundly-based and properly address site and infrastructure requirements, in accordance with national policy in NPPF.

Issue 13 – Do the waste policies included in the Plan ensure that the waste needs of the district can be sustainably managed?

481. The waste policies of the plan, PLP 43 and PLP 44, are supported by a Waste Needs Assessment (WNA) for the borough (LE105 and 106), set within the regional context. The assessment evaluates the likely need arising for each type of waste over the plan period and the capacity of the existing facilities available to deal with it. The Council is committed to meeting national recycling targets in accordance with the National Planning Policy for Waste (NPPW) and the local Municipal Waste Management Strategy through the waste hierarchy. MM (**SD1-MM102**) is required to update and correct the existing waste hierarchy diagram (Fig 8) in the plan. A further MM (**SD1-MM103**) is required to include a number of new paragraphs which set out the

position in the Borough for each type of waste and the outcome of the capacity assessment and the resulting land requirement. These paragraphs are necessary to give a complete picture of the wastes arising in the Council's area, the existing capacity for their management and indicate any further capacity required over the plan period.

482. The WNA modelled 12 different scenarios and then determined that a growth scenario, based on likely population growth and increases in waste, together with a median recycling rate, would provide for waste needs planning. I agree that this scenario is the most appropriate for examining the likely capacity gap.
483. In terms of landfill, for Local Authority Collected Waste (LACW), there would be only a small shortfall which could be accommodated through the restoration of mineral workings, and covered by Policy PLP 46. Sufficient capacity for Commercial and Industrial (C&I) landfill already exists for most of the plan period, with reliance placed on external facilities for both this and a small gap for hazardous waste landfill. Having regard to the outcome of the DtC discussions, I am convinced that there will be external capacity for those elements of the provision which cannot be accommodated within the District for the plan period and beyond.
484. There is currently an Energy from Waste (EfW) plant, with an expected life to 2028. A capacity gap of about 100,000t of waste would result from its closure at that time, although if it operated to the end of the plan period this would reduce to 30,000t. In order to make the plan sound an allocation is required to ensure that there is an appropriate site for an EfW plant available in the event of a decision to replace the existing plant. A significant amount of recycling provision is needed for LACW, together with some capacity for C&I, Agricultural and Construction, Demolition and Excavation waste. I consider that the allocated site and sites coming forward under Policy PLP 44, with existing transfer stations, would give sufficient capacity for the plan period. Recycling of hazardous waste depends on external provision and I consider that the external capacity secured through the DtC discussions would be sufficient to deal with this.
485. There is a need for a composting facility within the district, with Policy PLP44 providing opportunities for this type of facility. The policy also allows for the development of waste transfer capacity on appropriate sites, if needed. There is no need for the plan to provide other types of capacity, for example, low level radioactive waste.
486. The strategy which has evolved includes the allocation of one strategic site (W1), which would address the significant capacity gap identified for the recycling of LACW, alongside a network of transfer stations. The plan also sets more flexible policies for the development of further waste facilities in sustainable locations on appropriate employment land. The range of locations is such that it would provide for a number of sites in different areas of the Borough close to arisings suitable for the management of waste of different types through a range of technologies. As such, I consider that the analysis of need and the strategy selected provides a sound and positive basis for the planning of waste management in the borough and is in accordance with NPPW and PPG.

487. The Plan contains strategic policies which set out its relationship to the waste management hierarchy locally. Policy PLP 44 sets out the criteria for the development of sites for waste uses, including taking into account the natural and historic environment. Policy PLP 45 covers the safeguarding of waste facilities identified on the Policies Map. MM (**SD1-MM104**) is required to the text of Policy PLP45 to clarify that existing waste management facilities will be safeguarded for their operational period, subject to decommissioning and any revocation processes of any permits or licences, after which they would no longer be safeguarded, provided an equivalent replacement facility was provided. The policy also seeks to ensure that new development around existing or planned waste management sites does not compromise the operation of the waste site. Concerns have been raised that this might impede new development, especially housing, in regeneration areas along the Calder valley, for example, but with sufficient safeguards in place, there is no reason why new development cannot be provided in such areas. A further MM (**SD1-MM105**) is required to the text accompanying this policy, which clarifies the role of waste facilities, like anaerobic digesters, on agricultural holdings and the need for their monitoring.

Conclusion on Issue 13

488. Therefore I conclude that, subject to the afore-mentioned modifications, the waste policies included in the Plan make proper provision for the district's waste needs to be sustainably managed, complying with national policy in the NPPW and PPG.

Issue 14 – Is the proposed waste allocation in a suitable and appropriate location and is it effective, deliverable, justified and soundly based? Together with the safeguarded sites, does the Plan provide sufficient land for waste management needs?

489. The waste site allocation is set out in a text box in Part 2 of the Plan, but is not incorporated within an actual policy. In order to provide sufficient weight and clear direction for developers and the community, new policies are required which specify that sites are allocated and identified on the Policies Map, and establish the general approach that will apply. A new policy, PLP 72, is required, through MM **SD2-MM364**, in order to allocate the new strategic waste management site W1, with criteria for its development set out in the box below the policy.

490. The remainder of waste development will come forward through the market under the criteria-based policies, set out in the Strategies and Policies section of the Plan. I consider that these measures, together with agreed external capacity and the safeguarding of existing waste sites, will create the necessary provision to manage the waste needs of the district over the plan period.

491. In addition, further text is required on safeguarded waste management sites as set out in MM **SD2-MM365**, to give proper reference back to policy PLP45, the policy which covers safeguarding waste sites.

492. Site WS16 was allocated as a safeguarded waste site in the submitted plan. It covered a waste management site at Clayton Hall Farm, where renewable

energy is being produced from imported and farm-based waste. Following on from the changes to the text in MM SD1-MM105, this allocation is no longer required. MM **SD2-MM366** is required to delete the allocation.

493. There are a number of waste sites which have been safeguarded in the Dewsbury and Ravensthorpe area, notably sites WS27, WS33, WS34 and WS36, which are near to areas proposed for regeneration. I consider that the safeguarding of the sites would not unduly restrict development on nearby sites. It would be a matter for the design and layout of the new development proposed at planning application stage to ensure that the new development complied with Policy PLP 45, which covers this issue. A number of other issues were drawn to my attention but these mainly concern the accuracy of the boundaries of waste sites shown on the policy maps, which is a matter for the Council.

Conclusion on Issue 14

494. Therefore I conclude the proposed waste allocation is in a suitable and appropriate location and, together with the safeguarded sites and sites coming forward under policies PLP 44 and PLP 45 would provide sufficient land for waste management needs and is effective, deliverable, justified and soundly based, in terms of waste management, and complies with national policy in NPPW and PPG.

Issue 15 – Does the Plan set out a robust monitoring and implementation framework?

Minerals and waste

495. The Council has taken a pragmatic approach to the monitoring of minerals and waste development, given the difficulties with data collection for certain minerals and types of waste, some of which would be collected regionally and sub-regionally. The indicators selected for minerals and waste development are appropriate and the monitoring of the landbanks for relevant minerals would ensure that a review of the plan would be triggered, should they fall below the required level. The allocations also provide for development beyond the plan period which gives flexibility should requirements change or sites fail to come forward, which represents a sound approach to the implementation and monitoring of these sections of the Plan. MM **SD1-MM138** is necessary to ensure that all relevant information sources are taken into account, including those available locally. This provision also relates to the minerals and waste sections of the Plan.

496. Appendix 2 of the Plan, which comprises the Monitoring Framework, requires MMs to ensure the effective monitoring of the Plan in terms of minerals and waste policy. MM **SD1-MM153** is required to ensure that the 25-year landbank for clay and shale, a nationally important mineral, is maintained for the Plan period. MM **SD1-MM154** is necessary to make it clear that the Plan allocations for aggregates will contribute positively to the sub-regional apportionment for aggregate minerals, in accordance with national policy. MMs **SD1-MM155, SD1-MM156 and SD1-MM158** are required to make it clear that only those proposals which are contrary to policy are used as indicators for the loss of safeguarded minerals infrastructure and waste

management facilities to other uses. MM **SD1-MM157** is necessary to correct the target for policy PLP40a to zero, rather than saying that this part of the policy has no target.

Other matters

497. The remainder of the monitoring framework in the Plan captures a broad range of indicators and targets. In order to ensure effective monitoring of policies a number of additional indicators are required as follows; number of apprenticeship schemes or training programmes secured, linked to the encouragement of such schemes in Policy PLP 9 (**SD1-MM146**); total amount of comparison retail, convenience retail and leisure floorspace completed and levels of pedestrian footfall, linked to the delivery of retail needs and viable centres, as identified in Policy PLP 13 (**SD1-MM147, SD1-MM148, SD1-MM149**); loss/additions to designated and non-designated heritage assets, linked to protection of the historic environment in Policy PLP 35 (**SD1-MM152**).

498. The indicator and target for Policy PLP 24 on design looks at the percentage of appropriate applications, and in order to facilitate effective monitoring should be altered to focus on decisions/outcomes through modifications **SD1-MM150** and **SD1-MM151**.

Conclusion on Issue 15

499. In conclusion, subject to the above modifications, the Plan provides a robust monitoring and implementation framework.

Public Sector Equality Duty

500. During the course of the examination we have had due regard to the aims set out in Section 149(1) of the Equality Act 2010. This includes consideration of the Plan's provision to meet the accommodation needs of gypsies and travellers, and the need for accessible and adaptable housing and inclusive design.

Assessment of Legal Compliance

501. The examination of the legal compliance of the Plan is summarised below.

- The Local Plan has been prepared in accordance with the parameters and timetable set out in the Council's updated LDS (2018). Although the adoption date is later than anticipated the delay is not significant.
- As set out above, consultation on the Local Plan and the MMs was carried out in compliance with the Council's SCI.
- SA has been carried out and is adequate.
- As set out above, the HRA (2017) and HRA of the MMs (August 2018) identify that, subject to mitigation measures in the Local Plan through MMs, no significant adverse effect on the integrity of European protected sites is likely.

- The Local Plan includes policies designed to ensure that the development and use of land contributes to the mitigation of, and adaptation to, climate change, and this issue is covered by a number of objectives in the SA work.
- The Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

502. The Plan has a number of deficiencies in respect of soundness and/or legal compliance for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

503. The Council has requested that we recommend MMs to make the Plan sound and/or legally compliant and capable of adoption. We conclude that with the recommended main modifications set out in the Appendix, the Kirklees Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Katie Child

Elizabeth Hill

Inspectors

This report is accompanied by an Appendix containing the Main Modifications. The Appendix is divided into two sections, covering Parts 1 and Parts 2 of the Plan.

APPENDIX 2

This appendix can be viewed online via the Council's website at <http://democracy.kirklees.gov.uk> or a hard copy can be viewed at the following locations:

- Huddersfield Customer Service Centre, Civic Centre III, Huddersfield
- Huddersfield Central Library (reference section), Huddersfield
- Dewsbury Town Hall, Dewsbury

Additional hard copies will also be made available to Councillors and reference copies will be provided at the Council meeting.

APPENDIX 3

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- Huddersfield Central Library (reference section), Huddersfield
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APPENDIX 4

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APPENDIX 5

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- Huddersfield Central Library (reference section), Huddersfield
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APPENDIX 6

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APPENDIX 7

A guide to equality Impact Assessments (EIAs)

What are Equality Impact Assessments (EIAs)?

- EIAs are a **tool to help you analyse and make more considered decisions** about changes to service delivery, policy and practice. An EIA will help you to identify how specific communities of interest may be affected by decisions and to consider any potential discriminatory impact on people with **protected**
- EIAs can also help to improve or promote equality by encouraging you to **identify ways to remove barriers and improve participation** for people with a protected characteristic.

Why do we need to do Equality Impact Assessments (EIAs)?

- Although not a mandatory requirement, EIAs provide important **evidence** of how we have considered the implications of service and policy changes and demonstrate how we have met our legal Public Sector Equality
- The three main elements of the **Public Sector Equality Duty** are:
 - ✓ Eliminating discrimination
 - ✓ Promoting equality of opportunity
 - ✓ Fostering good relations
- In fulfilling our Public Sector Equality Duty we must ensure that we demonstrate that we have followed a number of key **principles** (based on previous case law):
 - ✓ Knowledge
 - ✓ Timeliness
 - ✓ Real consideration
 - ✓ Sufficient information
 - ✓ No delegation
 - ✓ Review
 - ✓ Proper record keeping
- We need to provide evidence that we have given **due regard to any potential discriminatory impact on people with protected characteristics** in shaping policy, in delivering and making changes to services, and
- We must always consider whether a service change, decision or policy could have a discriminatory impact on people with protected characteristics, not just any impact that is the same as it would be for everyone
- The EIA tool allows us to **capture, demonstrate and publish our rationale** of how we have considered our communities and legal responsibilities under the Public Sector Equality Duty and is our main way of
- **But above all, EIAs are about understanding and meeting the needs of local people and supporting us to deliver our vision for Kirklees.**

When do we need to do Equality Impact Assessments (EIAs)?

- Whenever you plan to **change, introduce or remove** a service, activity or policy.
- At the **VERY BEGINNING** of any process of:
 - ✓ Budget setting
 - ✓ Service review (including changes to employment practice)
 - ✓ Planning new projects and work programmes
 - ✓ Policy development and review
 - ✓ Procurement or commissioning activity

Who should do it?

- Overall responsibility for EIAs lies at a **service** level. A lead officer should be appointed from the service area that is making a proposal and all decisions should be approved by the senior management team in that
- Those directly affected (partners, stakeholders, voluntary groups, communities, equality groups etc) should be engaged with as part of the process.

How should we do it?

- Our EIA process has two stages:
Stage 1 - initial screening assessment
Stage 2 - further assessment and evidence

EIA STAGE 1 – SCREENING TOOL (initial assessment)

The purpose of this screening tool is to help you consider the potential impact of your proposal at an early stage.

Please give details of your service/lead officer then complete sections 1-3:

- 1) What is your proposal?
- 2) What level of impact do you think your proposal will have?
- 3) How are you using advice and evidence/intelligence to help you?

You will then receive your stage 1 assessment score and advice on what to do what next.

Directorate:	Senior Officer responsible for policy/service:
Place	Simon Taylor
Service:	Lead Officer responsible for EIA:
Investment and Regeneration	Richard Hollinson
Specific Service Area/Policy:	Date of EIA (Stage 1):
Planning Policy	01/02/2019

Go back

Move to next
section

1) WHAT IS YOUR PROPOSAL?	Please select YES or NO
To introduce a service, activity or policy (i.e. start doing something)	NO
To remove a service, activity or policy (i.e. stop doing something)	NO
To reduce a service or activity (i.e. do less of something)	NO
To increase a service or activity (i.e. do more of something)	NO
To change a service, activity or policy (i.e. redesign it)	YES
To start charging for (or increase the charge for) a service or activity (i.e. ask people to pay for or to pay more for something)	NO
Please briefly outline your proposal and the overall aims/purpose of making this change:	
<p>6) The adoption of the Kirklees Local Plan will provide a new local development plan for the district for the next 15 years and will be used as the basis for determining planning applications and guide strategic investment decisions linked to land use planning. It will replace the Kirklees Unitary Development Plan once adopted. The procedure to determine planning applications will not change, but there will be an up to date local plan upon which decision making will be based consisting of new local policy.</p>	

Go back

Move to next section

2) WHAT LEVEL OF IMPACT DO YOU THINK YOUR PROPOSAL WILL HAVE ON...		Level of Impact
		Please select from drop down
Kirklees employees within this service/directorate? (overall)		Positive
Kirklees residents living in a specific ward/local area?		Positive
Please tell us which area/ward will be affected:		All wards
Residents across Kirklees? (i.e. most/all local people)		Positive
Existing service users ?		Positive
Each of the following protected characteristic groups ?		Please select from drop down
<i>(Think about how your proposal might affect, either positively or negatively, any individuals/communities. Please consider the impact for both employees and residents - within these protected characteristic groups).</i>		
...age	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...disability	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...gender reassignment	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...marriage/ civil partnership	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...pregnancy & maternity	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...race	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...religion & belief	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...SEX	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...sexual orientation	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral

Go back

Move to next section

3) HOW ARE YOU USING ADVICE AND EVIDENCE/INTELLIGENCE TO HELP YOU?		Please select YES or NO
Have you taken any specialist advice linked to your proposal? (Legal, HR etc)?		YES
Do you have any evidence/intelligence to support your assessment (in section 2) of the impact of your proposal on...	...employees?	YES
	...Kirklees residents?	YES
	...service users?	YES
	...any protected characteristic groups?	YES
<p>An initial consultation took place in November 2014 known as "Shaping our Local Plan" where feedback from the public was sought to feed into developing the Draft Local Plan. A further period of public consultation took place between Nov 2015 and Feb 2016 on the Draft Local Plan. These comments have been analysed and used to inform the production of the publication draft local plan. A consultation methodology was prepared in accordance with the council's Statement of Community Involvement, the council's Involving Communities Framework, and the planning regulations. The Statement of Community Involvement was subject to a Equalities Impact Assessment and public consultation. Both the Statement of Community Involvement and the Involving Communities framework provide an open and transparent framework for consultation to ensure equality for all to make representations and shape planning policy documents including the Local Plan. An examination in public was held between October 2017 to April 2018 with an independent planning inspector. The Inspectors confirmed that consultation "was extensive and wide ranging and elicited a high level of response". The purpose of this was to hear issues arising from the publication draft local plan in a public arena. Numerous evidence base documents were required to provide evidence on housing, employment, infrastructure, retail, these can be viewed on the http://www.kirklees.gov.uk/beta/planning-policy/local-plan-examination-library-2017 webpage in a comprehensive local plan document library. Legal advice relating to process/case law, and a number of external consultants employed to produce evidence base reports, alongside working with other services within the council and external bodies on technical advice on for the local plan. The local plan has been prepared in accordance with European/national legislation and policy/guidance and council policies all of which seek to respond positively to the duty, furthermore the consultation has been undertaken in accordance with the Statement of Community Involvement which had its own Equalities Impapct Assessment. The Public can view all supporting evidence on the local plan, including the rationale and decision making for producing the local plan, and the Council's formal decision on the local plan. The comments received and responses on the draft local plan and publication draft local plan, have resulted in appropriate amendments to the publication draft local plan and modification to the plan including the inclusion of mitigation where appropriate. These consultation comments and responses have been set out in the Statements of Consultation setting out the community participation and stakeholder involvement in the production of the local plan. The policies included in the local plan help mitigate negative impacts. Alongside the determination of planning applications building control legislation provides a further level of mitigation prior to, during and post development. The publication draft local plan and associated modifications to the plan has an extensive evidence library available to view at kirklees.gov.uk/localplan including the Statement of Community Involvement and associated Equalities Impact Assessment.</p>		
		Please select from drop down
To what extent do you feel you are able to mitigate any potential negative impact of your proposal on the different groups of people outlined in section 2?		FULLY
To what extent do you feel you have considered your Public Sector Equality Duty?		FULLY

Go back

Move to next section

STAGE 1 ASSESSMENT

IMPACT	RISK
Based on scoring of 1) and 2)	Based on scoring of 2) and 3)
2	18
SCORE (calculated) Max = - / + 32	SCORE (calculated) Max risk = - / + 40

You need to move on to complete a Stage 2 assessment if:

The final Impact score is negative and or the Risk score is negative.

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APPENDIX 8

Sustainability Appraisal

Initial evidence gathering

- Formulate initial aims and objectives for Local Plan
- Begin evidence gathering process
- Identify relevant environmental, economic and social objectives to inform the Sustainability Appraisal

Initial consultation and continued work on evidence gathering

- Engage with local communities, businesses and other interested parties in line with Regulation 18 of Local Plan Regulations 2012
- Take into account representations received from consultation process in line with Regulation 18(3) of Local Plan Regulations 2012
- Engage with duty to cooperate partners
- Ensure compliance with local planning authority's Statement of Community Involvement
- Continue evidence gathering
- Test emerging options through Sustainability Appraisal

Publication and submission

- Draft plan published for representations for a **minimum of 6 weeks** in line with Regulations 17 and 19 of Local Plan Regulations 2012 (and Regulation 21 if application in London)
- Plan submitted for examination, along with Sustainability Appraisal, evidence base and a statement of representations and main issues in line with Regulation 22 of Local Plan Regulations 2012

Examination of submitted plan

- Independent Inspector assesses plan to determine whether it has been prepared in line with the duty to cooperate, other legal requirements, and whether it is sound in line with section 20 of the Planning and Compulsory Purchase Act 2004 and Regulations 23 - 24 of the Local Plan Regulations 2012
- Local planning authority can ask Inspector to recommend main modifications to make plan sound or comply with other legal requirements
- Inspector issues report at end of examination
- Exceptionally, the Inspector will recommend the draft plan is withdrawn if it has not been prepared in accordance with the duty to cooperate or it is likely to be found unsound

Adoption

- Draft plan formally adopted by the local planning authority in line with section 23 the Planning and Compulsory Purchase Act 2004
- Monitoring of implementation of Local Plan policies required in line with Regulation 34 of the Local Plan Regulations 2012

Produce post adoption statement and monitor Sustainability Appraisal indicators of adopted plan

Name of meeting: Council

Date: 27 February 2019

Title of report: Adoption of the Kirklees Local Plan

Purpose of report

To consider the adoption of the Local Plan (incorporating the Inspector's recommended Main Modifications (relating to soundness and legal compliance) and the council's Additional Modifications (relating to minor corrections/clarification) and, subject to this decision, delegate authority to the Strategic Director for Economy & Infrastructure to prepare and publish information required post-adoption of a development plan in accordance with relevant legislation.

Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	Yes. The Local Plan effects all wards.
Key Decision - Is it in the Council's Forward Plan (key decisions and private reports?)	Not applicable – this is a full council decision
The Decision - Is it eligible for call in by Scrutiny?	No
Date signed off by <u>Strategic Director</u> & name	Karl Battersby, Strategic Director Economy & Infrastructure – 12/02/19
Is it also signed off by the Service Director (Finance)?	Eamonn Croston, Service Director (Finance) – 12/02/19
Is it also signed off by the Service Director for Legal Governance and Commissioning?	Julie Muscroft, Service Director (Legal, Governance and Commissioning) – 12/02/19
Cabinet member portfolio	Cllr Peter McBride

Electoral wards affected: All

Ward councillors consulted: All

Public or private: Public

GDPR: This report does not contain information that is not publicly available

1. Summary

Following the Examination in Public the council has received the Secretary of State's final Inspector's report (Appendix 1) relating to the Kirklees Local Plan. The appointed Inspectors have concluded that, with the recommended Main Modifications, the Kirklees Local Plan is sound and compliant with legal requirements. The council is therefore, now in a position to adopt the Local Plan.

The Inspectors' recommendations are binding on the Council and the Local Plan cannot be adopted unless all the Inspector's recommendations are accepted and included in the final version of the plan.

The Plan will provide a sustainable framework for an ambitious, but realistic, housing and job growth programme for the next 15 years. The adoption of the plan will provide the certainty needed to allow the council, its partners and the community to shape the future of our towns and village, boost economic growth, help create healthier communities, maximise scope to attract business investment, and help protect urban green spaces.

Once adopted, the Local Plan becomes the statutory development plan for Kirklees and supersedes the Kirklees Unitary Development Plan (adopted March 1999). Planning law requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

2. Information required to take a decision

Background

Members will recall at an extraordinary council meeting on 12 October 2016 the council agreed to approve the publication draft of the Local Plan to invite formal representations relating to legal and soundness tests and thereafter submit the Local Plan to the Secretary of State for an independent examination in accordance with the council's approved Local Development Scheme.

The publication stage consultation closed on 19th December 2016 and following completion of analysis of the comments received and completion of the Habitat Regulations Assessment and Sustainability Appraisal, the Local Plan was submitted to the Secretary of State for the purposes of an Examination in Public in accordance with the Town and Country Planning (Local Plans) (England) Regulations 2012 on 25th April 2017, in accordance with the full Council resolution made 12 October 2016.

The Secretary of State, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended), appointed Katie Child BSc (Hons) MA MRTPI and Elizabeth Hill BSc (Hons) BPhil MRTPI to undertake the independent examination of the Local Plan. (Elizabeth Hill only dealt with issues regarding minerals and waste.)

The Inspectors reviewed all the comments received on the Publication Draft Local Plan, together with the full evidence base submitted alongside, to determine whether the plan meets the tests of soundness as set out in national planning policy and guidance and to determine if legal requirements had been complied with. The Inspectors conducted a series of public hearings as part of the examination which commenced in October 2017 and concluded in April 2018. These hearing sessions involved roundtable discussions and in some cases the exchange of more detailed evidence. The hearings included council representatives, private developers and members of the public and took place in a number of venues around the district.

Following the public hearings as part of the examination of the Kirklees Local Plan, the appointed Inspectors invited the council to consult on a list of proposed Main Modifications which are considered to make the plan sound and/or legally compliant. These included amendments to some site allocations and designations, as well as changes to policy wording and supporting text. This consultation was accompanied by a Sustainability Appraisal and Habitats Regulations Assessment. The Main Modifications are incorporated into the Inspector's final report (Appendix 1).

The modifications consultation ran from 20 August 2018 – 1 October 2018. At this time the council also took the opportunity to publish some Additional Modifications (minor changes) to provide clarification, corrections, minor up-dates to text and the correction of minor mapping errors to the Policies Map. These changes do not relate to the soundness of the plan (Appendix 2 and Appendix 3). Once the modifications consultation closed the comments received were forwarded to the Inspector's for consideration prior to the final reporting on the Local Plan and a summary of the comments received on the Main Modifications, Additional Modifications and their Sustainability Appraisal/Habitat Regulations Assessment can be found in Appendices 4, 5, and 6.

Following the independent examination of the Local Plan by the Planning Inspectorate the council has received the Inspector's report (Appendix 1) relating to the Kirklees Local Plan. The appointed Inspectors have concluded that with the recommended Main Modifications the Kirklees Local Plan is sound and compliant with the legal requirements. The report concludes that the Local Plan's vision, strategic objectives and spatial development strategy provide a positive and soundly based framework for the delivery of sustainable development in Kirklees.

The council is therefore, now in a position to adopt the Local Plan.

The Inspector's recommendations are binding on the Council and the Local Plan cannot be adopted unless all the Inspector's recommendations are accepted and included in the final version of the plan. If the Council rejects any of the Inspector's modifications, the plan cannot be adopted.

Once adopted, the Local Plan becomes the statutory development plan for Kirklees and supersedes the Kirklees Unitary Development Plan (adopted March 1999). Planning law requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

Options

The council has now reached the adoption stage of the development plan preparation process as set out in Appendix 8. In accordance with Section 23 of the Planning and Compulsory Purchase Act the council can now adopt the Local Plan (together with its modifications) or resolve to not adopt the Local Plan. As it is a statutory duty for the council to prepare a development plan a decision to not adopt would trigger a process to review the reasons given for non-adoption and to re-commence development plan preparation from an appropriate stage in the process.

3. Implications for the Council

3.1 Working with People

The Local Plan provides clarity for what development is intended to happen in the area over the life of the plan, where and when this will occur, and how it will be delivered. It provides certainty for local people regarding where most new development will take place and the policies that will be considered when planning applications are determined. Policies in the Local Plan encourage the involvement of local people in land use planning and the land use framework provided by the Local Plan will allow the further development of local responses, particularly in the form of community led

masterplans, locally led place shaping/renaissance/land use initiatives and Neighbourhood Plans/Orders, where appropriate. The Local Plan focuses on key land use issues that need to be addressed and recognises the contribution that Neighbourhood Plans can make in planning to meet development and infrastructure needs in the district. The Local Plan was subject to early engagement and continuous consultation with the Public. The Inspectors' Report confirms that consultation "was extensive and wide ranging and elicited a high level of response."

3.2 **Working with Partners**

The preparation of the Local Plan has involved working with partners from the outset. Alongside formal consultation with statutory and non-statutory bodies the council has worked collaboratively with adjoining local authorities and other external partners in order to meet its obligations under the Duty to Cooperate. This places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis. The Inspectors' report confirms that, following a review of the evidence presented, that the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

3.3 **Place Based Working**

The Local Plan provides clarity for what development is intended to happen in the area over the life of the plan, where and when this will occur, and how it will be delivered. It provides certainty for local people regarding where most new development will take place and the policies that will be considered when planning applications are determined.

The land use framework provided by the Local Plan will allow the further development of local 'place based' responses, particularly in the form of community led masterplans, locally led place shaping/renaissance/land use initiatives and Neighbourhood Plans/Orders, where appropriate. The Local Plan contains place shaping, design, masterplanning policies and land allocations which can provide the basis for place based working in specific localities in Kirklees. There are a number of Neighbourhood Plans in preparation in Kirklees which are required to be in general conformity with the strategic policies contained in the Local Plan.

3.4 **Improving outcomes for children**

The Local Plan, will create thriving communities through forward planning for jobs, homes, open spaces and the necessary infrastructure to support growth. The Local Plan's vision, objectives and policies aim to help implement the aims and objectives of the council's Economic Strategy and Health and Wellbeing Strategy. There are a number of indirect benefits from the Local Plan to improve the outcomes for children, including making land available for new homes, protection and promotion of important open spaces (including those with children's play facilities), making land available for new jobs and policies, and requiring the provision of essential infrastructure, including education facilities.

3.5 **Other (eg Legal/Financial or Human Resources)**

The absence of an approved Local Plan would have significant implications for development management processes and long term impacts on jobs, homes, inwards investment and prosperity in the district due to development happening in Kirklees in an uncoordinated way, making it difficult to ensure that new homes and employment areas are created alongside public infrastructure needs. In addition, the Housing and Planning Act 2016 increases the government's powers to direct an individual authority to prepare or revise their local plan, to submit it to independent examination, and to publish any recommendations from that examination and to consider whether they should be adopted. In practical terms this means the Planning Inspectorate would produce the Plan on behalf of the council. Intervention is likely to be prioritised against

those councils in areas of high housing pressure who have made the least progress on a plan. It should be noted the Local Planning Authority cannot currently demonstrate a 5 year supply of housing in accordance with the National Planning Policy Framework.

The government requires all local councils to develop a long-term plan which sets out how and where land can be developed over the next 15 years, in order to meet the growing needs of local people and businesses. Having an up to date plan will assist in determining planning applications in accordance with the national planning policy framework, help meeting housing and job needs and assist in increasing inward investment into the district.

An Equality Impact Assessment has been undertaken for the Local Plan which is attached (Appendix 7). The Equality Act 2010 requires local authorities to have a public duty to have due regard to eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between different groups and the Equality Impact Assessment helps to ensure that the council are able to do this. During the course of the Examination in Public, the Inspectors also had due regard to the Equality Act 2010 and this is confirmed in their final report.

The Inspectors have also concluded that various other legal tests have been met, including:

- The Local Plan has been prepared in accordance with the parameters and timetable set out in the Council's updated Local Development Scheme.
- Consultation on the Local Plan and the Main Modifications was carried out in compliance with the Council's Statement of Community Involvement.
- The Local Plan includes policies designed to ensure that the development and use of land contributes to the mitigation of, and adaptation to, climate change, and this issue is covered by a number of objectives in the SA work.
- The Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.
- Sustainability Appraisal has been carried out and is adequate.
- The Habitat Regulations Assessments identify that, subject to mitigation measures in the Local Plan, as modified, no significant adverse effects on the integrity of European protected sites are likely.

4. Consultees and their opinions

Comments from a wide range of statutory and non-statutory consultees have been taken into account in preparing the Local Plan by the council and the Inspectors.

As part of the technical evidence base underpinning the policies and proposals set out in the Local Plan, a wide range of internal and external consultees have provided technical advice. This advice has been considered, taken into account, and has informed decisions for accepted and rejected policies and proposals.

As part of the statutory regulations laid out for preparing development plan documents and, in accordance with the Council's Statement of Community Involvement and other council consultation protocols, the council consulted all interested parties. Formal stages of consultation have included:

- Early engagement – 2014
- Draft Local Plan Consultation – November 2015
- Publication Draft Local Plan Consultation – November 2016
- Examination in Public – April 2017 to January 2019

- Consultation on Local Plan Modifications – August 2018

As part of the Examination in Public the Inspectors held public hearing sessions which involved roundtable discussions and in some cases the exchange of more detailed evidence. The hearings included council representatives, developers/landowners, statutory/non-statutory bodies and members of the public.

Representations received by the council at all stages of the Local Plan's preparation have been made available to the Inspectors. A summary of the comments received at the publication stage have been previously reported to Cabinet members. A summary of the comments received on the Main Modifications is attached (Appendix 4). These comments were considered by the Inspectors as they related to soundness issues. A summary of the comments received on the Additional Modifications and the council's response to these comments are attached (Appendix 5). A summary of the comments received on the Sustainability Appraisal and the Habitat Regulations Assessment of the modifications is also attached (Appendix 6) which were considered by the Inspectors in relation to any relevant legal tests.

5. Next steps and timelines

Should members adopt the Local Plan there are a number of next steps in relation to Local Plan preparation and monitoring:

- The council is required to publicise the adoption of the Local Plan in accordance with planning legislation.
- Following adoption, legislation allows for a six week period to lodge a legal challenge against the Council's decision to adopt. Such challenges need to relate to the legislation and regulations for preparing, submitting and examining Local Plans. The adoption of a Local Plan can only be overturned by a successful challenge in the High Court on a point of law.
- The council is required to publish a Sustainability Appraisal/Strategic Environmental Assessment post adoption statement.
- The council is required to monitor the effectiveness of the Local Plan policies and the sustainability appraisal objectives. The Planning Service is committed to the production of an Annual Monitoring Report.
- The council is required to continue its Duty to Co-operate activity as an ongoing exercise with adjoining local authorities and other prescribed bodies.

6. Officer recommendations and reasons

- 1) That Council notes the Report of the Inspectors and their recommended Main Modifications as set out in the appendix to the report.
Reason: To comply with planning legislation the plan can only be adopted together with the recommended Main Modifications.
- 2) That Council adopts the Kirklees Local Plan incorporating the Main Modifications recommended by the Inspector (set out in Appendix 1) and further Additional Modifications proposed by the council (set out in Appendix 2 and Appendix 3). In doing so this will replace with current statutory development plan (Kirklees Unitary Development Plan).
Reason: To ensure that the council has an up-to-date development plan and to ensure the Local Plan is adopted in accordance with the timeline set out in the Council's Local Development Scheme.
- 3) Subject to recommendation 2 above, Council delegate authority to the Strategic Director for Economy & Infrastructure to prepare the Policies Map to illustrate geographically the

application of policies in the Kirklees Local Plan (incorporating the modifications which relate to the Policies Map) as set out in the Appendices to the report.

Reason: The Policies Map which accompanies the Local Plan is not a development plan document but the Council is required to update the Policies Map to comply with planning legislation.

- 4) Subject to recommendation 2 above, Council delegate authority to the Strategic Director for Economy & Infrastructure to make any further Additional Modifications to the Kirklees Local Plan that relate exclusively to factual updates, grammatical and formatting corrections for the purposes of publishing the plan.

Reason: To ensure that the council has an up-to-date development plan, to ensure statutory development plan is as accurate as possible and to ensure the Local Plan is adopted in accordance with the timeline set out in the Council's Local Development Scheme.

- 5) Subject to recommendation 2 above, Council delegate authority to the Strategic Director for Economy & Infrastructure to publicise adoption of the Kirklees Local Plan and to prepare and publicise the post-adoption sustainability appraisal/strategic environmental assessment statement in accordance with the regulations governing such matters.

Reason: To comply with planning legislation for preparing a development plan.

7. **Cabinet portfolio holder's recommendations**

The Portfolio Holder has been briefed on the implications of the final Inspector's Report, the process of adopting the Local Plan and the next steps which would follow. The Portfolio Holder supports and agrees with the officer recommendations set out in this report.

8. **Contact officer**

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9. **Background Papers and History of Decisions**

Appendices to this report:

- Appendix 1 - Inspectors' Report (including schedule of recommended Main Modifications)
- Appendix 2 - Kirklees Local Plan (Strategy and Policies) – Additional Modifications
- Appendix 3 - Kirklees Local Plan (Allocations and Designations) – Additional Modifications
- Appendix 4 - Summary of representations received on Main Modifications
- Appendix 5 - Summary of representations received on Additional Modifications
- Appendix 6 - Summary of representations received on Sustainability Appraisal and Habitat Regulations Assessment of the Modifications
- Appendix 7 - Equality Impact Assessment
- Appendix 8 – Plan making flowchart (source: NPPG)

Background Papers:

- Local Development Scheme
- Statement of Community Involvement
- Publication Draft Local Plan
- Sustainability Appraisal Addendum - April 2017
- Sustainability Appraisal – Modifications - August 2018
- Habitat Regulations Assessment – March 2017
- Habitat Regulations Assessment – Modifications – August 2018

PLEASE NOTE - HARD COPIES OF THE BACKGROUND PAPERS ARE AVAILABLE FOR COUNCILLORS TO VIEW AT THE CABINET OFFICE - OR GOVERNANCE AND DEMOCRATIC SERVICES - CIVIC CENTRE III.

PLEASE NOTE - HARD COPIES OF THE BACKGROUND PAPERS ARE AVAILABLE FOR MEMBERS OF THE PUBLIC TO VIEW AT HUDDERSFIELD CENTRAL LIBRARY (REFERENCE SECTION) AND DEWSBURY TOWN HALL.

History of Decisions

Extraordinary Council meeting on Wednesday 12 October 2016
(<https://democracy.kirklees.gov.uk/ieListDocuments.aspx?CId=534&MId=5200>)

10. **Service Director responsible**

Naz Parker – Service Director for Housing Economy and Infrastructure
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APPENDIX 1



Report to Kirklees Council

by Katie Child B.Sc. (Hons) MA MRTPI and Elizabeth Hill B.Sc. (Hons) B.Phil MRTPI

Inspectors appointed by the Secretary of State

Date: 30 January 2019

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Kirklees Publication Draft Local Plan

The Plan was submitted for examination on 25 April 2017

The examination hearings were held between 10 October 2017 and 26 April 2018

File Ref: PINS/Z4718/429/9

Abbreviations used in this report

AAP	Area Action Plan
BAP	Biodiversity Action Plan
BGS	British Geological Society
C&I	Commercial and Industrial Waste
CIL	Community Infrastructure Levy
DCLG	Department for Communities and Local Government (now the Ministry for Housing, Communities and Local Government)
DtC	Duty to Co-operate
EfW	Energy from Waste
GTAA	Gypsy and Traveller and Travelling Showperson Accommodation Assessment
HGV	Heavy Goods Vehicle
HIA	Heritage Impact Assessment
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
ITA	Interim Transport Assessment
KES	Kirklees Economic Strategy
LACW	Local Authority Collected Waste
LCR	Leeds City Region
LEP	Leeds City Region Local Enterprise Partnership
LCR SEP	Leeds City Region Strategic Economic Plan
LDS	Local Development Scheme
LGS	Local Green Space
MHLG	Ministry for Housing, Communities and Local Government
MM	Main Modification
MUGA	Multi Use Games Area
NPPF	National Planning Policy Framework
NPPW	National Planning Policy Waste
OAN	Objectively assessed need
PEA	Priority Employment Area
PDLP	Publication Draft Local Plan
PPG	Planning Practice Guidance
PROW	Public Right of Way
REM	Regional Econometric Model
RIS	Road Investment Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SIGI	Strategic Green Infrastructure project
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SRN	Strategic Road Network
UGS	Urban Green Space
UDP	Unitary Development Plan
UPC	Unattributable Population Change
WNA	Waste Needs Assessment
WYCA	West Yorkshire Combined Authority

Non-Technical Summary

This report concludes that the Kirklees Publication Draft Local Plan provides an appropriate basis for the planning of the district, provided that a number of main modifications [MMs] are made to it. Kirklees Council has specifically requested us to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings the Council prepared schedules of the proposed MMs, carried out sustainability appraisal of them, and updated the Habitats Regulations Assessment. The MMs were subject to public consultation over a six-week period. We have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them. In some cases we have amended their detailed wording.

The Main Modifications can be summarised as follows:

- Insertion of mitigation measures relating to assessing and addressing impacts on the South Pennine Moors Special Protection Area.
- Updates to the housing supply table, housing and delivery phasing table and housing trajectory, based on realistic assumptions regarding capacity and rates of delivery.
- Modifications to the employment supply table to update the figures and methodology.
- Applying the Liverpool approach in calculating five year housing land supply.
- Setting out the five year housing land supply position and methodology.
- Amending the gypsy and traveller pitch target to reflect identified needs in the Gypsy and Traveller and Travelling Showperson Assessment.
- Insertion of references to the production of Area Action Plans for Huddersfield and Dewsbury Town Centres.
- Insertion of new policies in Part 2 of the Plan which specify that the identified sites are allocated for development.
- Deletion and insertion of a number of employment, housing and mixed-use allocations.
- Adjustments to the indicative capacity of allocations, based on realistic and justified assumptions.
- Amendments and updates to requirements and criteria in the site-specific policies.
- Revisions to the wording of development management policies to ensure they are effective, justified and consistent with national policy.
- Amendments and updates to the minerals and waste sections of the Plan, in accordance with national policy.
- Various other changes to ensure the Plan is up-to-date, internally consistent, justified, effective and consistent with national policy.

Introduction

1. This report contains our assessment of the Kirklees Publication Draft Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. Paragraph 182 of the National Planning Policy Framework (NPPF) (2012) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. A revised NPPF was published in July 2018. However, the transitional arrangements in paragraph 214 of this document state that the 2012 NPPF will apply for the purpose of examining plans submitted on/before 24 January 2019 (ie the Kirklees Local Plan). Therefore, unless otherwise stated, references in this report are to the 2012 NPPF. In addition, references to the Planning Practice Guidance (PPG) are to the previous versions in place before publication of the revised NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Kirklees Publication Draft Local Plan, published for consultation in November 2016 and submitted in April 2017, is the basis for the examination. The Plan comprises two documents – Strategy and Policies (Examination Document SD1) and Allocations and Designations (SD2). In this report they are referred to collectively as 'the Plan', and as Part 1 and Part 2 respectively. Together the documents set out strategic policies, development management policies and a series of site allocations and designations that will replace saved policies of the Kirklees Unitary Development Plan (UDP) (1999 as revised). The list of superseded and replacement policies in Part 1 of the Plan contains several errors which are corrected through modification **SD1-MM145**, and is necessary to ensure the Plan is effective.
4. Part of Kirklees lies within the Peak District National Park, which is covered by a separate Local Plan produced by the National Park Authority. Therefore references in this report to the Plan area relate to the part of Kirklees which is outside the National Park.

Main Modifications

5. In accordance with Section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and/or not legally compliant and thus incapable of being adopted. This report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, with the prefix of either SD1 or SD2, and are set out in full in the Appendix.
6. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of them where necessary. The MM schedule, contained in two documents relating to Parts 1 and 2 of the Plan, was subject to public consultation for six weeks, alongside the other updated documents.

We have taken account of the consultation responses in coming to our conclusions in this report. We have made some amendments to the detailed wording of the MMs where necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory process and Sustainability Appraisal that has been undertaken. Where necessary these amendments are highlighted in the report.

Policies Map

7. The Council must maintain an adopted Policies Map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission Policies Map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission Policies Map comprises the set of plans identified as:
 - Kirklees Publication Draft Local Plan – Allocations and Designations Appendix 1 Town Centre Maps (November 2016)
 - Kirklees Publication Draft Local Plan – Allocations and Designations Appendix 2 Policies Maps (November 2016)
8. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. Accordingly, the Council's published proposed modification SD2-MM334 has been omitted from the schedule of MMs in the Appendix as it only relates to a change to the Lindley District Centre boundary within the Policies Map.
9. A number of the published MMs to the Plan's policies require further corresponding changes to be made to the Policies Map. In addition, there are some instances where the geographic illustration of policies on the submission Policies Map is not justified and changes to the Policies Map are needed to ensure that the relevant policies are effective. These further changes to the Policies Map were published by the Council for consultation alongside the draft MMs, either embedded within the Part 2 Main Modification document alongside a linked MM, or within the separate Part 2 Additional Modifications document. Although the embedded maps are shown within the MM schedules in the Appendix to this report they are not a formal part of the MMs.
10. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted Policies Map.

Habitats Regulations Assessment

11. The Council's HRA (March 2017), including Appropriate Assessment, sets out the assessment results of the submitted Plan. It identifies that the plan may have some adverse impact on the South Pennine Moors Special Protection Area (SPA), relating to habitats for bird species, which requires mitigation. This mitigation can be secured through modifications to the plan in the form of additional text in Policy PLP 30 (**SD1-MM91, SD1-MM92**) and a number of site allocation policies, as referenced under Issue 7 below. The Council's HRA of the MMs (August 2018) has not altered these findings.

12. The updated assessment of in-combination effects, as set out in the HRA on the MMs, indicates that it is not yet possible to conclude whether there may be adverse effects on the integrity of European protected sites in relation to the Leeds Core Strategy Review, Calderdale Local Plan and Greater Manchester Spatial Framework in combination with the Kirklees Local Plan. However, although these authorities will need to consider the matter through their HRA work, there is currently no evidence that the Kirklees Local Plan would have adverse effects in-combination with other plans, providing mitigation measures are implemented.
13. The HRA of the MMs, including new/amended policies and allocations, does not alter any of the other findings in the HRA 2017. Overall, having regard to the Council's HRA work and the position of Natural England, it is concluded that the Kirklees Plan is unlikely to have an adverse effect on the integrity of European protected sites, either alone or in-combination with other plans or projects, subject to mitigation in the Local Plan and the identified MMs. The Council has confirmed that it considers that the HRA work is legally compliant, taking account of the recent EU Court of Justice judgement (12 April 2018).

Consultation

14. The adequacy of the Council's consultation on the Plan has been questioned. However, public consultation on the Draft Local Plan (2015) and the Publication Draft Local Plan (PDLP) (2016) was extensive and wide ranging, and elicited a high level of responses. The hearings provided a further opportunity for comment and were well attended by community groups and other participants. A significant number of comments were submitted on the MMs. Overall, we consider that there has been adequate opportunity for people to express their views on the Plan.
15. The process has been supported by a wide range of evidence documents. Although some documents were issued after publication of the PDLP, representors have been provided with a variety of opportunities to respond, at the hearing sessions and in written form. Accordingly, we are satisfied that consultation on the Plan has not been compromised by an absence of evidence.
16. Overall, consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement (SCI) and the relevant regulations.

Assessment of Duty to Co-operate

17. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by Section 33A in respect of the Plan's preparation. The Council has prepared a Duty to Co-operate (DtC) Statement which sets out the nature of cooperation and joint working undertaken with other Local Planning Authorities and additional bodies prescribed in the Regulations.
18. Kirklees is part of the Leeds City Region Local Enterprise Partnership (the LEP) which incorporates eleven planning authorities and provides a forum for cooperation on planning matters. Kirklees is also a member of the West Yorkshire Combined Authority (WYCA). The Council's DtC Statement sets out

evidence relating to regular meetings within these groupings, and extensive engagement on strategic planning matters, including housing, employment, Green Belt, infrastructure and transport. Bespoke engagement has also taken place on an individual basis with these and other authorities, and DtC bodies as part of Plan preparation. This includes a Statement of Common Ground with Calderdale Council.

19. Kirklees has cooperated with authorities in the Leeds City Region (LCR) in establishing the Housing Market Area (HMA) for Kirklees and the wider functional economic market area. A shared methodology for demographic and job change scenario testing has been applied. The Council is proposing to meet its identified housing needs within Kirklees, as a single housing market area. Other adjoining authorities are at varying stages of Plan preparation, but there are no active requests from these authorities to meet unmet housing needs within Kirklees.
20. Jobs growth and employment land requirements in Kirklees over the Plan period have been calculated using the Regional Econometric Model (REM), and the use of this joint evidence base has allowed effects on the wider City Region functional economic area to be tested. A joint employment land availability assessment for functional parts of the city region including North Kirklees has not been carried out. However, the submitted evidence indicates that city region authorities are proposing to meet their objectively assessed employment needs in full, and there are no active requests from Bradford, Calderdale or any other authority to accommodate any shortfalls within Kirklees. In this context, and taking account of the extensive engagement on economic matters that has taken place, we are satisfied that the Council has complied with the duty to cooperate in relation to this matter.
21. The Council has demonstrated constructive and on-going engagement with local authorities and other organisations on strategic matters. Kirklees Council has sought to effectively resolve issues, and there are no concerns before us from other authorities and prescribed bodies regarding compliance with the duty to cooperate. The LEP has confirmed that the Kirklees Local Plan complies with the LCR Statement of Cooperation for Local Planning.
22. Overall we are satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

23. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings we have identified 15 main issues upon which the soundness of the Plan depends. Under these headings our report deals with the main matters of soundness rather than responding to every point raised by representors.
24. Issues 1 and 15 are matters covered by both of the Inspectors, and our joint conclusions are presented below. Issues 2 to 10 have been dealt with and reported on by Katie Child. Issues 11 to 14, relating to minerals and waste, are dealt with and reported on by Elizabeth Hill.

Issue 1 – Does the vision, strategic objectives and spatial development strategy in the Plan provide a positive and soundly based framework for the delivery of sustainable development in Kirklees?

25. The vision and strategic objectives in the Plan provide a broad framework for the delivery of sustainable development in the district. The vision and objectives seek to promote the regeneration of the towns whilst safeguarding their distinctiveness, and support the expansion of the local economy through employment and housing growth. They are supported by more detailed place-shaping principles for the four sub-areas of Huddersfield, Dewsbury and Mirfield, Batley and Spen and Kirklees Rural, which highlight the strengths, opportunities and challenges in each area. The sub-areas are extensive and based on Committee boundaries. However, locations within these areas exhibit a range of similar characteristics and features, and in broad terms they provide a reasonable basis for identifying constraints and opportunities.
26. Both minerals and waste are defined as an Issue (numbers 16 and 17) in the Plan and the strategic objectives cover these issues at objective 10. The delivery of the vision, objectives and strategy for minerals and waste is set out in section 6 of the Plan. Whilst minerals development is not specifically mentioned in the vision, there is sufficient reference in the Plan for future needs and the type of development required to enable the safeguarding of minerals and to ensure their sufficient supply. Although the vision has been interpreted differently by some, in order to meet the aspirations of the district the winning and working of minerals is required to supply materials for infrastructure, the historic environment and other works which will help to meet its economic and social needs.
27. The spatial development strategy in section 6 of the Plan seeks to focus most growth in the main urban areas of Huddersfield and Dewsbury, in line with the vision. Huddersfield and Dewsbury are the largest and most sustainable settlements in Kirklees. The LCR Strategic Economic Plan (LCR SEP) refers to these towns as priorities for regeneration, and identifies the Huddersfield and North Kirklees areas as key locations for sustainable economic growth, taking advantage of synergies and connections in the M62/M1 corridors. As such the 'urban focus' in the strategy is justified and consistent with the delivery of sustainable development. The Council's 'Additional evidence relating to distribution of growth between settlements' document (EX38) indicates that nearly 55% of housing growth is likely to take place in Huddersfield and Dewsbury within the Plan period.
28. The Plan identifies a number of strategic housing allocations in Huddersfield and Dewsbury and employment allocations in North Kirklees to realise this strategy. The suitability and deliverability of these and other individual allocations are discussed later in this report. Some capacity reductions are recommended, but are not sufficient to significantly alter the broad distribution and detract from the urban concentration.
29. Beyond this the Plan does not identify a settlement hierarchy, but seeks to distribute growth based on a range of factors, including settlement size and function, local character, place shaping constraints/opportunities and existing and planned infrastructure. This approach promotes sustainable patterns of

development but recognises environmental constraints and other factors relating to the suitability of a settlement to accommodate growth.

30. The strategy also seeks to maximise development on previously developed land within settlements and protect valued open spaces within settlements, whilst allowing some growth on greenfield sites on the settlement edge. Much of the district outside the main settlements is covered by the Green Belt. Elsewhere in this report it is concluded that in principle there are exceptional circumstances to justify the release of Green Belt land for housing and employment, and that the protection of valued urban open spaces is justified.
31. The proposed distribution of growth between different settlements, and the identification of settlement boundaries, is adequately articulated and justified in the Council's Settlement Appraisal Paper (BP17) and EX38. The distribution has been informed by a wide range of information, including the results of the Council's Green Belt Review, Open Spaces Study and settlement appraisal work. Overall, we consider the distribution is robustly based, and would facilitate development in sustainable locations whilst protecting the district's character. This includes the approach to small 'washed-over' settlements in the Green Belt which have limited services or other constraints, and are therefore not designated for growth. A degree of infilling is permitted in these settlements in accordance with the NPPF and modified Policy PLP 59, as set out later in this report.
32. The absence of specific housing targets in the Plan for sub-areas or settlements provides flexibility and does not render the Plan unsound. However, additional information on the approximate number of allocations likely to be delivered within each settlement are necessary to clarify the strategy and make the Plan effective (**SD1-MM8**).
33. The spatial development strategy is worded as a 'key statement on the Local Plan strategy' rather than a policy. It is considered that, in conjunction with other detailed policies and site allocation policies, it will provide an appropriate basis to guide development. Neighbourhood Plans may follow with additional detail and strategy for individual settlements, but we are satisfied that the broad principles and strategy in the Local Plan provide a suitable framework.

Conclusion on Issue 1

34. In conclusion, subject to the afore-mentioned modification, the vision, strategic objectives and spatial development strategy in the Plan provide a positive and soundly based framework for the delivery of sustainable development in Kirklees.

Issue 2 – Is the overall housing requirement in the Plan soundly based and capable of delivery over the Plan period? Will the Plan help to provide a five year supply of housing sites?

Objectively Assessed Housing Need

35. The Council's Strategic Housing Market Assessment (SHMA) (2016) identifies the objectively assessed need (OAN) for housing in Kirklees. It provides an update to the 2015 version of the SHMA which informed the Draft Local Plan (2015).
36. The SHMA 2016 identifies Kirklees as a relatively self-contained HMA. This is supported by the HMAs Report (2016) produced by the LEP. Based on the evidence before me regarding migration and travel to work patterns, I am satisfied that the identified Kirklees HMA is a credible and robust basis for assessing housing needs.
37. The OAN is informed by the 2014-based national household projections produced by the Department for Communities and Local Government (DCLG). The SHMA applies a vacancy rate of 4.2% to the DCLG household projection for Kirklees, which is prudent on the basis that it is linked to vacancy rates in the 2011 census and is higher than recent estimated rates. The demographic starting point is identified in the SHMA as an increase in 27,321 households or 1,584 dwellings per annum (dpa) over the period 2013-31. In line with the NPPF and PPG, the SHMA also considers whether adjustments to the DCLG household projections are necessary to take account of local demographic trends and household formation rates, employment trends, and market signals.
38. The application of alternative migration assumptions based on 10 year trends and excluding Unattributable Population Change (UPC) produces broadly comparable dwelling numbers to the 2014-based household projections. UPC was not explicitly included in the 2012-based or 2014-based population projections, and the effect of UPC would be less marked in 2014-based population projections as recent years of trend data are not affected by this issue. The 2014-based headship rates are not markedly changed from the 2012-based rates, and the Council's evidence shows that dwelling requirements under 2012-based headship rates fall within the range arising from 2008 and 2011-based headship rates, and are higher than the average of the 2008 and 2011 rates. There is no substantive evidence before me that headship rates will return to higher 2008-based trends. Accordingly, as established in the SHMA, I concur that no uplift is necessary in relation to alternative demographic trends and household formation rates.
39. The Plan is informed by a series of economic forecasts, and identifies a preferred jobs growth target of about 23,200 over the Plan period based on a 75% employment rate. As set out later in this report I consider this jobs target and the linked employment rate are realistic and justified. The SHMA identifies a number of jobs-led housing projections using this jobs growth target, and concludes that scenario 'SENS1', which produces an annual requirement for 1,730 dwellings, is appropriate and justified. I concur with this position, and the associated uplift in OAN, for the following reasons. Firstly, although the population is ageing, changes in state pension age and

initiatives such as flexible working may encourage people to work for longer and there are clear trends in Kirklees for increased female labour force participation. Accordingly the maintained base-year level economic activity rate of 68% for 16-74 year olds in SENS1 is reasonable. The lower unemployment rate of 4% in SENS1 is aspirational but credible, given that the rate has declined significantly in recent years and is predicted to decline to 4.2% based on trends alone. Secondly, in conjunction these assumptions produce an overall employment rate of 74% for 16-64 year olds which broadly aligns with objectives in the KES to achieve an employment rate of about 75%. The associated uplift in OAN will therefore help to support future economic development in the district, and facilitate a clear link between housing and economic growth.

40. Market signals indicate that the housing market in Kirklees is relatively stable, with house prices below regional and national averages, modest house price increases between 2005 and 2015 well below the national average, and reasonable and broadly consistent levels of affordability between 2010 and 2015. There are some signs of pressure, as private rents have risen faster than regional and national rates, and overcrowding levels are slightly above the national average. However, private rent increases in Kirklees are similar to several comparator districts and affordability is still good. Levels of overcrowding in Kirklees may also be partly due to higher levels of ethnicity and the existence of multi-generational households. There is evidence of under-delivery against housing targets, but this may be related to market conditions at the time. Furthermore any under-delivery since 2013 has been accounted for in the housing requirement calculations below, whilst prior under-delivery is dealt with as part of the household projections. Overall, it is reasonable for the SHMA to conclude that no uplift should be applied on the basis of market signals.
41. The SHMA does not propose a further uplift to OAN to increase affordable housing delivery. The Council's evidence shows a net shortfall of 108 affordable homes per year over the Plan period, and that this shortfall would be met through the provision of more than 250 additional affordable dwellings per year from outstanding permissions and new allocations, linked to the percentages sought in Policy PLP 11. The SHMA indicates that the net shortfall would be higher if backlog was dealt with more quickly. However, the PPG does not specify a particular time period for dealing with backlog, and the Council's updated affordable housing trajectory shows significant variation in annual rates, with high levels of delivery in the next five years. Accordingly, I concur that an uplift to OAN in order to deliver more affordable housing and within an earlier timeframe is not necessary or justified.
42. The SHMA 2016 concludes that, based on the uplift required to support jobs growth, the OAN for housing in Kirklees is 1,730 dwellings per annum, equating to 31,140 new dwellings over the period 2013 to 2031. Given the uncertainties at this stage surrounding the likely impact of Brexit on the Kirklees housing market, I conclude that no associated changes are required to OAN. Overall OAN in the SHMA 2016 is based on robust evidence and takes account of local circumstances.
43. Since the Local Plan hearings the Ministry for Housing, Communities and Local Government (MHLG) has published new 2016-based household projections

which indicate lower household growth for Kirklees compared to the 2014-based projections. However, this does not automatically mean that OAN should be revised downwards, as the projections represent a starting point and the case for uplifts linked to market signals, affordability and economic growth would need to be assessed. The Government's recent consultation paper indicates that Council's applying the standard methodology should continue to use 2014-based figures, but the Kirklees Plan is being considered under transitional arrangements. Nonetheless, the Council has confirmed that it wishes to continue to pursue the OAN identified in the SHMA 2016 in order to support economic growth and the delivery of jobs. Taking these factors into account, in the case of Kirklees I conclude that a revision to the demographic starting point and the approach to OAN is not necessary at this stage.

Housing requirement and Green Belt

44. Kirklees is a HMA for the purpose of plan-making, and the Plan seeks to deliver OAN for housing in full within the district in line with national policy. The Plan does not rely on other authorities to meet any shortfalls, and there are no active requests before me from nearby authorities to accommodate any of their unmet housing needs within Kirklees.
45. Most of the district outside the built-up area lies within the Green Belt. The Council has carried out an assessment of urban capacity as part of the Local Plan process, based on evidence in the Strategic Housing Land Availability Assessment (SHLAA), reviews of employment land and Urban Green Spaces, and other sources.
46. The assessment has been thorough, and where bespoke evidence was not available, involved the application of a reasonable rate of 35 dwellings per hectare (dph) to estimate capacity of potential housing options. Historical evidence demonstrates that a rate of 35 dph applied to developable areas is achievable, as an average gross rate of 36 dph was achieved on new build sites (excluding apartment-only schemes) in Kirklees between 2006 and 2016. The assessment also sought to protect open spaces and facilities within built-up areas with identified recreation, landscape character and/or biodiversity value. This approach is consistent with the NPPF as whole, which seeks to protect green infrastructure, biodiversity and landscape character, as well as formal open space and sports provision, and promote healthy communities. As concluded under Issue 9, the Council's Open Spaces Study is robust and fit for purpose. Further details of the site assessment methodology are set out under Issue 7 below.
47. The assessment work shows that, although there are a range of potential housing sites within towns and villages, there is insufficient capacity to deliver the identified housing requirement on non-Green Belt land. The Council's Green Belt Review Supporting Document indicates that the shortfall amounts to some 11,500 dwellings.
48. The NPPF states that alterations to Green Belt boundaries should only be made in exceptional circumstances. The delivery of OAN within Kirklees would help to provide sufficient homes to meet local needs, and facilitate the delivery of additional affordable housing. The provision of much needed additional housing would bring related social benefits. Population growth coupled with

new housebuilding could also help to boost the local economy and support the Council's aspirations for economic growth and jobs delivery. It would also make an important contribution to the wider LCR economy and support aims in the LCR SEP. As identified in the SA work, additional housing growth could potentially have a greater impact on the environment than lower levels of provision, and create demands for services and infrastructure. However, as set out elsewhere in this report I am satisfied that suitable mitigation and support measures could be put in place and sustainable growth could be achieved. The DtC work indicates that other nearby authorities are seeking to meet their own housing requirements, and many of these areas also contain land in the Green Belt or the Peak District National Park.

49. Without the release of Green Belt land in Kirklees a substantial level of new dwellings, potentially amounting to about one third of identified need, would not be delivered. Therefore, in the absence of reasonable alternatives, and given the benefits associated with local housing and economic growth, I conclude that exceptional circumstances exist in principle to justify the release of land from the Green Belt to deliver OAN for housing in Kirklees. This is supported by the Council's Green Belt review and site assessment work, as detailed in Issue 7 below, which illustrates that the release of land to meet OAN needs could be accommodated without significantly harming the overall integrity of the Green Belt in Kirklees. However, it is subject to an assessment of environmental capacity and demonstration of exceptional circumstances on a site by site basis, as covered later in this report.
50. The housing requirement of 31,140 dwellings over the Plan period, or 1,730 dwellings per year, is expressed in the Plan's spatial development strategy as 'about but not less than'. Modifications are necessary to clarify that it represents a minimum figure, and to refer to it in the Housing chapter (**SD1-MM6, SD1-MM33**).

Overall housing supply

51. Table 5 in the Plan identifies the estimated supply of housing over the Plan period from range of sources, including completions, commitments, windfall and allocations. The supply figures includes a 10% lapse rate on current permissions (excluding those on Local Plan allocation sites) and an allowance for homes lost through demolition, change of use or conversion, so in this regard are pragmatic and incorporate an element of flexibility. A lapse rate for allocations is not included, but on the basis that the suitability, capacity and deliverability of sites has been thoroughly assessed through the Local Plan process, and in light of flexibility elsewhere, this approach is sound.
52. A sizeable windfall allowance of 450 dpa is included. Much of this rate is based on estimated supply from small sites (less than 0.4 hectares) as the Plan allocates large sites for development, and therefore double counting is avoided. The rate of 450 dpa is similar to the average rate of about 453 dwellings per year achieved on small sites in Kirklees between 2006/7 and 2015/16, and does not account for declining opportunities as sites are built out. However, recent small-site completion rates have been strong, and the district has extensive urban areas and regeneration opportunities. There is also no clear correlation between the age of the Plan and small site windfall rates, and on this basis I am not persuaded that the rate since 2005-6 has

been significantly affected by the age of the UDP. Further, it is reasonable to assume that additional large windfall sites will come forward over the Plan period, in addition to available sites already allocated in the Plan. Whilst the Plan seeks to safeguard business uses in Priority Employment Areas, it does not seek to protect employment sites elsewhere which do not meet the needs of business. Other sites, including a number of safeguarded sites deleted under Issue 8, may also come forward if constraints are resolved or circumstances change.

53. The historical small site completions rate of 453 dpa is based on completions over a suitably long timeframe, and I am therefore satisfied that use of a mean average rather than a median figure is reasonable.
54. For the reasons above, I consider that the windfall rate of 450 dpa is justified and soundly based. However, in order to allow time for current outstanding commitments to be built out the rate should be applied from 2021 onwards rather than 2020. This is reflected in the modified housing supply table (**SD1-MM39**).
55. The supply figures also need to be amended to take account of completions and commitments data for 2015/16 and 2016/17, and to reflect changes in capacity on individual site allocations which are detailed under Issue 7 and are necessary for reasons of soundness. This also includes the deletion of a number of allocations, and the insertion of new ones. In some cases modifications to phasing of sites, as set out in the sub-section below, has reduced estimated capacity within the Plan period and resulted in adjustments to overall supply.
56. Modified Table 5 (**SD1-MM39**), taking account of site-specific changes detailed under Issue 7, indicates that some 31,012 dwellings can be delivered over the Plan period. Overall this represents a reasonable projection, which takes account of a range of sources and likely capacity. Consequential changes to housing supply figures elsewhere in the Plan are also necessary for reasons of effectiveness (**SD1-MM7, SD1-MM34, SD1-MM35, SD1-MM36, SD1-MM37, SD1-MM38**).
57. The estimated supply of 31,012 dwellings represents a slight shortfall against the identified housing requirement of 31,140 dwellings. However, the supply calculations include an element of flexibility, and density assumptions are suitably modest. Further, as set out below, the phasing rates as modified are achievable. The Plan proposes a significant amount of development across a wide area, and taking account of the small size of the shortfall I consider that the most appropriate way forward would be to monitor housing delivery and respond accordingly. The new legislative requirement to carry out Plan reviews within five years, and therefore before the shortfall occurs, lends support to this position. It would also be a pragmatic response in the context that identifying and releasing additional sites from the Green Belt would delay adoption of the Plan and delivery of the current allocations, and be contrary to the Government's priority to boost the delivery of housing to meet current needs. The Delivery and Implementation section in Chapter 8 of the Plan provides a clear framework and a range of actions for dealing with insufficient delivery. However, modifications **SD1-MM40** and **SD1-MM159** are necessary to clarify the position regarding supply and make the Plan clear.

58. I recognise that in some cases 'buffers' have been included in overall housing supply calculations in Plans elsewhere, to a varying degree. However, for the reasons set out above, in the case of Kirklees I consider that the absence of a buffer does not render the Plan unsound.
59. The annual rate of 1,730 dwellings per year represents a significant step-up from previous delivery rates in Kirklees. However, the Plan identifies a wide range of allocation sites and provides an up to date framework for assessing and supporting development proposals. The Council also has a clear commitment to the identified programme, including the delivery of Council-owned sites, and has invested in resources to increase capacity and assist in timely delivery.

Phasing and delivery

60. The estimated timescales for delivery of outstanding commitments and allocations are set out in Appendix 3 of the Plan and reflected in the housing trajectory.
61. Standard lead-in times and build rates have been used for many sites, with bespoke figures used where developers have supplied information or there is other evidence. Given the number of allocations in the Plan, this approach is reasonable in principle.
62. Since submission of the Plan, the Council has put forward an extended lead-in period to allow additional preparation time for outline planning applications and lead-in times for Green Belt sites, and has rolled forward the start date to take account of the passage of time since the start of the examination. The updated standard lead-in times and phasing are set out in Table 2 in the Council's Phasing and Delivery Options Paper (EX45.1). The table shows a lead-in period of between 2 and 2.5 years for sites which do not yet have a planning application submitted, and a shorter period where sites have gained outline and/or full permission or where there are undetermined applications.
63. The Council's analysis of all permissions granted between 2009/10 and 2012/13 shows an average lead-in period of 21.8 months between validation of a planning application and commencement of development on-site. Alternative evidence has been submitted which indicates that longer lead-in times and phases have been achieved elsewhere, particularly on strategic sites. However, the Council's evidence on lead-in times is based on extensive local analysis of data. Furthermore, the Council's standard lead-in times have not been applied to the main strategic sites. Based on the evidence before me, I consider that the updated standard lead-in times and phasing periods in Table 2 in EX45.1 are justified and take account of different stages leading to delivery. Some schemes may take longer and others less time to reach delivery stage, but I am satisfied that, overall, the applied lead-in times represent a reasonable average estimate.
64. In many cases a period of about 1.5 years has been allowed between disposal of Council-owned housing and mixed use sites to a housing developer and commencement of dwellings. Although early preparation work may have been undertaken prior to disposal, this period would, in many cases, be insufficient to enable a housing developer to revisit this work and take forward a scheme to full permission/reserved matters and commencement. I therefore conclude

that the phasing rates for Council-owned housing and mixed-use allocations likely to be sold to a housing developer should be altered to allow a minimum of 2 years between disposal and initial completion of dwellings. This does not apply in the case of sites with full planning permission and/or where disposal to a Registered Provider is anticipated, or strategic sites where bespoke rates are applied.

65. Standard build rates of 30 dpa for sites with less than 200 dwellings and 50 dpa for sites of 200-499 dwellings have been applied. The small site rate is supported by the SHLAA Working Group and is reasonable. The larger site rate is higher as on many larger sites, albeit not all, two or more developers may be involved in delivery. Evidence from the limited number of large sites that have recently come forward in Kirklees indicates that this rate is capable of being delivered.
66. I am not persuaded that the phasing of brownfield sites prior to greenfield releases is an appropriate or realistic approach, given the scale and urgency of housing delivery required in Kirklees. It is clear that unless greenfield sites are delivered alongside brownfield sites, the Council will not be able to provide a five year supply of housing land as required by national policy.
67. Modifications to the delivery and phasing tables in Appendix 3 and the housing trajectory are needed to capture the changes to lead-in times and start times referenced in this sub-section, and ensure the Plan is robustly based and can be effectively monitored (**SD1-MM160, SD1-MM41**). The modified tables and trajectory also capture bespoke changes to delivery timescales for individual allocations which are covered elsewhere in this report. Overall, I am satisfied that the tables and trajectory as modified are based on realistic lead-in times and build rates, and represent achievable rates of delivery.

Five year housing supply

68. Evidence on historical completions in the SHMA shows that there has been recent and persistent under-delivery of housing against Local Plan targets. Therefore, in accordance with paragraph 47 in the NPPF, a 20% buffer needs to be applied to the housing requirement figure when calculating five year housing supply.
69. The Council's Phasing and Delivery Options Paper (April 2018) (EX45.1) shows 4.87 years of deliverable housing supply between 2018/19 and 2022/23 applying the 20% buffer and using the 'Sedgefield' approach proposed in the submission Plan. The Sedgefield approach is based on shortfall since the start of the Plan period being delivered within the next five years. Additional changes to site allocations and lead-in times covered under Issue 7 below would reduce this level of supply further.
70. The PPG indicates that the Sedgefield approach should be used where possible. The alternative 'Liverpool' approach, based on past under-delivery being recovered over the remainder of the Plan period, is not ruled out in the PPG, and would be a pragmatic approach in the context of a large number of strategic allocations in the Plan which will take a while to come forward. Furthermore, maintaining a five year supply using the Sedgefield approach would require additional allocations in the Plan, and this would be likely to involve the further release of Green Belt land. Overall I consider that making

up the shortfall more quickly in Kirklees does not justify the additional harm to the Green Belt that would result from allocating additional sites, or amount to exceptional circumstances.

71. Accordingly I conclude that, in the case of Kirklees, the Liverpool approach is necessary to deal with the shortfall and ensure the Plan is sound. The updated five year supply calculations in modifications **SD1-MM42** and **SD1-MM43** indicate 5.51 years of supply based on the Liverpool approach, and provide necessary detail on the course taken and the workings. On this basis there would be a deliverable supply of housing land on adoption which exceeds the five year requirement.

Conclusion on Issue 2

72. In conclusion, the overall housing requirement in the Plan is soundly based and subject to modification is robustly expressed. A slight shortfall of supply against requirement over the Plan period is predicted, based on the updated supply figures, but this is marginal and capable of being dealt with through the monitoring and review process. The Plan will, based on the updated supply figures and subject to the above-mentioned modifications, provide in excess of the minimum five year supply of housing land on adoption.

Issue 3 – Have affordable housing needs, traveller accommodation needs and the housing needs of other groups been satisfactorily assessed and addressed in the Plan, in line with national policy?

Affordable housing

73. The definition of affordable housing in the Plan's Glossary does not fully accord with that in the revised NPPF (July 2018). Although the Plan is being examined under transitional arrangements and against the 2012 NPPF, it is sensible to future proof the text and simplify it for reasons of effectiveness. This would be facilitated through modification **SD1-MM139**.
74. Policy PLP 11 states that 20% affordable housing should be provided in residential schemes of more than 10 units. As detailed in Issue 2 above, the provision of additional affordable housing through this route would make an important contribution to meeting identified shortfalls and would help to deliver affordable housing early in the Plan period and deal with backlog. The Council's viability work indicates that 20% affordable housing is deliverable on schemes of 10 or more units in most parts of the district, and the policy provides sufficient flexibility to deal with situations where viability is an issue. I therefore consider that the proportion and approach in Policy PLP 11 is justified. However, in order to facilitate effective monitoring an affordable housing trajectory should be included in the Plan through **SD1-MM52**.
75. Policy PLP 11 supports exception sites for affordable housing in 'small free standing settlements' which are 'well away from the larger urban areas'. However, this approach is insufficiently justified and would not be effective in meeting local affordable housing across the district as many settlements would be excluded. Accordingly, modifications **SD1-MM45** and **SD1-MM51** are necessary to widen this requirement and allow exception sites across the district.

76. Affordable homes can now include starter homes and the phrase 'where appropriate' therefore needs to be inserted in Policy PLP 11 in relation to securing affordable homes in perpetuity (**SD1-MM45, SD1-MM51**). In the context of identified needs for other forms of specialist housing, and the Council's desire to facilitate this provision, **SD1-MM50** is necessary to clarify that in certain circumstances specialist housing may be accepted in lieu of affordable housing.

Traveller accommodation

77. The Council's Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) (2015) identifies a need for 10 new pitches for gypsies and travellers in the five year period 2014/15 to 2018/19, and a need for 2 pitches between 2019/20 and 2033/34. A need for four plots for travelling showpeople is identified between 2014/15 and 2033/34. Eight transit pitches are also required in the short-term. The GTAA is based on a wide range of quantitative and qualitative data, survey work and analysis of short and long term needs, and was subject to sensitivity testing of alternative household numbers. Overall I am satisfied that it applies a robust methodology.
78. The national planning definition of gypsies and travellers altered in 2015. Although it is referred to in the GTAA, the Council did not carry out a full reassessment of needs, including the requirement for alternative forms of caravan accommodation (as set out in the Housing and Planning Act 2016). As such the alternative pitch requirement of zero for years 0-5, which appears in brackets in Table 6 in the Plan, is not justified. The Plan should be based on the objectively assessed needs in the Council's GTAA, and the figure of zero should be deleted through modification **SD1-MM54**. In order to make the Plan effective and sound, modification **SD1-MM53** is also necessary to link the requirements in Table 6 into Policy PLP 12 itself. Subject to these modifications, Policy PLP 12 sets out a clear and robust framework for meeting accommodation needs and assessing windfall applications.
79. The Plan allocates two sites for traveller accommodation. A wide range of site options were identified and assessed and I am satisfied that the process was substantive and robust. The sites are located on non-Green Belt land within or adjoining urban areas, and make sufficient provision to meet needs over the Plan period. The Council, as landowner, has indicated the sites are likely to come forward within five years, and as such five year supply is achievable. The sites are in the north of the district in sustainable locations, and would help to meet local needs.
80. The sites are listed in text boxes in Part 2 of the Plan, but are not incorporated within an actual policy. In order to provide sufficient weight and clear direction for developers and the community, a new policy should be inserted which specifies the sites are allocated and identified on the Policies Map (**SD2-MM292**).
81. Site GTTS1957 involves extending an existing travelling showpersons site in Ridings Road, Dewsbury. Modification **SD2-MM293** is necessary to specify the area allocated, in order for the Plan to be effective. The requirement for a low emission travel plan is onerous given the modest scale of the extension,

and should be deleted (**SD2-MM294**). The site is a logical extension in a sustainable location.

82. Site GTTS2487 in Birstall would provide 12 permanent and 8 transit traveller pitches. The site adjoins a business park, and is within reasonable walking distance of retail and leisure facilities. The gross site area is large, but allows scope for the provision of landscaping, the division of permanent and transit pitches, and open areas in the vicinity of the on-site pylon and power lines. Taking account of the intervening road and scope for landscaping, I consider that any potential impacts on nearby businesses, or conversely impacts on the residential amenity of the occupants of the traveller site from nearby businesses, could be ably mitigated. Detailed matters such as landscaping, layout, footpath provision and surface water flooding could be dealt with at planning application stage. The allocation is soundly based and capable of delivery within the anticipated timeframe.

Other housing needs

83. The provision of older person housing is a key issue facing the district. Modification **SD1-MM3** in Chapter 3 is necessary to make this clear and set out the strategy for delivering additional accommodation. The Plan does not allocate specific sites for older person housing, but other forms of housing may be suitable, and the Council allows older person housing in lieu of affordable provision. The significant uplift in housing provision in the Plan should help to provide additional homes that will be needed for older persons, and other groups in the community. Subject to the above modification I am satisfied that the Plan makes suitable provision for the housing needs of older persons.
84. The Council has confirmed that, through Policy PLP 11, a mix of housing in terms of size and tenure would be sought on schemes of more than 10 units and encouraged on all. Modifications **SD1-MM44**, **SD1-MM46**, **SD1-MM47** and **SD1-MM49** are necessary to clarify this position and ensure the policy is effective. Whilst the SHMA would normally be the key evidence document on needs, additional and more up to date local evidence may be available and should be referred to for reasons of effectiveness (**SD1-MM47**). The policy does not specify provision for custom build housing but there could be opportunities through allocations or on windfall sites. Policy PLP 11 also requires development to make provision for different types of housing, based on the latest evidence of need.
85. The Council has confirmed that additional technical standards relating to access are not proposed. Accordingly, in order to be effective, modifications to Policy PLP 11 are necessary to clarify that design elements relating to adaptation will be encouraged rather than sought (**SD1-MM44**, **SD1-MM48**).

Conclusion on Issue 3

86. In conclusion, subject to the aforementioned modifications, affordable housing needs, traveller accommodation needs and the housing needs of other groups have been satisfactorily assessed and addressed in the Plan, in line with national policy.

Issue 4 – Is the employment land requirement in the Plan and the approach to employment justified, effective and consistent with national policy?

Employment land requirement

87. Kirklees forms part of the wider functional economic area of the LCR. As set out above, the evidence indicates that each authority in the region is aiming to meet its own employment needs. As such, the Kirklees Plan area forms an appropriate basis for assessing objectively assessed needs for employment.
88. The use of the REM by LCR authorities allows Local Plan proposals to be tested and wider economic impacts assessed. Three scenarios were tested for Kirklees to determine the likely future jobs growth forecast; firstly a baseline scenario, secondly a scenario based on KES objectives and a 75% employment rate by 2031, and thirdly a variation involving an 80% employment rate. The updated testing in 2016 was based on a revised REM methodology which factored in the potential impact of the Brexit vote.
89. The Plan's selection of the second scenario reflects the Council's ambition to increase jobs growth above baseline trends, achieve expansion of the manufacturing and engineering sector, and attain an employment rate of about 75% by 2031. Whilst the Council acknowledges that the resultant jobs growth of about 23,000 over the Plan period will be challenging, an employment rate of about 75% has been achieved in the past. There are also positive signs of recovery with a marked recent increase, up from 68.6% in 2013 to 71.1% in 2017. The Council has set out a coherent strategy for jobs growth ambitions based on assisting growth in manufacturing and engineering and building on existing strengths, developing business hubs and skills, and promoting strategic development sites. Overall, based on the evidence before me I consider that an employment target of around 75%, although stretching, is reasonable and capable of being delivered. The LCR SEP indicates there is capacity to build on manufacturing strengths in Kirklees whilst allowing other authorities to focus on other sectors. However, to be effective, the Plan should be modified through **SD1-MM19** to clarify that the jobs figure of 23,000 specified in paragraph 7.8 is approximate.
90. Based on a jobs forecast of some 23,000 over the Plan period, the Plan identifies an OAN for 175 hectares of employment land. Job density assumptions used to derive this OAN are based on an analysis of rates achieved in the Yorkshire and Humber region, as set out in the Roger Tym Report 'Planning for Employment Land, Translating Jobs into Land' (2010). Although the Homes and Communities Agency has produced more recent figures, they are nationally based. I therefore conclude that the jobs density assumptions applied in the Plan are reasonable.

Employment land supply

91. Table 3 in the Plan indicates that employment land would be delivered through a mix of permissions, commitments, potential supply from identified Priority Employment Areas (PEA) in the Plan, and allocations.
92. The PEAs are based on a wide ranging assessment of the suitability of existing employment sites for continued business and industrial use. The assessment

criteria cover a broad range of factors, and overall the work is appropriate and proportionate. Notwithstanding this, corrections to the site area of two PEAs listed in Part 2 of the Plan are necessary for reasons of effectiveness (**SD2-MM40, SD2-MM41**). The potential employment supply of 48 hectares from PEA sites is a broad estimate, but is supported by PEA work which shows potential capacity for business expansion within identified PEA sites. Whilst some changes to non-employment uses may be experienced on PEAs over the Plan period, the approach in Policy PLP 8 in the Plan seeks to retain established business uses, and there is no substantive evidence to demonstrate that there would be significant losses from this source.

93. The allocation sites include a range of different sizes and types that should cater for range of needs. Site capacities are based on floorspace ratios from the Roger Tym report and reasonable assumptions on a mix of B uses, whilst bespoke figures are applied where details are known.
94. A number of allocations involve the release of Green Belt land. As set out under Issue 2, the Council has carried out a thorough assessment of urban capacity which has incorporated an assessment of employment sites, and evidence from other sources of supply shows there is insufficient capacity to deliver OAN for employment on non-Green Belt land. Green Belt releases would enable the Council to meet local needs for economic growth and its aspirations for the delivery of some 23,000 additional jobs over the Plan period. Additional large sites, particularly in strategic locations in the north of the district, would help to boost the manufacturing and engineering sectors and make an important contribution to the economy of the wider region and in meeting the aims of the LCR SEP. It would also support housing growth in the district.
95. In the absence of reasonable alternatives, and given the benefits associated with local economic and housing growth, I conclude that exceptional circumstances exist in principle to justify the release of land from the Green Belt to deliver OAN for employment. As with housing, this is supported by the Council's Green Belt and site assessment work, detailed in Issue 7 below, which illustrates the release of land to meet OAN needs could be accommodated without significantly harming the overall integrity of the Green Belt in Kirklees. However, it is subject to an assessment of environmental capacity and demonstration of exceptional circumstances on a site by site basis, as covered later in this report.
96. The employment land supply figures in Table 3 in the Plan need to be amended to take account of recent completions and commitments data, and to reflect changes in individual site allocations detailed later in this report and are necessary for reasons of soundness. This includes site capacity changes and the deletion of a number of allocations. The updated figures, as set out in **SD1-MM25**, show that overall supply from the identified sources would total 193 hectares, against the requirement of 175 hectares. An oversupply of 18 hectares provides sufficient flexibility to allow for an element of non-delivery from commitments and allocations or deal with changing circumstances, and allows for some market choice. As further allocations would be likely to involve the release of Green Belt land, I consider it represents an appropriate balance between meeting employment needs and protecting the Green Belt. On-going monitoring will take place, and if there is future undersupply it could

be dealt with by Plan review. The submitted Plan includes a 10% flexibility allowance, but I consider that a specific figure is not necessary when an oversupply of 18 hectares is demonstrated. Modifications **SD1-MM5, SD1-MM19, SD1-MM20, SD1-MM21, SD1-MM22, SD1-MM23** and **SD1-MM25** are necessary to update the supply figures and methodology, and ensure the Plan is effective and can be adequately monitored.

97. Employment land requirement and supply in the Plan are based on the B use classes. However, this is not clarified in the Plan, and insertion of a clear definition of 'employment uses' in Part 1 of the Plan is necessary to make the employment strategy and policies effective (**SD1-MM141**).

Employment policies

98. Policy PLP 8 sets out the Council's approach to safeguarding employment land and premises in PEA's. It recognises the important role PEAs play in providing local employment opportunities and contributing to the local economy, whilst allowing flexibility for change of use if certain criteria satisfied. Nevertheless, modifications are necessary for reasons of effectiveness to clarify 'employment generating uses' (**SD1-MM140**), and that Policy PLP 13 will also apply where PEAs are out of centre and proposals involve main town centre uses (**SD1-MM26**). For the same reason modification **SD1-MM27** is necessary to provide additional information on the evidence applicants would be expected to show to justify change of use.
99. Policy PLP 9 requires new developments to contribute to local employment skills and opportunities. However, the policy does not specify the thresholds that would apply or the amount/form of contributions. Further, the viability work does not identify specific costings, despite evidence of training costs in EX83. As such the policy is not sufficiently justified or effective, and is contrary to national policy on viability and plan-making. Altering the requirement to 'encouragement' through modification **SD1-MM28** is necessary for soundness reasons. The insertion of a threshold through **SD1-MM28** is needed to make the policy effective.
100. Policy PLP 10 sets out the Council's approach to economic development in rural areas, and on the whole establishes an appropriate balance between rural development and protection of the countryside. However, modifications are needed to delete the first sentence of section 2 relating to new buildings in the Green Belt in order to be consistent with national policy (**SD1-MM29**), and to clarify that Local Plan and national policy will apply (**SD1-MM30**). Modifications are also required to section 4 to clarify that exceptions relate to farm shops and other businesses that require a rural location, and the circumstances when sequential and impact tests will be sought (**SD1-MM29, SD1-MM31, SD1-MM32**). This should ensure the policy is effective and consistent with paragraph 25 in the NPPF.

Conclusion on Issue 4

101. In summary I conclude that the employment land requirement in the Plan is justified, and, subject to aforementioned modifications, is capable of delivery over the Plan period. The employment strategy and policies, subject to the above modifications, are justified, effective and consistent with national policy.

Issue 5 – Does the Plan set out a positively prepared strategy and policies for retail growth and supporting town, district and local centres, which are justified, effective and consistent with national policy?

Retail needs and requirements

102. The Council has signalled its intention, through the updated Local Development Scheme (LDS), to produce Area Action Plans (AAPs) for Huddersfield and Dewsbury town centres. The AAPs will set out more detailed policies and proposals that will complement those in the Local Plan, and will be an important vehicle for delivering growth and vitality in these centres. Modifications to the Local Plan text are necessary to make this position clear (**SD1-MM2, SD1-MM70, SD1-MM71**).
103. The Council's Retail Capacity Study (September 2017) identifies a need for an additional 8,200-12,700 square metres (sqm) of convenience floorspace and 42,500-85,000 sqm of comparison floorspace over the Plan period up to 2031. The Council's post hearing Retail Needs and Delivery Note (EX35) indicates that a significant proportion of this need, at least up to 2026, is satisfied through planning permissions, pre-applications schemes in the pipeline, and the Southgate mixed use allocation on the edge of Huddersfield town centre (site MX2101). Additional supply over the Plan period is anticipated through new local centres proposed in the Local Plan and through windfall development and the re-use of vacant floorspace in designated centres. The forthcoming AAPs may also allocate further sites for retail use. Town centres remain the focus of retail development and wider needs over the Plan period, and important community hubs. Based on the evidence before me I consider that there is a reasonable prospect of delivering retail requirements over the Plan period, in terms of overall need and by sub-area.

Retail policies

104. Policy PLP 13 defines a hierarchy of town, district and local centres which is supported by evidence and in line with national policy. Retail parks are omitted from this list, but they do not have the same wide functional role as the identified centres. As such, and taking into account the priority the Council places on town centre and urban regeneration, this approach is justified.
105. Policy PLP 13 refers to defined centres as shown on the Policies Map. However, Local Centre boundaries are not clearly established. The Council therefore consulted on Local Centre boundaries alongside the proposed MMs and intends to incorporate these into the Policies Map. This will ensure that Policy PLP 13 can be effectively applied.
106. Clarification in Policy PLP 13, for reasons of effectiveness, is also necessary to refer to the locations of the new local centres proposed in the Plan (**SD1-MM59**). As the size of the local centres is not defined I am satisfied that the reference to impact assessment is justified, and that a sequential test would be proportional in its scope and content as specified in part B of Policy PLP 13.
107. The main part of the sequential test outlined in section B of Policy PLP 13 accords with national policy and is justified. However, modifications are necessary to delete the detailed bullets (**SD1-MM55**) as they seek to impose

additional requirements which are not specified in the NPPF, whilst inserting broad guidance in the supporting text to ensure the policy is effective (**SD1-MM58**).

108. For reasons of effectiveness and to ensure the needs of businesses and local communities are satisfied, modifications to Policy PLP 13 are necessary to clarify that the sequential test would be applied flexibly in the case of schemes with a locational requirement such as farm shops (**SD1-MM56**), or small shops serving localised needs (**SD1-MM57**).
109. The impact assessment thresholds in part C of Policy PLP 13 are supported by detailed local analysis relating to the form and type of defined centres, unit sizes and current vacancy levels in Kirklees, as set out in the Council's Impact Threshold Advice Note (Appendix B to the Council's Hearing Statement on Matter 18). I am satisfied that the thresholds are proportionate and justified, and should help to protect the vitality of defined centres. A bespoke/higher threshold specifically for proposals in retail parks could undermine the purpose of the policy and the regeneration of key centres in Kirklees, and accordingly would not be justified.
110. Policy PLP 14 seeks to ensure a strong retail core is retained within town centres. As a key main town centre use which adds to the vibrancy and vitality of centres, this approach is justified and in line with national policy, whilst allowing some flexibility for change. However, modifications are necessary for reasons of effectiveness, to clarify the definition of retail uses (**SD1-MM62**). For the same reasons, modifications are necessary to clarify the approach within Primary Shopping Frontages and Secondary Frontages (**SD1-MM60, SD1-MM61**), with 'predominant use' and 'dominance of non-retail uses' being clearly defined (**SD1-MM63, SD1-MM64**). The minimum proportions set out in the modified text are supported by local evidence of current proportions in retail frontages across Kirklees. Clarification of the approach to Local Centres is also necessary for reasons of effectiveness (**SD1-MM65**).
111. Criterion a in Policy PLP 15 states that residential uses in town centres will only be permitted on upper floors. In order to provide sufficient flexibility to deal with varying circumstances and be effective, the insertion of the word 'normally' and linked supporting text (**SD1-MM66, SD1-MM67**) is necessary for soundness reasons.
112. Modifications for reasons of effectiveness are necessary to Policy PLP 16 to clarify the definition of food and drink uses (**SD1-MM68**), and to ensure that the policy sets out a clear approach for dealing with food and drink and entertainment uses outside, as well as within, defined centres (**SD1-MM69**).

Conclusion on Issue 5

113. In conclusion, subject to the above main modifications, the Plan sets out a positive strategy and policies for retail growth and town centres which are justified, effective and in line with national policy, and will be supported by additional policies/proposals in the forthcoming AAPs.

Issue 6 - Does the Plan provide a robust framework for the delivery of infrastructure and viable development?

Infrastructure

114. The Council's Infrastructure Delivery Plan (2015) and Addendum (2016) (collectively the IDP) identify a range of infrastructure needed to support proposals in the Plan. The documents include estimated timings, costs and funding sources, and demonstrate on-going dialogue with infrastructure providers.
115. Key transport schemes required to support growth in Kirklees are detailed in Part 1 and Part 2 of the Plan. Policy TS8 also generically captures local highway network efficiency improvements. Delivery of transport schemes and improvements will rely on a range of funding sources including the Government's Road Investment Strategy (RIS), the West Yorkshire Transport Plus Fund, the Local Transport Fund, Network Rail, developer contributions or Community Infrastructure Levy (CIL) and other transport bidding opportunities. The Council has submitted a CIL Charging Schedule for examination, but until it is adopted developer contributions would continue to be sought through legal agreements.
116. Government RIS funding for improvements to junction 26 of the M62/M606 (Chain Bar) has been postponed. Highways England has indicated that, as a result, modifications to housing allocation policy H69 are necessary relating to the assessment of highway impacts and potential mitigation measures including developer funding and phasing are necessary. There is no substantive evidence to demonstrate that immediate effects would be wider, and Highways England modelling shows that site H69 would have a less than significant impact on the Strategic Road Network (SRN) until 2027 at the earliest, based on commencement in 2020/21. Funding may be secured through future RIS bid rounds, and Highways England is investigating interim improvement measures and alternative funding including the Government's Congestion Relief Programme. Overall, I consider that the proposed modification is a pragmatic approach, allows flexibility to deal with insufficient capacity where it is demonstrated, and is necessary for the Plan to be effective. This would be instigated through **SD2-MM161**.
117. The same modified wording in SD2-MM161 is also necessary in the case of other allocations which have potential for a significant effect on the SRN elsewhere. This is covered under Issue 7 below.
118. Modifications are required to the list of SRN improvements in Policy TS11 in Part 2 to reflect the full updated list of schemes in Part 1 (**SD2-MM337**). The text in Policy TS5 in the Plan should be modified to highlight improvements to the A644, including potential provision of a new highway to the south of Dewsbury (**SD2-MM335**). This will reflect the latest position and ensure the Plan is effective.
119. Key improvements to Dewsbury Rail Station and Batley Rail Station are included in the IDP but missing from the Plan. Modification **SD2-MM336** is necessary to insert this detail and ensure the Plan is effective.

120. The Kirklees Transport Model was used to assess the likely cumulative effect of the Plan's proposals on the highway and public transport network. The model takes account of potential growth in other nearby local authorities. Impacts on the local network, including key congested junctions, are identified, and mitigation schemes set out in the IDP. The modelling work indicates that subject to mitigation measures, the overall level of growth proposed in the Plan is capable of being accommodated. Modelling of the SRN was also undertaken by Highways England and related mitigation schemes included in the IDP. Further detailed modelling will be required for specific sites at planning application stage, but the Plan allows for this in Part 2. Overall, I am satisfied that the transport modelling work undertaken to date is robust and proportionate to the preparation of the Local Plan.
121. The IDP includes an extensive assessment of education infrastructure requirements relating to school places and early learning/childcare. Existing vacancies and shortfalls are taken into account, and the applied pupil yields and projections are informed by local trends and other established data. The methodology is robust, and the assessment provides a suitable broad overview for Local Plan preparation. Further assessment may be necessary at planning application stage and contributions via legal agreements and/or CIL sought through Policy PLP 4. Specific new schools/early years facilities required to support growth are listed against site-specific allocations in Part 2 of the Plan.
122. Policy PLP 4 indicates that both essential and desirable infrastructure will be sought, but that essential infrastructure should be operational no later than the appropriate phase of development for which it is needed. This approach is reasonable and will ensure that new developments are sustainable, suitable and attractive environments in which to live and/or work. However, in order to make the policy effective, the categories of 'essential' and 'desirable' infrastructure should be clearly explained (**SD1-MM10, SD1-MM142**).

Viable development

123. The Council's Viability Study (2015) and Viability Addendum (2016) provide a broad assessment of Local Plan viability, taking account of the types of development likely to come forward over the Plan period together with the requirements of national and Local Plan policies. Housing development is viable across most of the district and affordable housing policy PLP 11 is flexible enough to deal with situations where viability is more marginal. Commercial development is shown as more marginal. However, the Kirklees Employment Market Strength Assessment (2015) concludes that key strategic employment allocations are likely to be viable, and identifies on-going demand from businesses for additional employment land provision. A range of funding sources may be available for more marginal sites.
124. Overall, the evidence credibly indicates that the cumulative impact of national and Local Plan policies would not put implementation of the Plan at serious risk.

Conclusion on Issue 6

125. In conclusion, subject to the above modifications, the Plan provides a robust framework for the delivery of infrastructure and viable development.

Issue 7 – Are the proposed employment, housing and mixed use allocations justified, effective and consistent with national policy?

126. The Plan includes more than 230 employment, housing and mixed use allocations. My conclusions on the overall site assessment process are set out in the first sub-section below. The second sub-section highlights generic matters relating to a number of the allocations where I consider that modifications to policy wording are necessary for reasons of soundness. Any additional soundness matters relating to specific allocations are covered in the remaining sub-sections (divided by sub-area, as defined in the Plan).
127. For the avoidance of doubt, not all employment, housing and mixed use allocations in the Plan are referred to in the following sections. In such cases, having taken into account all the evidence and representations before me, I am satisfied that the proposals are soundly based and capable of being developed, and that the policies identify suitable constraints and mitigation measures to allow detailed impacts to be ably assessed and addressed at planning application stage.

Site assessment process

128. As set out in Issue 2 above, the Council has carried out a comprehensive assessment of urban capacity on non-Green Belt land. In these areas the Council has sought to allocate suitable and deliverable sites of 0.4 hectares or more for housing, employment and other uses, and has made reasonable assumptions regarding windfall supply. However, as demonstrated in Issues 2 and 4 above, there is insufficient capacity to accommodate OAN for housing and employment on non-Green Belt land, and a Green Belt review was therefore instigated.
129. The Council's Green Belt Review (2017) involved a comprehensive assessment of the Green Belt edge and adjoining land to determine the degree of constraint to development. Land without severe constraints was also subject to an evaluation of its Green Belt function.
130. The results of the Green Belt Review were fed into the Council's assessment of development site options. This captured potential options of 0.4 hectares or more on Green Belt and non-Green Belt land from a range of sources, including the call for sites process, UDP sites, and Council asset review. Notwithstanding the results of the Green Belt edge assessment, all site options in the Green Belt were assessed at this stage in terms of their Green Belt function to produce an edge rating where relevant and an overall Green Belt rating. Site options proposed by representors after production of the PDLP were also subject to this assessment process. Whilst the assessment process focused on sites in the Green Belt that have been proposed for development or where there is other planning history, I consider this approach is reasonable and not unusual, given the extent of the Green Belt in Kirklees and time/resources available. The availability of sites is a key factor in determining suitability for allocation.
131. Test 2d in the Council's Green Belt Review, preserving the setting of historic assets, does not feature in the Green Belt purposes identified in the NPPF. The Council has carried out a re-assessment of edge ratings in the Green Belt Review based on neutralisation of this element, which identifies adjusted edge

rating scores relating to a very small number of areas and site options. However, the site option Green Belt ratings and overall site option assessment conclusions were not affected by this adjustment.

132. The Council's site assessment methodology, incorporating detailed assessment of Green Belt functions on a site basis, is robust and credible. Site options were assessed against a wide range of criteria, including those relating to sustainable development. The results of the Council's Open Space Study (2016) and other evidence documents were fed into the process. The assessment process also sought to protect open spaces and facilities within built-up areas with identified recreation, landscape character and/or biodiversity value. I am satisfied that the Open Space Study is robust and the approach to protection of open spaces is sound, as established under Issue 9 and Issue 2 respectively.
133. Call for sites information and other evidence indicates that site allocations are available for development. Whilst the availability of parts of sites H768, H706 and H684 are not confirmed, given the existence of promoters for certain sections and other planning history, I consider there is a reasonable prospect of delivery within the Plan period.
134. Representors have commented on the accuracy and consistency of the scoring of individual criteria in the site options assessment process. However, assessments need to be read a whole, and overall, notwithstanding the MMs, I am not persuaded that the process is fundamentally flawed or has led to an inappropriate selection of allocations. The site assessment summaries and conclusions, albeit fairly short, are clearly presented in supporting evidence.
135. Potential site options were also subject to SA, through the SA (2016), SA Erratum (2016) and SA Addendum (2017). The MMs have also, where necessary, been subject to SA. Representors have commented on the accuracy and consistency of scoring against individual objectives, in relation to specific sites. Some differences may be due to different interpretations in the meaning/aims of the objectives. However, SA is one part of the evidence base which informs the process of site assessment and selection. There is no evidence that scorings are inaccurate to the degree that would have impacted on option selections. Overall I am satisfied that the Council's SA work is fit for purpose and provides a sufficiently robust high-level assessment, proportionate to Local Plan preparation.
136. All of the suitable, deliverable and available 'accepted options' are allocated in the Plan. As shown on map 4 in the Council's Green Belt Review Supporting Document, the location of the Green Belt releases shows a reasonable correlation to the main centres of population in the district, therefore contributing to a sustainable pattern of development. The distribution of growth also aligns with the spatial development strategy in the Plan.
137. Employment, housing and mixed use allocations have, in some cases, resulted in further consequential changes to the Green Belt boundary to allow more logical and defensible Green Belt boundaries to be created. These consequential changes, as shown on the Policies Map and as amended through further changes illustrated in the MM and Additional Modification documents, are logical and justified.

General site allocation matters

138. The employment, housing and mixed use allocation sites are set out in text boxes in Part 2 of the Plan, but are not incorporated within an actual policy. In order to provide sufficient weight and clear direction for developers and the community, new policies are required which specify that sites are allocated and identified on the Policies Map, and establish the general approach that will apply (**SD2-MM1, SD2-MM3, SD2-MM42, SD2-MM295**). For the same reason a new policy is also required in relation to land at Storthes Hall (**SD2-MM367**). The allocation policies will provide part of the framework for determining planning applications.
139. In order for the allocations to be effective it is necessary to clarify that employment uses relate to B use classes (**SD2-MM2**). The allocations do not specify a particular type or mix of B use class, and I consider this provides appropriate flexibility to respond to changes in economic circumstances and support economic growth in the district. At the hearing the Council confirmed that proposals for non-ancillary B1 offices on employment allocations would also, as a main town centre use, have to satisfy the sequential and impact tests in Policy PLP 13. For reasons of effectiveness it is necessary to clarify this position through modifications **SD2-MM2** and **SD2-MM3**.
140. The mixed use allocation policies provide insufficient detail regarding the type of uses envisaged on the site. The Council has confirmed that in many cases mixed use is based on a 50/50 assumed split of employment and housing. However, alternative mixes are envisaged on a number of sites, in some cases linked to existing planning permissions and including retail, and were tested through the site assessment process. With the exception of site MX1930 the evidence before me indicates that the proposed uses are suitable and capable of being delivered over the Plan period. In order to be effective, clarity should be provided on the type of uses sought on each site, through the following modifications; MX1903 in **SD2-MM296**, MX2101 in **SD2-MM299**, MX1911 in **SD2-MM303**, MX1906 in **SD2-MM309**, MX1929 in **SD2-MM312**, MX3394 in **SD2-MM314**, MX1905 in **SD2-MM316**, MX1907 in **SD2-MM319**, MX3349 in **SD2-MM321**, MX1919 in **SD2-MM324**, MX1920 in **SD2-MM327**, MX1912a in **SD2-MM330**. The suitability of MX1930 is dealt with in the Huddersfield urban sites sub-section below.
141. The housing, employment and mixed use allocations refer to 'indicative capacity' in terms of dwelling numbers/floorspace. This is a suitably flexible approach which allows some variation in numbers through the planning application process, depending on circumstances.
142. The allocation proposals set out details of specific constraints, reports required, and other site specific considerations including mitigation measures to aid developers and other stakeholders. A number of amendments are necessary to reflect updated constraints and requirements for specific sites, or provide additional information to aid effectiveness.
143. In the case of allocation sites owned by the Council, the Plan refers to 'enhanced' standards of provision required in terms of open space, affordable housing and/or design, above those established in the Part 1 policies. This fails to provide sufficient clarity and is imprecise, and could be dealt with on a

case by case basis to be determined by the Council. In order to be effective, modifications are needed to remove this wording from the site-specific proposals in Part 2 of the Plan; site E1836 in **SD2-MM4**, E1837 in **SD2-MM6**, E1899 in **SD2-MM9**, E1876 in **SD2-MM20**, H1679 in **SD2-MM51**, H734 in **SD2-MM54**, H809 in **SD2-MM55**, H1647 in **SD2-MM58**, H1656 in **SD2-MM59**, H1657 in **SD2-MM61**, H790 in **SD2-MM88**, H1694 in **SD2-MM89**, H101 in **SD2-MM95**, H1811 in **SD2-MM100**, H1731a in **SD2-MM102**, H1935 in **SD2-MM104**, H813 in **SD2-MM112**, H1937 in **SD2-MM114**, H776 in **SD2-MM117**, H1664 in **SD2-MM118**, H1754 in **SD2-MM123**, H46 in **SD2-MM128**, H794 in **SD2-MM135**, H758 in **SD2-MM138**, H1938 in **SD2-MM139**, H1696 in **SD2-MM144**, H1702 in **SD2-MM145**, H762 in **SD2-MM166**, H1704 in **SD2-MM168**, H2667 in **SD2-MM189**, H763 in **SD2-MM201**, H1709 in **SD2-MM204**, H780 in **SD2-MM231**, H730 in **SD2-MM269**, H128 in **SD2-MM278**.

144. A number of site policies refer to the need to assess the impact of schemes on the SRN. However, Highways England has indicated that some of these allocations are unlikely to have significant adverse effects on the SRN, and as Policy PLP 4 allows cumulative effects to be assessed has advised that these references are not required or justified. I concur that this would be a pragmatic approach, and accordingly, the following modifications are proposed to remove this requirement; site E1836 in **SD2-MM4**, E1831 in **SD2-MM15**, E1985a in **SD2-MM17**, H519 in **SD2-MM53**, H809 in **SD2-MM55**, H94 in **SD2-MM64**, H102 in **SD2-MM67**, H481 in **SD2-MM69**, H1783 in **SD2-MM74**, H758 in **SD2-MM138**, H138 in **SD2-MM147**, H508 in **SD2-MM164**, H222 in **SD2-MM212**, H502 in **SD2-MM217**, H688 in **SD2-MM219**, H690 in **SD2-MM221**, MX1903 in **SD2-MM297**, MX3349 in **SD2-MM323**.

145. In the case of other schemes which have potential to significantly impact on the SRN, Highways England has indicated that inclusion of the modified wording discussed under Issue 6 above (in relation to H69) would provide sufficient mitigation. I concur with this position, and therefore in order to be effective the additional wording should be inserted in the following policies: H559 (**SD2-MM111**), H1747/H351 (**SD2-MM63**), H2089 (**SD2-MM130**) and MX1905 (**SD2-MM317**).

146. The Council's Flood Risk Technical Paper demonstrates that a sequential approach has been suitably applied in the case of the accepted site options. Developable site areas have been reduced to exclude areas of Flood Zone 3. A small number of housing sites contain areas of Flood Zone 2, but the extent of these areas is limited and there is capacity for these areas to be used for landscaping or open space within scheme layouts. As allocations have been subject to the sequential test there is no need for an additional test at planning application stage. Accordingly, reference to this within the site-specific proposals should be deleted for reasons of effectiveness (MX1903 in **SD2-MM297**, MX2101 in **SD2-MM300**, MX1911 in **SD2-MM306**, MX1906 in **SD2-MM311**, MX1929 in **SD2-MM313**, MM3394 in **SD2-MM315**, MX1905 in **SD2-MM317**). Related modifications are also necessary to Policy PLP 27, as set out under Issue 10 below. The text for allocation site H85 should also be corrected to specify that part of the site is in Flood Zone 2 (**SD2-MM119**) and the text for site H1647 should refer to flood risk constraints (**SD2-MM56**).

147. As referenced in the HRA section above, modifications are necessary to refer to avoidance and mitigation measures in relation to a number of allocations in proximity to the SPA (E1866 in **SD2-MM33**, H356 in **SD2-MM195**, H67 in **SD2-MM233**, H200 in **SD2-MM237**, H342 in **SD2-MM238**, H343 in **SD2-MM239**, H288a in **SD2-MM251**, H626 in **SD2-MM260**). This reflects the findings of the Council's HRA work, and is necessary for the proposals to be clear and therefore effectively applied.
148. A number of sites have gained planning permission. In order to be effective and facilitate appropriate monitoring the indicative capacities in the site policies should be amended to reflect these consents, as well as being captured in the updated supply calculations through **SD1-MM160**. This relates to the following sites, and others referenced in the later site-specific sub-sections; site E1837 in **SD2-MM5**, H754 in **SD2-MM48**, H755 in **SD2-MM49**, E1899 in **SD2-MM7**, E1876 in **SD2-MM18**, H297 in **SD2-MM252**, H313 in **SD2-MM279**. An adjustment to the site boundary to reflect the planning permission should also be made in relation to site H356, with consequent reductions in gross and net site areas (**SD2-MM194**).
149. Modifications are needed to a number of allocation policies for reasons of effectiveness to specify new requirements for transport, ecology and flood risk/drainage reports, based on the latest Council evidence. The list below captures many of these changes, whilst some are referenced in the following site-specific sections.
- Transport Assessment - site E1899 in **SD2-MM8**, E1879 in **SD2-MM10**, E1873 in **SD2-MM11**, E1876 in **SD2-MM19**, , E1829 in **SD2-MM31**, E1900 in **SD2-MM37**, E1871 in **SD2-MM39**, H616 in **SD2-MM47**, H780 in **SD2-MM230**, H47 in **SD2-MM248**.
 - Transport Statement – site H1647 in **SD2-MM57**, H216 in **SD2-MM75**, H215 in **SD2-MM77**, H790 in **SD2-MM87**, H1731a in **SD2-MM101**, H1935 in **SD2-MM103**, H367 in **SD2-MM109**, H1937 in **SD2-MM113**, H2148 in **SD2-MM115**, H776 in **SD2-MM116**, H85 in **SD2-MM120**, H192 in **SD2-MM122**, H197 in **SD2-MM134**, H1696 in **SD2-MM143**, H796 in **SD2-MM154**, H162 in **SD2-MM156**, H49a in **SD2-MM158**, H1983 in **SD2-MM169**, H2645 in **SD2-MM170**, H567 in **SD2-MM178**, H2627 in **SD2-MM187**, H2667 in **SD2-MM188**, H221 in **SD2-MM193**, H356 in **SD2-MM195**, H763 in **SD2-MM199**, H17 in **SD2-MM211**, H549 in **SD2-MM229**, H178 in **SD2-MM235**, H200 in **SD2-MM237**, H342 in **SD2-MM238**, H343 in **SD2-MM239**, H784 in **SD2-MM245**, H785 in **SD2-MM246**, H786 in **SD2-MM247**, H130 in **SD2-MM250**, H297 in **SD2-MM253**, H626 in **SD2-MM260**, H728 in **SD2-MM264**, H2585 in **SD2-MM271**, H44 in **SD2-MM274**, H70 in **SD2-MM275**, H120 in **SD2-MM276**, H128 in **SD2-MM277**, H339 in **SD2-MM280**, H538 in **SD2-MM281**, H583 in **SD2-MM282**, MX1919 in **SD2-MM325**, MX1920 in **SD2-MM328**.
 - Ecological Assessment – site H481 in **SD2-MM68**, H439 in **SD2-MM76**, H3350 in **SD2-MM105**, H199 in **SD2-MM228**, H664 in **SD2-MM243**.
 - Drainage report – site H730 in **SD2-MM270**.
 - Flood Risk Assessment – site H85 in **SD2-MM120**.

- Deletion of requirement for Flood Risk Assessment - site H597 in **SD2-MM257**, H1774 in **SD2-MM287**.

Huddersfield urban sites (non-Green Belt)

150. H1656, south of St. Thomas Gardens, Bradley - The site contains a multi-use games area (MUGA) and the policy refers to replacement provision as part of redevelopment. The policy wording needs to be adjusted to refer to equivalent or better quantity or quality in order to be consistent with paragraph 74 in the NPPF (**SD2-MM59**).
151. H1657, north of Deighton Road, Deighton - In order to be effective the policy should be amended to refer to Public Right of Ways (PROW) which adjoin the site to the north and west (**SD2-MM60**).
152. H764, west of Sunningdale Road, Crosland Moor - The Council has carried out an open space assessment of the site since publication of the Plan, which identifies that the site has medium value as open space used for informal play and use of the public footpath as a route to school. In order to retain this facility and accord with the Plan's spatial strategy the housing allocation should be deleted (**SD2-MM73**) and the site designated as Urban Green Space (UGS) by extending site UGS1199.
153. H1783, east of Thewlis Lane, Crosland Hill - Given the scale of the proposal a masterplan is necessary to deliver quality and well planned development. This should be referenced in the policy for reasons of effectiveness (**SD2-MM74**).
154. H202, north of New Hey Road, Salendine Nook - Outline planning permission has been granted for 22 rather than 19 dwellings, and the site capacity in the policy should be amended accordingly (**SD2-MM79**). The existence of an overland drainage route and provision of a buffer should be included in the policy, in order to allow for effective planning (**SD2-MM78, SD2-MM80**).
155. H623, east of Weatherhill Road, Birchencliffe - The site adjoins listed buildings at Warren House Lane. The Council's Heritage Impact Assessment (HIA) identifies much of the site as an area of moderate significance, where mitigation is required to retain the open agricultural setting. However, the site is modest in size, contains a pylon and is crossed by electricity lines and a PROW. As such there is insufficient capacity to provide appropriate mitigation, and the proposal would cause harm to the heritage asset. Whilst harm would be less than substantial, I consider that public benefits linked to provision of additional housing on the site would, having regard to the modest dwelling numbers, be insufficient to outweigh harm. Accordingly I conclude that the allocation is not justified or consistent with national policy, and should be deleted (**SD2-MM81**).
156. H706, east of Halifax Road, Birchencliffe - The Council's HIA identifies that part of the site is of high significance to the setting of nearby listed buildings, where loss of openness would cause substantial harm to the assets. Other areas of moderate significance are identified beyond this. The indicative site capacity does not appear to take account of these constraints, and as such, there is a risk of considerable harm to the heritage assets. Whilst harm would be less than substantial in planning terms, I consider that public benefits linked to modest provision of additional housing within the area of high

significance would be insufficient to outweigh harm. Accordingly, in order to be justified and consistent with national policy, the policy should specify that the areas of high significance should not be developed (**SD2-MM85**), and accordingly the net site area and indicative capacity should be reduced to 11.39 hectares and 243 dwellings (**SD2-MM82, SD2-MM84**). Related heritage constraints and mitigation should also be inserted (**SD2-MM83, SD2-MM85**).

157. H789, west of Tanyard Road, Salendine Nook – The landowner has confirmed that the site is not available for development within the Plan period. Accordingly, the allocation is not effective and I conclude it should be deleted from the Plan (**SD2-MM86**).

158. H790, east of Fern Lea Road, Lindley – The site is a sloping area of scrubland adjoining a play area and informal open space. It has limited value as open space, and it could be sustainably developed for housing. Based on its size a Transport Statement is necessary through modification **SD2-MM87**.

159. H101, north of Jackroyd Lane, Newsome – The site is located close to Castle Hill Scheduled Monument (SM), and is identified in the Council's Castle Hill Setting Study as an 'important' undeveloped area which contributes to the significance of the hill's setting. The site consists of a series of attractive sloping fields, and contains a well-used PROW which provides a key route up the hillside towards the SM. As seen on my site visit, much of the site is clearly visible from the hill, and there are views across large sections of the site towards the hill and tower.

160. Taking these factors into account, I consider that the proposed allocation would erode the rural character of the site and cause considerable harm to the setting of Castle Hill. The Council's HIA fails to recognise the full extent of views to and from the SM and underplays the significance of the site to the asset. Whilst harm would be less than substantial in planning terms, Castle Hill is a heritage asset of high significance and a key feature in this part of Kirklees. Given this significance I consider that benefits arising from additional housing would not outweigh harm. However, a small section of the western part of the site is partially obscured by surrounding residential development, and does not afford clear views to or from the SM, and could be developed without harming the rural setting of Castle Hill. As such, in order to be justified and consistent with national policy, the allocation should be modified to relate to this discrete area only, as shown in EX89.1, with consequential reductions in the gross and net site areas and a reduced indicative site capacity (**SD2-MM90, SD2-MM91, SD2-MM93**). The policy should also be modified to specify the need for sensitive design and layout which avoids harm to the significance of Castle Hill. I have amended the wording in the Council's published modification to clarify this position and remove reference to the Council's HIA (**SD2-MM95**).

161. There are also consequential modifications in terms of constraints and mitigation measures associated with the reduced area, including deletion of reference to Biodiversity Action Plan (BAP) Priority Habitats (**SD2-MM91**), public sewers across the site (**SD2-MM92**), and the requirement to submit a Transport Assessment and Travel Plan (**SD2-MM94**).

162. H1811, south-east of Blue Bell Hill, Newsome – The Council's HIA identifies part of the site close to Taylor Hill Working Mens Club as moderate significance, which should be retained as an open landscaped setting to the listed building. The site also contains extensive woodland area which is a BAP Priority Habitat. These constraints are not reflected in a reduced net developable area or indicative capacity. Potential harm to the heritage asset would be less than substantial but would not be outweighed by benefits arising from the modest amount of additional housing. In order to avoid harm to the heritage asset and ecology, and ensure consistency with national policy, the net area and indicative site capacity should be reduced, and the policy should list related constraints and mitigation measures (**SD2-MM96, SD2-MM98, SD2-MM100, SD2-MM97, SD2-MM99, SD2-MM100**).
163. H1728a, Plantation Drive, Newsome – The site is located close to Castle Hill SM, and is identified in the Castle Hill Setting Study as an 'important' undeveloped area which contributes to the significance of the hill's setting. Most of the site is clearly visible from Castle Hill, and there are views from the site of the SM. Based on my observations and evidence from Historic England, I consider that the Council's HIA under-estimates the impact of the proposed development on the SM, and that the scheme would erode its rural character and cause considerable harm to the setting of Castle Hill. Whilst harm would be less than substantial in planning terms, Castle Hill is a heritage asset of high significance and a key feature in this part of Kirklees. Taking account of this significance and the scale of development I consider that benefits arising from additional housing would not outweigh identified harm. A small section in the south-east of the site is not clearly visible from the SM, and could be potentially developed without harm to the asset. However, it falls below the Council's size threshold for allocations. Therefore, for the above reasons, I conclude that the proposal should be deleted from the Plan through modification **SD2-MM106**.
164. MX1930, north of Blackmoorfoot Road, Crosland Moor - The site is allocated for a mix of housing and employment land. However, the site is accessed via the local road network and is located at a distance from the strategic road network. This poor connectivity means that access by Heavy Goods Vehicle (HGV) may be difficult, and affect the site's attractiveness to the commercial market. The market review evidence submitted by the landowner after publication of the Plan indicates that there is a high level of existing supply of employment land and a low employment demand in the Crosland Moor area, and that rental values for the site would be low, affecting viability. At the time of the hearing a planning application for residential only development on the site had been submitted.
165. Taking account of the site's locational constraints, coupled with the market review evidence, there is considerable uncertainty regarding the viability and delivery of the employment element of the allocation. Current and previous industrial uses and the sloping topography of the site may also involve remediation costs. Based on the evidence before me, I therefore conclude that the allocation for employment and housing should be amended to be for residential use. This would be realised through the deletion of the mixed use allocation (**SD2-MM298**) and insertion of a new housing allocation (H3397 in **SD2-MM107**).

166. The site appears to have reasonable capacity for some 700 dwellings, albeit the latest projections indicate that 16 of these would be delivered beyond the Plan period. In order to be effective the new policy should include reference to ecology and heritage constraints/mitigation, and a requirement to provide an access link between the north-east section and the rest of the site which is in different ownership (**SD2-MM107**).
167. MX1911, south of Lindley Moor Road, Lindley – Much of the site already has planning permission and has been developed. In this context reference to the need to assess impact on the SRN is not necessary and should be deleted (**SD2-MM306**). It has been confirmed that a small section of the site is no longer available for development, whilst a further area is not developable on account of its topography. The site area and housing and employment capacity should be adjusted accordingly (**SD2-MM301, SD2-MM302, SD2-MM304, SD2-MM305**).
168. MX1906, north of Trinity Street, Huddersfield – An indicative employment capacity should be inserted to provide clarity and ensure the policy can be effectively monitored (**SD2-MM310**). The developable area should also be increased to reflect discussions regarding an emerging masterplan for the site (**SD2-MM307**).
169. The site contains Grade II listed buildings and a statue. This constraint and associated mitigation measures should be inserted in the policy in order to provide adequate protection for the historic environment in line with the NPPF (**SD2-MM308, SD2-MM311, SD2-MM311**).

Huddersfield Green Belt sites

170. H31, north-west of Woodsome Drive, Fenay Bridge – The site is identified in the Council's Green Belt Review and site assessment work as having a less important Green Belt role and where development would have limited impact on Green Belt function. Having regard to its containment I concur with these findings, and recognise that adjacent roads would provide a strong and defensible new Green Belt boundary. As such, and in the context of the need for additional housing identified in Issue 2, I conclude that exceptional circumstances exist to justify removing the site from the Green Belt.
171. H2684a and H2730a, Woodsome Park/Hermitage Park, Lepton – These adjoining sites are identified in the Council's Green Belt Review and site assessment work as performing a moderately important Green Belt role and where development may potentially have a detrimental impact on Green Belt function. However, the sites are well contained by physical features, including residential development, Penistone Road, Lepton Great Wood and Beldon Brook and field boundaries. Despite the size of the sites, strong defensible Green Belt boundaries could be achieved, helping to safeguard the adjoining countryside from encroachment. A clear boundary does not exist at the point adjoining the disused railway line; however, as this area is small it would be possible to facilitate a new defensible boundary with suitable landscaping linking the existing field boundaries. The sites can be seen from Penistone Road and in longer distance views, but tree cover and topography provides an element of screening, and development would be seen from the south as an extension of the urban area. Although there would be some reduction in the

gap between Huddersfield and Highburton, Beldon Brook and field boundaries provide a clear defensible boundary, and existing tree cover coupled with appropriate scheme landscaping and layout could achieve an attractive edge.

172. Initial highway work indicates that primary access to both sites is required and achievable through site H2684a, potentially via a new roundabout on Penistone Road. Education needs have been modelled and there is no immediate need for additional school places in the area. Noise assessment work is required in policy H2684a and should ensure that any impacts linked to nearby employment uses and other sources are appropriately dealt with.
173. The Council's HIA identifies that part of site H2730a is of moderate significance for the setting of the listed building 'Crow Trees'. Site capacity allows scope for this area to be retained as open land. Accordingly, in order to avoid harm to setting the policy should be modified to specify that no development should take place in this area (**SD2-MM46**) and require the retention of the historic field boundaries, public footpath and protected trees to the south of Crow Trees which are also identified as significant to the asset (**SD2-MM45, SD2-MM46**).
174. Neither site is identified in the Castle Hill Setting Study (2016) as significant to its setting. As seen on my site visit, and as shown in submitted photographic evidence, the sites are visible from the grounds of the listed building of Woodsome Hall. Historic England has indicated that the allocation sites can also be seen from rooms within the Hall. However, there is a considerable distance between the Hall and the Lepton sites, and the sites are viewed as part of a wide vista which includes developed and open areas. Trees also provide some screening. Evidence from Historic England does not identify a clear connection between the Hall and Capability Brown. Taking account of these factors I conclude that any harm to the Hall or its setting would be limited, and could be mitigated through appropriate landscaping and layout. In reaching my conclusions I have taken account of comments received after the hearing session, in response to the submitted photographs. In order to provide appropriate protection for the historic environment I have amended the wording of published **SD2-MM46** to refer to heritage assets, rather than just Crow Trees.
175. Ecology reports on the sites indicate that further survey work will be required, and that mitigation measures may be necessary to protect ecological habitats within and nearby. Reference to potential avoidance, mitigation and compensation measures is therefore necessary within the policies, in order to ensure the Plan is effective (**SD2-MM43**). The site capacity provides scope for potential retention of habitats and provision of buffer zones, including in the vicinity of Lepton Great Wood. Ecology and protected trees would also be afforded protection through Policy PLP 30.
176. Due to inter-connections between the sites, a joint Masterplan is required and should be referenced in the policies (**SD2-MM43**). A slight adjustment is necessary to the gross site area for site H2730a to correct an error (**SD2-MM44**).
177. The site assessment ratings and SA scores have been disputed for both sites, However, I am satisfied that they broadly reflect the site's characteristics and

constraints, and there is no evidence to justify significant changes that would affect overall conclusions on suitability and sustainability. The assessment of rejected options covering parts of the sites is reasonable and shows that some of the smaller areas were unable to achieve defensible Green Belt boundaries or suitable access.

178. I recognise the level of local concerns regarding the allocation of Green Belt land on the edge of Lepton. However, sites H2864a and H2730a are in sustainable locations on the edge of the wider urban area, and subject to the aforementioned modifications the policies contain appropriate mitigation measures. Overall, in the context of identified housing needs and limited harm to the Green Belt, I conclude that exceptional circumstances exist to justify their removal from the Green Belt. Defensible boundaries can be achieved, and there are no exceptional circumstances to make further Green Belt boundary adjustments in this vicinity.
179. The evidence indicates that both sites are deliverable and available, albeit taking account of joint masterplanning and other technical work I consider that completions are unlikely to be achieved until 2021/22, to be identified in the updated phasing table in Part 1 of the Plan (**SD1-MM160**).
180. H1679, north of Fenay Lane, Almondbury – This site is identified in the Council's Green Belt Review and site assessment work as performing a moderately important Green Belt role and where development may potentially have a detrimental impact on Green Belt function. However, the site is well contained by built development, treed areas and roads, and its links to the wider Green Belt are constrained by the presence of Fenay Lane. Development on the site would not extend south of Fenay Lane, and would not result in significant encroachment into the countryside. Strong new defensible Green Belt boundaries would be provided by Fenay Lane and Penistone Road. Although the site is sloping, development would be seen from the south and east against an urban backdrop, and suitable landscaping and layout would help to mitigate visual impacts.
181. Areas of Flood Zone 3 and BAP Priority Habitat have been removed from the developable area. Further ecological investigation is necessary, and the policy should be amended to refer to this requirement in order to be effective (**SD2-MM50**). Overall, in the context of identified housing needs and limited harm to the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt. Defensible boundaries can be achieved, and there are no exceptional circumstances to make further Green Belt boundary adjustments in this vicinity.
182. Taking account of the need to undertake technical work and appoint a development partner, I consider that completions are unlikely until 2022/23, as identified in the updated phasing table in Part 1 of the Plan (**SD1-MM160**).
183. H351/H1747, Bradley Road, Bradley - Sites H351 and H1747 adjoin each other and would form a significant area of new housing development on the edge of Huddersfield. The sites are located in part of the strategic Green Belt gap between Huddersfield and Brighouse. However, notwithstanding potential development in Calderdale, a clear gap would remain and Bradley Wood and the M62 motorway would form part of this division. The sites are well

contained by existing features, and extensive enough to provide buffers and landscaping mitigation. The sites are in a sustainable location on the edge of the town, with a range of local services and facilities close by.

184. Development of site H1747 would involve the loss of an 18 hole golf course, 9-hole par 3 course, driving range and associated facilities. The Council's Golf Needs Assessment (2015) and other technical reports indicate that there is an oversupply of golfing provision in the area, with available capacity on other courses and scope to absorb future population/participation increases over the Plan period. However, Bradley Park is the only pay and play course in Kirklees, and is an active and well used facility. Although other golf clubs in the area allow visitors and may have similar pricing, the flexibility and informal nature of the pay and play facility means that it is likely to attract a particular market, including those without a golfing handicap, and is a different form of provision. On this basis I conclude that Bradley Park is an important local sporting facility which meets particular needs, and is not surplus to requirements. Sport England and England Golf support this position. As such the first bullet in paragraph 74 in the NPPF is not satisfied.
185. The second bullet in paragraph 74 states that the loss of sporting facilities may be permitted where loss resulting from development is replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Bullet 3 also allows for loss where the development is for alternative sports and recreational provision, the needs for which clearly outweighs the loss. However, as the proposal is for housing development I consider that bullet 2 rather than bullet 3 applies.
186. The Council's latest draft Masterplan shows the re-provision of a 9-hole golf course and driving range on-site as part of the development scheme, alongside two full-sized 3G pitches, two junior football pitches linked to a new school, walking/cycling facilities and other open space. The Masterplan proposes clusters of high density development, and there is scope to amend this further as the scheme evolves. Accordingly, taking account of the range of other facilities required, I am satisfied there is sufficient capacity within the site to deliver the scheme, and scope to amend the precise hectareage of the 9-hole course if necessary.
187. A 9-hole golf course with a larger driving range does not represent a like for like golfing replacement in terms of quantity or quality, and would accommodate fewer users. However, as set out in the Council's report, a 9-hole course could provide an important entry point into the sport. The proposed facility is supported by England Golf and Sport England, and there are other 9-hole courses in operation. Masterplanning work is still evolving, and overall I consider there is a reasonable prospect that a 9-hole course and associated facilities could be viable and deliverable on the site. There is some uncertainty as to whether the junior pitches would be made available to the public. However, the other new sports facilities would support a high throughput of users, and the two 3G pitches would help to meet an identified shortfall in Kirklees for this form of provision.
188. Therefore, notwithstanding that the residential development itself may create additional needs for sports and open space, taken as a whole I consider that the proposed new sporting facilities would go a significant way towards off-

setting the loss of the 18-hole course and current facilities. Bullet 2 in paragraph 74 in the NPPF does not specify that replacement provision should be for the same type of sport. Furthermore, as set out below the allocation would deliver a significant number of new homes in Huddersfield, as well as affordable housing. This would provide social benefits, boost the economy, and help to support the Plan's spatial strategy and objectives for employment growth.

189. Taking account of benefits arising from the proposed replacement sports provision, the identified needs for additional homes in the area, the lack of alternative options for provision and the sustainability of the location, I consider that, on balance, the benefits arising from the modified proposal would outweigh the loss of current sports facilities on the site. Therefore, although paragraph 74 in the NPPF is not met, I am satisfied that in this case there are particular circumstances which justify this departure. In order to secure replacement facilities the policy would need to be modified to specify the provision of a 9-hole course, driving range, clubhouse and two 3G pitches, and aim to ensure no gap in golfing provision on the site (**SD2-MM63**). The design process relating to the 9-hole course is a detailed matter that will be determined by the Council in consultation with stakeholders.
190. Technical transport work indicates that there is capacity to deliver 520-560 dwellings from three access points into the site, or up to 750 if signals are provided at Tithe House Way. Beyond this point the Cooper Bridge Link Road scheme would be required to provide additional access. The Cooper Bridge scheme is timetabled for completion in 2024/25, utilising an allocation from the West Yorkshire Plus Transport Fund, although the Council is seeking to accelerate this process to secure completion earlier. The housing phasing table, as modified through **SD1-MM160**, shows that an estimated 370 dwellings would be completed by 2024/25, and as such it seems unlikely that delivery would be constrained. Technical work on alignment options is being progressed, but there is no evidence that there are fundamental constraints that cannot be mitigated and would prevent the link road scheme coming forward.
191. The Council has indicated that there are no other identified fundamental constraints on the local highways network that would prevent the scheme being delivered. Highways England has not objected to the allocation, subject to the inclusion of additional policy wording requiring the impact of the scheme on the local highway network and the SRN to be assessed. The Council's evidence indicates that land ownership issues at the three initial access points have been or are capable of being resolved, and that suitable geometry and safety standards can be provided. I have had regard to alternative highways and access evidence submitted by representors. But as they are the Local Highways Authority I attach significant weight to the Council's findings, and on the balance of the evidence before me I consider that there is a reasonable prospect that the scheme is deliverable in highway terms. Further assessment will take place through the planning application process and provide an opportunity to address issues and identify necessary mitigation measures. The additional wording sought by Highways England and reference to the link road and connection to the site, as set out in modification **SD2-MM63**, would help to ensure the policy is effective.

192. In conclusion, the proposal would deliver a significant number of dwellings in a sustainable and strategic location, and involve limited harm to the Green Belt. I recognise that the existing golf facilities on site are a valued local facility. Nevertheless, on balance I consider that a range of benefits arising from the modified scheme would outweigh the loss of existing golf facilities. Taking account of the above factors, including identified housing needs and lack of suitable alternatives, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt. There is evidence that the landowners of H351 and H1747 are engaged in joint working and are committed to collaborative delivery. There are no other identified fundamental constraints that would prevent development coming forward, and detailed matters could be investigated and dealt with through the planning application process.
193. As the delivery of H351 and H1747 are inter-connected it is necessary for the separate policies to be amalgamated, in order for the Plan to be clear and effective. Policies H351 and H1747 would be deleted through modifications **SD2-MM52** and **SD2-MM62**, and replaced by a combined policy (**SD2-MM63**). In addition to modifications listed above, the combined policy should specify the production of a joint Masterplan and the provision of a local centre, and clarify school provision, in order to ensure effective planning. The policy should be amended to specify retention and reuse of the nearby listed barn at Shepherds Thorn Farm, provide additional clarity on measures to protect the wider setting of the building, and seek sensitive design and layout. These measures will help to protect heritage assets. Subject to the above modifications I am satisfied that the proposal is soundly based.
194. Taking account of the need for joint delivery and the large scale of the scheme I consider that completions in a number of zones are likely to come forward later than anticipated by the Council. The phasing table in Part 1 of the Plan should be adjusted as set out in **SD1-MM160**, to show the delivery of a small number of dwellings within the five year supply period, and a total of 1,460 dwellings within the Plan period. A further 498 units would be delivered after 2031.
195. H519, north and west of Gernhill Avenue, Fixby - The site is identified in the Council's Green Belt Review and site assessment work as having a less important Green Belt role and where development would have limited impact on Green Belt function. I concur with this, having regard to the site's containment by buildings to the south and east, and strong field boundaries to the west. Development would reduce the gap between Huddersfield and Rastrick/Brighouse, within Calderdale district. However, even if additional development occurs in this part of Calderdale, a clear physical gap would remain, and a strong new defensible boundary could be achieved along the northern edge of site H519 and prevent sprawl.
196. There are a number of listed buildings in the vicinity of the development site, including Upper Cote Farm. However, the submitted evidence indicates that, due to the distance from the site, topography and vegetation, development would not harm the setting of these designated heritage assets. The policy provides suitable mitigation measures to ensure that heritage is protected.

197. Infrastructure and transport impacts have been modelled, account has been taken of traffic impacts arising from growth in Calderdale, and there are no identified fundamental constraints to development of the site. Overall, in the context of identified housing needs and limited harm to the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
198. H94, west of Henry Frederick Avenue, Netherton – The site is identified in the Council's Green Belt Review and site assessment work as performing a moderately important Green Belt role and where development may potentially have a detrimental impact on Green Belt function. However, the site is well contained by built development and field boundaries. Development would not extend any further west than existing housing on Church Lane, and would be seen in this context. Although the development would narrow the gap between Netherton and South Crosland, a clear physical gap would remain, and strong new defensible Green Belt boundaries could be provided by existing trees and field boundaries.
199. The Castle Hill Setting Study identifies the wider area around Netherton as a 'dominant area' where there may be potential to harm the setting of the SM. However, views of the site from the hill form part of a wide vista of developed and undeveloped areas, and development would be seen as part of the built-up area of Netherton. Historic England has indicated that there are no significant heritage issues that would prevent allocation of the site, and taking account of the vista and intervening distance to Castle Hill I concur with this position. The policy requirement to undertake a HIA as part of a planning application would provide an opportunity for any impacts on heritage assets to be adequately mitigated.
200. No other fundamental constraints to development have been identified, and the policy provides necessary mitigation measures. In the context of identified housing needs and limited harm to the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
201. H102 and H660, land west and east of Netherton Moor Road, Netherton - These adjacent sites are identified in the Council's Green Belt review as performing a less important Green Belt role where settlement extension could have limited impact on Green Belt function. The sites are open sloping fields, but are well contained by residential development to the north/west, Netherton Road, and field boundaries. Development would reduce the gap between Netherton and Honley, but a reasonable divide incorporating woodland would remain. Additional landscaping on the south/south-east side and in the vicinity of Number 35 Lavender Court could strengthen the existing field boundaries, and also help to mitigate the impact of development on the Honley Conservation Area to the south. Accordingly, in order to be effective the policies should be amended to require a landscaping buffer on the south/south-eastern edge (**SD2-MM67, SD2-MM72**).
202. References to heritage constraints and related design and layout mitigation measures should be inserted, to provide sufficient protection for the historic environment (**SD2-MM67, SD2-MM72, SD2-MM65, SD2-MM70**). The Council's HIA indicates that, due to distance and adjoining urban areas, development is unlikely to harm the setting of Castle Hill, albeit there may be

some loss of views of Castle Hill from Nethererton Moor Road. The policy requirement to undertake further HIA at application stage would allow impacts on Castle Hill and other heritage assets to be fully assessed and addressed.

203. Additional mitigation may be required on the local highways network, and in order to be effective the policies should be amended to refer to this (**SD2-MM67, SD2-MM72**). Constraints relating to ecology and ancient woodland should be inserted, in order to provide appropriate protection for the natural environment (**SD2-MM70, SD2-MM65, SD2-MM66, SD2-MM71**).
204. There are no identified fundamental constraints to development, and subject to the aforementioned modifications the policies provide an appropriate range of mitigation measures. Overall, in the context of identified housing needs and limited harm to the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the sites from the Green Belt.
205. H3350, south-east of Knowle Road, Kirkheaton – The site is an open sloping field, predominantly located within the Green Belt. It adjoins built development, and is contained by a landscaped edge to the south-east. This edge limits the relationship of the site to the wider Green Belt, and would form a strong new defensible Green Belt boundary. The current Green Belt boundary across the field is not marked by physical features, and the proposal would, in this regard, present an improvement. Dwellings on the upper slope would be visible from within the village and in other views. However, there is existing built form on Cockley Hill Lane and development would be viewed within this context. On this basis, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.

Dewsbury and Mirfield urban sites

206. H95, east of The Combs, Hall Lane, Thornhill – The site is located in the Thornhill Conservation Area and the listed buildings of Thornhill Hall and cottages lie to the south. The site provides an open agricultural setting to the listed buildings, and there are attractive views of the buildings in this setting as seen from the adjoining recreation land. I consider that the Council's HIA does not sufficiently recognise the contribution the site makes to the setting of the listed buildings or Conservation Area, and underplays the harm that development would cause to the significance of these assets. I concur with Historic England that the proposal would erode the rural character and harm the setting of these designated assets. Harm would be considerable, albeit less than substantial in planning terms, and development would fail to protect and enhance the historic environment. Although 18 dwellings would provide some social/economic benefit this modest amount would be insufficient to outweigh the identified harm. As such I conclude that the allocation is not justified or consistent with national policy, and should be deleted from the Plan (**SD2-MM121**).
207. H1660, east of Heckmondwike Road, Dewsbury Moor – The reference to the existing play area on the site should be strengthened to require the retention of the facility or its replacement with an equivalent or better facility. This will ensure recreation facilities are protected and the policy is consistent with the NPPF (**SD2-MM127**).

208. The site contains protected trees. In order to be effective and support their protection, the policy should refer to this constraint (**SD2-MM126**). The net site area should be amended to take account of this area, and the site capacity reduced from 62 to 53 dwellings (**SD2-MM124, SD2-MM125**).

Dewsbury and Mirfield Green Belt sites

209. H307, east of Long Lane, Earlsheaton – The site is well contained and lies between built development which limits its relationship with the open countryside. The site is small and clear defensible boundaries would be provided by the field boundaries. Therefore the integrity of the gap between Dewsbury and Wakefield would be retained and sprawl would be prevented. On this basis, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.

210. H559, east of Leeds Road, Chidswell – The site is identified in the Council's Green Belt Review and site assessment work as performing a moderately important Green Belt role and where development may potentially have a detrimental impact on Green Belt function. However, the site is contained by built form on three sides and its relationship to the wider countryside is limited. The gap between Chidswell and Wakefield would be narrowed but a physical break would remain, and a clear new defensible Green Belt boundary would be formed by field boundaries on the south-east edge. In order to further strengthen this boundary and deliver a soft attractive edge to the development, the policy should be amended to require a landscaped buffer in this vicinity (**SD2-MM111**).

211. Overall, taking account of housing needs and the limited impact on the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt. The access road through the site to MX1905 would be provided via a new roundabout on Leeds Road, and the potential impact on the SRN should be assessed. The preparation of a masterplan is also necessary, given the scale of the scheme. These key constraints should be inserted in the policy in order to provide clarity and be effective (**SD2-MM111**). The number of potential dwellings should be adjusted from 279 to 280 to reflect the latest capacity work (**SD2-MM110**). Joint work will be necessary to deliver a roundabout and spine road, and therefore completions are unlikely to take place until 2020/21. The phasing table should be adjusted accordingly, as set out in **SD1-MM160**.

212. H661a, east of High Street, Batley – The site is identified in the Council's Green Belt Review and site assessment work as performing a moderately important Green Belt role and where development may potentially have a detrimental impact on Green Belt function. However, it is well contained and its relationship to the open countryside is limited by roads and built form on three sides. The site relates well to the settlement edge, and I consider that development would not harm the overall role and function of the Green Belt in this area. As such, and taking account of identified housing needs, I conclude that exceptional circumstances have been demonstrated to justify removal of the site from the Green Belt.

213. H46, Owl Lane, Shaw Cross – Planning permission has been granted for residential development on this site and building has commenced. Land which is not necessary to keep permanently open should not be included in the Green Belt. Therefore exceptional circumstances to justify the release of the site from the Green Belt have been demonstrated.
214. H2089, south of Ravensthorpe Road/Lees Hall Road, Dewsbury (Dewsbury Riverside) – The scheme involves a major urban extension to the south side of Dewsbury, providing some 4,000 dwellings and associated facilities. Part of the site lies within the Mirfield ward boundary and close to the settlement of Thornhill. However, the site adjoins the wider urban area of Dewsbury, and is separated from Mirfield and Thornhill by open countryside. As such it is reasonable to regard the site, both physically and functionally, as an extension to Dewsbury.
215. The site consists of an extensive series of fields, predominantly located in the Green Belt. Development would extend the built form of Dewsbury towards both Thornhill and Mirfield. However, a clear physical gap would remain, with rising ground to the south/south-west, and with woodland and existing field boundaries providing clear defensible boundaries. Development would, by virtue of its extent, be visible in the landscape and alter the rural and open character of the area. However, the site has a degree of containment on its southern and western boundaries, and is well related to the edge of Dewsbury. Development on the site would be seen against this urban backdrop. Existing pockets of woodland and vegetation would help to provide screening and mitigate visual impacts. This could be augmented by sensitive scheme layout, landscaping and buffer zones, particularly in the more prominent rising south/south-west section.
216. Technical work indicates that about 2,000 dwellings could be accommodated before strategic highway intervention is necessary. This may involve the provision of a strategic road link on the south side of Dewsbury, passing through H2089, although option testing is underway to identify a preferred solution. The revised phasing rates for H2089, as set out below, indicate that 1,868 dwellings are likely to be delivered up to 2031. On this basis strategic highway intervention may not be required within the Plan period, and there is a reasonable period of time to assess options, identify funding and secure delivery.
217. The initial transport work indicates that, up to the 2000th dwelling, impacts on the local highways network would not be severe and could be mitigated through off-site junction improvements and other work. The same conclusions are reached beyond the 2000th dwelling, assuming a link road or other strategic highway intervention is in place. Access is achievable from a number of points. The evidence before me is reasonable and proportionate to the Local Plan process. Highways England has indicated that, subject to the inclusion of wording in the policy which specifies that potential impacts on the SRN are assessed and addressed and impacts on the wider highway network are mitigated, they consider the proposal is sound. I therefore conclude that this wording, and reference to the 2000th dwelling position, is necessary to ensure the policy is effective (**SD2-MM130**). The potential strategic road link should also be referenced in Policy TS5 (**SD2-MM335**).

218. The site is in a sustainable location on the edge of the urban area, and close to Ravensthorpe railway station. Enhancement of the railway station and bus, walking and cycling links are proposed as part of the scheme. The provision of a new local centre, primary school provision and early years/child care provision would help to reduce the need to travel and meet the needs of new residents. The policy should be amended to specify provision of these facilities and other key services, in order to be effective (**SD2-MM130**). The requirement to undertake a sequential and impact assessment test in association with the new local centre provides protection for existing centres in absence of an indicative floorspace/hectarage within the policy.
219. Initial masterplanning work indicates there is sufficient capacity for 4,000 dwellings and necessary supporting facilities/infrastructure, including a potential link road, based on a net density of about 41 dph. This rate is reasonable in the context of historical completions evidence that a gross density of 36 dph has been achieved, as discussed in Issue 2.
220. A range of technical work and studies have been carried out, including ecology assessment, ground investigation, and flood risk and drainage work, and masterplanning work is progressing. This represents a suitable level of information for the Local Plan process, and has not identified any fundamental constraints that are likely to be incapable of resolution. The policy provides a framework for on-going masterplanning and the development of planning applications, and refers to further assessments and a range of mitigation measures.
221. Although the policy does not specify an Ecology Assessment, initial work has already been undertaken, and the policy refers to ecological constraints and related mitigation measures. As such I am satisfied that the policy, in conjunction with generic Policy PLP 30, provides a suitable framework for taking account of ecology issues and facilitating appropriate mitigation.
222. In conclusion, the site is sustainably located on the edge of Dewsbury and would deliver a significant number of new homes and jobs to meet identified needs. The scheme would, by virtue of its scale, support regeneration of the local area and transformational change in Dewsbury and help facilitate delivery of the Plan's vision and spatial strategy. Details of the initial viability work have not been released due to commercial sensitivities. However, there are positive signs as the first phase already has outline permission with active developer involvement. The scheme will result in the loss of an extensive area of countryside and alter the character of the locality. However, taking account of the above factors, identified housing needs, and the absence of suitable alternative options, on balance I conclude that there are exceptional circumstances to justify the release of the site from the Green Belt, and allocate the site for the proposed use. Masterplanning is a critical part of delivery and should be referenced in the policy, along with the need for a landscape buffer in the sensitive elevated southern section of the site (**SD2-MM130**). Subject to the above modifications through **SD2-MM130** I consider the proposal is soundly based.
223. Taking account of the scale and complexity of the scheme and the mix of landownerships, I consider that completions in a number of zones are likely to come forward later than anticipated by the Council. The phasing table in Part

- 1 of the Plan should be adjusted as set out in **SD1-MM160**, to show the delivery of a small number of dwellings within the five year supply period, linked to initial phases which have outline planning permission, and a total of 1,869 dwellings within the Plan period. A further 2,131 units would be delivered after 2031. In order to be effective the policy should clarify these figures through modification **SD2-MM129**. Although these rates will be challenging, the site is well connected and based on the evidence before me I am satisfied that there is a reasonable prospect of delivery. Detailed phasing and delivery issues would be subject to on-going monitoring by the Council.
224. H40, Granny Lane, Mirfield – The site lies between existing built development and within an area of sporadic development on Granny Lane. The southern boundary adjoins the wider countryside. However, a new defensible boundary would be provided by existing hedgerows, thereby preventing sprawl, and the loss of this site would not significantly harm the role and function of the Green Belt in this area. A new north-eastern boundary would be facilitated by an existing hedgerow and access road.
225. The net site area should be reduced to exclude a small section within Flood Zone 3 and an area identified as high significance to the setting of the adjoining listed building of Sheep Ings Farmhouse (**SD2-MM131**). Accordingly, the site capacity should be reduced from 74 to 70 dwellings (**SD2-MM132**). This is necessary to ensure flood risks and heritage matters are adequately taken into account, and align with national policy. For the same reason, the policy should be amended to include mitigation measures relating to heritage (**SD2-MM133**).
226. Overall, taking account of housing needs and the limited impact on the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
227. H205, east of Slipper Lane, Mirfield – The site is well contained by planting and field boundaries and is separated from the wider Green Belt by Slipper Lane. Removal of the site from the Green Belt would not harm the function and role of the Green Belt in this area, and Slipper Lane would provide a strong new defensible Green Belt boundary. As such, and taking account of identified housing needs, I conclude that exceptional circumstances have been demonstrated to justify removal of the site from the Green Belt.
228. H333, east of Northorpe Lane, Mirfield – The site is contained by residential development to the south and west, and a former railway line to the east. Development would be located in part of the gap between Mirfield and Ravensthorpe. However, it would not extend any further towards Ravensthorpe than existing built form, and encroachment would be prevented by the railway line forming a new defensible Green Belt boundary. Overall, taking account of housing needs and the limited impact on the Green Belt, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
229. MX1905, east of 932-1110 Leeds Road, Shaw Cross (Chidswell) - The site is allocated for a mix of housing and employment uses. The site lies in the M62 corridor and development of a major employment site in this strategic location

would help to meet the identified needs of businesses and generate new jobs. Chidswell is identified as an Employment Growth Area in the LCR SEP.

230. The site covers an extensive area of fields to the north-east of Dewsbury, and forms part of a strategic Green Belt gap between Dewsbury, Wakefield and Tingley. Although development would reduce this gap, a clear physical divide would exist. The eastern and southern site boundaries are marked by existing field boundaries and woodland, and are capable of providing defensible Green Belt boundaries, thereby preventing encroachment. The southern boundary appears on historic maps and therefore has a degree of permanence, and is distinguished by a stream and other existing features.
231. Development would, by virtue of its extent, be visible in the landscape and alter the rural and open character of the area. However, the site has a degree of containment on its southern and eastern boundaries, as described above, and adjoins residential development. Development on the site would be seen from open land to the north and east against this urban backdrop. Existing pockets of woodland and vegetation would help to provide screening and mitigate visual impacts, and could be augmented by sensitive scheme layout and landscaping.
232. The Interim Transport Assessment (ITA) for the proposal concludes that access can be achieved via a number of points, and some off-site mitigation measures are likely to be required to support future traffic levels. The ITA takes account of a significant range of data, and is based on extensive survey work and cooperation with neighbouring authorities. The method has been disputed but I am satisfied that the ITA is not fundamentally flawed to the degree that access cannot be achieved or future mitigation could not be provided. A full Transport Assessment would be required as part of the planning application process, and detailed mitigation matters would be addressed at that stage. In order to be effective, the policy should be amended to refer to potential mitigation relating to the wider highway network (**SD2-MM317**), the requirement to assess potential impacts on the SRN as identified above (**SD2-MM317**), and the need to achieve a key access point via site H559 (**SD2-MM318**).
233. A number of other modifications are necessary in order to provide further clarity and ensure effective delivery. This includes reference to the need to provide a buffer between built development and ancient woodland at Dum Wood/Dogloitch Wood, monitor the delivery of secondary school places, provide a new Local Centre, and prepare a masterplan (**SD2-MM318**).
234. The evidence before me indicates that there are no significant constraints that would prevent the site being delivered. This includes the Council's Air Quality Assessment (2017) which concludes that the overall effect of the Plan on local air quality will not be significant. The policy seeks further technical site work through the planning application process relating to issues such as ecology, drainage, flood risk and contamination and refers to mitigation measures. The site is sustainably located on the edge of Dewsbury and would deliver a significant number of new homes and jobs to meet identified needs and help facilitate the Plan's vision and spatial strategy. Overall, taking account the above factors and in the absence of suitable alternatives, I conclude that there are exceptional circumstances to justify the release of the site from the Green

Belt, and that subject to the aforementioned modifications the proposed allocation is soundly based. Due to the scale of the proposal I consider that on-site completions are unlikely to take place until 2021/22, and the phasing table should be amended as set out in **SD1-MM160**.

235. MX3394, Lees House Farm, Leeds Road, Dewsbury – The site is contained by built form and field boundaries, and development would not overly encroach into the open countryside. Taking account of identified housing and employment needs, I conclude that there are exceptional circumstances to justify its release from the Green Belt. In order to ensure effective connectivity and delivery, the policy should be amended to specify provision of access to adjoining site MX1905 (**SD2-MM315**).

Batley and Spen urban sites

236. H323, Lady Anne Road, Soothill – In order to be effective, the policy should be amended to refer to on-site protected trees and a noise source near the site (**SD2-MM140**).

237. H2647, Spafield Mill, Upper Road, Batley – In order to be effective, the policy should be amended to refer to the constraint of potentially contaminated land (**SD2-MM141**).

238. H760, Halifax Road, Staincliffe – The site frontage consists of a small grassed area which provides a break in the urban frontage and has some informal use. In order to be effective and consistent with the Plan's spatial strategy the policy should be amended to refer to the potential retention of this area (**SD2-MM142**).

239. H527, Staincliffe Hall Road, Staincliffe – Traffic safety issues have been identified on the surrounding network which would need to be assessed as part of a planning application. The policy should refer to this position, in order to be effective (**SD2-MM146**).

240. H138, south of Mill Street, Birstall – The policy seeks replacement provision of the on-site football pitch and associated facilities, and options are currently being investigated in the vicinity. In order to be consistent with paragraph 74 in the NPPF and ensure suitable mitigation, the policy wording should be amended to refer to the need for equivalent or better facilities in terms of quantity and quality (**SD2-MM147**).

241. The site is in a sustainable location on the edge of Birstall, and there are no identified fundamental constraints to development. Detailed Transport Assessment, Ecological Survey and other technical work would be required at application stage and direct any necessary mitigation measures. Taking account of the need to provide replacement facilities I consider that completions are unlikely to take place until 2021/22 and the phasing table should be amended as set out in **SD1-MM160**.

242. H172, Bradford Road, Birkenshaw – Part of the site contains an area of protected trees. In order to provide appropriate protection for these assets, the net site area should be amended to exclude this section (**SD2-MM148**) and the indicative capacity reduced from 55 to 30 dwellings (**SD2-MM149**).

243. H761, Raikes Lane, Birstall – The site adjoins and is close to a number of listed buildings, and is partly within the Birstall Conservation Area. Two sections of the site are identified in the Council's HIA as areas of moderate significance to the setting of heritage assets. The central section provides an open agricultural setting next to Birstall Old Hall, whilst the northern section of open space provides attractive views within the Conservation Area. The developable area has not been reduced to take account of these constraints, and as such I consider that the proposal would fail to facilitate sufficient areas of open land and cause considerable, albeit less than substantial, harm to the historic environment. Although additional housing would provide benefits it would not outweigh identified harm. Accordingly, in order to be effective and consistent with national policy the net site area and indicative site capacity should be reduced to allow the retention of open areas (**SD2-MM150, SD2-MM152**), and related constraints and mitigation referenced in the policy (**SD2-MM153, SD2-MM151**).
244. Subject to the above modifications I conclude that the policy is soundly based and provides scope to deal with detailed matters at application stage. Given the scale of the scheme and progress to date I consider that completions are unlikely to take place until 2020/21 and the phasing table should be amended accordingly through **SD1-MM160**.
245. H509, Brook House Mill, Balme Road, Cleckheaton – The Council has identified an error in the application of the standard density of 35 dph, which requires a reduction in the indicative site capacity from 25 to 21 dwellings (**SD2-MM165**). Drainage and other detailed matters could be appropriately addressed at planning application stage.
246. H810, Moorfield Avenue, Scholes – The landowner has confirmed that the site is no longer available for development within the Plan period. The allocation is therefore not developable and should be deleted (**SD2-MM167**).
247. H783, Dale Lane, Heckmondwike – The Council's assessment work indicates that the site has high value as an existing amenity greenspace, in terms of its qualitative function. This includes trees along the frontage, which provide an attractive vista when travelling along Dale Lane. In order to protect this facility and align with the Plan's spatial strategy the site should be deleted as a housing allocation (**SD2-MM171**) and identified as an extended part of adjoining UGS UGS1056.
248. H1772, Boundary Street, Heckmondwike – The Council has identified an error in the net site area which requires adjustment through modification **SD2-MM172**. The site capacity should also be amended, although as part of the site lies within a HSE Middle Zone site the capacity should be limited to 30 dwellings, in line with the Health and Safety Executive's (HSE) Land Use Planning Methodology (**SD2-MM173, SD2-MM174**). The policy requirement that no development should take place in Flood Zone 3 is superfluous and should be removed for clarity (**SD2-MM175**).
249. MX1907, Moorlands Business Centre and MX3349, Westgate, Cleckheaton – The sites contain existing employment premises that would be retained in development of the site. In order to provide clarity and ensure effectiveness,

the policies should be amended to refer to this position (**SD2-MM320, SD2-MM322**).

Batley and Spen Green Belt sites

250. E1831, Whitechapel Road, Cleckheaton – The site lies in the M62 corridor and development of a major employment site in this strategic location would help to meet the identified needs of manufacturing businesses and generate new jobs.
251. The site forms part of a strategic Green Belt gap between Scholes and Cleckheaton. However, although development would reduce this gap, a physical divide would remain to the west of the site. A landscaped buffer in the southern section of the site could help to provide mitigation and soften the edge of the development in this vicinity. The gap between settlements in Kirklees and Bradford would also decrease, but the remaining gap would be significant. Development would, by virtue of its extent, be visible and alter the open agricultural character of the site. However, the site is bounded by existing roads on three sides, including the M62 motorway to the east and the A58 to the north, which provide it with containment and limit its relationship with the open countryside. The sloping topography of the site curtails views of the open countryside beyond the site, as seen from the M62 and A58.
252. Highways England has confirmed that, notwithstanding postponement of the RIS scheme at junction 26 on the M62, the proposal is not considered to have potential to significantly impact on the SRN, based on a predominant B2/B8 mix of uses. Policy PLP 4 can be used to seek contributions towards mitigation measures linked to cumulative impacts, and relating to the local highway network. Air quality in the local area may be affected by the development, but this could be dealt with through appropriate mitigation measures at the planning application stage.
253. Overall, I consider that the proposal could be accommodated without harming the overall role and function of the Green Belt in this area. There are no identified fundamental constraints that would prevent development, and the policy refers to mitigation measures and detailed assessment as part of the planning application stage. The site would help to meet identified employment requirements. I therefore conclude that exceptional circumstances exist to justify removal of the site from the Green Belt.
254. The net developable area of the site and indicative capacity should be reduced in order to allow for provision of the landscaped buffer, and to take account of a gas pipeline across the site (**SD2-MM13, SD2-MM14**). The location of the landscaped buffer also needs to be clarified for reasons of effectiveness (**SD2-MM15**). The gross site area should be slightly adjusted to correct an error (**SD2-MM12**). The scale of the allocation necessitates the preparation of a Masterplan, and in order to be effective this should be referenced in the policy (**SD2-MM15**). The masterplanning process will provide an opportunity to finalise the precise position of the landscape buffer and developable area, and any adjustments which are necessary to the site boundary in the south-eastern corner adjoining land not within the Green Belt. Subject to the aforementioned modifications the proposal is soundly based.

255. E1985a, former North Bierley Waste Water Treatment Works, Cleckheaton – The site is brownfield land and has now gained outline planning permission for redevelopment for employment uses. The site is located in the M62 corridor, and development in this strategic location would help to meet the needs of businesses and generate new jobs. The site lies in part of the Green Belt gap between Hunsworth and Woodlands. However, the site is previously developed land which contains existing buildings and structures, and a clear physical gap would remain. The site is also contained by woodland and slopes to the east and by the M62 and the M606 to the west and south, and therefore has a limited relationship with the wider countryside. Taking account of these factors I conclude that exceptional circumstances exist to justify removal of the site from the Green Belt. In order to be effective, the policy should be modified to refer to the site capacity in the recent planning permission (**SD2-MM16**) and to require the preparation of a Masterplan (**SD2-MM17**).
256. E1832c, Leeds Road, Mirfield (Cooper Bridge) – The site comprises two distinctive areas. The northern part of the site is a series of open fields located in the Green Belt and adjoining the registered historic parkland of Kirklees Park. The section to the south of Leeds Road is brownfield land.
257. Kirklees Park contains the Grade I listed building of Kirklees Hall, and a number of other Grade I, Grade II* and Grade II listed buildings/structures and SMs, and other non-designated assets. The Park also contains a deer park and pleasure grounds, and has associations with the death of Robin Hood. Despite its location close to the M62 motorway and urban areas the setting of the Park has a rural character, with views of fields and woodland, particularly to the east. There are other designated and non-designated assets in the vicinity of the allocation site, including the Grade II listed Mock Hall and barn on Leeds Road.
258. The northern section of the proposal site adjoins the Park on its eastern and southern edge. As demonstrated in the Heritage Overview Report (2018), and as seen on my site visit, the site is visible from a number of points from within the Park and in views towards the Park from the east and south. The accuracy of the submitted visualisations and photomontages has been questioned but I am satisfied that they are adequate to inform the Local Plan process. Development of the site would introduce large industrial buildings and urban form within the rural setting of the Park. The loss of an extensive area of countryside adjoining the Park would harm the appreciation of the Park in its wider setting, and introduce urban form in views from the east, south and north. This includes from a number of PROWs including the Luddite Way, the Kirklees Way, and the Spen Heritage Trail. Overall I conclude the development would cause considerable harm, albeit less than substantial in planning terms, to the rural setting of the south part of the Park and the significance of the asset. Although landscaping and buffer areas could be provided, development would still be in close proximity to the asset and the visualisations, including over time, show that the scheme would still be clearly evident in the landscape. Similarly I consider that other mitigation measures relating to scheme design and layout may lessen impact but would not be sufficient to prevent considerable harm.
259. The Grade II listed Mock Hall and barn are located close to the southern boundary of the site. Mock Hall was previously a farmhouse, and the open

agricultural fields to the rear form part of its historic setting. There are attractive views of the buildings in their wider countryside setting as seen from Leeds Road. The proposed development of the northern part of the site would erode this rural setting and sever the listed buildings from the wider countryside. As such the proposal would cause considerable, albeit less than substantial, harm to the designated assets. Again, impacts may be lessened through landscaping, layout and design, but would not be sufficient to prevent considerable harm.

260. If the Grade II listed Roman Watchtower is restored and surrounding trees removed, there may be intrusive views of the development from the walkway. As such there could be potential for future harm to the significance of this asset, although the exact extent is unknown.
261. The open fields in the northern section of the site form part of a wider area of pleasant rolling countryside between Mirfield and Hartshead. Although the site is contained by woodland and existing field boundaries, there are clear attractive views of the site in its wider countryside setting from the south, east and north, and it forms an important belt of open land within an intensely developed part of Kirklees. As such I consider the scheme would encroach on the countryside and cause significant harm to Green Belt purposes. The submitted photomontages show that although landscaping and buffers would provide some mitigation, the scheme would still be clearly evident in the rural landscape, and detract from the open agricultural quality of the area.
262. Highways access would be required across an adjoining field in the Green Belt within Calderdale. There is industrial development on the west side of the A644, but the field to the east is open and provides an attractive rural setting for Kirklees Park as seen from the A644. Although building form is not proposed in this field, I consider that highway works would detract from its rural character, and cause considerable, albeit less than substantial, harm to the setting of the designated Park. Views across the field to the wider Green Belt are limited by adjoining woodland, but the field is an integral part of the structural Green Belt in and surrounding Kirklees Park. As such I consider that an access road in this highly visible location would harm its integrity, cause encroachment, and conflict with Green Belt purposes.
263. The site lies in the M62 corridor, and development would bring a range of economic and other public benefits. This includes meeting the needs of manufacturing businesses, boosting the economy, delivering new jobs and bringing related social benefits, and potentially facilitating investment in and management of heritage assets within Kirklees Estate. Cooper Bridge is identified as an 'Employment Growth Area' in the LCR SEP, and the scheme would help to deliver LCR SEP, KES and Local Plan objectives. In the context of identified harm I consider that additional landscaping would be a mitigation measure rather than benefit per se, and I have attached limited weight to this. The Council has indicated that the development would bring benefits in the form of investment in major transport infrastructure in this part of Kirklees, and linked air quality improvements. However, congestion in the area is a long-standing issue, and there is no evidence before me that the business case for major road improvements is wholly dependent on the Cooper Bridge site, or that removal of the northern part of the allocation from the Plan would

mean highway improvements cannot be delivered. As such this benefit is unclear and I have attached limited weight to it.

264. Kirklees Park, with its range of historic buildings and features, is an important heritage asset. Overall, having regard to the considerable harm to heritage assets outlined above, I consider that public benefits arising from the development would be insufficient to outweigh this harm. The scheme would also cause significant harm to the character and appearance of the countryside and Green Belt function. Therefore, notwithstanding identified benefits I conclude that exceptional circumstances have not been demonstrated to justify the release of the northern part of the allocation site from the Green Belt. The proposed development of the northern part of the site is therefore not justified or consistent with national policy.
265. There are no identified fundamental constraints that would prevent the southern section of the site being developed, and detailed matters would be assessed and addressed at application stage. The southern section is previously developed land, and development would provide economic benefits and jobs in a key strategic location. I therefore conclude that the proposed allocation should be reduced to exclude the northern part of the site, and be based on land to the south of Leeds Road. The reduced gross site area and net developable area should be reflected in the policy (**SD2-MM22, SD2-MM23**) and the indicative floorspace capacity lowered from about 162,000 sqm to some 15,000 sqm (**SD2-MM25**). Modifications are also necessary to alter the name of the allocation and omit constraints, report requirements and site-specific considerations which relate to the northern section (**SD2-MM21, SD2-MM24, SD2-MM26, SD2-MM27**). Consequential amendments are necessary elsewhere in the Plan to delete references to Cooper Bridge as a major employment site (**SD1-MM1, SD1-MM4, SD1-MM24**).
266. The scale of the proposal necessitates the preparation of a Masterplan, and modification **SD2-MM27** is necessary to refer to this.
267. H662, rear of 52 Upper Batley Low Lane, Batley – The site is screened by existing vegetation and has a different character to the adjoining open agricultural fields. The modest site size and contained character would limit encroachment. Accordingly, taking account of identified needs for housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt. There is no evidence before me that the site is subject to a restricted covenant preventing development. The reference to a drainage masterplan in the policy is not substantiated and should be deleted (**SD2-MM137**).
268. H193, Oxford Road, Gomersal – The site is partly screened by trees along the road frontage, is well related to the urban edge, and is different in character to the adjoining open fields to the north. As such its relationship with the wider countryside is limited. Development would be in a key gap between Gomersal and Birkenshaw but a physical gap would remain, including the M62 motorway. The northern edge of the site follows a clear field boundary and would provide a new defensible Green Belt boundary. Accordingly, and taking account of the identified need for housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.

269. H531, Soureby Cross Way, East Bierley – The site is located in part of the strategic gap between East Bierley and Birkenshaw. However, it would follow the existing south-eastern edge of the village and not encroach onto Birkenshaw. Accordingly, and taking account of the identified need for housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
270. H218, Bluehills Farm, Birkenshaw – The site has a limited relationship with the open countryside due to nearby farm buildings and the adjoining M62 motorway. Recent development to the south of the road has further urbanised the character of the locality. The northern part of the site is elevated but nearby built development exists at this level, and sensitive scheme layout and landscaping could provide mitigation. Taking account of these factors, and the identified need for new housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt. The site contains a PROW and in order to be effective the policy should include reference to this constraint (**SD2-MM155**).
271. H49a, Oddfellows Street, Scholes – The site is well related to the settlement edge, and is contained by dwellings on several sides. As such its relationship with the wider countryside is limited. There is existing built form on the opposite side of Oddfellows Street, and the eastern site edge is capable of forming a defensible Green Belt boundary. Taking account of these factors, and the identified need for new housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt. There are a number of PROWs in the vicinity and in order to be effective the policy should include reference to this constraint (**SD2-MM157**).
272. H69, Merchant Fields, Cleckheaton – The site is contained by built development on three sides, and is well related to the settlement. Its rural character is reduced by containment and overlooking. The site has clear field boundaries along its eastern edge which would be capable of forming a new defensible Green Belt boundary and preventing sprawl. This could be augmented through a landscape buffer which would also provide an appropriate visual, ecological and amenity setting for the BAP Priority Habitat of Nann Hall Beck. In order to be effective the policy should be modified to refer to this buffer (**SD2-MM161**) and the PROW (**SD2-MM160**), and clarify the area to be removed for BAP Priority Habitat (**SD2-MM159**).
273. Transport modelling on the Local Plan has looked at cumulative effects and no fundamental constraints are identified. A detailed Transport Assessment for the site would be required at application stage. As specified in modification **SD2-MM161** above, this should include assessment of the scheme's impact on the SRN and the need for potential mitigation measures. Overall, taking account of the above factors and the identified need for new housing, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
274. H508, Whitechapel Road, Cleckheaton – The site's relationship with the wider countryside is restricted due to the presence of the nearby M62 motorway and local roads to the north and south. The motorway and existing buildings to the east would create strong new defensible Green Belt boundaries.

275. The Council's HIA identifies areas of high and moderate significance within the site which provide an important open setting to the adjoining listed Whitechapel Church. There are clear views of the listed building from these areas, with attractive vistas across the fields. I consider that built development in these areas would erode the rural character and open setting, causing considerable, albeit less than substantial, harm to the significance of the heritage asset. Mitigation through sensitive design and layout would not be sufficient to retain openness and ameliorate considerable harm. Although additional dwellings in these areas could provide social/economic benefits the modest amount would not outweigh the identified harm to the heritage asset. In order to protect the historic environment and accord with national policy, the policy should specify the retention of the Council's HIA areas of high and moderate significance as open, with only the provision of an access road across the area of high significance. These constraints and related mitigation measures should be included in the policy through **SD2-MM164**. Based on the retention of these areas as open, and having regard to average densities and other site constraints, the net site area should be lowered to 3.12 ha and the indicative site capacity reduced from 170 to 122 dwellings (**SD2-MM162, SD2-MM163**).
276. Due to the proximity of the site to the M62 it will be important to ensure noise and air quality issues are assessed and addressed through the planning application process. The policy refers to these constraints and related requirements, and there is scope for mitigation.
277. Taking account of these factors, including limited harm to the Green Belt and the identified need for new housing, and subject to the above modifications, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
278. H2066, Warren Cottage, Halifax Road, Scholes – The site contains residential development, and has a distinctly different character to the adjoining open agricultural fields. The outer edge is well planted and would provide a strong new defensible Green Belt boundary and prevent sprawl. Accordingly, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
279. H198, south of Second Avenue, Hightown – The site was previously occupied by a school which has since been demolished. The southern section of the site is currently in the Green Belt. On my site visit I was unable to discern a clear boundary between the south and north sections of the allocation. As such the two parts of the site are well related, whilst links between the southern section and the wider countryside are limited by a field boundary on the south-east edge. The proposal would provide an opportunity to strengthen the Green Belt boundary in this locality.
280. The site lies close to the listed building of Thornbush Farm, which has connections with the Bronte family. However, the site does not immediately adjoin the farmhouse, and there is an intervening open field between the allocation site and the asset. As such, I consider that the proposal would have little effect on the significance of the designated asset. Nonetheless, given its proximity potential mitigation measures relating to sensitive scheme design and layout and protection of an adjacent trackway should be included in the

policy, for reasons of effectiveness. The retention or replacement of the existing on-site MUGA should also be referenced, in order to ensure effective protection for community facilities and accord with paragraph 74 of the NPPF. These changes would be achieved through modification **SD2-MM176**.

281. Taking account of the above factors, and identified housing needs, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt. Based on progress to date I consider that completions are unlikely to take place until 2020/21 and the phasing table should be amended accordingly through modification **SD1-MM160**.
282. H242, Peep Green Road, Hartshead – The site is well contained, well related to the settlement and development would be small-scale. The northern boundary would provide a strong new defensible Green Belt boundary, thereby preventing sprawl. As such, and taking account of identified housing needs, I conclude that exceptional circumstances justify the release of the site from the Green Belt.
283. H278, Lands Beck Way, Liversedge – The site is on the edge of Liversedge and adjoins built-form on several sides. It is contained by existing hedgerows and planting, which limit the links to the wider countryside and would help to screen development on the slope from wider views. As such development would cause limited harm to the Green Belt, and taking account of identified housing needs I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt.
284. H442, Richmond Park Avenue and Sunnyside Avenue, Roberttown - The settlements of Roberttown and Liversedge are already merged, in the vicinity of Huddersfield Road/Leeds Road. However, the pinch point at the Lumb Lane/Norristhorpe Lane junction is narrow, with intervening fields providing a clear separation either side, and the two settlements retain a separate and distinct identity. Roberttown, although significantly expanded during the 20th century, is smaller with development focused around a historic elevated village core. Whilst some ribbon development exists along Roberttown Lane, this is partly dispersed and there are clear visual links to the wider countryside. As such I consider that coalescence has not occurred here.
285. The allocation site is located in part of the open gap between Roberttown and Liversedge, along one of the main roads between the settlements. The open sloping site can be clearly seen when travelling along Roberttown Lane, and provides a clear sense of physical and visual divide between the settlements. As such, notwithstanding the 'amber' rating in the Council's Green Belt edge review, I consider the site performs an important strategic Green Belt function, helping to prevent Roberttown and Liversedge merging into one another.
286. The site consists of attractive open agricultural fields, which despite the intervening presence of Roberttown Lane, are visually connected to the wider countryside by virtue of the topography and more dispersed pattern of development on the north side of the road. There are clear views from the site of the wider countryside. As such, and notwithstanding the presence of pylons and overlooking dwellings in the south/east sections, I consider that the site plays a role in preventing encroachment into the open countryside.

287. The proposed development would substantially erode a strategic and visually prominent gap between Roberttown and Liversedge, and detract from the setting and separate identity of the settlements. There would also be some harm to the character of the countryside arising from encroachment. Although additional housing would be provided this would not outweigh harm to the Green Belt. Accordingly, I conclude that exceptional circumstances to release the site from the Green Belt have not been demonstrated. The southern and eastern existing Green Belt edges are clearly marked by field and property boundaries and provide a reasonable defensible boundary. Taking account of these sensitivities, and all of the submitted evidence and representations before me, I conclude that the allocation should be deleted from the Plan for reasons of soundness, and the land retained as Green Belt (**SD2-MM177**).
288. Part of the site is identified in the Council's updated HIA as high significance to the setting of the adjacent listed building of Old Hall Farmhouse. The evidence shows the site had historical links to the building, and there are clear views of the designated asset across the open fields. Accordingly, I consider that development of the site for the density proposed in the policy would erode this open setting and cause considerable, albeit less than substantial, harm to the heritage asset. In heritage terms there may be some scope to reduce the site capacity in order to limit harm to the designated assets. However, this does not alter my overall conclusion regarding the site's deletion, as set out above.
289. H489, Church Lane, Gomersal – The site is identified in the Council's Green Belt Review as part of a strategic area separating Gomersal and Birstall. However, the site is small and well related to the urban edge, and is bounded by trees and vegetation which separates it from the wider countryside. As such development would not compromise the strategic role of the Green Belt in this vicinity. Accordingly, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify its release from the Green Belt. No fundamental constraints relating to matters such as highways, access, biodiversity or subsidence have been identified, and the policy allows for mitigation measures.
290. H567, Stubble Farm, Leeds Road, Heckmondwike – The site is identified in the Council's Green Belt Review and site assessment work as having a less important Green Belt role and where development would have limited impact on Green Belt function. I concur with this, having regard to the site's containment by surrounding development and therefore limited links with the wider countryside. Accordingly, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify its release from the Green Belt.
291. H591, Cliffe Mount, Ferrand Lane, Gomersal – The site is well contained, with built development to the east and south, and Ferrand Lane to the north. Although there are views to and from the adjoining countryside, the site's containment and strong hedgerows on the northern edge limit this relationship. The northern and western site edges are marked by planting and would provide new defensible Green Belt boundaries.
292. Ferrand Lane is a pleasant rural road which contributes to the appearance of the nearby Gomersal Conservation Area and the setting of the nearby listed Methodist church, and forms part of the Spennithorne Heritage Trail. In order to

protect these special qualities and the significance of designated heritage assets the site policy should be modified to specify sensitive design and landscaping which maintains the rural character of Ferrand Lane (**SD2-MM181**). Hedgerows, field boundaries and other trees on the site would also be afforded protection under generic Policies PLP 30, 32 and 33.

293. At the hearing the Council confirmed that suitable access and visibility splays can be achieved from Cliffe Lane, through control of adjacent land. Changes to clarify this position should be included in the policy, for reasons of effectiveness (**SD2-MM179, SD2-MM181**). Although there will be some increase in traffic on nearby roads, the evidence indicates there is network capacity subject to suitable mitigation measures being identified at planning application stage. No nearby noise source was identified, and therefore the reference to this constraint should be deleted from the policy (**SD2-MM179**). The Council has confirmed that the site is located within a Coal Mining Risk Area, and accordingly, in order to be effective the policy should refer to this constraint (**SD2-MM180**).
294. On the basis of limited harm to the Green Belt and taking account of identified housing needs, I conclude that there are exceptional circumstances to justify the removal of the site from the Green Belt. The policy provides necessary mitigation, and subject to the above modifications is soundly based.
295. H2537, Halifax Road, Hightown, Liversedge – The site is a well contained small parcel of land on the edge of the settlement which is partly previously developed. As such, and due to planting on the south and west boundaries, its relationship with the wider countryside is limited. Although the site is sloping, any development on the upper slopes would be viewed in the context of a back-drop of surrounding development along the ridgeline. As such, the site could be removed from the Green Belt with minimal impact on its openness, or impact on the gap between Liversedge and Hightown and Roberttown. In conclusion, taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
296. A small adjoining area to the south is well contained, screened by trees from the wider countryside, and its removal would facilitate access to safeguarded land SL2181. The need to avoid prejudicing development on safeguarded sites and facilitating access to adjoining undeveloped land is highlighted in Policies PLP 6 and 7. There are no identified fundamental constraints, including access, that would prevent the overall scale of the development. Taking these factors into account, and having regard to identified housing needs, I conclude that exceptional circumstances exist to release this small additional area from the Green Belt for residential development. The site area for H2537 should be increased accordingly (**SD2-MM182, SD2-MM183**) and capacity raised from 23 to 42 dwellings (**SD2-MM185**). In order to ensure effective delivery the policy should specify provision of a linkage to SL2181 (**SD2-MM186**) and maintenance of a PROW crossing the site (**SD2-MM184**). Linked modifications relating to the adjoining safeguarded site are covered under Issue 8 below.
297. H2667, former Gomersal Primary School – The rear part of this former school site is located within the Green Belt, and in the strategic gap between

Gomersal and Birstall. However, the site is well related to the settlement form, has a different character to the open agricultural fields to the rear, and is separated by clear boundaries. As such I consider the area could be released from the Green Belt with minimal impact on openness, and new defensible boundaries would prevent encroachment. Accordingly, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify its release from the Green Belt.

298. The original school buildings on the site are located within the Gomersal Conservation Area. Although not listed they are an attractive historic feature, and a key part of the streetscape along Oxford Road. As such, they make a significant contribution to the character and appearance of the Gomersal Conservation Area. A modification to the policy is necessary to specify the retention of the original buildings, walls and railings in order to protect the historic fabric and quality of the local environment. Mitigation measures relating to protection of the boundary wall and footpath to the adjoining listed church are also necessary for the same reasons. The amended wording refers to some flexibility, which is consistent with Policy PLP 35 and the NPPF. The site contains a previous playing pitch, and therefore mitigation measures consistent with paragraph 74 in the NPPF should be referenced for reasons of soundness. These changes are captured under modification **SD2-MM189**.

Kirklees Rural, Colne Valley urban sites

299. H738, west of Heathwood Drive, Golcar – The site adjoins a terrace of weavers cottages which are listed. The cottages are in an elevated position and prominent in the landscape as seen from the south/south-west. The cottages were occupied by weavers/farmers, and the site forms part of the open agricultural setting to the buildings. There are clear views across the site towards the cottages from Heathwood Drive, and longer distance views of the cottages and their setting from the south-west. I concur with Historic England that the undeveloped allocation site makes an important contribution to the setting of the cottages, and that the loss of the open site would erode the rural setting and cause considerable, albeit less than substantial, harm to the significance of the assets. Mitigation measures in the Council's HIA relating to height restrictions would do little to ameliorate harm to the open setting. I conclude that additional housing and other benefits arising from the scheme would, taking account of modest numbers, be insufficient to outweigh harm. Accordingly I conclude that the allocation is not justified or consistent with national policy, and should be deleted (**SD2-MM196**).
300. H763, Gordon Street, Slaithwaite – The site adjoins listed chapels to the north and west and is close to a Conservation Area. Subject to sensitive layout and landscaping the site could be developed without harming the designated assets. However, in order to allow sufficient capacity for mitigation and ensure effective protection for the historic environment, the site area should be reduced and the indicative number of dwellings lowered from 28 to 25 (**SD2-MM197, SD2-MM198**). The policy should also be amended to refer to related mitigation measures (**SD2-MM200**).
301. H1709, Upper Clough Linthwaite – The site is bounded by an attractive stone wall on its western edge. The policy should be modified to require the re-positioning and retention of this stone wall, in order to protect the character

and appearance of the streetscape (**SD2-MM204**). The listed noise and odour constraints no longer exist and therefore the policy should be amended to remove reference to these constraints and the need for associated reports, for reasons of effectiveness (**SD2-MM202, SD2-MM203**).

302. H2649, Victoria Terrace, Marsden – The site is in the Marsden Conservation Area and opposite the listed building of the New Inn. The Fire Station building within the site is identified in the Marsden Conservation Area appraisal as a key unlisted building of merit. The Council's HIA advises that the eastern area of the site should be developed sensitively with areas of landscaping, and the Fire Station and PROW within the site should be retained as part of a redevelopment scheme as they are of high significance to designated heritage assets. I concur with these conclusions. However, the net site area and indicative capacity do not provide sufficient scope to deliver these requirements. Accordingly, in order to avoid harm to the historic environment the net site area should be reduced and the indicative capacity lowered from 35 to 28 dwellings (**SD2-MM207, SD2-MM209**). The policy should also be amended to refer to heritage constraints and mitigation measures, including retention of the Fire Station and PROW (**SD2-MM208, SD2-MM210**).
303. MX1919, Bank Bottom Mills, and MX1920, New Mills, Marsden – The mill buildings on these sites are identified in the Marsden Conservation Area Appraisal as focal buildings, and contribute to the distinct identity of Marsden. New Mills is located within the Marsden Conservation Area and Bank Bottom Mills is close to it. Accordingly, in order to protect the historic environment and character of the town, and accord with Policy PLP 35 in the Plan, the policies should be modified to seek the retention of the mill buildings (**SD2-MM326, SD2-MM329**).

Kirklees Rural, Colne Valley Green Belt sites

304. H213, Black Rock Mills, Linthwaite – The site has planning permission and is under construction. As such the part of the site in the Green Belt no longer performs a clear Green Belt function. Accordingly exceptional circumstances are demonstrated to release this section from the Green Belt. In order to be effective the indicative site capacity should be amended to reflect the planning permission (**SD2-MM192**).
305. H1776, south of The Lodge, Linthwaite – The site is well contained, with built development to the north, west and south. Church Lane and field boundaries would provide defensible Green Belt boundaries. However, the south-east part of the site is steeply sloping and prominent, and I consider that the indicative capacity of 209 dwellings could not be accommodated without harming long distant views and character. Nevertheless, mitigation is capable of being provided through provision of an open buffer and a reduction in site capacity to 170 dwellings. Subject to modifications **SD2-MM205** and **SD2-MM206**, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt. The proposed wording in SD2-MM205 is suitably flexible to allow the exact position of the buffer and open areas to be determined through the planning application process.

Kirklees Rural, Denby Dale urban sites

306. H358, east of Wentworth Drive, Emley – The site is contained between dwellings off Wentworth Drive and Warburton Road, and is well related to the built-up form of the village. The Council's highways evidence indicates the main site access can be achieved from Wentworth Drive, and no other fundamental constraints to development have been identified. The site contains a PROW and provides access to the adjoining Millennium Green, and this should be referenced in the policy for reasons of effectiveness (**SD2-MM213**). Subject to this modification, I am satisfied that the proposal is sound.
307. H454a and H498, west of Manor House Farm, Clayton West – The sites adjoin Clayton West Cricket Club, and mitigation in the policies relating to protective measures should help to ensure the operations of the club are not unduly affected and protect residential amenity. Site H454a contains the cricket club car park and access road. The policy for H454a should be amended to specify the retention of these features as part of any redevelopment scheme, in order to protect a valued community facility (**SD2-MM214**). The cricket ground itself is identified as UGS in the Plan.
308. At the hearing it was confirmed that land for the provision of visibility splays on Manor Road is within the control of the owner of site H498. As such, reference in the policy to access being required via site H454a should be corrected (**SD2-MM215**).
309. H690, Cliff Hall, Leak Hall Crescent, Denby Dale – The site is contained by dwellings on three sides and is well related to the core of the village. At the hearing the Council indicated that access may be facilitated via Leak Hall Lane, and this should be clarified (**SD2-MM220**). No fundamental constraints relating to heritage and other matters have been identified and, subject to the above modification, the allocation is soundly based.
310. H768, Willow Close, Skelmanthorpe – The site adjoins the village Conservation Area and the listed building of St. Aidan's church. The Council's HIA identifies an area of moderate significance close to the heritage asset and concludes that loss of open land immediately adjoining the church boundary would cause less than substantial harm. Additional housing in this area would not outweigh harm, and accordingly, the policy should be amended to specify the provision of open space in this area and the retention of protected trees on the western boundary to safeguard the character of the Conservation Area (**SD2-MM223**). The policy should also refer to the presence of the Conservation Area (**SD2-MM222**).
311. H1784, land east of Denby Dale railway station – The site adjoins the railway station and small station car park, and is a sustainable location on the edge of the village. Given its proximity to the station, the policy should seek to secure the provision of additional cycle and car parking for the station through the scheme (**SD2-MM224**).

Kirklees Rural, Denby Dale Green Belt sites

312. E2333a, east of Park Mill, Clayton West – The site is in the Green Belt on the eastern edge of the village, and straddles both sides of the A636. The open

fields provide an attractive green setting for the village, and form part of a wider verdant river valley. The proposal would introduce industrial buildings at this key entrance point, and would significantly extend the built-up form of Clayton West into the open countryside along both sides of the road. The site is bounded by built development to the south/south-west and by the River Dearne and existing field boundaries, with only a short undefined section in its northern boundary. Some visual mitigation could be provided through measures such as landscaping, buffer zones and terracing. The settlement is also a sustainable location with a range of services and facilities. However, an industrial estate in this open location, particularly on the prominent sloping northern section, would be highly visible on the approach towards and out of the village, the nearby Kirklees Way, and in longer distance views from the surrounding countryside. The proposal would appear incongruous and encroach into the countryside, resulting in significant harm to the character of the area and the setting of the river and the village.

313. Development would provide a number of economic and social benefits, as outlined in the submitted Public Benefits Statement. This includes meeting the needs of local businesses, boosting the economy, and providing jobs. I consider that environmental benefits linked to the provision of landscaping and buffer zones and connections to the PROW network are mitigation measures rather than benefits. Notwithstanding this, I conclude that the identified benefits would not outweigh the significant harm to the Green Belt, local character and the setting of the village identified above, and therefore exceptional circumstances do not exist to justify the release of the site from the Green Belt. As such the proposal is not justified or consistent with national policy. Accordingly, I conclude the allocation should be deleted from the Plan and the site retained within the Green Belt (**SD2-MM28**). The reference to employment allocations in the Dearne Valley should consequently be deleted from Part 1 of the Plan (**SD1-MM9**) and the allocation removed from the key diagram (**SD1-MM162**). In the context of this harm there is no justification for an extension to the northern boundary of the site.
314. The site is visible from several points within the Registered Park and Garden of Bretton Hall, located to the north-east. However, the distance of the site from the asset would limit the visual impact, with development seen from a distance within a wide area of countryside. As such I consider that harm to the significance of the designated asset would be limited and less than substantial, and could be partly mitigated by landscaping, terracing and layout. However, my views on this matter do not alter my conclusions above regarding the deletion of the site. The distance and lack of visibility from the nearby SM at Bentley Grange means that the impact on this designation and its setting would be negligible.
315. H17, Park Mill House, Clayton West – The site adjoins the village, contains built form and is separated from the wider Green Belt by Kiln Lane. As such it has a markedly different character to the surrounding countryside. Although the upper part of the site is more prominent, screening is provided by trees and hedgerows, and I consider the site could be developed without causing encroachment. Kiln Lane would form a new strong defensible Green Belt boundary. In this context, and taking account of identified housing needs and the sustainability of the village, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt.

316. H72, Station Road, Skelmanthorpe – The site is well related to the settlement and contained by residential development to the west and part of the northern and southern boundaries. Field boundaries to the east/north-east would provide new defensible Green Belt boundaries. In this context, and taking account of identified housing needs and the sustainability of the village, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt.
317. H233 and H634, Barnsley Road, Denby Dale – The sites are identified in the Council's Green Belt Review and site assessment work as having a less important Green Belt role and where development would have limited impact on Green Belt function. Taking account of their containment and the urban fringe character of Barnsley Road, I concur with these findings. In this context, and taking account of identified housing needs and their proximity to the village, I conclude that exceptional circumstances exist to justify the release of the sites from the Green Belt.
318. H502, Huddersfield Road, Skelmanthorpe – The southern part of the site is located within the Green Belt. It is an open field on the edge of the village, and is visible on the approach to the village from the west. However, the site is well related to the built-up part of the village, and development represents a modest extension and would be seen against an urban back-drop. Much of its western boundary is marked by a hedgerow, and could be continued to the road to provide a clear new defensible Green Belt boundary. In this context, and taking account of the site's sustainable location and identified housing needs, I conclude that exceptional circumstances exist to justify the release of the southern section from the Green Belt. In order to secure suitable landscaping on the sensitive western edge the policy should specify provision of a landscaped buffer in this vicinity (**SD2-MM217**).
319. At the hearing the Council indicated that access to the site may be deliverable from Bedale Drive and Heather Fold, and via Cumberworth Road subject to changes in speed limits. A full Transport Assessment would be required through the planning application process, and detailed access and highway matters would be dealt with at that stage. The reference in the policy to suitable visibility splays is incorrect and should be deleted to provide clarity and effectiveness (**SD2-MM218**). The indicative dwelling capacity should be adjusted to take account of the latest layout and design work, with a reduction from 203 to 189 dwellings (**SD2-MM216**). Subject to the above modifications I am satisfied that the policy is soundly based.
320. H3325a, Park Mill, Manor Road, Clayton West – Most of the site is currently in employment use, and is not within the Green Belt. The building stock is old, and redevelopment of the site for employment use is constrained by the junction of Manor Road and Wakefield Road which has insufficient width to facilitate safe HGV access. Options to widen the junction are limited by the presence of nearby buildings, a listed bridge and an adjoining watercourse. The Council's site assessment work indicates that suitable access is capable of being achieved for residential development, albeit the planning application stage would provide an opportunity to explore this matter in detail. In this context, I consider that the proposed allocation for residential use is reasonable and pragmatic.

321. A small section of the site, to the north of the employment land, is undeveloped and within the Green Belt. The open field is highly visible as you drive towards Clayton West on the A636, and provides part of an attractive setting to the village. It is separated from the main allocation site by the River Dearne. Taking account of the deletion of allocation E2333a, as set out earlier in this section, I consider this part of H3325a plays an important Green Belt role in preventing encroachment and has visual and physical links to the wider countryside. As such I conclude that exceptional circumstances have not been demonstrated to justify releasing this area of the allocation from the Green Belt. This area should therefore be excluded from the site and retained within the Green Belt. The gross and net site area in the policy should be reduced accordingly (**SD2-MM225, SD2-MM226**) and the indicative site capacity lowered from 122 to 91 dwellings (**SD2-MM227**).

322. At the time of the hearing the business was still on the site. Taking account of proposed re-location plans, I consider that completions are unlikely to take place until 2021/22, and the phasing table should be amended accordingly in **SD1-MM160**.

Kirklees Rural, Golcar urban sites

323. H814, Grove Street, Longwood – The site is an attractive sloping area of woodland along the edge of Grove Street. The site is identified as BAP Priority Habitat and contributes to the character and appearance of the valley. The previous planning permission on the site for 12 dwellings has expired. Development would result in the loss of trees and habitat and significantly harm the character of the area. Accordingly, I conclude that the allocation is not justified, and should be deleted from the Plan (**SD2-MM232**).

Kirklees Rural, Holme Valley North urban sites

324. E1829, New Mill Road, Brockholes – The site contains a playing pitch and the policy refers to replacement provision as part of redevelopment. The policy wording needs to be adjusted to refer to equivalent or better quantity or quality in order to be consistent with paragraph 74 in the NPPF (**SD2-MM32**). A slight reduction in the net area and indicative site capacity is necessary in order to provide sufficient protection for the adjoining River Holme and BAP Priority Habitat (**SD2-MM29, SD2-MM30**).

325. E1900, west of Honley Business Centre, Honley – In order to be effective the adjoining BAP Priority Habitat should be referenced in the list of constraints (**SD2-MM35**), and the net area and indicative capacity should be adjusted to take account of a recent planning permission (**SD2-MM34, SD2-MM36**).

Kirklees Rural, Holme Valley North Green Belt sites

326. H48, Travel Station Yard, Honley – The site lies between the settlement edge and the railway line, and has a limited relationship with the wider Green Belt. The site already contains built form, and could be developed without causing harm to Green Belt purposes. As such, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt.

327. H178, Southwood Avenue, Honley – The north-western part of the site is located in the Green Belt, and would provide access to the remainder of the site from Southwood Avenue. The north-western section is elevated and sloping, but is well related to the settlement edge and does not extend down the hillside. The existing trackway could provide a new defensible Green Belt boundary.
328. The topography of the site means engineering solutions may be required to achieve access via Southwood Avenue, potentially involving construction of part of the access road in the Green Belt. This would be close to the edge of the site, and subject to sensitive design could be capable of being accommodated without significant visual harm. Conversely, dwellings in this area and further down the hillside would introduce buildings onto a prominent slope, be clearly visible from the surrounding countryside, and cause encroachment.
329. Taking account of the above factors and identified housing needs, I conclude that exceptional circumstances exist to justify the release of the allocation site from the Green Belt. However, due to the topography of the site, I consider that a lower density would be more realistic and achievable. Accordingly, the indicative site capacity in the policy should be reduced from 23 to 17 dwellings (**SD2-MM234**). The policy should also refer to the potential extension of the access road outside the site boundary, in order to be clear and effective (**SD2-MM236**).
330. H2586, Thirstin Mills, Honley – A narrow strip of the site on the western edge is located in the Green Belt, forming part of the retaining wall for the mill development. As such its Green Belt role is limited and it could be released without harm to the Green Belt function. Accordingly, I consider that exceptional circumstances exist to justify the release of this area from the Green Belt. The mill site has planning permission for residential development.
331. H584, Gynn Lane, Honley – The site is contained by built development, woodland and a railway line, thereby limiting its relationship with the wider countryside. Development would reduce the gap between Honley and Hall Ing. However, a physical gap would remain, and the railway line, woodland and field boundaries to the south would form strong new defensible Green Belt boundaries, preventing encroachment.
332. Two Grade II listed weaver cottages are located close to the north-west corner of the site. In order to avoid harm to the historic environment the policy should be amended to require suitable mitigation measures, as referenced in the Council's HIA. This includes the retention of the northern woodland belt and stream, and retention of open land adjoining the tree belt and in the north-west corner (**SD2-MM241**). Reference to the existence of protected trees on the northern boundary should also be included, for reasons of effectiveness (**SD2-MM240**). The policy refers to appropriate mitigation measures relating to the loss of trees in order to achieve suitable access.
333. In the context of limited harm to the Green Belt and identified housing needs, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt. The SA results have been disputed but I am not persuaded that significant changes to the scores are justified to the extent

that would alter overall conclusions regarding the sustainability and suitability of the site. I therefore conclude that, subject to the above modifications, the policy is soundly based.

334. H664, Scotgate Road, Honley – The site adjoins residential development to the south and east, and is contained by sloping woodland to the north. It therefore has limited visual relationship with the wider countryside, and new defensible Green Belt boundaries could be formed.
335. The site contains a listed farmhouse and barn. The open fields adjoining these buildings are of particular significance to the setting of these assets. In order to avoid harm to the historic environment the policy should be amended to clarify that no development takes place in the areas of 'high' and 'considerable' significance, as identified in the Council's HIA. Reference to mitigation measures relating to design and layout should also be inserted. These changes would be effected through modification **SD2-MM244**. The areas of moderate significance in the HIA are located further from the listed buildings, and I am therefore satisfied that any impacts could be mitigated through sympathetic layout and landscaping. The policy adjoins rather than contains a Habitat of Principal Importance, and this should be corrected for reasons of effectiveness (**SD2-MM242**).
336. In the context of limited harm to the Green Belt and identified housing needs, I conclude that exceptional circumstances exist to justify the release of the site from the Green Belt. Subject to the above modifications, the policy is soundly based.

Kirklees Rural, Holme Valley South urban sites

337. E1871, north-east of Bottoms Mills, Holmfirth – The existing use is listed as 'UDP allocation'. Deletion of this reference through **SD2-MM38** is necessary to avoid confusion and ensure effectiveness.
338. H50, Bridge Mills, Holmfirth – The mill buildings are part of the district's industrial heritage and contribute to the distinct character and identity of the locality. Accordingly, in order to protect the historic environment and character of the area, and accord with Policy PLP 35 in the Plan, the policy should be modified to seek the retention of the mill buildings (**SD2-MM249**).
339. H597, Sandy Gate, Scholes – The site consists of a series of open sloping fields on the edge of the village, divided by traditional stone walling. There are views across the site towards the nearby listed building of Sandy Gate Farmhouse and to the wider countryside, and the site provides an attractive setting to the village.
340. The Council's HIA identifies areas of moderate significance within the site which form part of the agricultural setting of Sandy Gate Farmhouse and another nearby listed building (The Olde House). I concur with Historic England that the HIA underplays the significance of other parts of the site, as these form part of the historic field system, and there are clear views towards Sandy Gate Farmhouse from along much of Scholes Moor Road. The HIA indicates that views towards the asset are of 'high significance'. I therefore conclude that development across much of the site would cause considerable,

albeit less than substantial, harm to the listed farm, and detract from the character and setting of this part of the village. Although additional housing would provide public benefits, this would be insufficient to outweigh harm to heritage assets. The southernmost field adjoining Moorlands could, however, be developed without causing undue harm to the assets or setting of the village, by virtue of the intervening distance to the asset and its containment by residential buildings to the south and west. The allocation area should therefore be reduced accordingly, and the indicative site capacity lowered from 141 to 28 dwellings (**SD2-MM254, SD2-MM255, SD2-MM256**).

341. The boundary walls of the site are key features of the field system, and therefore the policy should specify their retention, with access being provided via Moorlands (**SD2-MM258**).
342. H626, west of Bankfield Drive, Holmbridge – The highway network in the local area has a number of constraints, including narrow carriageways, steep topography and the presence of buildings close to the road. I recognise the concerns of local residents regarding highway safety in the locality. However, the Council's site assessment work indicates that access can be taken from Laithe Avenue, and that additional traffic arising from this scale of scheme is capable of being accommodated on the highways network. Detailed assessment would be undertaken through the planning application process.
343. Views towards the wider countryside and National Park can be seen from across the site. However, the National Park boundary is over half a kilometre away and there is intervening development. The site is well related to the settlement edge, contained by dwellings to the north and east, and is not located within the Green Belt. The National Park Authority has not objected to the proposal. Detailed matters relating to landscaping and layout could be dealt with at planning application stage and could help to ensure a sympathetic form of development. I am satisfied that development of this modest sized site would not have a detrimental visual impact in terms of views to or from the National Park.
344. Overall, taking account of all the evidence and representations before me, I conclude the site is capable of being developed for housing without resulting in significant highway safety issues, or harming the National Park. The planning application stage would provide an opportunity to consider detailed matters relating to ecology, transport, drainage, design and layout, and potential mitigation measures. Accordingly, the proposal is soundly based. In reaching this conclusion I have had regard to an appeal that was refused in the early 1990s on the site. However, it also covered adjoining land and was larger than the allocation. A PROW adjoins the site, and should be correctly referenced in the constraints section for reasons of effectiveness (**SD2-MM259**). The insertion of mitigation relating to the nearby SPA is also necessary, as referred to earlier.
345. H715, Wesley Avenue, Netherthong – The site adjoins the Netherthong Conservation Area. The northern section of the site, as identified in the Council's HIA, is elevated above Miry Lane and provides an attractive landscaped aspect which contributes to the character of the locality. In order to avoid harm to the heritage asset and the appearance of the streetscape, the policy should be amended to require retention of this area as open land

(**SD2-MM263**). The site area should be reduced accordingly and the number of dwellings lowered from 43 to 38 (**SD2-MM261, SD2-MM262**).

346. H729, Tenter Hill Road, New Mill – Options for providing upgraded football/rugby facilities are currently being explored in the Holmfirth area, including on playing fields adjoining the allocation. Access to upgraded facilities may need to be facilitated via site H729 and the policy should be modified to refer to this position (**SD2-MM265**).
347. H730, Royds Avenue, New Mill – The site adjoins the Wooldale Conservation Area. The Council's HIA identifies open areas of high and moderate significance in the northern part of the site which contribute to the setting of the Conservation Area and views along key historic approaches. I concur with this assessment. As such the policy should be amended to require retention of the northern part of the site as open land, and existing walls within the site (**SD2-MM269**). The net site area should be reduced accordingly, and the site capacity lowered from 74 to 53 dwellings (**SD2-MM266, SD2-MM268**). The presence of nearby listed buildings and protected trees in the north part of the site should also be referenced (**SD2-MM267**). These modifications should help to avoid harm to the historic environment, in line with national policy, and ensure effectiveness.
348. H2587, former Midlothian Garage, New Mill Road, Holmfirth – The site contains an area of trees which are BAP Priority Habitat. In order to protect these features the policy should be amended to exclude the habitat from the developable area (**SD2-MM273**). The site capacity is based on the outline planning permission and takes account of constraints.

Kirklees Rural, Holme Valley South Green Belt sites

349. H727a, Miry Lane, Thongsbridge – The far western section of this site is located within the Green Belt. However, the site is largely contained by urban form on three sides and adjoins a cricket ground to the west. Its containment limits the relationship of the western section to the open countryside. The current Green Belt boundary in this vicinity is poorly defined on the ground, and the proposal would provide an opportunity to create a new defensible boundary. On this basis, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify releasing the western part of the site from the Green Belt.
350. H2585, Water Street, Holmbridge – Part of the site is in the Green Belt and was occupied by an industrial building. It is separated from adjoining agricultural land by changes in topography. The allocation site has planning permission for residential development. Overall I consider that removing this small area from the Green Belt would have minimal impact on openness. As such, and taking account of identified housing needs, I conclude there are exceptional circumstances which justify its removal from the Green Belt.
351. The remaining mill buildings on the site form part of the industrial heritage of the district and contribute to the distinct character and identity of Holmbridge and the Conservation Area. In order to protect the historic environment and character of the settlement and accord with Policy PLP 35 in the Plan, the policy should be modified to seek the retention of the mill buildings (**SD2-MM272**).

352. MX1912a, Dobroyd Mills, Hepworth – Part of the site is in the Green Belt and contains substantial mill buildings. Redevelopment is therefore capable of being accommodated without impacting on openness or increasing the urban appearance of the locality. There is a clear separation between this site on the edge of Hepworth and Jackson Bridge to the north. Taking account of these factors, and identified housing and employment needs in the area, I conclude that exceptional circumstances exist to justify the removal of this area of the site from the Green Belt.
353. The site has recently gained outline planning permission for up to 75 dwellings and 880 sqm of employment floorspace. In order to be effective the policy should be modified to refer to these amended quantities (**SD2-MM331** and **SD2-MM332**). The mill buildings are part of the district's industrial heritage and contribute to the distinct identity of Hepworth. In order to protect the historic environment and character of the settlement and accord with Policy PLP 35 in the Plan, the policy should be modified to seek the retention of the mill buildings (**SD2-MM333**).

Kirklees Rural, Kirkburton Green Belt sites

354. H2576, south of Red Deer Park Lane, Bristfield – The site adjoins residential development to the south and is contained by a tree belt to the east. It has a different character to the open agricultural fields to the east, and its containment means that sprawl would be prevented. As such, the site could be released without harming the strategic function of the Green Belt in this locality. On this basis, and taking account of identified housing needs and the sustainability of the settlement, I conclude that exceptional circumstances have been demonstrated to justify removal of the site from the Green Belt.
355. H120, Park Farm, Farnley Tyas – The site is largely located within the built-up part of the village, and only a small strip of land is located in the Green Belt. The site has planning permission for housing and was under construction at the time of my site visit. The strip is included within the scheme, does not protrude into the open countryside, and new defensible Green Belt boundaries will be created through the permitted scheme. As such, and taking account of identified housing needs, I conclude that exceptional circumstances exist to justify its release from the Green Belt.
356. H339 and H652, Abbey Road North, Shepley – Site H339 is occupied by industrial buildings. The woodland area to the rear is excluded from the developable area, and therefore development on this site would have little impact on openness. Adjoining site H652 mainly comprises a series of open fields, but is contained by development on three sides, and by a railway line and strong field boundaries to the north. As such its relationship with the open countryside is limited. In this context, and having regard to the sustainability of the location and identified housing needs, I conclude that exceptional circumstances exist to justify the release of these sites from the Green Belt. The employment uses on H339 are not identified as a PEA.
357. H518, Yew Tree Farm, Farnley Tyas – A small area of the site, currently occupied by a farm building, is in the Green Belt. The impact of development on openness would be limited, and the scheme would provide a clearer and more defensible Green Belt boundary. As such, and taking account of

identified housing needs, I conclude that exceptional circumstances exist to justify the release of the small area from the Green Belt. The new boundary would be in line with other development on the south side of Butts Road. The inclusion of further land beyond this would intrude into the countryside and detract from the setting of the village.

358. The policy provides sufficient mitigation to ensure that development could be accommodated without harming the significance of the listed buildings on the site and the village Conservation Area.
359. H638, Tinker Lane, Lepton – The site is identified in the Council's Green Belt Review and site assessment work as having a less important Green Belt role and where development would have limited impact on Green Belt function. The site is well contained by field boundaries, Tinker Lane and residential development, and I concur with these findings. Clear defensible Green Belt boundaries could be achieved, thereby preventing sprawl. On this basis, and in the context of identified housing needs, I conclude that exceptional circumstances exist to justify the removal of the site from the Green Belt.
360. H1774, east of Manor House Farm, The Village, Thurstonland – The site is located in the village Conservation Area, and is partly within the Green Belt. The Conservation Area comprises the historic core of the village, and is characterised by a mix of urban form surrounded by open fields which contribute to its agricultural history.
361. The southern section of the site adjoining The Village provides a gap in the built-up frontage, and despite the presence of a wall, affords extensive views towards the surrounding countryside and to the church. These views extend over the middle section of the site which lies within the Green Belt. These open areas allow the agricultural setting of the village to be appreciated, provide a visual link to the countryside, and make an important contribution to the setting of the Conservation Area. The attractive traditional stone wall on the southern boundary contributes to the historic appearance of the streetscape. Development in the open southern and central parts of the site would erode the rural setting, detract from Green Belt function, sever key views, and cause considerable, albeit less than substantial, harm to the character and appearance of the Conservation Area. Additional housing would provide public benefits, but would not outweigh the identified harm to heritage assets. Taking account of these factors I conclude that exceptional circumstances do not exist to justify the release of the section within the Green Belt.
362. The eastern section of the site adjoining Marsh Hall Lane also provides views to the adjoining countryside, but these are less extensive due to topography and include views of more modern housing off The Green. Marsh Hall Lane is characterised by dwellings set back in larger plots and has a mix of older and more modern development. I therefore consider that sympathetic landscaping, layout and design could help to mitigate the impact of new dwellings, and that development in the eastern section of the site could potentially be accommodated without causing harm to the significance of heritage assets. This area corresponds to 'Area 1' as shown in figure 10 in the Council's HIA.

363. Taking account of the above factors I conclude that development in the southern and middle sections of the site is not justified. The site allocation area should be reduced to correspond to Area 1, and the number of dwellings lowered from 42 to 14 dwellings (**SD2-MM283, SD2-MM284, SD2-MM286**). In order to provide suitable protection for the historic environment the policy should also refer to the site's location within the Conservation Area (**SD2-MM285**), and specify the retention of existing boundary walls (**SD2-MM288**). Thurstonland has some services and facilities, and is a sustainable location for this scale of development.
364. MDGB2134, Storthes Hall, Kirkburton – The site is previously developed land in the Green Belt. The southern section has planning permission for 300 dwellings and a care home. The northern section is currently occupied by student halls of residence, and as such may provide an opportunity for redevelopment without having a greater impact on openness or Green Belt purpose, in line with Policy PLP 59 in the Plan and paragraph 89 in the NPPF.
365. Storthes Hall is located in the countryside south of Huddersfield, and does not adjoin a settlement. However, the northern section of the site is already in residential use and the proposal for its redevelopment to provide 205 dwellings would make use of brownfield land. Additional housing and affordable housing would also contribute towards identified needs. Taking account of the above factors, I conclude that the proposal for potential redevelopment of this Green Belt site is soundly based. However, the policy should be amended to refer to additional constraints and mitigation measures, including the retention and protection of BAP Priority Habitats and heritage assets, and the production of Masterplans (**SD2-MM368, SD2-MM369, SD2-MM370**). This should ensure the policy is effective and help to avoid harm to ecology, the historic environment and the Green Belt. Evidence in EX64 indicates that completions in the southern section are likely to take place from 2018/19.

Conclusion on Issue 7

366. The site assessment process has been reasonable and robust. Exceptional circumstances have been demonstrated to release the individual site allocations from the Green Belt, subject to the aforementioned modifications. Therefore, taking account of my conclusions on the principle of release in Issues 2 and 4, I am satisfied that exceptional circumstances have been fully demonstrated to release land from the Green Belt for employment, housing and mixed use allocations as modified. Overall, the housing, employment and mixed use allocations are justified, effective and consistent with national policy, subject to aforementioned modifications. In this context, and having regard to my conclusions reached under Issues 2 and 4 on housing and employment supply, I have not considered it necessary to give further consideration to any additional site allocations (omission sites) within this report.

Issue 8 – Are the safeguarded land designations justified and consistent with national policy, and does the Plan make appropriate provision for longer-term housing needs beyond the Plan period? Are other adjustments to the Green Belt boundary justified and consistent with national policy?

Approach to safeguarded sites

367. The Plan identifies a total of 51 safeguarded sites that, through application of Policy PLP 6, would be considered for development via a future review of the Plan. Given the extensive Green Belt coverage in Kirklees, the designation of safeguarded land could be particularly beneficial in helping to provide Green Belt boundaries with a degree of permanency beyond the Plan period and limit the scale of future review. There is some uncertainty regarding the extent of future housing needs in Kirklees beyond the Local Plan period, but it is reasonable to surmise that there may be some future land requirements and a need to review Green Belt boundaries at some point in time, as permitted by the NPPF. I therefore consider that the designation of safeguarded land in the district is, in principle, an appropriate and pragmatic approach.
368. The safeguarded sites in the Plan are proposed on the basis of identified site-specific constraints which are unlikely to be resolved within the Plan period, but where solutions in the longer term have some prospect. Eight of the sites involve the release of land from the Green Belt. The sites have been assessed using the Local Plan site assessment methodology and subject to SA, and the Green Belt release sites have also been informed by the Green Belt Review.
369. A number of safeguarded sites are on land within the built up urban areas of Kirklees, rather than between the urban area and the Green Belt. This is not consistent with paragraph 85 of the NPPF which states that safeguarded land may be identified between the urban area and the Green Belt. Furthermore, if constraints are overcome before 2031, preventing the release of such sites for development could fail to accord with the Plan's strategy to deliver additional housing in sustainable locations and support urban regeneration. Accordingly, in order to be effective and consistent with national policy, modifications are necessary to delete the safeguarded sites that are located in the built-up urban areas of Kirklees (site SL2177 in **SD2-MM372**, SL2193 in **SD2-MM373**, SL2292 in **SD2-MM375**, SL2194 in **SD2-MM376**, SL2268 in **SD2-MM377**, SL2271 in **SD2-MM378**, SL3363 in **SD2-MM379**, SL2273 in **SD2-MM380**, SL2201 in **SD2-MM381**, SL2198 in **SD2-MM382**, SL2302 in **SD2-MM383**, SL2171 in **SD2-MM384**, SL2202 in **SD2-MM385**, SL2169 in **SD2-MM388**, SL2187 in **SD2-MM391**, SL2188 in **SD2-MM392**). Site SL2271 is designated for housing (H641a in **SD2-MM108**), as planning permission has been granted for residential development subject to resolution of a S.106 agreement, and it appears that access constraints are capable of being overcome. At this stage there is no firm evidence before me to confirm that the site is unavailable for this use. It is not wholly clear whether the constraints relating to the other sites are capable of being resolved within the Plan period, and therefore alternative allocations for these sites are not justified.

Specific safeguarded sites between the urban area and the Green Belt

370. Turning to the remaining safeguarded sites, evidence indicates that constraints relating to several are capable of being resolved within the Plan period. This includes site SL2181 in Liversedge, where the adjoining landowner has confirmed access can be made available via an extension to H2537. As set out under Issue 7, the adjoining area is within the Green Belt but is well contained and I have concluded that exceptional circumstances are demonstrated to justify its release from the Green Belt. SL2181 is in a sustainable location on non-Green Belt land, and should be deleted as safeguarded land (**SD2-MM386**) and allocated for housing (H709 in **SD2-MM191**).
371. Outline planning permission has also been approved for residential development on SL3396 in Golcar and SL2186 in Meltham, and on part of site SL2161 at Upper Quarry Road in Huddersfield where it appears that access issues may be capable of resolution. These safeguarded land designations should therefore be deleted for reasons of soundness (**SD2-MM389**, **SD2-MM390**, **SD2-MM374**). The allocation of SL3396 and SL2186 for housing is justified on the basis that planning permission relates to the whole site (H119a in **SD2-MM290** and H628 in **SD2-MM291**).
372. Site SL2284 at Lower Busker Farm in Scissett is an attractive sloping open field on the edge of the village. Although there is nearby built development the site is well connected to the open countryside, and is visible from a distance due to its elevation and sloping aspect. As such I consider that development could harm the character and appearance of the wider countryside and cause sprawl, and that exceptional circumstances have not been demonstrated to justify release from the Green Belt. The site also has potential constraints linked to a presence of a Listed Building which is likely to constrain capacity. The site should be deleted as safeguarded land and retained as Green Belt land (**SD2-MM387**).
373. In other cases I am satisfied that the safeguarded land designations, including consequential changes to ensure robust Green Belt boundaries, are soundly based. The safeguarded sites have identified constraints which are unlikely to be resolved within the Plan period, but where solutions in the longer term cannot be wholly ruled out and sites have some prospect of delivery. The Green Belt release sites have individually demonstrated exceptional circumstances to justify the alteration of the Green Belt, as set out below. There is no evidence before me that other constraints would wholly prevent development coming forward, and prior to allocation detailed matters relating to site capacity and issues such as heritage, landscape character, biodiversity, and infrastructure capacity would be appraised and addressed. However, in order to provide clarity and ensure the Plan is effective, reference to this assessment process should be inserted in Policy PLP6 (**SD1-MM14**) and a cross reference to Policy PLP 6 included in Part 2 of the Plan (**SD2-MM371**). An overview of my reasoning in relation to the Green Belt release sites, and a small number of other sites, is set out below.
374. SL2277, Snelsins Road, Chain Bar (Green Belt release) - The site adjoins built development and its relationship to the wider countryside is significantly curtailed by the presence of the M62 motorway and associated sliproads. As

such I am satisfied that any impact on views from the Green Belt would be limited and largely mitigated through landscaping and tree planting, and that overall the site does not perform a strong Green Belt function. I conclude that exceptional circumstances have been demonstrated to release the site from the Green Belt. The highway network in the vicinity has constraints but there is a reasonable prospect that solutions may be found beyond the Plan period.

375. SL2290, Cambridge Chase, Gomersal (Green Belt release) - The site is well contained by the built-up area of Gomersal, does not appear part of the wider countryside, and development would have limited effect on the strategic gap between Gomersal and Birstall as other parts of the two settlements are closer. I conclude that exceptional circumstances have been demonstrated to release the site from the Green Belt. The removal of long gardens in Summerbridge Crescent is also necessary to create a new defendable Green Belt boundary. There is a reasonable prospect that access issues relating to SL2290 are capable of being resolved beyond the Plan period.
376. SL2297, Mill Lane, Flockton (Green Belt release) – The site is open farmland on the edge of the village, with visual links to the wider countryside. However, the site is well contained by development to the north, a trackway to the east, and field boundaries to the south, and I consider that development on the site would not cause significant encroachment and that the resulting Green Belt boundary would be defendable. I conclude that exceptional circumstances have been demonstrated to release the site from the Green Belt.
377. The Local Highways Authority has indicated that, despite a number of properties on The Paddocks being in the same ownership as the site, it would not be possible to facilitate development of the site as a whole via this point, due to visibility issues and conflicting movements. On the balance of evidence before me I consider there is some uncertainty regarding deliverability in the short term, but a reasonable prospect that third party land and solutions may be secured beyond the Plan period.
378. SL2173 and SL3356, Far Bank, Shelley (first site non-Green Belt release, latter site Green Belt release) – The sites are contained by built development to the north and west. Although they slope, the relationship to the wider countryside is limited and development would be well related to the built form of the village. As such, I conclude that exceptional circumstances have been demonstrated to release site SL3356 from the Green Belt. It is unclear whether access to either site is capable of being resolved during the Plan period, but in the longer term it may be possible to secure third party land. There is no firm evidence before me to suggest that sites in their entirety are undeliverable on the basis of other matters, including heritage and biodiversity. Therefore designation as safeguarded land is robust.
379. SL3357, Fulstone Road, Stocksmoor (Green Belt release) – The site is contained and well related to the built-up framework of the village. There would be minimal impact in terms of encroachment or impact on the character and function of the Green Belt, and I conclude that exceptional circumstances have been demonstrated. Third party land is needed to provide access but there is a reasonable prospect of securing this beyond the Plan period.

380. SL3358, Shepley Road, Stocksmoor (Green Belt release) – The site is extensive in size and sloping, but is well contained. Therefore development would not cause significant encroachment or sprawl, and I am satisfied that impacts on the nearby wood could be dealt with as part of the process of option assessment in the next Local Plan review. Exceptional circumstances have been demonstrated to release the site from the Green Belt. Third party land is needed to provide access but there is a reasonable prospect of securing this beyond the Plan period.
381. SL2163, Balderstone Hall Lane, Mirfield (non-Green Belt) - The north-western part of site was subject to a pending planning application for housing at the time of the hearing and has since been refused. However, this related to a small section of the site, and notwithstanding the proposal, there is considerable uncertainty whether highway network and access constraints can be resolved within the Plan period to enable delivery of the site as a whole. Nevertheless, highway solutions cannot wholly be ruled out in the longer term. The site is partly surrounded by built development and relatively well-contained, and there is no evidence that the presence of Balderstone Hall and other nearby heritage assets would wholly prevent development. Overall I consider that the safeguarded land designation is soundly based.
382. SL2166 and SL2331, Holmbridge (non-Green Belt) - The highway network in Holmbridge has a number of constraints, including narrow carriageways, sloping topography and the presence of buildings close to the road. However, whilst solutions to enable housing development on the sites are unlikely to be readily forthcoming, I am unable to wholly rule out potential highway solutions being found at some point beyond the Plan period. The impact of development and highway works on landscape character and heritage assets would be assessed as part any allocation process in a future Plan review. Overall, although there is some doubt regarding deliverability, I am satisfied that, on balance, designation as safeguarded land is justified.
383. SL2170a and SL2170b in Hade Edge, SL2191 in Holmfirth and site SL3359 in Scholes (non-Green Belt) – Odour issues relating to site SL2170a may be capable of resolution if the nearby chicken farm ceases operation. There is no evidence of this occurring in the short term, but there may be some prospect beyond the Plan period.
384. In the same vein I consider that identified constraints relating to land availability and highways issues for site SL2170b, highways issues for SL2191, and access for SL3359 may be resolvable at some future point. The HRA identifies that impacts on the SPA are capable of being mitigated through additional wording in policies. This matter, along with infrastructure capacity, sustainability and other issues, would need to be assessed when looking at options in the next Plan review. Although Hade Edge and Scholes are modest in size they have a number of amenities. Overall I consider the safeguarded land designations are justified.

Provision for longer-term needs

385. The Plan as modified identifies a total of about 2,300 dwellings on the remaining safeguarded sites. Whilst this represents less than 2 years of housing supply, the Plan as modified identifies a further 2,900 or so dwellings

that would come forward on allocated sites beyond 2031 and help to meet longer-term development needs. It is also reasonable to assume that additional windfall supply is likely to be realised. Accordingly, and in the absence of national guidance on the amount of safeguarded land that should be identified, I am satisfied that the scale of safeguarded land identified in the Plan, based on the revised total, is sound. Based on longer term needs and individual assessment above, I conclude that exceptional circumstances have been demonstrated to justify the release of the Green Belt sites for safeguarded land, as modified.

386. The revised total supply from safeguarded sites and allocations beyond the Plan period should be clarified for reasons of effectiveness through modifications **SD1-MM15** and **SD1-MM16**.

Other Green Belt alterations

387. A number of minor changes to the Green Belt boundary have been proposed to take account of mapping errors, planning permissions, and changes in physical features. These are detailed in the Green Belt Boundary Changes document (2017) and shown on the Policies Map, and would ensure the boundary is logical and robust. Consequently exceptional circumstances exist to justify these boundary changes.

388. An extensive area of additional Green Belt land is proposed at New Laithe Hill, Newsome. The land is an open and undeveloped series of fields, and when viewed from nearby residential areas appears an integral part of the open elevated countryside south of Huddersfield. A strong new defensible Green Belt boundary could be formed by residential development to the north and west, and would prevent further encroachment of the built-up area. The area also forms part of the foreground to the Castle Hill SM, and is identified in the Castle Hill Setting Study (2016) as critical to the historical legacy and setting of the SM. Whilst this study focuses on the SM, it has highlighted the importance of the openness of these fields to the wider landscape and setting of the town. Overall, the area performs an important Green Belt function, and the Council's Local Plan evidence represents a material change of circumstances since the last Green Belt review was undertaken. I therefore conclude that exceptional circumstances have been demonstrated to justify altering the Green Belt boundary, as shown on the Policies Map, to include this site within the Green Belt.

Conclusion on Issue 8

389. Subject to the above modifications, including the deletion of a number of sites, I am satisfied that the safeguarded land designations in the Plan are justified and consistent with national policy. The Plan, subject to the above mentioned modifications, makes appropriate provision for longer-term development needs beyond the Plan period. Other alterations to Green Belt boundaries referenced in the above sub-section are justified and consistent with national policy.

Issue 9 – Are the open space designations in the Plan justified, effective and consistent with national policy?

Assessing Urban Green Space

390. The Plan designates a number of UGS within towns and villages, which are identified as providing an important function for sport, recreation, wildlife and/or visual amenity. This includes some extensive tracts of natural/semi-natural greenspace which are surrounded by built-up development and which have identified value as UGS. The Council's approach has focused on potential UGS sites in built-up areas, rather than the open countryside. This appears reasonable and proportionate, in the context that sites in the open countryside benefit from Green Belt protection.

391. Some of the UGS allocations in Kirklees are not publicly accessible, or have limited access via a PROW(s). However, the NPPF does not specify that open space should have public access, and the Council's evidence indicates that some sites have other UGS values linked to wildlife, visual amenity or landscape function. As such these sites may contribute to the quality, character and appearance of the district and/or to the health and well-being of local residents. In the case of Kirklees the designation of UGS sites without public access is therefore justified in principle.

392. The UGS are based on an extensive review of sites, informed by the Council's Open Space Study (2016), Playing Pitch Strategy (2015) and other evidence documents. The process has involved looking at both qualitative and quantitative data, and assessing whether a site is important in meeting local needs. In addition to ward level benchmarking against quantity and accessibility standards, the 'scarcity value' of a site has been assessed, based on distance to other open spaces of the same typology. Although open countryside (Green Belt) has not been factored into the benchmarking of natural/semi-natural greenspace, the Council's evidence in EX42 shows that designation of natural/semi-natural greenspace is based on other determinative factors including the qualities and UGS function of a site and its setting.

393. Overall I am satisfied that the Council's UGS site assessment process and general methodology, including the applied open space standards and typology definitions, has been appropriate and robust. The Council's approach is also consistent with the NPPF as whole, which seeks to protect green infrastructure, biodiversity and landscape character, as well as formal open space and sports provision, and promote healthy communities. In reaching my conclusions I have had regard to recent Inspector decisions relating to the loss of open space in Kirklees¹ Specific UGS allocations are considered below.

Urban Green Space designations

394. Since the Plan was submitted a number of housing developments have been approved on UGS. The following changes to Part 2 of the Plan are therefore necessary; deletion of UGS at Rumble Road, Dewsbury (UGS2151 in **SD2-MM398**) and allocation of the site for housing (H357 in **SD2-MM136**);

¹ APP/Z4718/W/16/3147937, APP/Z4718/W/16/3162164.

deletion of UGS on land south of Lancaster Lane, Brockholes (UGS909 in **SD2-MM402**) and allocation of the site for housing (H331 in **SD2-MM289**).

395. Other small changes in area size are necessary to correct errors, including a slight reduction in the size of sites UGS1264 (**SD2-MM395**), UGS948 (**SD2-MM400**), UGS884 (**SD2-MM403**) and UGS914 (**SD2-MM404**). Part of site UGS1251 in Meltham includes land used as a tree surgery business and private garden land, which does not perform an open space function, and a reduction in site area is therefore necessary for the Plan to be sound (**SD2-MM401**).
396. Elsewhere in this report I have recommended that housing allocation sites H783 in Heckmondwike and H764 in Huddersfield are deleted, on the basis that they have value as open space. Accordingly, adjoining UGS sites UGS1056 and UGS1199 respectively should be extended to include these areas (**SD2-MM396, SD2-MM399**). I have also recommended that housing allocation site H442 in Roberttown is deleted, and consequential changes for the Green Belt boundary place the cricket ground UGS (UGS3333) outside the built-up area in the Green Belt. The Plan seeks to identify UGS within towns and villages, and therefore a modification is needed to delete the UGS designation of the site (**SD2-MM397**).
397. Having regard to the evidence before me, I am satisfied that the other UGS designations in the Plan are justified. An overview of my reasoning in relation to a number of these is set out below. In order to be effective a link should be inserted alongside the list of UGS sites in Part 2 of the Plan to clarify that they are designated sites under Policy PLP 61 (**SD2-MM393**). Whilst UGS designations may be revisited as part of the next review of the Local Plan, Policy PLP 61 also provides some flexibility to deal with changing circumstances and proposals as they arise. Policy PLP 61 is covered later in this report.
398. UGS1240 (part of), Celandine Avenue Recreation Ground, Huddersfield – Although the University playing field section of the UGS is not currently in active University use, the Council's evidence shows a shortfall in playing pitches in the area. On this basis, and in the context that there is no proposal before me for replacement sports provision to mitigate loss, I conclude that its designation as UGS is justified. Policy PLP 61 provides some flexibility to respond to changing circumstances.
399. UGS851, Thewlis Lane, Crosland Hill – The Council's evidence shows that the site has high value on the basis of its recreational, biodiversity, landscaping and visual amenity function. Although nearby housing allocation H1783 is proposed, it would be possible to ensure that the UGS value is not unduly diminished through appropriate mitigation measures at planning application process.
400. UGS1219, Ballroyd Clough and Cliffe Road, Quarmby - The Open Space Study shows that the site overall has high value in terms of wildlife and its contribution to the character and appearance of the area, and on this basis I conclude it is justified as UGS.
401. UGS1804, south of the Beeches, Birkenshaw – The Council's evidence shows the site has high scarcity value as natural/semi-natural greenspace with

protected trees on its northern boundary, and is one of only two areas of natural/semi-natural UGS within the built-up area of Birkenshaw. On this basis I conclude it is justified as UGS.

402. UGS1477, land adjacent to Victoria Street allotments, Birstall – The natural/semi-natural section of this site is rated as low value in the Open Space Study. However, further assessment by the Council identified that the site has value as part of a larger open space and in providing a connection between existing allotments and grassland to the north. I am therefore satisfied that the site's designation as UGS is justified.
403. UGS1068, Springfield, Upper and Lower Blacup Farms, Cleckheaton – Housing has been approved on a small part of the UGS and therefore modifications to reduce the UGS area (**SD2-MM394**) and insert new housing allocation H2590a (**SD2-MM190**) are required. The remainder of the site is an attractive mix of fields and grassland, and makes an important contribution to the landscape and the character and appearance of the local area. The site is surrounded by built development and does not immediately adjoin the Green Belt, and does not appear to perform a Green Belt function. I am satisfied that the UGS designation, as modified, is robust and justified.
404. UGS973, land at Field Head Farm, Batley – The site consists of several typologies of open space, including natural/semi-natural greenspace and amenity greenspace, and provides a large tract of open land within a built-up and highly urbanised area of the district. The site includes attractive open fields which can be seen from the surrounding area, contribute to the character and appearance of the locality, and are partly crossed by a number of public footpaths. The site is surrounded by built development and does not immediately adjoin the Green Belt, and does not appear to perform a Green Belt function. Although some of the site is classed as medium UGS value in the Open Space Study, these areas form part of a wider open space and the bulk of the site is high value UGS with important recreational, landscaping and visual amenity functions. Accordingly, the overall rating of 'high' is justified. In conclusion, based on the evidence before me and observations from my site visit, the designation of the site as UGS and the boundaries of the site are justified and effective. In reaching this conclusion I have had regard to a recent Inspector's decision appertaining to part of the UGS.²
405. UGS1214, Golcar Flatts, Moorcroft Avenue, Golcar – The site comprises a mix of playing fields, natural/semi-natural greenspace, amenity greenspace and allotments, and forms an attractive open area within this part of Golcar. The natural/semi-natural section provides opportunities for informal recreation via a PROW on part of its western boundary and other informal paths, whilst the site as a whole provides visual, recreation and health benefits within a dense urban area. The northern section of the natural-semi-natural greenspace is grassland and is less open as the site is narrower in this locality. However, despite the presence of housing on two sides the grassland provides an open setting for the nearby allotments and amenity greenspace, an attractive visual break in the urban area, and despite the presence of boundary treatment forms part of a wider area of natural/semi-natural habitat to the south.

² APP/Z4718/W/16/3162164.

Although it does not contain a PROW, there is evidence of informal paths crossing the site from adjoining residential areas. Taking account of the above factors and setting aside the issue of open space deficiencies, the UGS designation of the northern natural/semi-natural section of the site, and the UGS designation as a whole, is justified.

406. UGS886, Sands Recreation Ground, Holmfirth – Part of the UGS site is within the private curtilage of residential properties and has a 'low' rating in the Open Space Study. However, as covered above, UGS can be in private ownership, whilst the Council's evidence indicates that this section forms an integral part of a wooded embankment which adjoins woodland, and contributes to the Kirklees Wildlife Habitat Network, the River Holme corridor and is part of the Holme Valley Strategic Green Infrastructure Network. Taking account of the evidence before me, I am satisfied that this section of the UGS, and the UGS as a whole, is justified and soundly based.
407. UGS936, Clayton West Cricket Ground – The site includes an area of grazing land and access track on its eastern side, which is identified as natural/semi-natural habitat in the Open Space Study. Although this area is not part of the current cricket ground or adjoining play area, it is part of a wider green space which contributes to the character and setting of the locality. Accordingly the designation of the UGS is justified.

Other open spaces

408. The Plan designates a small number of Local Green Spaces (LGS). The Council's evidence indicates that potential LGS sites were subject to a robust assessment, in line with criteria in paragraphs 76 to 78 of the NPPF. I am satisfied that the allocated LGS sites are demonstrably special with particular local significance, and consistent with national policy. However, in order to be effective a link should be inserted alongside the list of LGS in Part 2 of the Plan to clarify that they are designated sites under Policy PLP 62 (**SD2-MM405**).
409. The Plan identifies a Strategic Green Infrastructure project (SGI), Mirfield Promenade, in a text box in Part 2 of the Plan. The project is an on-going project with community involvement, and the boundaries take account of intended environmental improvements and footpath routes. There is an overlap with housing site H2089, but the allocation box for H2089 recognises that development would need to take account of the SGI. However, in order to provide suitable protection and be effective, a new policy in the Plan is required which specifically allocates the SGI site, provides a link to the Policies Map, and establishes the general approach to development proposals in this area (**SD2-MM406**).

Conclusion on Issue 9

410. On the basis of the evidence before me, and subject to the above modifications, I am satisfied that the open space designations in the Plan are justified, effective and consistent with national policy.

Issue 10 - Does the Plan set out positively prepared detailed policies on growth delivery, sustainable travel, design, climate change, the natural and historic environment, community facilities, environmental protection, Green Belt and open spaces which are justified, effective and consistent with national policy?

Growth delivery

411. Policy PLP 3 sets a broad framework to secure a sustainable pattern and form of development in the district. Whilst some aspects of the policy could be more precise and measurable, overall I am satisfied that it provides sufficient clarity and clear links to the spatial strategy, and that the general aims are in line with the Plan's vision and objectives. Although the policy refers to the re-use of brownfield land early in the Plan period, this is a broad aspiration rather than a requirement and is qualified by reference to the need to deliver five year housing supply and overall housing and job requirements.

412. Policy PLP 5 recognises that Masterplans can provide important detailed design and planning for some schemes, but may not be appropriate for all developments. However, additional wording to clarify this position, provide some general examples of when masterplans will be sought, and highlight responsibilities, would ensure the policy is effective and sound, whilst providing flexibility (**SD1-MM11, SD1-MM12, SD1-MM13**). The policy is complemented by site-specific policies in Part 2 of the Plan as modified which specify when Masterplans are required for specific allocations. I am satisfied that other aspects of the policy are suitably flexible, and do not impose specific standards or unreasonable requirements. The submission of an indicative phasing and implementation plan and a management plan would allow early consideration of these matters and assist in infrastructure planning and securing local involvement in running community assets.

413. Policy PLP 7 seeks to make efficient and effective use of land and buildings. In order to allow adjoining undeveloped land to be developed in the future, the policy should be modified to require proposals to factor in potential access (**SD1-MM17**). Reference in the supporting text to a 'brownfield first' approach in the policy should also be deleted, as this does not accurately reflect the policy approach and is inconsistent with the priority that national policy places on housing delivery and the need for both greenfield and brownfield developments in Kirklees (**SD1-MM18**). These changes are necessary for reasons of effectiveness and to make the policy sound. The minimum net density requirement of 35 dph incorporates suitable flexibility to respond to local circumstances. It is also supported by evidence which shows that an average gross density of 36 dph was achieved on new build sites in Kirklees between 2006 and 2016 (excluding apartment-only schemes), indicating that a minimum of 35 net dpa would be deliverable.

Sustainable travel

414. Changes are necessary to Policy PLP 20 to highlight that Travel Plans will be sought where a development has potential to generate significant amounts of transport movement (**SD1-MM72**). Modifications are needed to Policy PLP 21 to clarify that new development will only be prevented on transport grounds where cumulative impacts of development are severe (**SD1-MM73**). These

changes are needed for reasons of effectiveness and to ensure consistency with the NPPF.

415. The Plan does not establish specific parking standards and the Council has confirmed that it seeks to promote sustainable travel and ensure the efficient use of land on a case by case basis. This is a reasonable approach which is capable of achieving sustainable development. Nevertheless, in order to be effective the Council's position should be specified in Policy PLP 22 through modification **SD1-MM74**.

416. In order to effectively protect PROWs across the district Policy PLP 23 should be amended to seek the protection and enhancement of the PROW network (**SD1-MM75**). To ensure consistency with paragraph 10.103 of the Plan I have suggested a slight re-wording of the Council's published draft proposed modification to refer to all PROWs, in addition to those within the Council's 'core walking and cycling network'. As this position is already established in paragraph 10.103 this does not significantly alter the Council's approach.

Design

417. The Council has confirmed that it is not intending to impose additional local technical standards relating to the construction, internal layout and performance of new dwellings. Accordingly, modifications **SD1-MM76, SD1-MM77, SD1-MM78** are necessary to Policy PLP 24 to clarify that particular sustainable design features are encouraged rather than required, and to establish a positive and proportionate approach. This will ensure the policy is justified, effective and in line with national guidance.

418. The provision of electric charging points, as established in Policy PLP 24, is supported by the Council's viability evidence. However, adjustments to the wording are necessary to clarify these are required rather than encouraged (**SD1-MM79, SD1-MM81**), and thereby ensure the policy is effective. Additional detail on the Council's approach to design in the Green Belt is also needed to ensure effectiveness and appropriate protection (**SD1-MM80**).

Climate change

419. Policy PLP 26 establishes a criteria-based approach to renewable and low carbon energy proposals. However, the Plan does not identify areas of suitability for wind energy development. Therefore, in order to comply with national policy³, Policy PLP 26 should be amended to exclude its application to this form of development (**SD1-MM82, SD1-MM83, SD1-MM84, SD1-MM85, SD1-MM86, SD1-MM87**).

420. The Plan does not include a specific carbon reduction target. However, this is not a requirement, and the Plan provides a range of measures to reduce carbon including the renewable energy policy, the sustainable spatial strategy and other policies.

421. In order to be effectively applied and consistent with national policy, Policy PLP 27 on water management should be amended to clarify that not all

³ Written Ministerial Statement – 18th June 2015.

development proposals will be required to undergo a sequential test in relation to site location (**SD1-MM88, SD1-MM89**). In the case of Local Plan allocations the locational sequential test has already been applied, but other aspects of flood risk management in Policy PLP 27 would need to be satisfied.

Natural environment

422. Policy PLP 30 establishes the Council's approach to biodiversity and geodiversity, and provides protection for a range of habitats, sites and species. However, in order to be consistent with the NPPF and sound, the test for locally designated sites should be based on whether benefits outweigh the need to safeguarded conservation value, rather than on whether development is of 'overriding public interest'. The modifications in **SD1-MM90** will ensure a clear distinction in the hierarchy of international, national and locally designated sites. To ensure consistency with the NPPF, modifications are also needed to clarify that compensatory measures are a last resort after avoidance and mitigation (**SD1-MM91**).
423. The environmental designations listed in Part 2 of the Plan also need to be updated to reflect the latest evidence from West Yorkshire Ecology Service's records on quality and boundaries. This necessitates the deletion of Local Geological Site LGS12 (**SD2-MM338**), and amendments to the size of the following Local Wildlife Sites; site LWS8 in **SD2-MM339**, LWS10 in **SD2-MM340**, LWS29 in **SD2-MM341**, LWS36 in **SD2-MM342**, LWS39 in **SD2-MM343**, LWS47 in **SD2-MM344**, LWS57 in **SD2-MM345**, LWS60 in **SD2-MM346**, LWS64 in **SD2-MM347**, LWS73 in **SD2-MM348**, LWS77 in **SD2-MM349**, LWS87 in **SD2-MM350**.
424. Amendments are also required to Policy PLP 30 to clarify that, for development proposals within 2.5 kilometres of the SPA, further surveys will be required at planning application stage to assess detailed impacts on SPA birds and necessary avoidance and/or mitigation measures will be sought (**SD1-MM92**). This reflects the findings of the Council's HRA work, and is necessary for the policy to be clear and therefore effectively applied. The associated issue of legal compliance is covered later in this report.
425. Policies PLP 31, 32 and 33 provide a positive framework for protecting the Strategic Green Infrastructure Network, landscape character and trees.
426. Policy PLP 34 seeks to conserve and enhance the water environment, including all forms of watercourses and water bodies. A number of modifications are needed to make the policy effective and sound, including the insertion of the words 'where practicable' in relation to seeking enhancements to water courses/bodies, recognising there may be circumstances where this is difficult to achieve. The Council has confirmed that other improvements to water quality and efficiency would be encouraged rather than required, and modifications are needed to reflect these positions (**SD1-MM93, SD1-MM94**). Additional text relating to groundwater protection is also necessary to provide clarity and ensure effectiveness (**SD1-MM95**).

Historic environment

427. Policy PLP 35 seeks to protect and enhance the historic environment. A number of changes are needed to ensure consistency with the NPPF and make

the policy sound. This includes reference to the enhancement of historic assets, clarification of when substantial harm or loss may be permitted, and clearer distinction between and strengthening of the approach to designated and non-designated heritage assets. The approach to Conservation Areas also needs to be widened to enable the conservation of significant elements in all Conservation Areas, and not just those where Conservation Area Appraisals have been undertaken. Subject to these changes (**SD1-MM96** and **SD1-MM97**) I am satisfied that the policy would be sound and provide an appropriate framework for protecting the range of heritage assets in Kirklees.

428. Historic designations are listed in Part 2 of the Plan, including SMs, historic battlefields, historic parks and gardens, and archaeological sites. However, a modification to the supporting text is necessary to make it clear that the list and the Policies Map are not definitive, and do not, for example, include listed buildings (**SD2-MM351**). This is necessary in order for the Plan to be effectively applied. West Yorkshire Archaeology Advisory Service records are referenced within Part 1 of the Plan.

Communities

429. Chapter 17 includes a range of positive policies which seek to protect and enhance the provision of community facilities and sports facilities and open space, and support healthy communities. A number of changes are needed to make the policies effective and sound. Firstly, modifications to avoid overlap and provide a clear distinction between Policy PLP 48 on community facilities and PLP 50 on sports facilities and open space (**SD1-MM107**, **SD1-MM108**, **SD1-MM109**, **SD1-MM111**). Secondly, amendments to the supporting text in Policy PLP 48 to clarify the need to protect facilities which are critical to the role and function of a centre (**SD1-MM107**). Thirdly, adjustments to Policy PLP 48 to ensure that options for alternative community uses and compliance with Community Asset regulations are considered when assessing proposals for the loss of a community facility (**SD1-MM106**). New wording in Policy PLP 50 referring to replacement facilities in terms of 'quantity and quality' is also needed to ensure compliance with paragraph 74 in the NPPF (**SD1-MM110** and **SD1-MM112**).

430. Although criterion c in Policy PLP 50 refers to 'an alternative sport use', I am satisfied that, in the context of the plural reference in the supporting text and the Council's past application of policy, that the criterion is broadly consistent with paragraph 74 in the NPPF and would be reasonably applied to schemes involving more than one alternative sport use. Overall, despite other slight differences in wording and subject to the above modifications, I am satisfied that Policy PLP 50 is broadly consistent with the NPPF.

Environmental protection

431. The policies in chapter 18 provide a positive framework for protecting and improving environmental quality. In order to be effective Policy PLP 51 should be amended to refer to the West Yorkshire Low Emission Strategy 2016 to 2021 and associated Technical Planning Guidance, as these documents provide key details on the assessment of impact and evidence required to support applications (**SD1-MM114**). Wording relating to 'nuisance' and 'unsafe levels' should also be removed for reasons of soundness (**SD1-MM113**). Nuisance is

not a measure of air quality, and focusing on development which reaches unsafe levels would fail to improve air quality across the district or accord with the Low Emission Strategy (**SD1-MM113**).

432. The Council's Air Quality Assessment document indicates that the Plan could have a moderate or slight adverse effect on air quality in some areas. However, the assessment concludes that the overall effect of the Plan on air quality will not be significant, and that effects would be negligible in identified Air Quality Management Areas in Kirklees. Furthermore, there are policies and measures embedded in the Plan that will help to provide mitigation, including transport and design policies and the spatial strategy. Policy PLP 51 also requires development schemes to demonstrate that they will not result in air pollution increases that cause unacceptable impacts, and seeks sustainable mitigation measures.

Green Belt

433. Chapter 19 includes a range of detailed policies relating to different forms of development in the Green Belt. These policies, in conjunction with national policy and subject to the modifications below, will enable the Council to effectively deal with proposals that come forward.

434. In order to be effective, modifications are needed in Policies PLP 54 and 57 to provide a clearer approach to design which seeks to avoid harm to Green Belt function (**SD1-MM115, SD1-MM116, SD1-MM120**). Other changes are needed to ensure consistency with Green Belt policy in the NPPF, including substitution of the word 'buildings' in Policy PLP 56 with the term 'appropriate facilities' in association with outdoor sport and recreation proposals, and requiring schemes to preserve openness and ensure no conflict with Green Belt purposes (**SD1-MM117** and **SD1-MM118**). References to 'host building' in Policy PLP 57 also need to be replaced with the term 'original building' (**SD1-MM119, SD1-MM121, SD1-MM144**). The impact of outdoor areas on openness would be assessed as an integral part of the decision-making process on applications for extensions/alterations, and consequently this aspect of Policy PLP 56 is sound.

435. Policy PLP 59 deals with infill and redevelopment of brownfield sites in the Green Belt. Criterion c which seeks to restrict the height of new structures is insufficiently flexible to allow the effect on openness to be considered on a case by case basis. It is also unclear how the requirement to avoid cumulative impacts on openness in criterion e would be measured or achieved. These criteria therefore need to be deleted to make the policy effective (**SD1-MM124**), whilst clarification on the definition of 'infill' is required (**SD1-MM125**). Other changes are needed to bring the policy in line with the approach established in paragraph 89 of the NPPF. This includes deleting reference to 'environmental improvements' and other circumstances in criterion b (**SD1-MM124, SD1-MM126**), and amending the wording on Storthes Hall to clarify key tests (**SD1-MM124, SD1-MM127**).

436. Reference to infilling in villages in the Green Belt (overwashed settlements) in the supporting text to Policy PLP 59 should be placed in a separate section, to provide a clear distinction with between this matter and the purpose of Policy PLP 59 (**SD1-MM122, SD1-MM123**). To make the new section effective and

allow for changing circumstances, amendments are needed to allow the assessment of whether a settlement is a village to be made on a case by case basis (**SD1-MM122**). The definition of 'limited infilling' as comprising up to two plots within a continuously built-up frontage is reasonable and should be inserted for the policy to be effective (**SD1-MM122**).

Urban Green Space

437. Policy PLP 61 seeks to protect UGS identified on the Policies Map, and also applies to small open spaces (less than 0.4 hectares) identified as valuable in the Council's Open Space Study (2016) or Playing Pitch Strategy (2015). In order to provide sufficient clarity and make the policy effective, these valuable small sites should be referenced in the Plan (**SD1-MM161**). A number of small sites in the Open Space Study were not assessed, and the Council has confirmed that it would undertake an assessment of value at the time of a planning application. This position needs to be inserted into the policy to make it effective and sound (**SD1-MM129**).
438. Criterion a in the policy states that loss of UGS will only be permitted where a site does not meet local needs for open space, sports or recreational facilities, in line with the first bullet in paragraph 74 in the NPPF. However, the Council's evidence shows that, in addition to recreational value, some sites in Kirklees have significant visual, landscape and/or biodiversity value, and/or may not have public access. As established elsewhere in this report, these sites can contribute to the quality, character and appearance of the district and contribute to the health and well-being of local residents, in line with aims in the NPPF. Accordingly, in order to be effective, word changes are needed to recognise these other contributions, extend beyond the issue of open space standards and deficiencies, and clarify the Council's approach in relation to the full range of UGS in Kirklees (**SD1-MM128, SD1-MM130, SD1-MM143**).
439. Other changes are needed to Policy PLP 61 to ensure consistency with paragraph 74 in the NPPF, including deletion of the requirement that replacement facilities are equivalent or better in terms of accessibility and type (**SD1-MM128, SD1-MM131**). Criteria d and e should also be deleted as these are additional exceptions which go beyond paragraph 74, and would be appropriately assessed through the planning application process (**SD1-MM128, SD1-MM132, SD1-MM133**).
440. The remaining exceptional circumstances where loss of UGS may be permitted, as set out in criteria a, b and c, are expressed as options. As such, although not all criteria may be applicable in every case, I am satisfied that the policy as modified provides some flexibility for all forms of UGS, and allows for changing circumstances or replacement/alternative provision. In reaching this conclusion I have had regard to a number of recent Inspector decisions in the district relating to proposals on UGS, which have been drawn to my attention⁴.

⁴ APP/Z4718/W/16/3147937, APP/Z4718/W/16/3162164, APP/Z4718/W/16/3162164, APP/Z4718/W/16/3147937.

Open spaces – other aspects

441. Policy PLP 62 seeks to establish the circumstances in which development on Local Green Spaces may be permitted as an exception, but does not cover the full range of Green Belt exceptions in paragraphs 89 and 90 in the NPPF. In order to be clear and consistent with national policy, the text should be simplified to specify that proposals on these sites will be assessed having regard to Green Belt policy (**SD1-MM134, SD1-MM135**).
442. Policy PLP 63 seeks the provision of new open space in association with development proposals. However, although a standards table is contained in the Plan, a link to the table is required within Policy PLP 63 itself in order to clarify these standards will apply (**SD1-MM136**). The open space standards in the table have been informed by a range of local and national evidence and are broadly robust. However, in order to provide sufficient information and ensure effectiveness, standards for play provision and the amount required per dwelling for different typologies should be included (**SD1-MM137**).

Conclusion on Issue 10

443. In conclusion, subject to the above modifications, the Plan's detailed policies relating to growth delivery, sustainable travel, design, climate change, the natural and historic environment, community facilities, environmental protection, Green Belt and open spaces are justified, effective and consistent with national policy.

Issue 11 – Does the plan make appropriate provision for the steady and adequate supply of minerals?

444. Minerals of importance found in the district are: aggregates, sandstone and clay/shale. Coal is also present in the east of the district and provision also needs to be made for hydrocarbons, in accordance with the NPPF and PPG.
445. In terms of aggregates, regional guideline supply figures have been set by Government, most recently in 2009. Although the Yorkshire and Humber Regional Aggregates Working Party was dissolved in 2011 for a temporary period, it was reinstated in 2013 and aggregate supply continues to be monitored through the annual West Yorkshire Local Aggregates Assessment, which is the level at which assessment is set. The NPPF requires a minimum landbank of 7 years for sand and gravel and 10 years for crushed rock. Sand and gravel supplies in the district are limited, although a further allocation is proposed, and, on 2015 data, there is a landbank of 8 years 3 months for sand and gravel and 30 years and 2 months for crushed rock.
446. The supply of crushed rock is relatively healthy, being a by-product of the sandstone block/dimension stone but I accept that the quality is generally quite poor which results in the import of aggregates to Kirklees and therefore the larger landbank indicated for crushed rock is not unreasonable. The calculation of the 10 year sales supply figures has been uplifted by 25% to reflect growth in demand and a return to the levels prior to the economic downturn in 2008, considered by some to be an overestimate. However, the increase reflects the Council's economic and housing aspirations for the area, reflected in the other areas of the Plan. With the minerals allocations in place,

there could be a large landbank of 80 or so years for crushed rock but it is unlikely that all this would be worked at any one time but would depend on the market. In any event, it is dependent on sandstone/ dimension stone working, for which no specific targets for landbanks have been set in the NPPF. The Council has taken into account the opportunities for recycling of aggregate but these are often not recorded in construction, demolition and excavation waste data since the recycled material does not leave the site but used for redevelopment. Whilst the national and regional guidelines envisage greater use of recycled material (up to 31%), local data estimates that this is much lower, at about 7.5%, although I consider that the Plan allocates sufficient recycling sites for processing at higher rates.

447. The current estimated landbank for sandstone block/ dimension stone is about 18 years in the Council's estimate. The stone in this area is considered to be of national and local importance in new building projects and the restoration of older buildings and areas. Paragraph 143 of the NPPF states that Councils should plan for the continued supply of such minerals and this would contribute to the maintenance of the many listed buildings in the area as well as prestige projects nationally. Whilst some of the stone might not be used locally, the NPPF recognises national resources need to be reserved since minerals can only be worked where they occur. Given the local variability of the quality of the stone, even on the same site, a significant allowance needs to be made for the quality stone required. The Minerals Site Methodology (LE100) recognises that there are sufficient blockstone allocations for the plan period but that further allocations for sites and areas need to be made as the current reserves would be severely depleted by the end of that period. As such, I consider that the various allocations made allow for a reasonable reserve of the resource.
448. Clay and shale has a landbank of 18 years and the NPPF says that this needs to cover 25 years, since the use for clay pipes makes it similar to the use of brick clay, which the NPPF defines as a national resource mineral. Two large production plants blend the mineral from more than one source to produce the pipes and the location of the resource is important in respect of the plants. As such, further sites need to be allocated in the Plan to ensure a 25 year landbank over the Plan period.
449. The policies of the Plan are consistent with those in the NPPF and the minerals section of the PPG. Policy PLP 36 sets out criteria against which applications for the exploration and extraction of minerals will be scrutinised. This includes heritage repair which I consider important in site selection. The Council has taken the view that minerals development is not inappropriate in the Green Belt. However, consideration has to be given to the openness of the Green Belt and the reasons for including land in the Green Belt when determining whether this is the case. In examining the allocated sites I have taken these criteria into account. A MM (**SD1-MM98**) is required to ensure that landscape character is taken into account in assessing the impact of the development. In addition, a MM (**SD1-MM99**) is needed to the policy to ensure that it includes an assessment of need for the mineral concerned, which would be looked at in the light of the allocations in the Plan and the size of the landbank at the time of the application.

450. Policy PLP 37 concerns site restoration and aftercare. A MM (**SD1-MM100**) is needed to ensure that landscape character is assessed as part of any proposals for restoration and aftercare. The policy also needs to be split into two parts to ensure that mineral working will only be allowed where the site can be restored and aftercare managed to a high standard, including a reference to landscape character, and a second part which covers the criteria for site restoration, including enhancement benefits. Although concerns have been raised that the original character and biodiversity of sites could not be restored, since they are rarely the same in terms of their appearance, there are good examples of sites where biodiversity has been improved and landscape character is not adversely affected after restoration.
451. Policy PLP 38 covers minerals safeguarding areas. The background papers, especially Minerals Safeguarding Report and Policy Options paper (LE102), set out the reasoning and the policy options available on safeguarding. Paragraph 143 of the NPPF requires Councils to adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by new non-mineral development, whilst not creating a presumption that resources defined will be worked. The Council has chosen to use British Geological Society (BGS) mapping and DCLG resources to define the mineral resource and follows BGS guidance in safeguarding the whole of the resource, on which consultation will take place when non-mineral applications are received. This ensures that the whole of the known mineral resource is safeguarded and does not need to be site specific, which has been suggested as an alternative. The exemption of various types of minor development works from consultation is also a sound approach to safeguarding the resource.
452. The Safeguarding Report also covers buffer zones around sites. However, this is within the context of preventing new, sensitive development from sterilising mineral development, rather than defining the minerals allocations for the Plan, when constraints are considered when allocating sites. Whilst other minerals authorities might have accepted buffer zones around sites, this is a broadbrush approach which might lead to sites not being permitted when constraints could be overcome.
453. Policies PLP 39 and PLP 40 cover the protection of minerals infrastructure, and alternative development on these sites, with a 100m buffer is drawn around them. The buffer has been drawn to prevent any problems with noise and dust from these sites which might occur if there were any sensitive uses nearby. Whilst some developers might want to build closer to these sites than the buffer would allow, 100m represents a point at which such problems would decline. The policies are intended to be flexible and PLP 40 sets criteria for alternative development on these sites.
454. Policies PLP 41 and PLP 42 cover the exploration, appraisal and production of hydrocarbons. The processes that are covered by these policies can involve the transportation of large volumes of water and equipment, which result in high volumes of HGV traffic. As such I consider that a MM (**SD1-MM101**) is necessary to PLP 41 to ensure that the highway impacts of such development are taken into account when decisions are made on planning applications. The wording of PLP 42 is such that it refers to impacts in general, which would include the highways impacts and impacts on designated areas.

Conclusion on Issue 11

455. Therefore I conclude that, subject to the afore-mentioned modifications, the plan makes appropriate provision for the steady and adequate supply of minerals, as required in the NPPF and PPG.

Issue 12 – Are the proposed minerals site allocations effective, deliverable, justified and soundly-based and do they properly address site and infrastructure requirements, mitigation measures and environmental, traffic and other considerations in accordance with national policy?

Site selection process

456. The Council has allocated sites in accordance with the PPG paragraph 27-008-20140306 in respect of each specific type of mineral. The sites have been categorised as minerals extraction sites, Preferred Areas or Areas of Search, depending on whether there was evidence of supportive landowners, mineral presence and the viability of the reserve. They were the subject of SA and reasonable alternatives were considered and consulted on, including through the Site Options report. Buffer zones were used around constraints in earlier iterations of the plan documents. However, the Council has chosen to take a more site specific approach in setting out the constraints for each of the sites in the submitted Plan. In accordance with NPPF, extensions were sought to existing sites, which might increase the length of working in certain areas, but which reduces the need for other areas to be brought forward.

Minerals site allocations policies

457. The minerals site allocations are set out in text boxes in Part 2 of the Plan, but are not incorporated within an actual policy. In order to provide sufficient weight and clear direction for developers and the community, new policies (PLP 68-71) are required which specify that sites are allocated and identified on the Policies Map, and establish the general approach that will apply. These modifications relate to sites in Areas of Search – Policy PLP 68 (**SD2-MM352**), Minerals Extraction sites – Policy PLP 69 (**SD2-MM353**), Minerals Preferred Areas Policy PLP 70 (**SD2-MM360**), in addition to Minerals Infrastructure sites – Policy PLP 71 (**SD2-MM362**). The new policies for the allocation of the minerals sites are positively-worded and set criteria for their development in the box below the policy.

Minerals sites in the Green Belt

458. A number of non-operational minerals sites are in the Green Belt. In Plan order these are: ME1965b, ME2248a, ME2259 ME2267a, ME2312a&b, ME2314, ME1965a, ME2248c, ME2263, ME2265, ME2568, ME1966, ME1975 and ME3324. In examining these sites I have taken into account the effects on the openness of the Green Belt and the reasons for including land in the Green Belt, in accordance with the relevant paragraphs of the NPPF. In all of the cases I have found that there would be no harm to the openness of the Green Belt or the reasons for including land in the Green Belt. Any built ancillary development could be controlled through any subsequent planning

application and the proposal would not encroach on the countryside, since it would be restored following the quarrying to an appropriate use.

Areas of Search

459. These are sites with a likely resource which is relatively unconstrained, which have not been promoted by landowners or the quantity and quality of the mineral has not been confirmed through evidence.
460. ME1965b - This site has been identified as being likely to have viable quantities of sandstone block, which is a nationally significant resource. It is close to an existing operational quarry (ME2263), through which it could be worked and processed, although improvements would be required to the access. There are residential properties nearby and any application would need to assess the impacts on the occupiers, and appropriate mitigation, where necessary.
461. ME2248a - This site has been identified as being likely to have viable and significant quantities of clay and shale. It is close to an existing operational quarry (ME2248b) and would effectively be an extension to it. There are residential properties nearby and any planning application would need to assess the impacts on the living conditions of their occupiers as well as the other identified constraints on the site, with mitigation where appropriate.
462. ME2259 - The site is for sand and gravel extraction in the Calder valley from river gravels, which are relatively scarce in this area, and therefore the site would perform a useful role, despite being on higher quality agricultural land. There are a number of constraints on the site including the management of flood risk and the impact on wildlife and heritage assets. However, any impacts would be assessed as part of the planning application and at that stage it would be considered whether any mitigation would be required.
463. ME2267a/ME2312a&b - The site was previously safeguarded and is considered to contain good reserves of clay and shale, being next to an active clay and shale quarry (ME2247), to which it would be a large extension, along with sites ME2312a&b. The sites are within an area of open countryside with scattered dwellings and it will be necessary to assess the impacts on both of these when any planning application is submitted for their development. However, the character of the local area ensures that there is scope for mitigation measures to protect the local landscape and the amenities of local residents, if necessary.
464. ME2314 - This is a large site close to an existing minerals operation for clay and shale (ME2248b) and known reserves at ME2248c and would continue existing working in the area. Whilst the site is large, the allocation of sites in this area would help to provide reserves for a mineral of national importance. There are residential properties nearby and any planning application would need to assess the impacts on the living conditions of their occupiers, as well as the other identified constraints on the site, together with mitigation where appropriate.

Mineral extraction sites

465. These are sites which likely to be acceptable in planning terms, with a willing land owner in place, and minerals operators having also supplied the Council with evidence demonstrating the existence of the mineral in sufficient quantity and quality, providing a greater degree of certainty to the viability of the mineral resource. Only those sites which are not already operational or did not have planning permission at the time of the examination are assessed in this section.
466. ME1965a - would be a large new site close to an existing quarry with processing facilities (ME2243) and would produce blockstone, a nationally significant resource. The need for this mineral has already been discussed under the need for a steady and adequate supply of minerals and that need remains despite the recent planning permission on site ME2568 and a small windfall of blockstone at Peace Wood. The site is close to an Area of Search (ME1965b), but this is a much smaller site, which contains only a little of the reserve. It could not compensate for this site in terms of production and is properly allocated as an Area of Search, rather than a mineral extraction site.
467. There are a number of constraints on the site. There are residential properties nearby at Park Head and Deane Grange and the large site is open, with a traditional agricultural landscape, including dry stone walls. The landscape would be changed by the quarrying operation but the Council would need to assess whether the proposed restoration and aftercare scheme for the site was appropriate, in terms of landscape and biodiversity, when considering any planning application. There are currently some views of the site uphill from Park Head and across Park Head Lane and the visual impact of the proposal, together with the impact of dust and noise on the occupiers of these properties, would also need to be addressed in any future planning application.
468. The River Dearne is on one side of the site and the Park Dike also crosses it. A document used to inform the former Core Strategy suggested a buffer zone of 250m should be drawn around watercourses. However, no justification for this distance is offered in the document, which, in any event, has not been used to inform this Plan. The Environment Agency's latest consultation response requires only an 8m standoff from these watercourses. In order to inform the size of the working areas and pollution prevention measures necessary in this case, a hydrological assessment is required. This would also examine other water environment impacts, including any wells in or near the site, and the protection of water infrastructure, such as that belonging to Yorkshire Water. MMs **SD2-MM354** to **MM357** would be necessary to address these matters and correct the name of the site. The nearby archaeological site would be the subject of an assessment prior to the determination of any planning application and Historic England has no objection to this approach. Other impacts, such as those on the users of nearby footpaths and long distance trails, would also need to be taken into account in the assessment of any subsequent application.
469. ME2248b&c - Site ME2248c is in the Green Belt and was previously a minerals safeguarded site in the UDP. The site is adjacent to an existing quarry at ME2248b and to proposed extensions to the north (ME2314) and to the west (ME2248a), both of which are Areas of Search. Two MMs (**SD2-MM358** and

SD2-MM359) are required to correct the gross and net sizes of site ME2248b to 28.69ha. Together these sites, for clay and shale, represent a national reserve for material for clay pipes. There are residential properties nearby and these sites might be worked over long periods of time. Any planning application for the sites would need to assess the impacts on the living conditions of their occupiers, as well as the other identified constraints on the site, together with mitigation where appropriate.

470. ME2265 - This site is for the extraction of clay and shale and is in the Green Belt. The site is close to an existing operational quarry for clay and shale (ME2249) to which it would form an extension and the allocation of the site would ensure that sufficient reserves are available for this important mineral. Any planning application for the sites would need to assess the impacts of the proposed development and the matters identified in the policy box, together with mitigation where appropriate.
471. ME2568 - At the time of the hearings the Council had resolved to grant planning permission for the site, subject to a suitable S106 agreement being agreed. Full planning permission was subsequently granted on 18 October 2018 for the quarrying of blockstone. However, this matter and any other constraints have been considered as part of the planning application process.

Preferred Areas

472. The Preferred Areas represent known, relatively unconstrained sites with a viable quantity of reserve for the target mineral, but with no willing landowner. Once these sites are allocated then it becomes more likely that the landowner would allow quarrying.
473. ME1966 - This site is immediately adjacent to site ME2246, which includes high quality blockstone stone and processing facilities. It could be accessed through the existing quarry and use the existing facilities there. MM (**SD2-MM361**) is required to ensure that reports are produced on the impacts on the habitats which are important for off-site foraging by South Pennine Moors SPA qualifying bird species birds in accordance with policy PLP30. The site has a number of other constraints, including recreational uses, and site specific considerations which will require reports and further information, should a planning application be made to work the site.
474. ME1975 - The site is next to an existing operational quarry (ME2251), which produces good quality blockstone, a nationally significant resource. This site would represent an extension to it and would be able to use existing processing facilities. The site has a number of constraints and site specific considerations which will require reports and further information, should a planning application be made to work the site.
475. ME3324 - The site has a good quality viable blockstone reserve, which is a nationally significant resource, and is adjacent to site ME2568, to which it would form an extension. The access to the site would use the junction of Black Lane/Intake Lane/Nopper Road and Arborary Lane. Although six accidents were reported over a 5-year reporting period at this junction, only one of these was reported as serious. The allocation notes the need for

highways improvements as well as the assessment of other impacts, including those on heritage assets, hydrology and noise.

476. There are a number of areas which have been the subject of quarrying in the past and at present and where further allocations are being made in the plan. Residents in and around these areas, for example, around Shelley, Upper and Lower Cumberworth and Crosland Moor, are concerned about the concentration of minerals development and the cumulative impact on them over the years. However, it has to be borne in mind that minerals can only be worked where they occur and these areas are likely to represent the best reserves of relevant minerals which operators wish to develop.

Minerals infrastructure sites

477. The safeguarding of minerals infrastructure sites, including those for processing and distributing the minerals is important and assists in the use of sustainable means of transport for minerals, in accordance with the NPPF and PPG.

478. Site MI3403 is an area of sidings and other railway land owned by Network Rail. However, they have said that the site is operational railway land and is not available for minerals infrastructure uses. Therefore, MM **SD2-MM363** is required to delete this undeliverable site from the plan.

479. There are a number of minerals infrastructure sites which have been safeguarded in the Dewsbury and Ravensthorpe area, notably sites MI3398, MI3399 and MI3404, which are near to areas proposed for regeneration. Under policies PLP39 and PLP40 these sites have 100m buffer zones around them to protect any new development proposed. It would be for a developer to show through a submitted planning application that mitigation for any adverse impacts could be provided, to ensure the continued operation of these minerals infrastructure sites.

Conclusion on Issue 12

480. Therefore I conclude that, subject to the afore-mentioned modifications, the proposed minerals site allocations are effective, deliverable, justified and soundly-based and properly address site and infrastructure requirements, in accordance with national policy in NPPF.

Issue 13 – Do the waste policies included in the Plan ensure that the waste needs of the district can be sustainably managed?

481. The waste policies of the plan, PLP 43 and PLP 44, are supported by a Waste Needs Assessment (WNA) for the borough (LE105 and 106), set within the regional context. The assessment evaluates the likely need arising for each type of waste over the plan period and the capacity of the existing facilities available to deal with it. The Council is committed to meeting national recycling targets in accordance with the National Planning Policy for Waste (NPPW) and the local Municipal Waste Management Strategy through the waste hierarchy. MM (**SD1-MM102**) is required to update and correct the existing waste hierarchy diagram (Fig 8) in the plan. A further MM (**SD1-MM103**) is required to include a number of new paragraphs which set out the

position in the Borough for each type of waste and the outcome of the capacity assessment and the resulting land requirement. These paragraphs are necessary to give a complete picture of the wastes arising in the Council's area, the existing capacity for their management and indicate any further capacity required over the plan period.

482. The WNA modelled 12 different scenarios and then determined that a growth scenario, based on likely population growth and increases in waste, together with a median recycling rate, would provide for waste needs planning. I agree that this scenario is the most appropriate for examining the likely capacity gap.
483. In terms of landfill, for Local Authority Collected Waste (LACW), there would be only a small shortfall which could be accommodated through the restoration of mineral workings, and covered by Policy PLP 46. Sufficient capacity for Commercial and Industrial (C&I) landfill already exists for most of the plan period, with reliance placed on external facilities for both this and a small gap for hazardous waste landfill. Having regard to the outcome of the DtC discussions, I am convinced that there will be external capacity for those elements of the provision which cannot be accommodated within the District for the plan period and beyond.
484. There is currently an Energy from Waste (EfW) plant, with an expected life to 2028. A capacity gap of about 100,000t of waste would result from its closure at that time, although if it operated to the end of the plan period this would reduce to 30,000t. In order to make the plan sound an allocation is required to ensure that there is an appropriate site for an EfW plant available in the event of a decision to replace the existing plant. A significant amount of recycling provision is needed for LACW, together with some capacity for C&I, Agricultural and Construction, Demolition and Excavation waste. I consider that the allocated site and sites coming forward under Policy PLP 44, with existing transfer stations, would give sufficient capacity for the plan period. Recycling of hazardous waste depends on external provision and I consider that the external capacity secured through the DtC discussions would be sufficient to deal with this.
485. There is a need for a composting facility within the district, with Policy PLP44 providing opportunities for this type of facility. The policy also allows for the development of waste transfer capacity on appropriate sites, if needed. There is no need for the plan to provide other types of capacity, for example, low level radioactive waste.
486. The strategy which has evolved includes the allocation of one strategic site (W1), which would address the significant capacity gap identified for the recycling of LACW, alongside a network of transfer stations. The plan also sets more flexible policies for the development of further waste facilities in sustainable locations on appropriate employment land. The range of locations is such that it would provide for a number of sites in different areas of the Borough close to arisings suitable for the management of waste of different types through a range of technologies. As such, I consider that the analysis of need and the strategy selected provides a sound and positive basis for the planning of waste management in the borough and is in accordance with NPPW and PPG.

487. The Plan contains strategic policies which set out its relationship to the waste management hierarchy locally. Policy PLP 44 sets out the criteria for the development of sites for waste uses, including taking into account the natural and historic environment. Policy PLP 45 covers the safeguarding of waste facilities identified on the Policies Map. MM (**SD1-MM104**) is required to the text of Policy PLP45 to clarify that existing waste management facilities will be safeguarded for their operational period, subject to decommissioning and any revocation processes of any permits or licences, after which they would no longer be safeguarded, provided an equivalent replacement facility was provided. The policy also seeks to ensure that new development around existing or planned waste management sites does not compromise the operation of the waste site. Concerns have been raised that this might impede new development, especially housing, in regeneration areas along the Calder valley, for example, but with sufficient safeguards in place, there is no reason why new development cannot be provided in such areas. A further MM (**SD1-MM105**) is required to the text accompanying this policy, which clarifies the role of waste facilities, like anaerobic digesters, on agricultural holdings and the need for their monitoring.

Conclusion on Issue 13

488. Therefore I conclude that, subject to the afore-mentioned modifications, the waste policies included in the Plan make proper provision for the district's waste needs to be sustainably managed, complying with national policy in the NPPW and PPG.

Issue 14 – Is the proposed waste allocation in a suitable and appropriate location and is it effective, deliverable, justified and soundly based? Together with the safeguarded sites, does the Plan provide sufficient land for waste management needs?

489. The waste site allocation is set out in a text box in Part 2 of the Plan, but is not incorporated within an actual policy. In order to provide sufficient weight and clear direction for developers and the community, new policies are required which specify that sites are allocated and identified on the Policies Map, and establish the general approach that will apply. A new policy, PLP 72, is required, through MM **SD2-MM364**, in order to allocate the new strategic waste management site W1, with criteria for its development set out in the box below the policy.

490. The remainder of waste development will come forward through the market under the criteria-based policies, set out in the Strategies and Policies section of the Plan. I consider that these measures, together with agreed external capacity and the safeguarding of existing waste sites, will create the necessary provision to manage the waste needs of the district over the plan period.

491. In addition, further text is required on safeguarded waste management sites as set out in MM **SD2-MM365**, to give proper reference back to policy PLP45, the policy which covers safeguarding waste sites.

492. Site WS16 was allocated as a safeguarded waste site in the submitted plan. It covered a waste management site at Clayton Hall Farm, where renewable

energy is being produced from imported and farm-based waste. Following on from the changes to the text in MM SD1-MM105, this allocation is no longer required. MM **SD2-MM366** is required to delete the allocation.

493. There are a number of waste sites which have been safeguarded in the Dewsbury and Ravensthorpe area, notably sites WS27, WS33, WS34 and WS36, which are near to areas proposed for regeneration. I consider that the safeguarding of the sites would not unduly restrict development on nearby sites. It would be a matter for the design and layout of the new development proposed at planning application stage to ensure that the new development complied with Policy PLP 45, which covers this issue. A number of other issues were drawn to my attention but these mainly concern the accuracy of the boundaries of waste sites shown on the policy maps, which is a matter for the Council.

Conclusion on Issue 14

494. Therefore I conclude the proposed waste allocation is in a suitable and appropriate location and, together with the safeguarded sites and sites coming forward under policies PLP 44 and PLP 45 would provide sufficient land for waste management needs and is effective, deliverable, justified and soundly based, in terms of waste management, and complies with national policy in NPPW and PPG.

Issue 15 – Does the Plan set out a robust monitoring and implementation framework?

Minerals and waste

495. The Council has taken a pragmatic approach to the monitoring of minerals and waste development, given the difficulties with data collection for certain minerals and types of waste, some of which would be collected regionally and sub-regionally. The indicators selected for minerals and waste development are appropriate and the monitoring of the landbanks for relevant minerals would ensure that a review of the plan would be triggered, should they fall below the required level. The allocations also provide for development beyond the plan period which gives flexibility should requirements change or sites fail to come forward, which represents a sound approach to the implementation and monitoring of these sections of the Plan. MM **SD1-MM138** is necessary to ensure that all relevant information sources are taken into account, including those available locally. This provision also relates to the minerals and waste sections of the Plan.

496. Appendix 2 of the Plan, which comprises the Monitoring Framework, requires MMs to ensure the effective monitoring of the Plan in terms of minerals and waste policy. MM **SD1-MM153** is required to ensure that the 25-year landbank for clay and shale, a nationally important mineral, is maintained for the Plan period. MM **SD1-MM154** is necessary to make it clear that the Plan allocations for aggregates will contribute positively to the sub-regional apportionment for aggregate minerals, in accordance with national policy. MMs **SD1-MM155, SD1-MM156 and SD1-MM158** are required to make it clear that only those proposals which are contrary to policy are used as indicators for the loss of safeguarded minerals infrastructure and waste

management facilities to other uses. MM **SD1-MM157** is necessary to correct the target for policy PLP40a to zero, rather than saying that this part of the policy has no target.

Other matters

497. The remainder of the monitoring framework in the Plan captures a broad range of indicators and targets. In order to ensure effective monitoring of policies a number of additional indicators are required as follows; number of apprenticeship schemes or training programmes secured, linked to the encouragement of such schemes in Policy PLP 9 (**SD1-MM146**); total amount of comparison retail, convenience retail and leisure floorspace completed and levels of pedestrian footfall, linked to the delivery of retail needs and viable centres, as identified in Policy PLP 13 (**SD1-MM147, SD1-MM148, SD1-MM149**); loss/additions to designated and non-designated heritage assets, linked to protection of the historic environment in Policy PLP 35 (**SD1-MM152**).

498. The indicator and target for Policy PLP 24 on design looks at the percentage of appropriate applications, and in order to facilitate effective monitoring should be altered to focus on decisions/outcomes through modifications **SD1-MM150** and **SD1-MM151**.

Conclusion on Issue 15

499. In conclusion, subject to the above modifications, the Plan provides a robust monitoring and implementation framework.

Public Sector Equality Duty

500. During the course of the examination we have had due regard to the aims set out in Section 149(1) of the Equality Act 2010. This includes consideration of the Plan's provision to meet the accommodation needs of gypsies and travellers, and the need for accessible and adaptable housing and inclusive design.

Assessment of Legal Compliance

501. The examination of the legal compliance of the Plan is summarised below.

- The Local Plan has been prepared in accordance with the parameters and timetable set out in the Council's updated LDS (2018). Although the adoption date is later than anticipated the delay is not significant.
- As set out above, consultation on the Local Plan and the MMs was carried out in compliance with the Council's SCI.
- SA has been carried out and is adequate.
- As set out above, the HRA (2017) and HRA of the MMs (August 2018) identify that, subject to mitigation measures in the Local Plan through MMs, no significant adverse effect on the integrity of European protected sites is likely.

- The Local Plan includes policies designed to ensure that the development and use of land contributes to the mitigation of, and adaptation to, climate change, and this issue is covered by a number of objectives in the SA work.
- The Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

502. The Plan has a number of deficiencies in respect of soundness and/or legal compliance for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

503. The Council has requested that we recommend MMs to make the Plan sound and/or legally compliant and capable of adoption. We conclude that with the recommended main modifications set out in the Appendix, the Kirklees Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Katie Child

Elizabeth Hill

Inspectors

This report is accompanied by an Appendix containing the Main Modifications. The Appendix is divided into two sections, covering Parts 1 and Parts 2 of the Plan.

Kirklees Local Plan

SD1 Kirklees Local Plan Strategy and Policies Main Modifications



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Document Introduction

This document sets out Main Modifications required to make the Plan sound and/or legally compliant and capable of adoption.

Modifications are indicated as follows: deletions are shown as a ~~striketrough~~ and new text is shown *underlined* and in italics. Modifications to the Local Plan Policies Map are incorporated into SD2 Kirklees Local Plan Allocations and Designations Main Modifications.

1 Introduction

Table Modification SD1-MM1

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM1	Page 8	Paragraph 1.30	Delete and add text: “The SEP sets out spatial priorities in order to maximise growth potential and ensure prosperity across the whole City Region and for Kirklees. The identified priorities for Kirklees include regenerating Huddersfield and North Kirklees and providing space for businesses to grow. In Huddersfield, key mixed use developments include HD One, the Waterfront Quarter and St George’s Quarter, together with Sstrategic employment growth opportunities at Cooper Bridge, Gildswell and through the M62 Enterprise Zone sites at Lindley Moor and Mirfield. In Dewsbury, the North Kirklees Growth Zone is outlined as an opportunity for economic transformation and housing growth. <u>Strategic employment growth opportunities for Kirklees are promoted along the M62 corridor.</u> Across the district, the council has aligned its strategies for the economy and for health and wellbeing, and is seeking inclusive growth that benefits quality of life and reduces inequalities.”

Table Modification SD1-MM2

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM2	Page 10	New section after Paragraph 1.42	Insert text: “ <u>Area Action Plans</u> <u>The purpose of Area Action Plans (AAP’s) are to help shape the future of specific areas in Kirklees by developing a shared direction for the area and co-ordinating development proposals across a number of significant sites. They will provide a detailed planning framework for areas that are subject to significant development and change, provide guidance on delivery tools and mechanisms for growth in homes</u> ”

<p><u>and jobs and infrastructure needs. They can also identify specific sites and more detailed policies to guide future retail growth and assist in the future development and place shaping of town centre areas. Area Action Plans for central Huddersfield and central Dewsbury will be produced which will set out a framework for promoting regeneration, place shaping and managing development within and around the edge of these town centres so that they fill their role in providing shopping, leisure, residential and employment opportunities.</u> “</p>			
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2 Achieving sustainable development

2 Achieving sustainable development

No modifications proposed

3 Issues facing Kirklees

Table Modification SD1-MM3

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM3	Page 15	Paragraph 3.5	<p>Delete and insert text:</p> <p><u>"People over 60 will be an increasing proportion of the population increasing by 35,600 from 2013 to 2031(5), but in some parts of Kirklees there will be significant increases in numbers of young people. It is also expected that the average household size will decline from 2.43 in 2013 to 2.34 in 2031, as household numbers grow faster than the population(6):</u></p> <p><u>There is need and demand for new homes in all parts of Kirklees. If identified housing needs are to be met, houses of all sizes are needed together with an increasing number of bungalows and flats/apartments. People over 60 will be an increasing proportion of the population increasing by 35,600 from 2013 to 2031(5), but in some parts of Kirklees there will also be significant increases in numbers of young people. It is also expected that the average household size will decline from 2.43 in 2013 to 2.34 in 2031, as household numbers grow faster than the population(6). A key challenge for the Council is to ensure a greater diversity of support services are made available to older people wanting to stay in their own home and develop funding mechanisms to achieve this. Additionally, the range of housing options available to older people needs to be diversified, for instance through the development of open market housing designed at older people and the development of sheltered accommodation, extra care housing and co-housing for rent or sale."</u></p>

4 Vision and strategic objectives

4 Vision and strategic objectives

Table Modification SD1-MM4

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM4	Page 21	Section 4.2 Vision for Kirklees	Delete and insert text: “Kirklees will be ideally placed to encourage inward investment and stimulate economic growth. This will be achieved through the provision of new prime employment land, sites of strategic importance for employment with a focus on manufacturing and engineering including <u>Whitehall Road, Cleckheaton Coöper-Bridge and Chidswell</u> and safeguarded employment land which, as a whole, provide the opportunities to grow businesses, improve economic resilience and increase the district’s ability to compete with other areas, economic benefits of housing delivery and the potential to reduce out-commuting.”

5 Place shaping

No modifications proposed

6 Delivering growth and sustainable development

Table Modification SD1-MM5

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM5	Page 36	Spatial development strategy box	<p>Delete and insert text:</p> <p>Sustainable economic growth is delivered in Kirklees during the plan period through the provision of:</p> <ul style="list-style-type: none"> • About 465 <u>95</u> hectares of new employment land to achieve a 75% employment rate over the plan period. • Recognising its role in terms of market demand, available land supply and access to the strategic road network, prime new employment development is located along the M62 corridor to the north of Kirklees and in the Dearne Valley where easier access can be achieved to the M1 through: <ul style="list-style-type: none"> • Allocated sites at: Lindley Moor, Cooper Bridge, Slipper Lane, Whitechapel Road, the former North Bierley Waste Water Treatment Works; and <u>Clayton West</u>

Site	Net additional employment land (Hectares)
Lindley Moor	8
Cooper Bridge	33 <u>4</u>
Slipper Lane	6

		25 <u>11</u>
Whitechapel Road (Cleckheaton)		
Former North Bierley Waste Water Treatment Works		8
Chidswell		35
Clayton West		45

Table Modification SD1-MM6

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM6	Page 37	Spatial development strategy box	<p>Delete and insert text:</p> <p>“Sustainable housing growth is delivered in Kirklees during the plan period through the provision of <u>The council will seek to achieve sustainable housing growth through:</u></p> <ul style="list-style-type: none"> • <u>The delivery of a minimum of About, (but not less than) 31,140 new dwellings between 2013 and 2031 (1730 new dwellings per annum) through allocation sites and taking account of windfalls, committed housing figures and losses/demolitions.</u> <p>The council has assumed a windfall allowance; taken into account committed housing figures, and losses/demolitions when determining how much land is required from new housing allocations. This results in the need for about 21,324 19,868 new dwellings from allocated land.”</p>

Table Modification SD1-MM7

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

6 Delivering growth and sustainable development

SD1-MM7	Page 37	Spatial development strategy box - Table 1	Delete and insert text:		
			Settlement	Approximate number of dwellings	<u>Approximate number of dwellings to be delivered beyond the plan period</u>
			Huddersfield	7,000 <u>6,000</u>	<u>770</u>
			Dewsbury	5,000 <u>4,650</u>	<u>2,130</u>

Table Modification SD1-MM8

Modification Ref	Page	Policy/Para /Table/Box	Tracked change												
SD1-MM8	Page 37	Spatial development strategy box	<p>Insert text and new table:</p> <p>" • Outside of Huddersfield and Dewsbury, identified housing needs across the district's settlements through a combination of housing and mixed use allocations <u>as follows:</u></p> <p><u>Housing capacity from allocations in settlements outside of Huddersfield and Dewsbury¹</u></p>												
			<table border="1"> <thead> <tr> <th><u>Settlement</u></th> <th><u>Approximate number of dwellings</u></th> <th><u>Settlement</u></th> <th><u>Approximate number of dwellings</u></th> </tr> </thead> <tbody> <tr> <td><u>Armitage Bridge</u></td> <td><u>0</u></td> <td><u>Meltham</u></td> <td><u>370</u></td> </tr> <tr> <td><u>Batley</u></td> <td><u>725</u></td> <td><u>Mirfield</u></td> <td><u>400</u></td> </tr> </tbody> </table>	<u>Settlement</u>	<u>Approximate number of dwellings</u>	<u>Settlement</u>	<u>Approximate number of dwellings</u>	<u>Armitage Bridge</u>	<u>0</u>	<u>Meltham</u>	<u>370</u>	<u>Batley</u>	<u>725</u>	<u>Mirfield</u>	<u>400</u>
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6 Delivering growth and sustainable development

<u>Birkenshaw</u>	<u>335</u>	<u>Netherthong</u>	<u>90</u>
<u>Birstall</u>	<u>375</u>	<u>Netherton</u>	<u>410</u>
<u>Clayton West/ Scissett</u>	<u>370</u>	<u>New Mill</u>	<u>0</u>
<u>Cleckheaton</u>	<u>1295</u>	<u>Oakenshaw</u>	<u>0</u>
<u>Denby Dale</u>	<u>270</u>	<u>Outlane</u>	<u>30</u>
<u>East Bierley</u>	<u>60</u>	<u>Ravensthorpe</u>	<u>25</u>
<u>Emley</u>	<u>45</u>	<u>Roberttown</u>	<u>0</u>
<u>Farnley Tyas</u>	<u>25</u>	<u>Sapegoat Hill</u>	<u>0</u>
<u>Flockton</u>	<u>160</u>	<u>Scholes (Cleckheaton)</u>	<u>35</u>
<u>Gomersal</u>	<u>270</u>	<u>Scholes (Holmfirth)</u>	<u>65</u>
<u>Grange Moor</u>	<u>65</u>	<u>Shelley</u>	<u>0</u>
<u>Hade Edge</u>	<u>65</u>	<u>Shepley</u>	<u>120</u>
<u>Hartshead</u>	<u>15</u>	<u>Skelmanthorpe</u>	<u>390</u>

6 Delivering growth and sustainable development

<u>Heckmondwike</u>	<u>340</u>	<u>Slaithwaite</u>	<u>95</u>
<u>Hepworth</u>	<u>75</u>	<u>Stocks Moor</u>	<u>40</u>
<u>Holmbridge</u>	<u>40</u>	<u>Thongsbridge</u>	<u>175</u>
<u>Holmfirth</u>	<u>195</u>	<u>Thornhill</u>	<u>60</u>
<u>Honley/ Brockholes</u>	<u>350</u>	<u>Thurstonland</u>	<u>15</u>
<u>Kirkburton/ Highburton</u>	<u>95</u>	<u>Upper Cumberworth</u>	<u>0</u>
<u>Kirkheaton</u>	<u>300</u>	<u>Upper Denby</u>	<u>0</u>
<u>Lepton</u>	<u>820</u>	<u>Upper Hopton</u>	<u>0</u>
<u>Linthwaite</u>	<u>230</u>	<u>Upperthong</u>	<u>25</u>
<u>Lower Cumberworth</u>	<u>0</u>	<u>Wellhouse</u>	<u>0</u>
<u>Marsden</u>	<u>95</u>	<u>Land at Storthes Hall (outside of identified settlements in the Local Plan)</u>	<u>505</u>

					¹ <i>This table includes the approximate number of dwellings to be delivered from allocations in the Local Plan. It does not take into account completions that have occurred during the plan period, or planning permissions on sites not allocated in the Local Plan.</i>
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Table Modification SD1-MM9

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM9	Page 38	Spatial development strategy box	Delete text: How is the vision, objectives and strategy delivered? Support the growth and diversification of the economy ". Allocation of prime strategic employment locations along the M62 corridor and to take advantage of the Dearne Valley's access to the M1 corridor"

Table Modification SD1-MM10

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

6 Delivering growth and sustainable development

SD1-MM10	Page 42	Policy PLP4	<p>Insert text:</p> <p>"The council will work with partners to bring forward the necessary and proportionate essential <i>and desirable</i> infrastructure that is required in order to deliver the spatial strategy as set out in the local plan.</p> <p><u>Essential infrastructure is defined as infrastructure that is required to make development acceptable in planning terms. Desirable infrastructure is described as infrastructure which would improve the capacity and deliver place making benefits.</u></p> <p>Where new infrastructure is needed to support new development, the essential infrastructure must be operational no later than the appropriate phase of development for which it is needed.</p> <p>Where new infrastructure is needed, the council will expect phasing plans to be submitted as part of planning applications and where appropriate, will link the construction and occupation of that development to infrastructure provision.</p> <p>New development should contribute to the provision of infrastructure, taking account of local and strategic needs and financial viability. This may be achieved on-site or off-site through planning conditions or legal agreements and/or through contributions to the Community Infrastructure Levy (CIL)."</p>
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Table Modification SD1-MM11

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM11	Page 44	Policy PLP5	<p>Delete and insert text:</p> <p>"Masterplans must involve <u>all</u> the at relevant stakeholders, including the council, landowners, developers, the local community, service providers and other interested parties. Masterplans will be developed in consultation with the council prior to the submission of a planning application. <u>Masterplans would only be sought where feasible and appropriate.</u>"</p>

Table Modification SD1-MM12

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM12	Page 45	Paragraph 6.23	<p>Delete and insert text:</p> <p>"High levels of designs for all types of development are essential to maintaining and enhancing the character of the area. Masterplans will be required where proposals warrant such an approach owing to the site location, development scale, relationship with surrounding uses, mix of uses or where the scale of change is significant. <u>The council will normally require a masterplan to be submitted where:</u></p> <ul style="list-style-type: none"> <u>• developments are to be developed in separate phases over a number of years</u> <u>• multi-plot developments where there may be multiple landowners and it is important to co-ordinate the delivery of infrastructure and ensuring the place shaping principles and other policy requirements are met as set out in the plan</u> <u>• for mixed use development to ensure that the different land uses to be developed on a site are capable of being delivered.</u> <p>Masterplanning ensures that development is properly integrated with existing settlements, with the focus on sustainable mixed communities. New development offers the opportunity to expand and enhance local infrastructure and facilities for the wider area. To achieve these objectives, development will be planned in a co-ordinated way through a comprehensive masterplanning process."</p>

Table Modification SD1-MM13

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

6 Delivering growth and sustainable development

SD1-MM13	Page 45	Paragraph 6.25	Insert text: "Masterplans are normally prepared by developers to interpret planning policies and are often submitted as part of the pre-application process. <u>Where appropriate, the council will take a lead role on preparing masterplans.</u> The documents are frequently prepared in consultation with local communities and other organisations. A masterplan once endorsed by the council will be used as a guidance document to inform the consideration of future planning applications."
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Table Modification SD1-MM14

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM14	Page 46	Paragraph 6.29	Insert text: "The consideration of the permanent development of safeguarded land, such as for housing or employment, will only occur through a change to the allocation through a review of the local plan. During a local plan review, the reassessment of safeguarded land will involve determining for each site whether in the prevailing circumstances there is a case for releasing some or all of the land for development, or whether it should be maintained as safeguarded land until the next review of the plan. <u>This reassessment will need to consider the principles of sustainable development and specific constraints to development, such as impact on heritage assets.</u> "

Table Modification SD1-MM15

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM15	Page 46	Paragraph 6.30	Delete and insert text: "The local plan has identified approximately 115 hectares of safeguarded land. If the same indicative housing densities (35 dwellings per hectare) which are assumed in the plan are projected forward this equates to approximately 4000 dwellings. There

			<p>are also approximately 2000 dwellings to be delivered on sites which will continue to deliver homes post the plan period⁽⁴⁶⁾. This equates to a total of approximately 6000 dwellings of safeguarded land, equivalent to 28% of the land identified in housing allocations or almost 20% of the objectively assessed need for homes</p> <p><u>"The plan provides safeguarded land to accommodate approximately 2300 dwellings (assuming the same indicative housing densities of 35 dwellings per hectare used in the plan). The plan also provides for approximately 2900 dwellings to be delivered on sites post the plan period. This equates to a total of approximately 5200 dwellings of safeguarded land/flexibility, equivalent to approximately 26% of the land identified in housing allocations or almost 17% of the objectively assessed need for homes."</u></p>
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Table Modification SD1-MM16

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM16	Page 46	Paragraph 6.30 (Footnote 15)	<p>Delete and insert text:</p> <p><u>"4690 to be delivered after the plan period on Dewsbury Riverside (H2089) plus 257 likely to be delivered after the plan period on H1783 (Thewlis Lane, Grosland Hill) due to mineral extraction activity on the site. This includes the following capacity which is expected to be delivered beyond the plan period: H2089 (2131 dwellings), H1747 (437 dwellings), H351 (61 dwellings), H1783 (257 dwellings) and H3397 (16 dwellings)."</u></p>

Table Modification SD1-MM17

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

6 Delivering growth and sustainable development

SD1-MM17	Page 47	Policy PLP7 (1st Paragraph)	<p>Delete and insert text:</p> <p>"To ensure the best use of land and buildings, proposals: should encourage:</p> <p>a. should encourage the efficient use of previously developed land in sustainable locations provided that it is not of high environmental value;</p> <p>b. should encourage the reuse or adaptation of vacant or underused properties;</p> <p>c. should give priority to despoiled, degraded, derelict and contaminated land provided that it is not of high environmental value;</p> <p>d. will allow the opportunity for access to adjoining undeveloped land so it may subsequently be developed."</p>
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Table Modification SD1-MM18

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM18	Page 48	Paragraph 6.36	<p>Delete text:</p> <p>"Whilst the majority of local plan housing and employment allocations are therefore on greenfield sites, the council remains committed to a brownfield first approach as set out in the policy."</p>

7 Economy

Table Modification SD1-MM19

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM19	Page 50	Paragraph 7.8	Delete and insert text: "Based on this evidence, the Local Plan seeks to deliver <u>approximately</u> 23,000 jobs over the plan period from 2013-31 to meet the objectively assessed jobs need. This equates to a total employment land requirement of 175 hectares. Naturally some of this supply already exists; therefore careful consideration has been given to the current stock of employment land in Kirklees to determine how much new prime employment land is required to accommodate the jobs. In view of this, a number of factors have been taken into account, including completions since 2013, existing employment land supply, potential windfall from established sites; <u>and</u> the type of market this land will serve; and an allowance for flexibility. "

Table Modification SD1-MM20

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM20	Page 51	Paragraph 7.9	Delete and insert text: "Since the Local Plan base date (1st April 2013) a total of 45 28 hectares of land has been developed for employment use. This take-up has contributed towards meeting the employment land requirement. It is also important to take account of the 15 hectares currently subject to planning permission. This supply is windfall (land not allocated in the previous development plan) and plays an important role in terms of contributing to the current supply of employment land."

Table Modification SD1-MM21

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM21	Page 51	Paragraph 7.10	Delete and insert text: "In terms of existing land supply, Kirklees has 37 hectares supply from previous permissions (on land not allocated for employment or mixed use). The land accounted for is unallocated land made up of previous planning permissions that have since expired but are deemed available and suitable for business and industrial use. Much of this land will meet the needs of the districts small and medium enterprises (SME's) and is therefore an important component of the land supply."

Table Modification SD1-MM22

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM22	Page 51	Paragraph 7.11	Delete text: "It is considered prudent to add a flexibility allowance to ensure an appropriate range of sites for the market and to account for the non-delivery of prime sites. In order to allow for this a 10% flexibility has been applied to the outstanding employment land requirement of 142 hectares (175 ha – 15 ha – 15 ha – 3 ha = 142 ha). This equates to an additional 14 hectares."

Table Modification SD1-MM23

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM23	Page 51	New paragraph between paragraphs 7.13 and 7.14	Insert text: " <u>In total the employment land supply for the Kirklees district predicted to come forward during the Local Plan period equates to 193 hectares and leads to an employment oversupply of 18 hectares. This 18 hectares ensures a degree of flexibility is accounted for and will allow for range of sites for the market and to account for the non-delivery of prime sites.</u> "
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Table Modification SD1-MM24

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM24	Page 51	Paragraph 7.14	Delete and insert text: "Taking account of both the LCR SEP and KES objectives, and factoring in calculations on jobs growth, new prime-employment land will be required if Kirklees is to achieve its economic objectives. The supply set out in the table below identifies potential outstanding employment land supply on predominantly small parcels of land within already established business and industrial locations (priority employment areas). This land has been calculated as potential windfall that may come forward during the plan period, however, it is not considered to be prime and does not therefore contribute to the key objectives of the LCR SEP or the KES. It is however worthwhile acknowledging its potential to contribute to the employment land needs of business and industry and has therefore been included. An exercise has been undertaken to rationalise <u>this existing</u> supply, i.e. to not needlessly protect employment stock that may not meet the needs of modern business operations, and <u>therefore</u> the remaining supply is considered to be best retained for employment purposes. This will allow for churn and continue to support the growth aspirations of the small and medium sized businesses established in <u>Kirklees</u> these locations. The LCR SEP identifies land at Cooper Bridge (allocation E1832e) and in the Chidswell area (allocation MX1905) as strategic priorities of sub-regional significance."

Table Modification SD1-MM25

Modification Ref	Page	Policy/Para /Table/Box	Tracked change																		
SD1-MM25	Page 52	Table 3 Meeting the employment land requirement	Delete Table 3 Meeting the Employment Land Requirement and insert revised Table 3:																		
<table border="1"> <thead> <tr> <th data-bbox="435 506 858 1417">Meeting the Employment Land Requirement</th> <th data-bbox="435 230 858 506">Hectares</th> </tr> </thead> <tbody> <tr> <td data-bbox="866 506 1002 1417">Employment land requirement (based on REIU work)</td> <td data-bbox="866 230 1002 506">475</td> </tr> <tr> <td data-bbox="1010 506 1145 1417">Completions -- employment land take-up (since 1st April 2013)</td> <td data-bbox="1010 230 1145 506">-15</td> </tr> <tr> <td data-bbox="1153 506 1289 1417">Commitments -- on land not allocated for employment or mixed use</td> <td data-bbox="1153 230 1289 506">-15</td> </tr> <tr> <td data-bbox="1297 506 1433 1417">Supply from previous permissions -- on land not allocated for employment or mixed use</td> <td data-bbox="1297 230 1433 506">-3</td> </tr> <tr> <td data-bbox="1441 506 1576 1417">10% flexibility allowance</td> <td data-bbox="1441 230 1576 506">+14</td> </tr> <tr> <td data-bbox="1584 506 1596 1417">Potential supply from PEAs</td> <td data-bbox="1584 230 1596 506">-48</td> </tr> <tr> <td data-bbox="1728 506 1596 1417">Amount of additional employment land required</td> <td data-bbox="1728 230 1596 506">408</td> </tr> <tr> <td data-bbox="1872 506 1596 1417">Amount of land allocated (net)</td> <td data-bbox="1872 230 1596 506">467</td> </tr> </tbody> </table>			Meeting the Employment Land Requirement	Hectares	Employment land requirement (based on REIU work)	475	Completions -- employment land take-up (since 1st April 2013)	-15	Commitments -- on land not allocated for employment or mixed use	-15	Supply from previous permissions -- on land not allocated for employment or mixed use	-3	10% flexibility allowance	+14	Potential supply from PEAs	-48	Amount of additional employment land required	408	Amount of land allocated (net)	467	
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	<u>Meeting the Employment Land Requirement</u>	<u>Hectares</u>
<u>A</u>	<u>Employment land requirement (Based on REIU work)</u>	<u>175</u>
<u>B</u>	<u>Completions – employment land take-up (since 1st April 2013)</u>	<u>28</u>
<u>C</u>	<u>Commitments – on land not allocated for employment or mixed use</u>	<u>15</u>
<u>D</u>	<u>Supply from previous permissions – on land not allocated for employment or mixed use</u>	<u>7</u>
<u>E</u>	<u>Potential supply from PEAs</u>	<u>48</u>
<u>F</u>	<u>Amount of additional employment land required through allocations (A-B-C-D-E)</u>	<u>77</u>
<u>G</u>	<u>Amount of land allocated (net)</u>	<u>95</u>
<u>H</u>	<u>Oversupply of employment land (G-F)</u>	<u>18</u>
<u>I</u>	<u>Amount of employment land predicted to come forward over the Plan period (B+C+D+E+G)</u>	<u>193</u>

Table Modification SD1-MM26

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

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SD1-MM26	Page 53	Policy PLP8	<p>Delete and insert text:</p> <p>“1. Proposals for development or re-development for employment generating uses <u>(as defined in the Glossary)</u> in Priority Employment Areas will be supported where there is no conflict with the established employment uses <u>(as defined in the Glossary)</u> in the area. <u>In instances where the site is out of centre and the proposal includes main town centre uses then policy PLP 13 will need to be applied.</u></p> <p>2. Within Priority Employment Areas, proposals for redevelopment resulting in a non-employment generating end use, or for the conversion or change of use of sites and premises in use or last used for employment, will only be supported where:”</p>
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Table Modification SD1-MM27

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM27	Page 53	New paragraphs after paragraph 7.17	<p>Insert text:</p> <p><u>“All sites allocated as Priority Employment Areas are viable, in terms of style and age of buildings, the internal site arrangement, neighbouring uses and opportunities for expansion and are strategically or locally significant. As such they house well established business and industry sites that warrant protection from changes of use. Applicants will need to demonstrate that the site or premises are no longer capable of employment use, the availability of business/industrial sites of equivalent quality in the area (this is particularly relevant in south Kirklees where existing employment sites are locally significant), that the proposed use is compatible with neighbouring uses and where applicable would not prejudice the continued use of neighbouring land for employment.</u></p> <p><u>It should be demonstrated that the site has been marketed as a potential site for business and industry and why the building(s) do not fulfil the standards required by modern commercial uses. The period of marketing would need to be agreed by the Council and will be reflective of the significance of the employment asset.</u></p>

			<p><u>This would be assessed on a case by case basis: this allows flexibility as the stock is so varied. The Priority Employment Area assessment as set out in Appendix 3 of the Methodology Paper: Priority Employment Areas (October 2016), would be the starting point for this assessment.</u></p> <p><u>For the purposes of policy PLP 8 employment generating uses are recognised as the B use class employment uses derived from the Town and Country Planning (Use Classes) Order 1987 (as amended) and enterprises which provide jobs, for example, retail, hotel, assembly and leisure and certain non-residential Sui Generis uses (such as clubs, cash and carry businesses and builders merchants).</u></p> <p><u>Employment uses are recognised as the B use class employment uses derived from the Town and Country Planning (Use Classes) Order Guide 1987 (as amended). A comprehensive definition of both employment generating uses and employment uses are supplied in the glossary."</u></p>
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Table Modification SD1-MM28

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM28	Page 60	Policy PLP9	<p>Delete and insert text:</p> <p>"Supporting skilled and flexible communities and workforce</p> <p>The council will work with partners to accelerate economic growth through the development of skilled and flexible communities and workforce in order to underpin future economic growth to deliver the Kirklees Economic Strategy.</p> <p>Wherever possible, proposals for new development will be <u>strongly encouraged</u> required to contribute to the creation of local employment opportunities <u>within the district</u> with the aim of increasing wage levels and to support growth in the overall proportion of local residents in education or training. Applicants should reach an agreement with the council about measures to achieve this, which could include: provision of specific training and apprenticeships that are related to the proposed development or support other agreed priorities for improving skills and education in Kirklees or the creation of conditions to support a higher performing workforce, increasing productivity and the in work progression of employees.</p>

<p><u>The Council will therefore seek to secure an agreed training or apprenticeship programme with applicants where development meet the following thresholds:</u></p> <ul style="list-style-type: none"> • <u>3.500 sq.m. or more of business or industrial floorspace; or</u> • <u>Housing developments which would deliver 60 dwellings or more</u> <p><u>In instances where the development does not trigger one of the above thresholds then wherever feasible the Council will seek to secure alternative education or training programmes with the applicant.</u></p>	<p>To contribute to skills development, the council will support development which relates to the operational needs of and/or expansion of all of the districts higher, further and specialist education establishments including the University of Huddersfield and Kirklees College.</p> <p>Ancillary and related uses will also be supported providing it can be demonstrated that such uses are:</p> <ol style="list-style-type: none"> a. genuinely linked to the education establishment and its operations; b. in locations where they are compatible with the surrounding land uses; c. in accessible locations which minimise the need to travel; <u>and</u> d. where it does not conflict with the plan's town centre policies or other relevant policies. <p>Where appropriate any new or proposed extensions to existing campuses should be guided by a comprehensive, up to date strategy and masterplan."</p>
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Table Modification SD1-MM29

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
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SD1-MM29	Page 62	Policy PLP10	<p>Delete and insert text:</p> <p>"2. Where new buildings are proposed in the green belt the development proposed must be considered to be acceptable having regard to green belt policy. In all cases where development is proposed in the green belt regard must be had to the relevant policies in this plan and relevant national planning policy.</p> <p>4. Development proposals for main town centre uses <u>that are above 150 square metres in non-urban areas*</u> and in out of centre locations will only be permitted where identified needs <u>of the business</u> cannot be met within existing local centres or in edge of centre locations.</p> <p><u>*Non-urban areas are defined as areas or land located within the Green Belt."</u></p>
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Table Modification SD1-MM30

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM30	Page 62	Paragraph 7.28	<p>Insert text:</p> <p>"In green belt locations, while national guidance states that the countryside should be protected for its own sake this should not mean that businesses within it cannot thrive. Carefully designed and sited development to support existing businesses, and new businesses that can justify a green belt location, can maintain the economy, provide local jobs and help to support communities. <u>In all cases, where development is proposed in the Green Belt regard must be had to the relevant policies in this plan and relevant national planning policy.</u>"</p>

Table Modification SD1-MM31

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM31	Page 62	Paragraph 7.29	Delete text: “Changing agricultural practises also mean that farms are seeking new ways to maintain their viability and this will often lead to proposals for diversification schemes and tourist related enterprises that have a genuine need for a green belt location, usually because they are ancillary to their host enterprise. The re-use of buildings in the green belt makes use of existing resources and in some cases can enhance the appearance of the area. However, the re-use of isolated buildings for economic purposes is unlikely to be acceptable unless there are clear and demonstrable reasons why an isolated location is required. Where the proposal is within the green belt then the requirements of the green belt policies will be applied. Only where there is a genuine requirement for a green belt location will new buildings be permitted.” ”
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Table Modification SD1-MM32

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM32	Page 63	Paragraph 7.31	Delete and insert text: <u>“Proposals for farm shops and other predominately town-centre based uses should also have regard to national planning policy and Local Plan policies regarding sequential test and impact assessment. Farm shops are generally farm diversification schemes which support the viability of the enterprise. They are generally ancillary to the core agricultural business and are usually proposed to be located at the farm. As shops are a main town centre use and if they are over 150 square metres, this locational requirement needs to be justified. Where a robust justification is not provided, for example linked to the needs of business, a sequential test is required in accordance with national planning policy and local plan policy PLP 13. Other proposals that are regarded as main town centre uses such as leisure, culture and tourism development can have a locational requirement which means that they can be only accommodated in specific locations. If this locational requirement is above 150 sq m, it needs to be justified to pass the town centre sequential test.”</u>

Table Modification SD1-MM33

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM33	Page 64	Paragraph 8.6	Insert text: "The Publication Draft Local Plan housing requirement has used the most up to date national household projections (2014-based) as a starting point. Following analysis of this information and consideration of economic assumptions, the local plan housing requirement is <u>a minimum of 31,140</u> homes over the plan period from 2013-31 which will meet identified needs. This equates to an annual housing requirement of 1,730 new homes per annum. As this is based on up-to-date demographic evidence it takes account any need arising from shortfalls in delivery against previous targets."

Table Modification SD1-MM34

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM34	Page 64	Paragraph 8.8	Delete and insert text: "There have been 4,706 <u>3,828</u> (net) new homes built between 1st April 2013 and 31st March 2015 <u>2017</u> which have contributed towards meeting the Local Plan housing requirement. There is also capacity for 7,135 <u>8,410</u> new homes yet to be built on sites which already have planning permission (at 1st April 2015 <u>2017</u>). Of these, 2,024 <u>3,739</u> homes are on sites proposed as housing allocations in the Publication Draft Local Plan. These have been assessed using the Local Plan methodology as deliverable or developable during the plan period but have been removed from the table below to avoid double counting with allocations. As the remaining planning permission capacity for 5,111 <u>4,671</u> homes have not been assessed through the local plan methodology, a contingency allowance of 10% of the capacity of these sites has

			been added to the housing requirement (an additional 544 467 dwellings). This is to ensure the Local Plan will meet the housing requirement even if some of the sites with planning permission are not delivered."
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Table Modification SD1-MM35

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM35	Page 65	Paragraph 8.10	Delete and insert text: "The total number of new homes built on windfall sites since 1999/2000 (excluding residential gardens) was 44,162 15,165 (an average of 885 892 per annum). Windfall sites have therefore been a reliable source of supply in Kirklees over the past 46 17 years. The "brownfield first" policy in previous national planning policy and the council exceptions approach to greenfield development during much of this period restricted the development of greenfield Kirklees Unitary Development Plan (UDP) housing allocations. This may have led to an increase in delivery on windfall sites as particularly brownfield sites were developed in the absence of available greenfield capacity."

Table Modification SD1-MM36

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM36	Page 65	Paragraph 8.12	Delete and insert text: "The Local Plan does not incorporate a windfall allowance for the early part of the plan period as it has been assumed that windfall delivery during this part of the plan period will be from sites which already have planning permission. A windfall allowance of 450 per annum for the final eleven ten years of the plan period (2020/4

				2021/22-2030/31) has been included in the land requirement calculations. The total amount of housing anticipated on windfall sites during the plan period is therefore 4,950 <u>4,500</u> ."
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Table Modification SD1-MM37

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM37	Page 65	Paragraph 8.13	Delete and insert text: "The amount of residential units lost through demolition, conversion and change of use over the past 5 years since 2008/09 indicates an average of approximately 90 dwellings lost per annum which equates to 1,440 <u>1,260</u> (for remaining the 46 <u>14</u> years of the plan period)."

Table Modification SD1-MM38

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM38	Page 65	Paragraph 8.14	Delete text: "The Local Plan therefore needs to provide housing allocations to meet the requirement for 21,324 new homes."

Table Modification SD1-MM39

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

Delete table 5 Meeting the Housing Requirement and insert revised table 5:

Housing supply sources / allowances	Explanation	Amount to be added / subtracted to reach the requirement for new housing allocations
Housing requirement (from the Strategic Housing Market Assessment)	The amount of housing required over the plan period (1,730 x 18 years)	31,140
Net housing completions (2013/14 - 2014/15)	New homes built in the first two years of the Local Plan period	-1,706
Sites with planning permission at 01/04/2015 (that are not also proposed as allocations in the Local Plan)	The total capacity of sites with planning permission is 7,135 homes but to avoid double counting with allocations, this table only shows the capacity with planning permissions for new homes where sites are not proposed as allocations in Local Plan.	-5111

Table 5 Meeting the housing requirement

Page 65

SD1-MM39

10% lapse rate on planning permissions not allocated in the Local Plan	To provide contingency where some planning permissions may not be delivered	+511
Windfall allowance	An allowance of 450 per annum (2020-31 only)	-4,950
Allowance for houses lost through demolition / change of use / conversion	90 per annum, projecting forward the trend from the last five years (2014-31)	+1,440
Sub-total of land to be allocated in the Local Plan	Total derived from above rows	21,324

Table 5 - Housing requirement and sources of housing supply in the Local Plan

<u>Housing supply sources / allowances</u>	<u>Summary explanation</u>	<u>Number of dwellings</u>
<u>Housing requirement</u>	<u>Housing required over the plan period (1,730 x 18 years within the period 2013-31)</u>	<u>31,140</u>
<u>Allowance for homes lost through demolition / change of use / conversion</u>	<u>90 per annum (2017-2031), projecting forward the past trends</u>	<u>+ 1,260</u>

<p><u>10% lapse rate on planning permissions not allocated in the Local Plan</u></p>	<p><u>To provide contingency where some planning permissions may not be delivered</u></p>	<p><u>+ 467</u></p>
<p><u>Gross housing capacity required</u></p>	<p><u>Housing capacity required taking into account an allowance for losses and lapse rate on planning permissions.</u></p>	<p><u>32,867</u></p>
<p><u>Net housing completions (2013/14)</u></p>	<p><u>New homes built (net)</u></p>	<p><u>1,036</u></p>
<p><u>Net housing completions (2014/15)</u></p>	<p><u>New homes built (net)</u></p>	<p><u>666</u></p>
<p><u>Net housing completions (2015/16)</u></p>	<p><u>New homes built (net)</u></p>	<p><u>1,143</u></p>
<p><u>Net housing completions (2016/17)</u></p>	<p><u>New homes built (net)</u></p>	<p><u>983</u></p>
<p><u>Sites with planning permission at 01/04/2017 (that are not proposed as allocations in the Local Plan)</u></p>	<p><u>The total capacity of sites with planning permission is 8,410 homes but to avoid double counting with allocations, this table only shows those that are not also proposed as allocations in Local Plan.</u></p>	<p><u>4,671</u></p>
<p><u>Windfall allowance</u></p>	<p><u>An allowance of 450 per annum (2021-31 only)</u></p>	<p><u>4,500</u></p>

			<u>Total existing supply</u>	<u>Total existing supply including net completions (2013/14 – 2016/17), sites with planning permission which are not proposed Local Plan allocations and a windfall allowance.</u>	<u>12,999</u>
			<u>Capacity from allocations (taking account of completions to date)</u>	<u>Allocations capacity (20,067) minus completions on allocations to date (327) = 19,740</u>	<u>19,740</u>
			<u>Housing capacity in the Local Plan</u>	<u>'Total existing supply' plus 'Capacity from allocations (taking account of completions to date)'</u>	<u>32,739</u>

Table Modification SD1-MM40

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM40	Page 66	Paragraph 8.17	Delete and insert text: "The Local Plan sets out allocated sites for housing to meet the need for allocations (21,324). These sites <i>which</i> have been selected based on a site allocations methodology. Of the land selected for allocations, there are 2,024 <u>3,739</u> dwellings on these sites with planning permission so these are not included in the table above to avoid double counting. <i>There is a slight shortfall in overall housing supply for the full plan period (2013 – 2031) but the evidence demonstrates a five year supply of deliverable housing capacity to facilitate delivery early in the plan period. The council will monitor the effectiveness of the plan and if necessary the council will prepare delivery action plans or consider a plan review, however the housing supply figure</i>

				<i>includes a number of flexibility factors. The Local Plan also sets out a number of pro-active measures to help bring forward housing supply as set out in the Delivery and Implementation section below. "</i>
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Table Modification SD1-MM41

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM41	Page 67	Figure 7 Housing Trajectory	Delete Figure 7 Housing Trajectory and insert revised Figure 7

Housing Trajectory

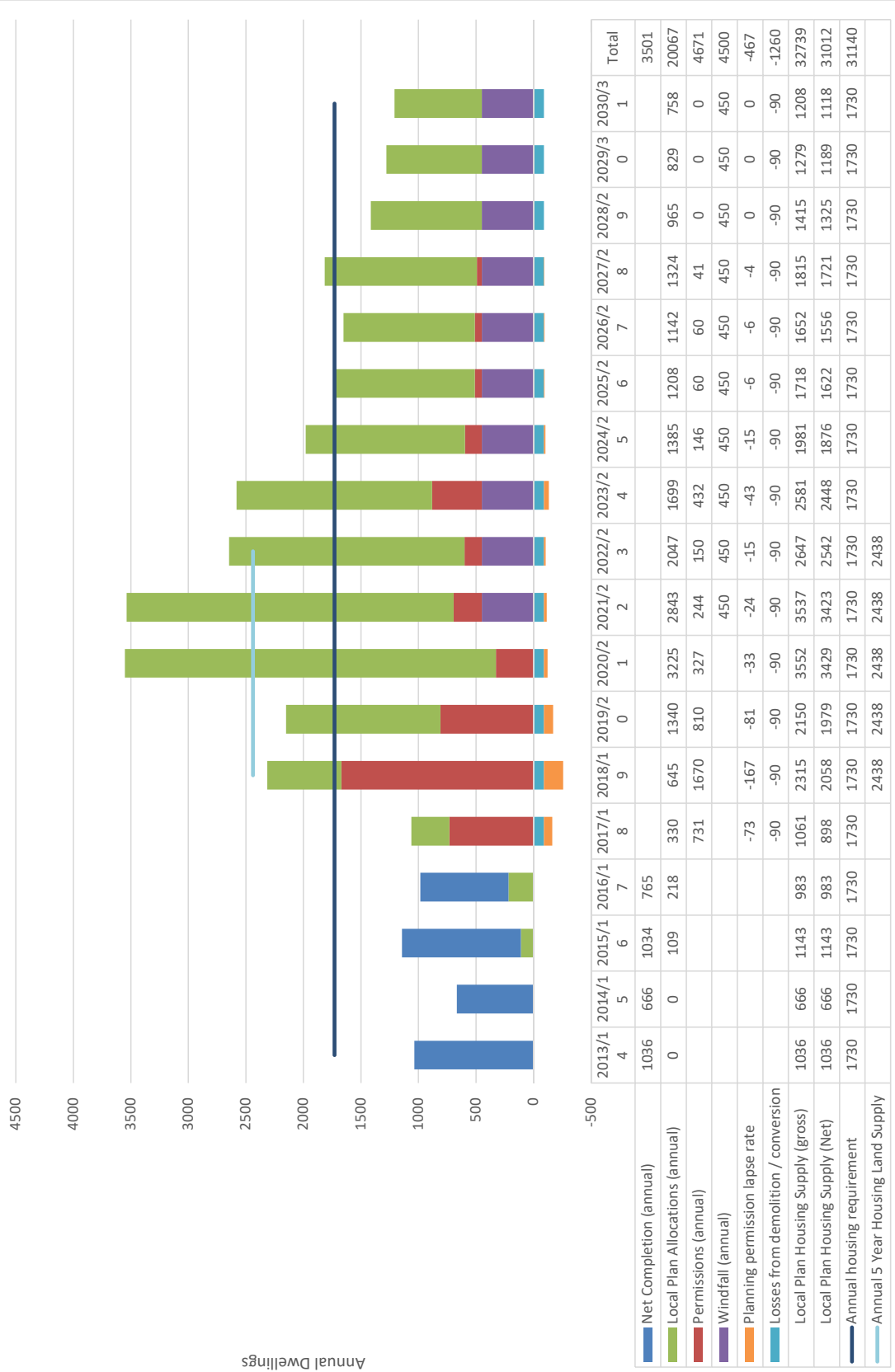


Table Modification SD1-MM42

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM42	Page 67	New paragraph after Figure 7	Insert text: <u>"The table below sets out the five year supply calculation including the five year requirement and the deliverable housing supply. The five year requirement is based on meeting the shortfall in housing completions since 2013 over the remainder of the plan period to 2031. The five year supply calculation is based on the period 2018/19 - 2022/23 and the housing supply reflects the phasing of sites set out in Appendix 3 of this document."</u>

Table Modification SD1-MM43

Modification Ref	Page	Policy/Para /Table/Box	Tracked change									
SD1-MM43	Page 67	New five year housing supply calculation table	Insert new Five Year Housing Supply Calculation table: <table border="1" data-bbox="938 226 1469 1420"> <thead> <tr> <th><u>Requirement</u></th> <th><u>Explanation</u></th> <th><u>Number of homes</u></th> </tr> </thead> <tbody> <tr> <td><u>Five year housing requirement</u></td> <td><u>Local Plan target of 1,730 per annum x 5</u></td> <td><u>8,650</u></td> </tr> <tr> <td><u>Shortfall</u></td> <td><u>Shortfall in completions since the start of the Local Plan period (2013/14 – 2017/18) (3,924) divided by the remainder of the plan period (13 years) then multiplied by 5</u></td> <td><u>1,509</u></td> </tr> </tbody> </table>	<u>Requirement</u>	<u>Explanation</u>	<u>Number of homes</u>	<u>Five year housing requirement</u>	<u>Local Plan target of 1,730 per annum x 5</u>	<u>8,650</u>	<u>Shortfall</u>	<u>Shortfall in completions since the start of the Local Plan period (2013/14 – 2017/18) (3,924) divided by the remainder of the plan period (13 years) then multiplied by 5</u>	<u>1,509</u>
<u>Requirement</u>	<u>Explanation</u>	<u>Number of homes</u>										
<u>Five year housing requirement</u>	<u>Local Plan target of 1,730 per annum x 5</u>	<u>8,650</u>										
<u>Shortfall</u>	<u>Shortfall in completions since the start of the Local Plan period (2013/14 – 2017/18) (3,924) divided by the remainder of the plan period (13 years) then multiplied by 5</u>	<u>1,509</u>										

<u>20% buffer</u>	<u>Additional 20% added to the housing requirement and shortfall</u>	<u>2,032</u>
<u>Total five year requirement</u>	<u>Taking into account the factors above</u>	<u>12,191</u>
<u>Planning permissions</u>	<u>Capacity expected to be delivered from planning permissions (not allocated within the Local Plan) within the five years from 2018/19 – 2022/23)</u>	<u>3,201</u>
<u>Local Plan Allocations</u>	<u>Expected delivery from Local Plan housing allocations (from the revised phasing table following the Stage 4 hearings)</u>	<u>10,100</u>
<u>Windfall allowance</u>	<u>2 years of windfalls capacity to reflect planning permissions granted which are not currently in the supply</u>	<u>900</u>
<u>Sub-total of deliverable housing capacity</u>		<u>14,201</u>
<u>Demolitions allowance</u>	<u>90 per annum (2018/19 – 2022/23), projecting forward the trend</u>	<u>-450</u>
<u>10% lapse rate</u>	<u>10% discount applied to planning permissions to recognise that some sites may not come forward as expected</u>	<u>-320</u>

			<u>Total deliverable housing capacity</u>	<u>Deliverable housing capacity minus demolitions and lapse rate</u>	<u>13,431</u>
			<u>Difference between requirement and supply</u>	<u>Total deliverable housing supply minus total five year requirement</u>	<u>1,240</u>
			<u>Supply of deliverable housing capacity</u>	<u>Years of deliverable housing supply compared to the total five year requirement</u>	<u>5.51</u>

Table Modification SD1-MM44

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM44	Page 68	Policy PLP11 (Paragraph 2)	Delete and insert text: "All proposals for housing must <u>aim to provide a broad mix (size and tenure)</u> of housing suitable for different household types which reflect changes in household composition in Kirklees in the types of dwelling they provide, taking into account the latest evidence of the need for different types of housing. This includes consideration of provision for those with specialist needs. For schemes of more than 10 dwellings or those of 0.4ha or greater in size, the housing mix should specifically reflect the proportions of households that require housing, <u>achieving and achieve</u> a mix of house size and tenure. This should include <u>The council encourages the inclusion of</u> appropriate design elements that ensure buildings are suitable or can be adapted to meet the needs of people needing specialist accommodation at present and into later life. The council will encourage proposals for custom/self-build homes where consistent with other policies in the Local Plan."

Table Modification SD1-MM45

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM45	Page 69	Policy PLP 11 (Paragraph 6)	Delete and insert text: "Exceptionally, planning permission may be granted for affordable homes in small freestanding settlements on land which would not normally be permitted for housing development, where there is otherwise little prospect of meeting robustly evidenced local needs particularly for housing to rent by people who work locally. <u>Where appropriate</u> , such schemes must include arrangements for the homes to remain affordable in perpetuity."

Table Modification SD1-MM46

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM46	Page 69	Paragraph 8.29	Delete text: "It is important to achieve a mix of housing in terms of size, type, tenure and suitability for specific groups of people to contribute to meeting local needs and contribute to sustainable development in accordance with national planning policy. The Kirklees Strategic Housing Market Assessment (SHMA) provides evidence to allow the Local Plan to set out policies to achieve an appropriate housing tenure and mix to meet needs within Kirklees. Other specialist evidence provided by partners will support the SHMA to ensure the development of schemes to meet needs."

Table Modification SD1-MM47

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM47	Page 69	Paragraph 8.30	Delete and insert text: "The SHMA sets out household needs and examines the current range of housing stock. The policy allows the provision of sufficient homes and land to ensure that the needs of different groups can be planned for, in accordance with national planning policy, including families with children, younger and older people, people with disabilities, service families, students and people wishing to build their own home. For schemes of more than 10 dwellings or those of 0.4ha or greater in size, the housing mix should <u>specifically</u> reflect the proportions of households that require housing. <u>achieving and achieve</u> a mix of house size and tenure as evidenced by information set out in the latest SHMA <u>or evidence of local need submitted through the planning applications process</u> . For smaller schemes, <u>where possible a broad mix</u> should still be achieved <u>taking account of the latest evidence of housing need</u> , but <u>specifically</u> reflecting needs may be difficult due to the size of sites."
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Table Modification SD1-MM48

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM48	Page 70	Paragraph 8.31	Delete and insert text. " <u>... Design advice and support will be provided for developers on the types of housing appropriate for inclusion in new developments but the design should ensure that Proposals will be assessed in relation to any prevailing design guidance at the time of a planning application. Applicants are encouraged to include appropriate design elements to ensure buildings are suitable or can be adapted to meet the needs of people needing specialist accommodation at present and into later life.</u> "

Table Modification SD1-MM49

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM49	Page 70	Paragraph 8.32	Insert and delete text: "In addition to the health and well-being of older residents, there is the need to consider the housing aspirations of families and younger people in terms of affordable housing and providing a mix of homes to allow them to access the housing ladder <u>and the range of housing tenures and sizes they will need during their lifetime</u> . There is also the need to provide for the care facilities of both adults and children with disabilities, those with long-term illnesses and residents with mental health issues. In line with national planning guidance, the council are <u>is</u> supportive of those wishing to build their own homes (known as "self-build" or "custom build") and proposals for starter homes where such proposals are consistent with national and Local Plan policies. The council have a self-build and custom build register on the Kirklees Council website where interest can be registered."
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Table Modification SD1-MM50

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM50	Page 71	Paragraph 8.38	Insert text: " ...Negotiation will take place on individual planning applications if viability information is provided to show that the level of affordable homes required cannot be delivered. <u>Where proposals include an element of affordable specialist housing (including Extra Care) in accordance with the affordable housing definition these could meet part of the affordable housing requirement.</u> "

Table Modification SD1-MM51

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM51	Page 71	Paragraph 8.41	<p>Delete and insert text: "In smaller free-standing settlements, well away from the larger urban areas, in exceptional circumstances it may be appropriate to accept schemes for affordable provision on land where development would not otherwise be permitted. The exceptional circumstances are where needs have been identified for people with jobs in those settlements, or with strong local connections, which have been difficult to satisfy through lack of development opportunities and may include starter homes. Such local need will need to be supported by robust evidence and may include parish assessments, settlement assessments or similar documents. It is anticipated that arrangements to secure affordability will normally be based on social rents as the principal tenure required to provide the best opportunities to satisfy needs and should, where appropriate, show that the homes will remain affordable in perpetuity."</p>
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Table Modification SD1-MM52

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM52	Page 72	New Affordable Housing Trajectory and introductory text after paragraph 8.44	<p>Insert text and new Affordable Housing Trajectory Figure: <u>"The affordable housing trajectory set out below shows the potential affordable housing delivery based on the overall housing trajectory set out in Figure 7 and takes into account affordable housing completions from 2013/14 to 2016/17."</u></p>

Affordable Housing Trajectory

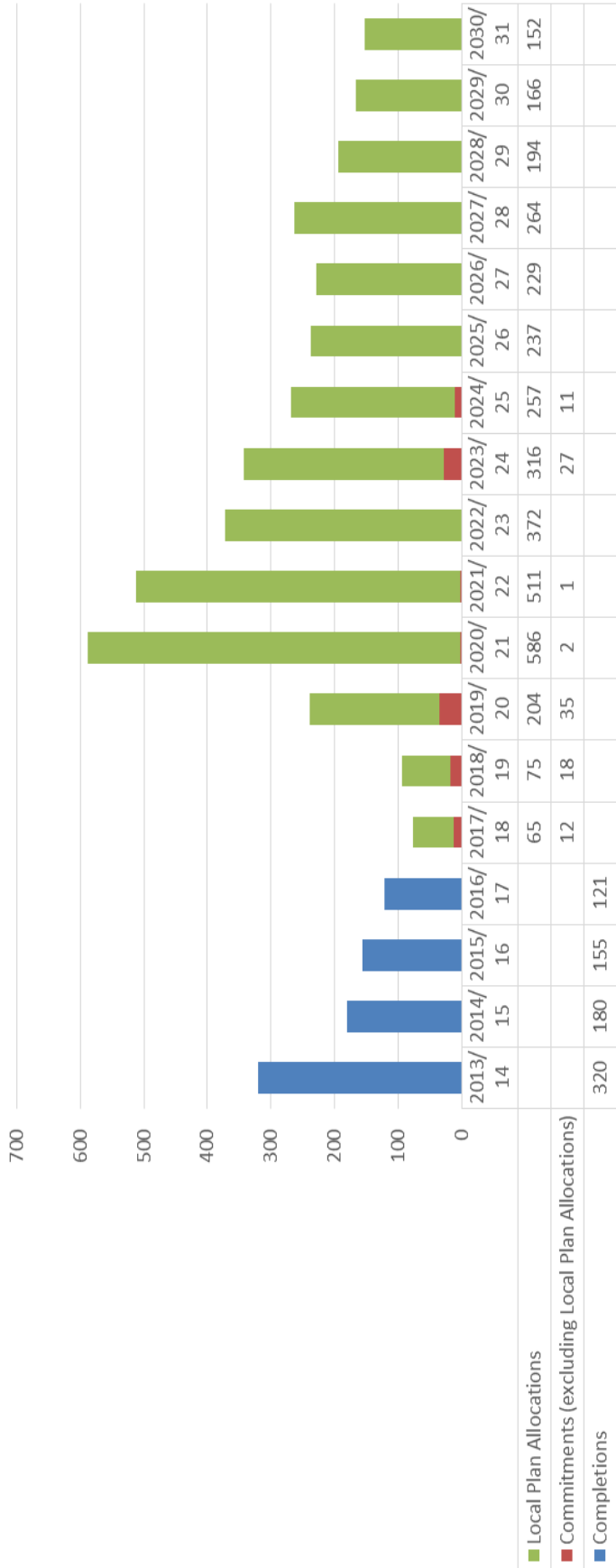


Table Modification SD1-MM53

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM53	Page 72	Policy PLP12	Insert text: "The Local Plan will seek to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople <u>set out in table 6</u> . The Local Plan will meet this by:"

Modification Ref	Page	Policy/Para /Table/Box	Tracked change																
SD1-MM54	Page 73	Paragraph 8.46 and Table 6 Gypsy and Travellers accommodation requirements	<p>Delete text:</p> <p>"...The assessment includes provision for people currently living in 'bricks and mortar (B&M)'; the table also includes a requirement figure if these people were excluded from the assessment.</p> <p>Delete and insert text in table 6 Gypsy and Travellers Accommodation Requirements:</p> <p>Table 6 Gypsy and Travellers accommodation requirements</p>																
<table border="1"> <thead> <tr> <th data-bbox="515 1126 655 1426">Requirement</th> <th data-bbox="515 759 655 1126">Gypsy and Travellers (Pitches)</th> <th data-bbox="515 430 655 759">Travelling Showperson (Plots)</th> <th data-bbox="515 241 655 430">Transit</th> </tr> </thead> <tbody> <tr> <td data-bbox="662 1126 794 1426">0-5 years</td> <td data-bbox="662 759 794 1126">10 (0 excluding B&M)</td> <td data-bbox="662 430 794 759">1</td> <td data-bbox="662 241 794 430">8</td> </tr> <tr> <td data-bbox="801 1126 933 1426">Years 6-15</td> <td data-bbox="801 759 933 1126">2</td> <td data-bbox="801 430 933 759">3</td> <td data-bbox="801 241 933 430">-</td> </tr> <tr> <td data-bbox="940 1126 1072 1426"><u>Total</u></td> <td data-bbox="940 759 1072 1126"><u>12</u></td> <td data-bbox="940 430 1072 759"><u>4</u></td> <td data-bbox="940 241 1072 430"><u>8</u></td> </tr> </tbody> </table>				Requirement	Gypsy and Travellers (Pitches)	Travelling Showperson (Plots)	Transit	0-5 years	10 (0 excluding B&M)	1	8	Years 6-15	2	3	-	<u>Total</u>	<u>12</u>	<u>4</u>	<u>8</u>
Requirement	Gypsy and Travellers (Pitches)	Travelling Showperson (Plots)	Transit																
0-5 years	10 (0 excluding B&M)	1	8																
Years 6-15	2	3	-																
<u>Total</u>	<u>12</u>	<u>4</u>	<u>8</u>																

9 Retailing and town centres

Table Modification SD1-MM55

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM55	Page 77	Policy PLP13	<p>Delete text:</p> <p>“B. Sequential Test - Proposals which come forward for main town centre uses, which are located outside of the defined centre boundaries, will require the submission of a Sequential Test. For retail proposals the boundary shall form the Primary Shopping Area; for all other main town centre uses this shall be the extent of the centre boundary. Main town centre uses shall be first located in the defined centres, then edge of centre locations, and only if there are no suitable sites shall out of centre locations be considered. For offices and small scale proposals in non-urban areas*, the sequential approach will not be required for proposals of 150 square metres and under. All proposals in out of centre locations shall demonstrate:</p> <ul style="list-style-type: none"> • the business model for the development and appropriate catchment that the business would seek to serve in accordance with the Shopping Centre Hierarchy Table shown above; • an extensive audit trail of any sequentially preferable sites that have been discounted and robust justification given; • any regeneration or economic benefits brought forward by the development; • appropriate access/improvements to access by all travel modes, in particular by public transport, safe and convenient pedestrian and cycling routes, and provision of an appropriate level of vehicular and cycle parking; and • connectivity to surrounding defined centres, and appropriate enhancements to these linkages. <p>The scope and content of any Sequential Test shall be agreed with the council and shall be reflective of the scale, role and function of the proposal. Proposals which fail to pass the sequential test will not be supported.”</p>

Table Modification SD1-MM56

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM56	Page 78	Paragraph 9.8	<p>Insert text: "...The policy ensures that a town centre first approach is taken for new main town centre uses. <u>There are some proposals for main town centre uses that have a locational requirement such as farm shops, leisure, culture and tourism development where the site is integral to the development. These are generally within the rural area. As set out in Local Plan Policy PLP 10, Supporting the Rural Economy paragraph 7.31 this locational requirement needs to be justified to pass the town centre sequential test.</u>"</p>

Table Modification SD1-MM57

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM57	Page 78	New paragraph between paragraph 9.8 and paragraph 9.9	<p>Insert text: <u>"Proposals for small scale local convenience shops (under 280 sq m) within residential areas which serve day to day needs and that do not have a defined local centre nearby are serving a local catchment and therefore are meeting local needs. As such these proposals will be supported."</u></p>

Table Modification SD1-MM58

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM58	Page 78	Paragraph 9.11	<p>Insert text:</p> <p><u>“When suitable sites are not available within defined centres, the policy sets out the requirements for the sequential approach to ensure that main town centre uses are located in appropriate locations across the district. The scope of the sequential test should be agreed with the council being reflective of the scale, role and function of the proposal, and will be expected to provide evidence on: the business model for the development and appropriate catchment that the business would seek to serve in accordance with the Shopping Centre Hierarchy Table, and an appropriate audit trail of any sequentially preferable sites that have been discounted with a robust justification. The local requirements for an impact assessment are defined, a tiered approach has been taken to ensure that an appropriate assessment is made in relation to the size of the development, and its distance from defined centres.”</u></p>
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Table Modification SD1-MM59

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM59	Page 78	New paragraph after 9.11	<p>Insert text:</p> <p><u>“The following site allocations Bradley (H1747), Chidswell (MX1905) and Dewsbury Riverside (H2089), propose a significant level of residential growth with the absence of an existing local centre nearby. In accordance with PLP13 (part a, paragraph 4) the creation of a new local centre commensurate with the scale of growth proposed will be supported, subject to the sequential test and impact assessment.”</u></p>

Table Modification SD1-MM60

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM60	Page 80	Policy PLP14	<p>Delete and insert text:</p> <p>Primary Shopping Frontages – frontages within the Primary Shopping Area in Principal and Town Centres that contain predominately retail uses and where further retail uses will be focused.</p> <p>Within the Primary Shopping Frontages as defined on the Town Centre Maps, at street level, proposals should seek to continue retail uses in order to retain vitality and viability within the Centre and the strong retail core. <u>Retail will remain the predominant use on each primary shopping frontage.</u> Other main town centre uses <u>may will</u> be acceptable, subject to an assessment of the following criteria: where the frontage remains predominately in retail use taking account of:</p> <p>a) the existing proportion of retail uses within the defined primary shopping frontage; the number, proximity, and distribution of uses other than retail and the level of vacancy of ground floor units, and the duration of vacancy; <u>Retail will remain the predominant use in terms of length of frontage and/or the number of units within Primary Shopping Frontages. Changes of use shall also take account of the location and prominence of the unit within the primary shopping frontages. Changes of use which detract from the primary shopping nature of the frontage will not be supported;</u></p> <p>b) <u>the location and prominence of the unit within the primary shopping frontage;</u></p> <p>b. c) the nature of the proposed use, including the associated level of activity, hours of operation whether a shop front would be incorporated and whether it would complement neighbouring uses; and</p> <p>e d) in all cases proposals including changes of use shall seek to either retain, enhance or replace to improve shop front design and layout."</p>
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Table Modification SD1-MM61

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM61	Page 80	Policy PLP14	Delete and insert text: "Within the Secondary Shopping Frontages as defined on the Town Centre Maps, at street level, proposals for retail and other main town centre uses will be acceptable provided they meet the following criteria <u>a. taking into account criteria b and c.</u> "

Table Modification SD1-MM62

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM62	Page 80	Paragraph 9.13	<p>Insert text:</p> <p>“Retail represents a key main town centre use, and such uses add to the vibrancy, vitality and viability of centres across the district. Retail uses can range from convenience store provision of varying scale, through larger national retail stores in the comparison goods sector found both in town centres such as Huddersfield, and out of centre retail parks. Such uses form principal reasons for people to visit centres of all sizes across the district to meet day to day requirements, but also make larger purchases and enjoy leisure time. <u>Retail uses for the application of this policy are defined as Use Class A1 only.</u>”</p>

Table Modification SD1-MM63

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM63	Page 81	Paragraph 9.16	<p>Delete and insert text:</p> <p><u>“Primary shopping frontages have been defined on the basis that a minimum 60% to 70% of each frontage will typically be in A1 retail use at ground floor level with rental levels and pedestrian flow also being key considerations. Therefore predominant retail use on a particular frontage is considered to be over 60% of units. The length of the frontage as shown on the Town Centre proposals map and the position of uses along it in relation to each other will also be considered to ensure there is no clustering or over dominance of non retail uses to maintain a strong retail core.</u></p> <p>The policy sets out <u>additional</u> criteria which can be used to assess proposals for non-retail uses in Primary Shopping Frontages on a case by case basis to <u>support active primary shopping frontages</u>. The policy provides for a degree of flexibility</p>

			depending on the success or otherwise of a particular centre, the desirability of a particular unit for a retail function, the scale of the unit, its position in the frontage, and how any proposed use would impact on the adjacent or neighbouring uses.”
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Table Modification SD1-MM64

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM64	Page 81	Paragraph 9.17	Delete and insert text: <u>“Secondary shopping frontages have been defined on the basis that at least 40% of each frontage will typically be in A1 retail use at ground floor level with rental levels and pedestrian flow also being key considerations. Therefore a dominance of non-retail uses is considered to be over 60% of units. The length of the frontage as shown on the Town Centre proposals map and the position of uses along it in relation to each other will also be considered to retain a mix of town centre uses.</u> A The policy for secondary frontages is included as these support <u>supports</u> the wider function of the Primary Shopping Area, but allows for a greater diversity of uses. The policy provides a more flexible approach to non-retail uses in these areas, but still ensures an appropriate assessment is carried out, and space for retail uses are provided in the area.”

Table Modification SD1-MM65

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM65	Page 81	New paragraph after 9.18	Insert text: <u>“Support for the retention of retail uses within Local Centres is set out in part a of local plan policy PLP 13. Proposals which would undermine the role and function of Local Centres to provide for top-up shopping and local services particularly food and drink will not be supported. Local Centres have a role in meeting day to day needs serving</u>

			<i>the local community. Local Plan Community Facilities and Services policy PLP 48 set out criteria for proposals that involve the loss of community facilities including shops which are also to be considered for proposals involving the loss of retail in Local Centres."</i>
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Table Modification SD1-MM66

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM66	Page 82	Policy PLP15 a.	Insert text: "Proposals for residential uses (including student accommodation) within the defined town centres as set out on the Policies Map will be supported subject to: a. the protection of primary shopping areas, primary and secondary shopping frontages, and space for other main town centre uses within the defined centre. Residential proposals in these areas shall <u>normally</u> only be permitted on upper floors, and shall not prejudice existing established uses;"

Table Modification SD1-MM67

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM67	Page 83	Paragraph 9.22	Delete and insert text: "The principle for the provision of residential accommodation in town centres is supported provided it does not lead to an adverse impact on the operation of the town's retail core, or would reduce space for other main town centre uses if outside of the primary shopping area. It is important that consideration is given to the loss of space for main town centres uses to ensure that centres across the district can meet the needs of the market, and that a scheme does not lead to a detrimental impact to adjacent established uses. <u>It is recognised that on some occasions there are instances when the nature of individual buildings and their position within the primary shopping</u>

			<p><u>area, means that their use for residential on the ground floor may be appropriate. This may be to facilitate access to the wider upper and lower floors of properties, including small entrances with limited active frontage. In addition there may be instances where consideration can be given to the viability of the redevelopment of older properties that are no longer suited to modern day business needs within the primary shopping area. However, it is acknowledged that there is a lot of space within existing centres which is underutilised; this can be because it is of an insufficient quality to meet the needs of the market.</u></p>
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Table Modification SD1-MM68

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM68	Page 84	Paragraph 9.26	<p>Insert text: "...This is required to prevent any harmful effects occurring to the operational vitality of these centres, adjacent uses, the health and wellbeing of the residents and prevent potential for anti-social behaviour. <u>Food and drink uses for the purpose of this policy are defined as Use Classes AA, A3, A4 and A5.</u>"</p>

Table Modification SD1-MM69

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM69	Page 84	Policy PLP16	<p>Delete and insert text:</p> <p>"Proposals for food and drink, licensed entertainment uses and associated proposals will be supported, provided they are located within a defined centre, and subject to:</p> <ul style="list-style-type: none"> • ensuring the concentration of food and drink and licensed entertainment uses are not located in a particular centre or part of a centre, where they would result in harm to the character, function, vitality and viability of the centre, either individually or cumulatively. <p>In order to assess the potential harm of food and drink and licensed entertainment proposals on a centre, the following criteria will be considered with a planning application:</p> <ul style="list-style-type: none"> a. the number, distribution and proximity of other food and drink uses, including those with unimplemented planning permission in a particular centre; b. the impacts of noise, general disturbance, fumes, smells, litter and late night activity, including those impacts arising from the use of external areas; b. c. the potential for anti-social behaviour to arise from the development, having regard to the effectiveness of available measures to manage potential harm through the use of planning conditions and/or obligations; e d. the availability of public transport, parking and servicing; d e. highway safety; e f. the provision of refuse storage and collection; and f g. the appearance of any associated extensions, flues and installations. <p>Proposals for food and drink uses and licensed entertainment uses located outside of defined centres <u>will be subject to criteria b to g set out above and</u> also require the submission of a Sequential Test and Impact Assessment."</p>
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Table Modification SD1-MM70

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
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SD1-MM70	Page 88	New paragraph after paragraph 9.38	Insert text: <u>"An AAP (Area Action Plan) for central Huddersfield will be produced which will set out a framework for promoting regeneration, place shaping and managing development within and around the edge of the Town Centre so that it can fulfil its role in providing shopping, leisure, residential and employment opportunities. "</u>
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Table Modification SD1-MM71

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM71	Page 91	New paragraph after paragraph 9.45	Insert text: <u>"An AAP (Area Action Plan) for central Dewsbury will be produced which will set out a framework for promoting regeneration, place shaping and managing development within and around the edge of the Town Centre so that it can fulfil its role in providing shopping, leisure, residential and employment opportunities. "</u>

10 Transport

Table Modification SD1-MM72

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM72	Page 104	Policy PLP20	<p>Delete and insert text:</p> <p>"Travel plans will <u>normally</u> be required for all major planning applications in accordance with current guidance and should set targets and monitoring arrangements to ensure sustainable travel patterns are maintained. Travel plans should include agreed and defined outcomes related to a package of specified measures to be implemented including an approach to lower carbon emissions where applicable.</p> <p><u>The requirement of a Travel Plan will also be considered on case by case basis where the proposed development falls below the major application category where it has the potential to generate significant transport movements and/or has insufficient off-street parking within the vicinity of a stressed part of the highway network"</u></p> <p>Proposals for new development shall be designed to encourage sustainable modes of travel and <u>demonstrate how links have been utilised to encourage connectivity.</u></p> <p><u>Proposals</u> will be required to facilitate the needs of the following user hierarchy:</p> <ul style="list-style-type: none"> a. pedestrians b. cyclists c. public transport d. private vehicles <p><u>For larger schemes, proposals will:</u></p> <ul style="list-style-type: none"> a. be supported by travel plans which encourage the use of public transport, cycling and walking, where appropriate; b. address how the hierarchy of users have been taken into account during the master planning/design process and how links have been utilised to encourage connectivity; c. provide full details of the design and levels of proposed parking provision. They should demonstrate how the design and amount of parking proposed is the most efficient use of land within the development as part of encouraging sustainable travel."

Table Modification SD1-MM73

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM73	Page 106/107	Policy PLP21	<p>Delete and insert text:</p> <p>"Proposals shall demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users.</p> <p>New development will not be permitted if it adds to highway safety problems or in the case of development which will generate a substantial amount of trip generation, cannot be adequately served by the existing local highway network.</p> <p><u>New development will normally be permitted where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of development are not severe.</u></p> <p>Proposals shall demonstrate adequate information and mitigation measures to avoid a detrimental impact on highway safety and the local highway network. Proposals shall also consider any impacts on the Strategic Road Network.</p> <p>All proposals shall:</p> <ol style="list-style-type: none"> a. ensure the safe and efficient flow of traffic within the development and on the surrounding highway network; b. in locations where development is otherwise considered acceptable <u>provide</u> new infrastructure or improvements on or off site may be required to ensure safe access from the highway network to the development site for pedestrians or disabled people, cyclists, public transport users, and private vehicles which will not materially add to highway safety problems or reduce the efficiency of the highway network; c. be accompanied by a supporting Transport Assessment or Transport Statement where the development would generate significant trip generation, providing detail as to the impact on highway safety, air quality, noise and light restrictions; d. take into account changes in site levels and topography to ensure the development can be accessed easily and safely by all sections of the community and by different modes of transport;

			<p>e. take into account the features of surrounding roads and footpaths and provide adequate layout and visibility to allow the development to be accessed safely;</p> <p>f. take into account access for emergency, service and refuse collection vehicles;</p> <p>g. have provision for electric vehicle-charging points within the site layout;</p> <p>h. provide on-site safe, secure and convenient cycle parking/storage facilities to encourage sustainable travel modes.”</p>
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Table Modification SD1-MM74

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM74	Page 109	Policy PLP22	<p>Insert text:</p> <p>“h. provision will be made to accommodate the needs of disabled people for the parking of vehicles. <u>All proposals shall provide full details of the design and levels of proposed parking provision. They should demonstrate how the design and amount of parking proposed is the most efficient use of land within the development as part of encouraging sustainable travel.</u>”</p>

Table Modification SD1-MM75

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM75	Page 111	Policy PLP23	<p>Insert text:</p> <p>“Proposals that may prejudice the function, continuity or implementation of the core walking and cycling network will not be permitted. <u>Existing public rights of way that form part of the core walking and cycling network or elsewhere will be protected and enhanced.</u>”</p>

11 Design

Table Modification SD1-MM76

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM76	Page 114	Policy PLP24	Insert text: “d. high levels of sustainability, to a <u>degree proportionate to the proposal</u> , through.”

Table Modification SD1-MM77

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM77	Page 114	Policy PLP 24	Delete and insert text: “d. iii) <u>considering the use of</u> innovative construction materials and techniques, including reclaimed and recycled materials”

Table Modification SD1-MM78

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM78	Page 115	Policy PLP 24	Delete and insert text: " d. iv) <u>where practicable</u> , minimising resource use in the building by orientating buildings to utilise passive solar design. <u>This includes encouraging the incorporation of</u> incorporating vegetation and tree planting to assist heating and cooling and <u>providing for</u> <u>considering</u> the use of renewable energy.”

Table Modification SD1-MM79

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM79	Page 115	Policy PLP 24	Delete and insert text: " d. v) <u>providing charging points to encourage</u> encouraging the use of electric and low emission vehicles by <u>providing charging points</u> ,"

Table Modification SD1-MM80

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM80	Page 115	Paragraph 11.4	Delete and insert text: " ...The urban areas of the district are surrounded by Green Belt, with principles set out in the national policy and in the local plan Green Belt policies <u>where national policy states that local planning authorities should plan positively to retain and enhance landscapes, visual amenity and biodiversity. Development in the Green Belt should wherever possible ensure the use of vernacular building styles and traditional materials and that surface and boundary treatments are sensitive to their setting. Native species should be used if any planting is required in order to mitigate the impact of development.</u> "

Table Modification SD1-MM81

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM81	Page 116	New paragraph between paragraphs 11.15 and 11.16	<p>Insert text: <u>Most of West Yorkshire benefits from very good air quality and, overall, air quality has improved relative to air pollution levels experienced by previous generations. However, traffic in our urban centres and on busy roads result in levels of air pollution which have a significant impact on the health of the population, with those having underlying health conditions being most at risk. There are two pollutants of greatest concern: nitrogen dioxide (NO2) and particulate matter (PMn), which have an adverse impact on health and are mainly caused by emissions from traffic, particularly exhaust emissions from older diesel vehicles. The West Yorkshire Low Emission Strategy focuses on reducing emissions from cars, by making it easier for people to switch to ultra-low emission alternatives, such as plug-in electric, hybrid and hydrogen fuel-cell power-trains and developing the necessary infrastructure to support this change by considering the role of Planning in the development of Local Plans and determining individual planning applications.</u></p>
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12 Climate change

Table Modification SD1-MM82

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM82	Page 121	Policy PLP26	Insert text: "Renewable and low carbon energy proposals (<u>excluding wind</u>) will be supported and planning permission granted where the following criteria are met: a. the proposal would not have <i>either individually or cumulatively</i> an unacceptable impact on landscape character and visual appearance of the local area, including the urban environment;"

Table Modification SD1-MM83

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM83	Page 121	Policy PLP26	Delete text: "Proposals for wind turbines must consider the Kirklees wind turbine landscape sensitivity maps which identify the suitability of different sizes of turbine across the district."

Table Modification SD1-MM84

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM84	Page 122	Paragraph 12.10	Delete text: "The council has commissioned evidence to assess the impact of the Local Plan upon landscape, including specific consideration of the impact of wind turbines. The South Pennines Wind Energy Landscape Study, Julie Martin Associates and LUG (October 2014) and Landscape Guidance for Wind Turbines up to 60m high in the South and West Pennines, Julie Martin Associates (January 2013) have been collaboratively commissioned by the South Pennines Wind Energy Group authorities (Kirklees, Calderdale, Barnsley, Rossendale, Burnley) to assess and understand the sensitivity of different landscapes to varying scales of wind turbine development. These assessments are based upon national landscape character areas and define local character areas and types using best practise and national landscape assessment guidance."
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Table Modification SD1-MM85

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM85	Page 122/123	Paragraph 12.11	Delete text: "The South Pennines Wind Energy Landscape Study includes landscape sensitivity maps. These maps identify levels of suitability based on landscape sensitivity in relation to 5 different height categories of turbine. These landscape sensitivity maps are included in the Local Plan and can be found in the Maps and Diagrams section of the document. The maps must be considered as part of any wind turbine proposal as they allocate varying levels of suitability across the district in relation to underlying landscape character and turbine height. The South Pennines Study also includes further detail and guidance about siting, layout, design and assessment of landscape, visual and cumulative impacts of wind turbines, and must also be considered."

Table Modification SD1-MM86

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM86	Page 123	Paragraph 12.12	Delete text: "The South Pennines Wind Energy Landscape Study also considers the cumulative impact of existing and consented wind turbines including cross border impacts. It is recognised that the study provides an assessment at a point in time. As part of the study commissioned by the South Pennines Wind Energy Group a live website has been created that monitors new wind turbine planning permissions and developments to understand the evolving cumulative impact. This web site must also be considered as part of any wind turbine proposal: http://www.tucmaps.co.uk/SPWED/mainmenu.html"

Table Modification SD1-MM87

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM87	Page 123	Paragraph 12.17	Delete and insert text: "Developments for wind turbines should be considered in accordance with the Written Ministerial Statement (WMS) dated 18th June 2015 (* footnote). In addition there are have national policy requirements and guidance relating to public consultation. There is a legal requirement to carry out pre-application consultation with the local community for planning applications for wind turbine development involving more than 2 turbines or where the hub height of any turbine exceeds 15 metres (39)." Insert new footnote: ** www.parliament.uk/documents/commons-vote-office/June%202015/18%20June%20June%20DCLG-Planning.pdf

Table Modification SD1-MM88

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM88	Page 124	Policy PLP27	Insert text: “Proposals for development <u>which require a Sequential Test in accordance with national planning guidance</u> will need to demonstrate that development has been directed to areas at the lowest probability of flooding, following a sequential risk based approach.”

Table Modification SD1-MM89

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM89	Page 125	Paragraph 12.20	Insert text: “As a consequence of climate change, it is predicted that the risk of flooding will increase. As such, the council will apply a sequential approach to the location of development <u>in accordance with national planning guidance</u> to avoid, where possible, flood risk to people and property. <u>Local Plan allocations were subject to a flood risk sequential test during the plan preparation process so proposals in accordance with the allocated land use would not require a further sequential test during the plan period.</u> The Kirklees district should be the starting point for the sequential test search area although smaller areas of search may be justified in certain circumstances. It is the responsibility of the applicant to provide evidence where a smaller area of search is proposed.”

13 Natural Environment

Table Modification SD1-MM90

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM90	Page 133	Policy PLP30	Delete and insert text: "Local Designated Sites and Important Local Ecological Features Proposals having a direct or indirect adverse effect on a Local Wildlife Site or Local Geological Site, Ancient Woodland, Veteran Tree or other important tree, will not be permitted unless <u>the benefits of</u> the development can be <u>clearly shown to be of an overriding public interest to outweigh the need to safeguard the local conservation value of the site or feature</u> and there is no alternative means to deliver the proposal. In all cases, full compensatory measures would be required and secured in the long term."

Table Modification SD1-MM91

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM91	Page 133	Policy PLP30	Delete and insert text: "Biodiversity and Development Development proposals will be required to:- (i) <u>avoid result in no</u> significant loss or harm to biodiversity in Kirklees through <u>protection avoidance, adequate mitigation and or, as a last resort, compensatory</u> measures secured through the establishment of a legally binding agreement;"

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM92	Page 134	Paragraph 13.10	<p>Delete and insert text:</p> <p>"The Council has undertaken a Habitats Regulations Assessment (HRA) of the local plan. Within this, consideration was given to the potential for adverse effects on the integrity of the Special Protection Area through the loss of any functionally connected land within 2.5km of its boundary, and a conclusion reached that adverse effects on integrity from the local plan would not occur. However, as a precautionary approach and to allow for potential changes in habitat over time or use of land by the SPA birds, the site allocation box for sites within 2.5km of the boundary of the SPA indicates if additional evidence at the time of a planning application may be required to determine if there is any potential for adverse effects on the integrity of the SPA as a result of the development proposed. These issues alongside DEFRA's 'Impact Risk Zones' should be considered when submitting any planning application that falls within the remit of the Habitats and Species Regulations 2010 (as amended).</p> <p><u>In accordance with the findings of the Habitats Regulations Assessment, for those development allocations within 2.5km of the SPA, further surveys will be required at planning application stage to assess detailed impacts on SPA birds and, if found to be necessary, appropriate avoidance and/or mitigation measures will be required to address any identified impacts in line with policy PLP30. Suitable avoidance and mitigation measures may include:</u></p> <ul style="list-style-type: none"> • <u>Avoidance of areas used by significant numbers of SPA birds (to be determined by a project level Habitats Regulations Assessment).</u> • <u>Provision of equivalent or greater quantity and quality of replacement habitat onsite (or as a last resort off site within 2.5km) with improved management to ensure use by SPA birds.</u> • <u>Timing of works (construction, operation and decommissioning) outside the period most frequently used by SPA birds.</u> • <u>Monitoring of impacts to assess bird use over time."</u>

Table Modification SD1-MM93

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM93	Page 141	Policy PLP34	<p>Delete and insert text: "Proposals will be supported which <u>must</u>:</p> <p>1. Do not result in the <u>Ensure no</u> deterioration of water courses or water bodies (including groundwater) and by conserve conserving and, enhance where practicable, enhancing:</p> <p>a. the natural geomorphology of watercourses, including reinstating watercourses to their natural state through removal of modifications resulting from past industrial uses;</p> <p>b. water quality; and</p> <p>c. the ecological value of the water environment, including the functionality of habitat networks.</p> <p>3. 2. Ensure Source Protection Zones are protected from contamination as a result of the proposal in line with national guidance.</p> <p>6. 3. Dispose of surface water appropriately (in accordance with the Local Plan drainage policy) adhering to the following networks in order of preference:</p> <p>a. to an infiltration based system wherever possible (such as soakaways);</p> <p>b. discharge into a watercourse with the prior approval of the landowner, navigation authority or Environment Agency, where applicable. To comply with part a <u>1 of this policy</u> this must be following treatment where necessary or where no treatment is required, to prevent pollution of the receiving watercourse;</p> <p>c. discharge to a public sewer.</p> <p><u>Proposals are encouraged to:</u></p> <p>2. 4. Make positive progress towards achieving 'good status or potential' under the Water Framework Directive in surface and groundwater bodies.</p>

			<p>4. <u>5.</u> Manage water demand and improve water efficiency through appropriate water conservation techniques including rainwater harvesting and greywater recycling as well as considering water availability from surface water and groundwater sources.</p> <p>5. <u>6.</u> Improve water quality through the incorporation of appropriately constructed and maintained Sustainable Drainage Systems and surface water management techniques taking into account the sensitivity of groundwater."</p>
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Table Modification SD1-MM94

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM94	Page 142	Paragraph 13.43	Delete and insert text: "To conserve and enhance <u>natural</u> watercourses <u>and water bodies</u> in Kirklees, proposals will be supported which do <u>must</u> not result in their deterioration <u>and where practicable should include measures to improve water quality especially in areas which are not currently</u> and which make positive progress towards achieving 'good status or potential' under the Water Framework Directive. In Kirklees, modification of watercourses has occurred to facilitate past industrial uses. Where these modifications are now redundant and where flood risk would not be increased as a result, consideration should be given to their removal to facilitate improvements in biodiversity and water quality <u>in accordance with PLP 27</u> . The role of tree planting in appropriate locations within the catchment should be considered in meeting the aims of improving water quality."

Table Modification SD1-MM95

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM95	Page 142	Paragraph 13.44	<p>Delete and insert text:</p> <p><u>"It is important to consider the sensitivity of groundwater to potential pollution resulting from development proposals and their associated drainage solutions. Contamination of groundwater can impact the quality of drinking water supplies and can also have a detrimental impact on the quality of surface water bodies. It is therefore important to protect groundwater from potential contamination resulting from development in order to protect both drinking water supplies and surface water bodies. It is also important to protect the sources of drinking water from potential contamination resulting from development. The Environment Agency have <u>has</u> published Source Protection Zones which seek to protect abstractions used for providing the drinking water supply. Within Kirklees, there are a number of Source Protection Zones, mostly in the south of the district. Generally, the closer an activity is to the Source Protection Zone, the greater the risk of contamination. It is therefore important that Source Protection Zones are protected from contamination as a result of the proposals in line with national guidance to ensure the continuing protection of the water supply in these zones."</u></p>
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14 Historic environment

Table Modification SD1-MM96

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM96	Page 144	Policy PLP35	<p>Delete and insert text:</p> <p>"1. Development proposals affecting a designated heritage asset (or an archaeological site of national importance) should <u>conserve those elements which contribute to its significance preserve or enhance the significance of the asset.</u> Harm to such elements will be permitted only where this is outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset (or an archaeological site of national importance) will be permitted only in exceptional circumstances: <u>In cases likely to result in substantial harm or loss, development will only be permitted where it can be demonstrated that the proposals would bring substantial public benefits that clearly outweigh the harm, or all of the following are met:</u></p> <ul style="list-style-type: none"> • <u>the nature of the heritage asset prevents all reasonable uses of the site;</u> • <u>no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;</u> • <u>conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and</u> • <u>the harm or loss is outweighed by the benefit of bringing the site back into use.</u> <p>2. Development proposals affecting archaeological sites of less than national importance should conserve those elements which contribute to their significance in line with the importance of the remains: <u>Proposals which would remove, harm or undermine the significance of a non-designated heritage asset, or its contribution to the character of a place will be permitted only where benefits of the development outweigh the harm having regard to the scale of the harm and the significance of the heritage asset.</u> In those <u>the</u> cases where <u>of</u> developments affecting such <u>archaeological sites of less than national importance where development affecting such sites</u> is acceptable in principle, mitigation of damage will be ensured through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified,</p>

the developer will be required to make adequate provision for excavation and recording before or during development. ~~Proposals which would remove, harm or undermine the significance of a non-designated heritage asset, or its contribution to the character of a place are permitted only where the public benefits of the development would outweigh their harm.~~

3. Proposals should retain those elements of the historic environment which contribute to the distinct identity of the Kirklees area and ensure they are appropriately conserved, to the extent warranted by their significance, also having regard to the wider benefits of development. Consideration should be given to the need to:

- a. ensure that proposals maintain and reinforce local distinctiveness and conserve the significance of designated and non-designated heritage assets;
- b. ensure that proposals within Conservation Areas conserve those elements which ~~have been identified as contributing~~ contribute to their significance ~~in the relevant Conservation Area Appraisals~~;
- c. secure a sustainable future for heritage assets at risk and those associated with the local textile industry, historic farm buildings, places of worship and civic and institutional buildings constructed on the back of the wealth created by the textile industry as expressions of local civic pride and identity;
- d. identify opportunities, including use of new technologies, to mitigate, and adapt to, the effects of climate change in ways that do not harm the significance of heritage assets and, where conflict is unavoidable, to balance the public benefit of climate change mitigation measures with the harm caused to the heritage assets' significance;
- e. accommodate innovative design where this does not prejudice the significance of heritage assets;
- f. preserve the setting of Castle Hill where appropriate and proposals which detrimentally impact on the setting of Castle Hill will not be permitted."

Table Modification SD1-MM97

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM97	Page 147	Paragraph 14.15	<p>Insert text: "Change needs to be managed on the basis of a clear understanding of the significance of heritage assets and their wider context. Developers will be expected to demonstrate that they understand and have given due consideration to heritage significance when formulating proposals. <u>A number of Kirklees' Conservation Areas have Conservation Area Appraisals which identify those elements which are considered to contribute to their special architectural or historic interest.</u> The council will make information on the significance of heritage assets available through the Historic Environment Record which is held and managed by the West Yorkshire Archaeology Advisory Service. This provides detailed evidence of the heritage assets of the district and will be supplemented by further historic landscape characterisation studies being undertaken by Historic England and the West Yorkshire Archaeology Advisory Service."</p>
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15 Minerals

Table Modification SD1-MM98

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM98	Page 151	Policy PLP36	<p>Insert text: "Proposals to explore for, or extract minerals, including from former waste deposits will be permitted provided that they will not:</p> <p>a. cause unacceptable detriment to <u>the</u> landscape <u>including its character</u> or local visual amenity during or subsequent to extraction;"</p>

Table Modification SD1-MM99

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM99	Page 151	Policy PLP36	<p>Insert text: "Proposals to extract minerals should be accompanied by sufficient information to demonstrate that such unacceptable impacts would not occur, or could be satisfactorily controlled, and to demonstrate the presence of <u>and need for</u> the mineral."</p>

Table Modification SD1-MM100

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM100	Page 153	Policy PLP37	<p>Insert text: "Part 1 Mineral working will be permitted only where the council is satisfied that the site can be restored and managed to a high standard, the proposed restoration is sympathetic to the character and setting of the wider area and is capable of sustaining an appropriate after-use. Restoration proposals for mineral workings should be designed to:"</p> <p>"c. ensure that restoration and aftercare is appropriate with regard to the characteristics of the site's surroundings, <u>including landscape character</u>:"</p> <p>"Part 2 Mineral working will be permitted only where the proposed site restoration delivers benefits such as enhancement of biodiversity interests, improved public access and the provision of climate change mitigation. Restoration proposals should therefore include:"</p>
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Table Modification SD1-MM101

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM101	Page 158	Policy PLP41	<p>Insert text: "b. any adverse impacts can be avoided or mitigated to the satisfaction of the Mineral Planning Authority, with safeguards to protect <u>highway</u>, environmental and amenity interests put in place as necessary;"</p>

16 Waste

Table Modification SD1-MM102

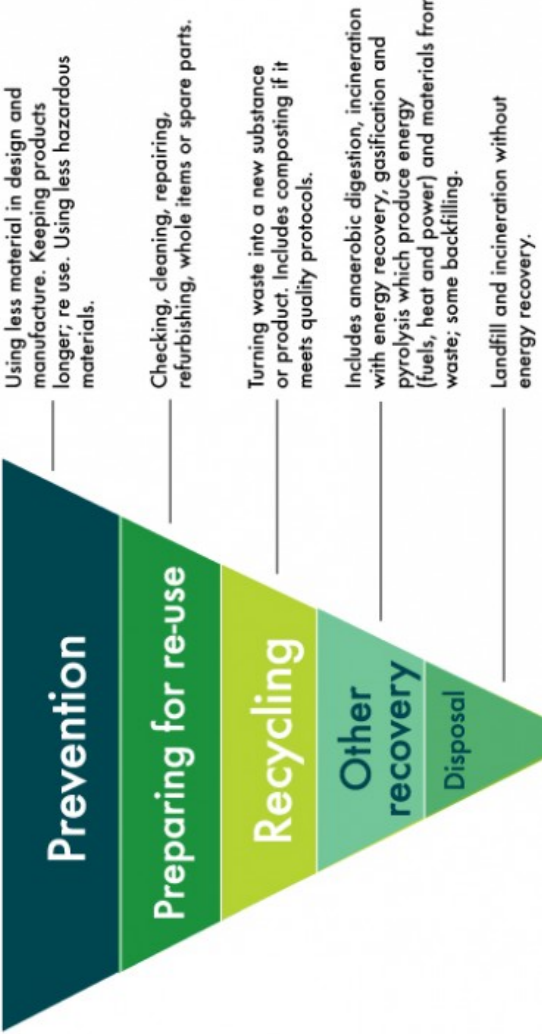
Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM102	Page 161	Figure 8 Waste Hierarchy	<p>Delete Figure 8 and insert revised Figure 8.</p> <p><u>Figure 8 Waste Hierarchy</u></p>  <p>The diagram is a pyramid divided into five horizontal sections, each with a label and a description to its right:</p> <ul style="list-style-type: none"> Prevention: Using less material in design and manufacture. Keeping products longer; re use. Using less hazardous materials. Preparing for re-use: Checking, cleaning, repairing, refurbishing, whole items or spare parts. Recycling: Turning waste into a new substance or product. Includes composting if it meets quality protocols. Other recovery: Includes anaerobic digestion, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat and power) and materials from waste; some backfilling. Disposal: Landfill and incineration without energy recovery.

Table Modification SD1-MM103

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM103	Page 162	New text inserted between paragraph 16.7 and Section 16.1 Waste Management Hierarchy	<p>Insert text: <u>16.8 The WNA has identified the following requirements for Kirklees over the plan period.</u></p> <p><u>Provision for Kirklees Waste to 2031</u></p> <p><u>16.9 The chosen approach to future waste management in Kirklees is to reduce waste exports by identifying land for facilities to manage the equivalent of all Local Authority Collected Waste, Commercial and Industrial and Construction and Demolition waste generated in Kirklees, while recognising that some imports and exports will continue (net self-sufficiency). The Local Plan will seek to move waste up the waste hierarchy by diverting as much waste as possible away from disposal to landfill by identifying land suitable for recycling and recovery facilities.</u></p> <p><u>16.10 The waste management needs in Kirklees to 2031 can be summarised as follows. full details of requirements can be found in the Waste Needs Assessment 2016 (a breakdown is provided in Appendix 4):</u></p> <p><u>Local Authority Collected Waste (LACW)</u></p> <p><u>16.11 Kirklees have an existing waste management contract in place with Suez which includes the following:</u></p> <ul style="list-style-type: none"> • <u>processing of LACW through the existing Energy Recovery Facility in Huddersfield</u> • <u>Management of waste from 5 Household Waste Recycling Centres; and</u> • <u>Recycling of the co-mingled recyclables from households.</u> <p><u>16.12 The contract is in place until 2028 with the potential for a 5 year extension which would cover the requirements until the end of the plan period. If the extension beyond 2028 is not achieved, then Kirklees will have a capacity gap of around 27,000 tonnes for EfW. Should this situation arise then Kirklees could rely on external capacity within the wider region during the plan period.</u></p>
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16.13 Kirklees does not have sufficient facilities for the recycling of LACW and there is a requirement for additional recycling capacity throughout the plan period.

16.14 Kirklees has limited non-hazardous landfill capacity which is insufficient throughout the plan period. It is likely that export to neighbouring areas, and therefore reliance on the wider regional capacity, will continue throughout the plan period.

Commercial and Industrial Waste

16.15 There is insufficient capacity locally for recycling and landfilling of C&I waste throughout the plan period. The WNA identifies the need for additional recycling capacity but recognises that landfill will be met through export to neighbouring areas.

16.16 There is a small requirement for EfW, but not sufficient to warrant the development of a facility to make it economical for Kirklees waste alone.

16.17 There is a surplus in capacity of treatment facilities for C&I and CD&E waste throughout the plan period. There is also surplus capacity at transfer stations throughout the plan period. Although not classed as recycling facilities, some transfer stations do undertake this role and may aid in providing local recycling capacity during the plan period.

Construction, demolition and excavation waste (CD&E)

16.18 Kirklees has sufficient capacity for landfill of CD&E waste and currently imports a significant amount of this waste for management within Kirklees.

16.19 There is a requirement for recycling facilities for CD&E waste. However, to counteract this there is surplus capacity for land recovery and treatment facilities. The latter is also available for the management of C&I waste.

16.20 There is also surplus capacity at transfer stations throughout the plan period. Although not classed as recycling facilities, some transfer stations do undertake this role and may aid in providing local recycling capacity during the plan period.

Agricultural Waste

16.21 The small amount of agricultural waste generated in Kirklees is not expected to increase over the plan period and there is no requirement to plan for additional facilities to manage this waste stream.

Low Level Radioactive Waste (LLW)

16.22 Kirklees contains a single location generating a very small amount of low-level radioactive waste, the nature of which means it can be disposed via the foul sewer network with other wastes. Therefore there is no need for specialised local management capacity.

Waste Water

16.23 Yorkshire Water has advised the Council that additional capacity is likely to be needed at two plants within the Borough. The timescale for improvement has not been established yet and will be identified through ongoing dialogue with the company.

Land Requirement

16.24 Using indicative information on facility sites across West Yorkshire, it is estimated that to meet the requirements for built facilities across the plan period, a maximum of 10ha of land will be required for the provision of new waste management infrastructure. It is assumed that due to economies of scale it is unlikely that a hazardous waste recycling/treatment facility will be required for Kirklees based on existing capacity within the Region, however should a facility be required this would need up to 2 Ha of land.

16.25 It is important to note that a number of transfer stations also undertake recycling as part of their operations, but due the way their status is recorded in the Environment Agency's Waste Data Interrogator it is not possible to distinguish which sites provide this without more detailed analysis. In addition, some facilities classed as treatment may also provide recycling capacity. As such it is important to keep the requirements under review throughout the plan period as this indicative requirement could change if further information on recycling capacity of existing sites can be shown to provide capacity for Kirklees.

Table Modification SD1-MM104

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM104	Page 165	Paragraph 16.16	<p>Insert text:</p> <p><u>"It is therefore essential that existing waste management facilities and associated infrastructure in the district are safeguarded. For the purposes of the policy waste management facilities are safeguarded during their operational period, subject to their decommissioning and revocation of any associated waste licenses the facilities would no longer be subject to the protection under this policy unless an equivalent replacement facility was provided."</u></p>

Table Modification SD1-MM105

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM105	Page 165	New paragraph after paragraph 16.16	<p>Insert text:</p> <p><u>"The council recognise that farm holdings may include facilities associated with the processing of waste, such as anaerobic digestion, these facilities have the potential to play an important role in meeting the waste needs of the district. Facilities such as these have not been identified on the proposals map, however the role that these facilities play in continuing to process waste material will be monitored."</u></p>

17 Health and supporting communities

Table Modification SD1-MM106

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM106	Page 169	Policy PLP48	<p>Delete and insert text:</p> <p>"Proposals which involve the loss of valued community facilities such as shops, public houses and other facilities of value to the local community will only be permitted where it can be demonstrated that:</p> <ul style="list-style-type: none"> a. there is no longer a need for the facility <u>and all options including the scope for alternative community uses has been considered</u>; or b. its current use is no longer viable; or c. there is adequate alternative provision in the locality to serve the local community which is an equally accessible location; or d. an alternative facility of equivalent or better standard will be provided, either on-site or equally accessible; <u>and</u> e. <u>any assets listed on a Community Asset Register have satisfied the requirements under the relevant legislation.</u> <p>In all instances, the following must be demonstrated that:</p> <ul style="list-style-type: none"> a) all options for their continuance have been explored, including any scope for alternative community uses; and b) any assets listed on a Community Asset Register have satisfied the requirements under this obligation."

Table Modification SD1-MM107

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM107	Page 170	Paragraph 17.13	<p>Insert text: "NPPF promotes the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports-venues, cultural buildings, public houses and places of worship as part of planning for prosperity. For the local plan, community facilities and services are also considered to include uses associated with statutory undertakers and emergency services, indoor recreation <u>servicing a local-catchment area (especially dual use) and welfare. Local centres have services that meet day to day needs as defined in the shopping centre hierarchy set out in PLP 13. Proposals that would result in the loss of a facility which would undermine the role and function of a centre would not be supported. The protection and enhancement of sport and leisure facilities is dealt with under Policy PLP50 Sport and physical activity and the protection of urban green space under Policy PLP61."</u></p>
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Table Modification SD1-MM108

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM108	Page 173	Policy PLP50	<p>Insert text: "The council will seek to protect, enhance and support new and <u>existing open spaces, outdoor and indoor sport and leisure facilities</u> where appropriate, encouraging everyone in Kirklees to be as physically active as possible and promoting a healthier lifestyle for all."</p>

Table Modification SD1-MM109

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM109	Page 173	Policy PLP50	Insert text: "Sport and leisure facilities will be protected where they are needed to meet current and future demands. The loss of <u>open space</u> , sport and leisure facilities will only be allowed where:-"
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Table Modification SD1-MM110

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM110	Page 173	Policy PLP50 b	Insert text: "b. equivalent or better replacement facilities <i>in terms of quantity and quality</i> are provided to compensate for those lost as a result of the development and these are within an easily accessible location for existing and potential new users; or

Table Modification SD1-MM111

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM111	Page 173	Paragraph 17.28	Insert text: "Good quality <u>open spaces</u> , outdoor and indoor sport and leisure facilities provide important opportunities for everyone in Kirklees to access and enjoy the benefits of being as physically active as possible. Encouraging healthy lifestyles and increasing participation in sport and physical activity active leads to significant gains in physical and mental health well-being. <u>The aim of Policy PLP50 is to safeguard existing and support new open spaces, outdoor and indoor sport and recreation opportunities wherever they are located, including within the green belt. Those within the urban areas which form valuable open spaces are also protected as urban green spaces under policy PLP61.</u> "

Table Modification SD1-MM112

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM112	Page 174	Paragraph 17.33	Insert text: "...Proposals that include replacement sport and leisure facilities will be allowed where equivalent or better compensatory provision <i>in terms of quantity and quality</i> can be provided in a location that is easily accessible to existing and potential new users."

18 Environmental protection

Table Modification SD1-MM113

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM113	Page 176	Policy PLP51	Delete and insert text: "1. Development will be expected to demonstrate that it is not likely to result, directly or indirectly, in an increase in air pollution which would <u>have an unacceptable impact on unacceptably affect or cause a nuisance</u> to the natural and built environment or to people. 2. Proposals that have the potential to increase local air pollution either individually or cumulatively must be accompanied by evidence to show that the impact of the development has been assessed in accordance with the relevant guidance. Development which has the potential to cause levels of local air pollution to increase, <u>to unsafe levels</u> must incorporate sustainable mitigation measures that reduce <u>the level</u> of this impact. <u>to a safe level</u> . If sustainable measures cannot be introduced the development will not be permitted."

Table Modification SD1-MM114

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM114	Page 177	Paragraph 18.6	Delete and insert text: " <u>The West Yorkshire Low Emissions Strategy (WYLES) has been developed through collaboration between the West Yorkshire local authorities (Bradford MDC, Calderdale MBC, Kirklees MDC, Leeds CC and Wakefield MDC); West Yorkshire Combined Authority (WYCA) and Public Health England (PHE), with each organisation having an input and contributing to the content of the Strategy. The five local authorities in West Yorkshire have been working towards a single Low Emission Strategy for West Yorkshire. The Strategy outlines what the key challenges are in relation to air quality</u>

within West Yorkshire and how, together, we can deliver cleaner air for all to create a healthier place for people to live, work and visit. It considers a number of areas such as economic and transport plans, changes in energy production and use, land-use planning, supporting walking and cycling and tackling transport emissions. looks at a number of areas such as buses, taxis, procurement, freight operations and it has produced a planning guidance document: Technical guidance has been produced. Air Quality and Emissions Technical Planning Guidance, this document forms part of the overarching WYLES with a vision of “Delivering Cleaner Air for all in West Yorkshire”. This guidance is aimed at helping planning authorities’ deliver National Air Quality Objectives (NAQO) through cost effective service planning brought about by joint working and individual policies set out in each authority’s Local Plan. aims to achieve consistency across West Yorkshire when responding to planning consultations in relation to air quality. It looks to promote sustainable development by introducing the concept of developers monetising the damage caused from their developments to local air quality and to spend the equivalent sums on mitigation measures to improve air quality, thus making the development more sustainable: This Technical Guidance sets out a three stage Air Quality and Emissions Mitigation Assessment Process which should be used when preparing evidence in respect of Policy PLP 51.”

19 Green belt and open space

19 Green belt and open space

Table Modification SD1-MM115

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM115	Page 184	Policy PLP54	Delete and insert text: "Proposals for new buildings for agriculture and forestry will normally be acceptable, provided that: a. the building is genuinely required for the purposes of agriculture or forestry; b. the building can be sited in close association with other existing agricultural buildings, subject to the operational requirements of the holding it is intended to serve. Isolated new buildings will only be accepted exceptionally where there are clear and demonstrable reasons for an isolated location; c. there will be no detriment to the amenity of nearby residents by reason of noise or odour or any other reason; and d. the resultant development is of a standard of design and materials appropriate to its green-belt setting <u>the design and materials should have regard to relevant design policies to ensure that the resultant development does not materially detract from its green belt setting.</u> "

Table Modification SD1-MM116

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM116	Page 185	Paragraph 19.12	Insert text: <u>"Development in the Green Belt should be appropriate to its setting and should wherever possible reflect vernacular building styles and materials, with sensitive boundary and surface treatments and native planting where necessary. Where modern agricultural or forestry buildings are proposed, these can still be carefully sited and</u>

				<p><u>designed so as not to be discordant with their setting or intrusive in the landscape.</u> Wherever possible and in accordance with core planning principles the reuse of existing buildings will be preferable to the erection of new ones."</p>
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Table Modification SD1-MM117

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM117	Page 187/188	Policy PLP56	<p>Delete and insert text: "In the green belt proposals for new buildings or structures <u>appropriate facilities</u> associated with outdoor sport, outdoor recreation or cemeteries will normally be acceptable provided that as long as the openness of the Green Belt is preserved and there is no conflict with the purposes of including land within it. Proposals should ensure that: a. the scale of the building <u>facility</u> is no more than is evidently <u>reasonably</u> required for the proper functioning of the enterprise or the use of the land to which it is associated; b. the building <u>facility</u> is unobtrusively located and designed so as not to introduce a prominent urban element into a countryside location, including the impact of any new or improved access and car parking areas; c. in the case of all-weather riding arenas or other facilities for the exercising of horses, the degree of engineering operation required and the resultant re-grading of land, including any earth mounding and retaining structures, does not result in incongruous or discordant landform out of character with its setting that cannot be mitigated through the use of appropriate hard and soft landscape techniques."</p>

Table Modification SD1-MM118

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

19 Green belt and open space

SD1-MM118	Page 188	Paragraph 19.20	<p>Delete and insert text:</p> <p>"There are many existing sport and recreation facilities in the green belt, including stables, football pitches, golf courses, cricket grounds etc. The green belt in Kirklees also contains a number of cemeteries. For their continued proper functioning the need for new associated buildings <i>and other appropriate facilities</i> occasionally arises. As the principal objective of green belt policy is to maintain an open character it follows that any new building development, including as well as the treatment of associated outside space, including for access arrangements and car parking should be no more than is genuinely <i>reasonably</i> required to enable that use to be carried on. Even then the consequent impact on the green belt may render a proposal unacceptable. In accordance with core planning principles it will be preferable if an existing building can be converted to provide the accommodation required. Any development, including any new access, car parking areas, floodlighting or additional curtilage, should be unobtrusive and will not be acceptable where it would create a significant and essentially urban element in the landscape to the detriment of its green belt setting. Consideration will be given as to whether the new facility proposed would lead to the expansion of the existing use to the extent that it would become unacceptable in its location because the noise and other disturbance it would generate, both on site and on the road network leading to the site, would be harmful to the amenity of local residents or people visiting the area for recreation. In these cases permission should not be forthcoming."</p>
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Table Modification SD1-MM119

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM119	Page 189	Policy PLP57 a.	<p>Delete and insert text:</p> <p>"a. in the case of extensions the best original building remains the dominant element both in terms of size and overall appearance. The cumulative impact of previous extensions and of other associated buildings will be taken into account. Proposals to extend buildings which have already been extended should have regard to the scale and character of the original part of the building; "</p>

Table Modification SD1-MM120

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM120	Page 189	Policy PLP57 d.	Delete and insert text: "d. the design and materials used should be sensitive to the character of the green belt setting <u>have regard to relevant design policies to ensure that the resultant development does not materially detract from its Green Belt setting.</u> "

Table Modification SD1-MM121

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM121	Page 189	Paragraph 19.25	Delete and insert text: "Disproportionate additions will be deemed to be those where the host <u>original</u> building is no longer the dominant element and this will not be judged solely on whether the extension is visible from public vantage points, such as roads or footpaths. Just because an extension is not visible from a public vantage point does not make it acceptable as any built form impacts on openness. Assessment will also include consideration of the presence of outbuildings and other curtilage buildings where the cumulative effect of those buildings, the proposed extension and any previous extensions would render the host building subservient in appearance. In the case of buildings that have already been extended the host building should be taken to mean the original building."

Table Modification SD1-MM122

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

19 Green belt and open space

SD1-MM122	Page 191	Before section 19.1.7	<p>Insert new section heading and revised paragraph 19.31: " 19.1.7 Limited Infilling in Villages 19.xx National planning guidance states that new dwellings may not be inappropriate in the green belt where they constitute <u>limited</u> infilling within existing villages. There are a number of smaller settlements in Kirklees which are <u>either</u> overwashed by the green belt. However, none of these settlements are deemed to constitute villages for the purposes of paragraph 89 of the National Planning Policy Framework as they are not sustainable locations for new dwellings. Consequently, new dwellings in settlements overwashed by the green belt will not normally be permitted unless very special circumstances exist that would justify allowing a proposal which is contrary to green belt policy: <u>or inset within it and the level of services contained within these settlements varies considerably. Any application for infill development within the Green Belt will therefore be judged in the first instance on whether the settlement is a village for the purposes of Green Belt policy. If it is established that the site is within a village the plot should be small, normally sufficient for not more than two dwellings and within an otherwise continuously built up frontage.</u>"</p>
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Table Modification SD1-MM123

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM123	Page 191	19.1.7 Section heading	Delete and insert heading text: " <u>Infilling and redevelopment of Brownfield sites in the Green Belt</u> "

Table Modification SD1-MM124

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM124	Page 191/192	Policy PLP59	<p>Delete and insert text:</p> <p>"b. in the case of partial or complete redevelopment the extent of the existing footprint is not exceeded; unless the resulting development would bring about significant and demonstrable environmental or other improvements;</p> <p>c. any new building or structure does not materially exceed the height of the existing built development, unless there are demonstrable operational requirements for such a building; <u>and</u></p> <p>d.c. redevelopment does not result in the loss of land that is of high environmental value which cannot be mitigated or compensated for. ; and</p> <p>e. the development does not result in any detrimental cumulative impact on the openness of the green belt.</p> <p>The council recognises that the redevelopment of land at Storthes Hall as identified on the Policies Map may be acceptable provided that the impact on the openness of the green belt is minimised and that the harm is outweighed by the beneficial re-use of this extensive brownfield site: <u>Land at Storthes Hall has been designated in the Local Plan in order to recognise it as a major brownfield site in the Green Belt. Development proposals should be accompanied by a masterplan with special attention paid to the impact of any proposal on the openness of the Green Belt.</u></p> <p>In <u>all</u> those cases where the site is proposed to be redeveloped for a new use the design and materials should have regard <u>should be had</u> to the relevant design policies in this plan, to ensure that the resultant development does not materially detract from its green belt setting."</p>
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Table Modification SD1-MM125

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM125	Page 192	Paragraph 19.32	<p>Delete and insert text:</p> <p>"Infilling <u>for the purposes of PLP 59</u> is defined as development in a small gap between existing buildings on a brownfield site. <u>What constitutes a small gap will be judged on a case by case basis and will depend on the circumstances on the ground at the time of the application. The new building must be proposed on a brownfield site and</u></p>

				<i>will not apply to small gaps between separate brownfield sites. Such infilling should not result in a greater impact on the open nature of the green belt and should not lead to a material increase in the developed proportion of a site."</i>
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Table Modification SD1-MM126

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM126	Page 192	Paragraph 19.33	Delete and insert text: "As the green belt is very extensive it inevitably includes sites that have a legacy of, or are currently occupied by an industrial use or are otherwise deemed to be previously developed. Where these sites are already covered by buildings it should be possible to add new buildings without impacting on openness provided that the gap they are to occupy is small and they <u>the development</u> can be accommodated within the existing curtilage. Alternatively, the redevelopment of the site, either in the same use or for a new use, may be acceptable provided that the redevelopment is designed so as not to have any more impact on the openness of the green belt than the existing built form. <u>The extent of the existing footprint should not normally be exceeded, although it may be possible to redistribute built form on the site provided that the resulting impact is no more than that of the existing development.</u> Assessment of these <u>all</u> proposals will also include an assessment of any intensification of use on local roads. Extension to the existing curtilage will not be permitted unless it can be clearly shown that this would result in significant environmental improvements, such as the reclamation of derelict or contaminated land. Where this is proposed these areas should be designed to remain largely open."

Table Modification SD1-MM127

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM127	Page 192	Paragraph 19.34	<p>Delete and insert text:</p> <p><u>"Within the site delineated on the Policies Map as 'Land at Storthes Hall', the council will encourage redevelopment proposals for the northern or southern parts of the site that are supported by a master plan for each part of the site in order that the proper planning of the site as a whole can be considered. Special attention will need to be paid within the master plan to the impact on openness. At the current time the northern part of the site is occupied by buildings and the southern part has been cleared and has planning permission for residential development.</u></p> <p><u>When considering any planning application, the council will ensure that substantial weight is given to any harm to the Green Belt including impact on openness. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</u></p> <p>This is because the original hospital buildings on the southern half of the site were demolished around 15 years ago and that part of the site is now cleared of all buildings. In these circumstances it is inevitable that any redevelopment scheme will impact on openness. The council will take into account the history of permission for redevelopment and the footprint of the original buildings when considering whether the harm caused to openness is outweighed by the beneficial reuse of the site. Where impact is minimised and the scheme has sufficient merit the council will consider that the very special circumstances required to justify inappropriate development have been demonstrated."</p>
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Table Modification SD1-MM128

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
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19 Green belt and open space

SD1-MM128	Page 194	Policy PLP61	<p>Delete and insert text:</p> <p><u>"Development P</u>roposals will not be permitted within <u>which would result in the loss of urban green space (as identified on the Policies Map) except where the proposed development will only be permitted where:-</u></p> <p>a. <u>demonstrates an assessment showing shows the open space is clearly no longer required to meet local needs for open space, sport or recreational facilities and does not make an important contribution in terms of visual amenity, landscape or biodiversity value; or</u></p> <p>b. <u>provides replacement open space, sport or recreation facilities which are equivalent or better in size; and quality and accessibility and are provided elsewhere within an easily accessible location for existing and potential new users; or</u></p> <p>c. <u>the proposal is for an alternative open space, sport or recreation use that is needed to help address identified deficiencies and clearly outweighs the loss of the existing green space; or</u></p> <p>d. <u>relates to the continuation or enhancement of the main use of the site and maintains the quality and function of the green space; or</u></p> <p>e. <u>results in a substantial community benefit that clearly outweighs the harm resulting from the loss of the existing green space.</u></p> <p>The protection set out in this policy also applies to other smaller valuable green spaces not identified on the Policies Map."</p>
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Table Modification SD1-MM129

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM129	Page 195	Paragraph 19.43	<p>Delete and insert text:</p> <p>"Valuable green spaces less than 0.4 hectares in size are not shown on the Policies Map but are identified in the council's Open Space Study and <u>Playing Pitch Strategy</u>. These smaller sites and other sites <u>have been identified through an open space assessment as having value as green an open space, sport or recreation facility either through an open space assessment carried out as part of the Open Space Study (see Appendix 4 for other sites protected under PLP61) or through recommendations in</u></p>

			<p><u>the Playing Pitch Strategy will be afforded the same level of protection as urban green space shown on the Policies Map. These assessments and recommendations will be taken into account when considering a development proposal and sites will be afforded the same level of protection as urban green space where appropriate. For smaller sites included in the Open Space Study that have not been assessed, the council will undertake an open space assessment when development proposals are being considered to determine the site's value as an open space, sport or recreation facility."</u></p>
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Table Modification SD1-MM130

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM130	Page 194	New paragraph after paragraph 19.45	<p>Insert text: <u>"Some open spaces in Kirklees have been designated as urban green space for purposes other than sport and recreation and may not have public access. These include urban green spaces important for their visual amenity, landscape and biodiversity benefits which close to where people live can help promote the health and well-being of local residents and contribute significantly to the quality and local character of the built-up areas in Kirklees. In order to safeguard these sites, development proposals will not be permitted which would be harmful to these qualities or the function of the urban green space."</u></p>

Table Modification SD1-MM131

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM131	Page 195	Paragraph 19.46	Delete text: "Development of urban green space and smaller valuable green spaces may also be permitted where replacement equivalent or better provision can be created to serve the same community. The new open space must be as easily accessible for existing and potential new users and at least equivalent or better in type, quantity and quality to the green space being replaced."
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Table Modification SD1-MM132

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM132	Page 195	Paragraph 19.48	Delete text: "Proposals involving the continuation or enhancement of an existing open space use may be allowed in connection with existing educational, open space, sport, recreational or community uses, provided they maintain or enhance the site's function and value as open land. Proposals of this nature could include additional classrooms, sports pavilions, changing room facilities and equipped children's play areas."

Table Modification SD1-MM133

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM133	Page 195	Paragraph 19.49	Delete text: "Exceptionally, planning permission may be granted within urban green space or smaller valuable green spaces where it can be shown that the proposed development would result in a substantial and specific benefit to the local community that clearly outweighs the loss of the existing green space."

Table Modification SD1-MM134

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM134	Page 196	Policy PLP62	Delete and insert text: "The council will give special protection to sites designated as Local Green Space that are important to the local community and shown on the Policies Map. Inappropriate development within a designated Local Green Space will not be permitted other than in very special circumstances, except:- a. new buildings for appropriate facilities for outdoor sport, outdoor recreation and cemeteries, provided they do not conflict with the purpose of the Local Green Space; b. the extension or alteration of a building provided that it does not result in disproportionate addition over and above the size of the original building; c. the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces. <u>Development proposed within a Local Green Space will be considered having regard to Green Belt policy.</u> "

Table Modification SD1-MM135

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM135	Page 197	Paragraph 19.54	Delete and insert text: "Special protection is given to Local Green Space. Therefore, inappropriate development which is harmful to Local Green Space will not be allowed other than in very special circumstances <u>consistent with Green Belt policy</u> . <u>The exceptions to development are set out in paragraphs 89 and 90 of the National Planning Policy Framework and include the provision of appropriate facilities for outdoor sport and recreation and appropriate extensions, alterations or replacement of existing buildings.</u> "

19 Green belt and open space

Table Modification SD1-MM136

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM136	Page 197	Policy PLP63	Insert text: "New housing developments will be required to provide or contribute towards new open space or the improvement of existing provision in the area, unless the developer clearly demonstrates that it is not financially viable for the development proposal. <u>New open space should be provided in accordance with the council's local open space standards or national standards where relevant.</u> "

Table Modification SD1-MM137

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM137	Page 199	Table 7 District wide open space provision standards	See tables below

Delete Table 7 District Wide Open Space Provision Standards and insert revised table 7:

Type of Open Space	Quantity Minimum hectares per 4,000 population	Quality Site Assessment Rating	Accessibility Minimum walk time or distance for residents in towns or villages
Parks & Recreation Grounds	0.8	High	15 minutes/720 metres 30 minutes travel time of a major park

Natural/ Semi-Natural	2.0	High	15 minutes/720 metres 2km of a 20ha site
Amenity Greenspace	0.3	High	10 minutes/480 metres
Alotments	0.5 ha	High	15 minutes/720 metres
Provision for Children & Young People	per 1,000 households No standard	High N/A	15 mins walk/720 metres for children's provision and 2km for youth facilities

Table 7: District wide open space standards

<u>Type of Open Space</u>	<u>Minimum standard for the amount of new open space</u>			<u>Quality Standard</u>	<u>Minimum Accessibility Standard</u>	
	<u>Type of Standard</u>	<u>Amount per 1,000 population (hectares)</u>	<u>Amount per dwelling (sq m)*</u>		<u>Site Assessment Rating</u>	<u>Type of Standard</u>
<u>Parks & Recreation Grounds</u>	<u>National /Local</u>	<u>0.8</u>	<u>19.44</u>	<u>High</u>	<u>Local</u>	<u>15 minutes/720 metres</u> <u>30 minutes travel time of a major park</u>

19 Green belt and open space

<u>Natural/ Semi-natural greenspace</u>	<u>Local</u>	<u>2.0</u>	<u>48.6</u>	<u>High</u>	<u>National /Local</u>	<u>15 minutes/720 metres</u>
<u>Amenity Greenspace</u>	<u>National</u>	<u>0.6</u>	<u>14.58</u>	<u>High</u>	<u>National /Local</u>	<u>10 minutes/480 metres</u>
<u>Allotments</u>	<u>National /Local</u>	<u>0.5 per 1,000 households</u>	<u>5</u>	<u>High</u>	<u>Local</u>	<u>15 minutes/720 metres</u>
<u>Children's Equipped/ Designated Play Areas</u>	<u>National</u>	<u>0.25</u>	<u>6.1</u>	<u>N/A</u>	<u>Local</u>	<u>15 minutes/720 metres</u>
<u>Young People Provision</u>	<u>National</u>	<u>0.3</u>	<u>7.3</u>	<u>N/A</u>	<u>Local</u>	<u>2km</u>

*Based on average Kirklees household of 2.43 people

20 Monitoring and implementation

Table Modification SD1-MM138

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM138	Page 202	Paragraph 20.12	Insert text: “Monitoring data will be drawn from a whole range of sources. These sources will include national, regional and locally published sources <u>such as <i>neighbourhood plan monitoring and data and community surveys</i></u> and surveys carried out by the council”.

Table Modification SD1-MM139

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM139	Page 203	Glossary - Affordable Housing	<p>Delete and insert text: "Affordable housing <i>Whether housing meets the definition of affordable housing will be determined in accordance with the latest definition in the national planning policy at the time of a decision on a planning application.</i> Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency. Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered as affordable housing for planning purposes."</p>

Table Modification SD1-MM140

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM140	Page 205	Glossary New - Employment Generating Use	<p>Insert text:</p> <p><u>"Employment generating use</u> <u>The B use class employment uses derived from the Town and Country Planning (Use Classes) Order Guide 1987 (as amended). These are:</u></p> <ul style="list-style-type: none"> • <u>B1 Business</u> (a) <u>Offices (other than those that fall within A2 (Professional and Financial Services)</u> (b) <u>Research and Development of products or processes</u> (c) <u>Light Industry</u> • <u>B2 General Industry</u> • <u>B8 Storage and Distribution</u> <p><u>And enterprises which provide jobs, for example, retail, hotel, assembly and leisure and certain non-residential Sui Generis uses (such as clubs, cash and carry businesses and builders merchants)."</u></p>

Table Modification SD1-MM141

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM141	Page 205	Glossary New - Employment Use	<p>Insert text:</p> <p><u>"Employment use</u> <u>The B use class employment uses derived from the Town and Country Planning (Use Classes) Order Guide 1987 (as amended). These are:</u></p> <ul style="list-style-type: none"> • <u>B1 Business</u> (a) <u>Offices (other than those that fall within A2 (Professional and Financial Services)</u> (b) <u>Research and Development of products or processes</u> (c) <u>Light Industry</u> • <u>B2 General Industry</u> • <u>B8 Storage and Distribution"</u>
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Table Modification SD1-MM142

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM142	Page 205	Glossary New - Essential Infrastructure	<p>Insert text:</p> <p><u>"Essential Infrastructure</u> <u>Infrastructure that is required to make development acceptable in planning terms."</u></p>

Table Modification SD1-MM143

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM143	Page 207	Glossary - Open Space	<p>Delete text:</p> <p><u>"Open space</u> <u>All open space of public value, which offer important opportunities for sport and recreation and can act as a visual amenity."</u></p>

Table Modification SD1-MM144

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM144	Page 207	Glossary New - Original building	<p>Insert text: <u>"Original building"</u> <u>Original building means a building as it existed on 1 July 1948, or if constructed later, as it was built originally. If a building existed on 1 July 1948 but has since been replaced then the term 'original' relates to the replacement building as it was built originally. If a building existed on 1 July 1948 but no longer exists then this is not included in the definition of 'original'. When assessing extensions to buildings and the cumulative impact of extensions, the 'original' building will include any outbuildings within its curtilage that were erected as part of the original development and are still of permanent and substantial construction. Extensions to the original building or outbuildings added at a later date, regardless of whether planning permission was required, will not be included as part of the 'original' building.</u></p>

Appendix 1 Replaced Unitary Development Plan Policies

Appendix 1 Replaced Unitary Development Plan Policies

Table Modification SD1-MM145

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM145	Page 209	Appendix 1 Table 8	Delete existing Table 8 Saved UDP Policies proposed to be superseded by the Local Plan and replace with revised Table 8.
DP	Kirklees Unitary Development Plan		
Policy no	Policy Title		
<u>G1</u>	<u>Regeneration</u>		<u>Spatial Development Strategy</u>
			<u>PLP7 Efficient and effective use of land and buildings</u>
<u>G4</u>	<u>Design</u>		<u>PLP24 Design</u>
<u>G5</u>	<u>Access to buildings and open space facilities</u>		<u>PLP24 Design</u>
<u>G6</u>	<u>Contamination and instability</u>		<u>PLP53 Contaminated and unstable land</u>
<u>D1</u>	<u>Loss of valuable land</u>		<u>PLP61 Urban green space</u>
<u>D2</u>	<u>Land without notation</u>		<u>PLP24 Design</u>
<u>D3</u>	<u>Urban Greenspace</u>		<u>PLP61 Urban green space</u>
<u>D4</u>	<u>Change of use or redevelopment</u>		<u>PLP61 Urban green space</u>
<u>D5</u>	<u>Provisional open land</u>		<u>PLP6 Safeguarded land</u>
<u>D6</u>	<u>Green corridors</u>		<u>PLP31 Strategic green infrastructure network</u>
<u>D7</u>	<u>Green corridor gaps</u>		<u>PLP31 Strategic green infrastructure network</u>
<u>D10</u>	<u>Outdoor sport and recreation in the green belt</u>		<u>PLP56 Facilities for outdoor sport, outdoor recreation and cemeteries</u>
<u>D11</u>	<u>Extension of buildings in the green belt</u>		<u>PLP57 The extension, alteration or replacement of existing buildings in the green belt</u>
<u>D2A</u>	<u>Removal of permitted development rights in the green belt</u>		<u>Deleted – No specific replacement</u>

Appendix 1 Replaced Unitary Development Plan Policies

D13	Infill in green belt settlements	PLP59 Infilling and redevelopment of brownfield sites
D15	Storches Hall University site	PLP59 Infilling and redevelopment of brownfield sites
NE3	Sites of Scientific Interest	PLP30 Biodiversity & geodiversity
NE4	Sites of Wildlife Significance	PLP30 Biodiversity & geodiversity
NE5	Wildlife corridors	PLP30 Biodiversity & geodiversity
NE6	Water and wetlands	PLP30 Biodiversity & geodiversity
NE8A	The Peak District National Park	PLP32 Landscape
NE9	Development proposals affecting trees	PLP33 Trees
BE1	Quality of design	PLP24 Design
BE2	Design	PLP24 Design
BE5	New development in conservation areas	PLP35 Historic environment
BE6	Impact on infill on conservation area	PLP35 Historic environment
BE9	Archaeological value of class 1 or 11 sites	PLP35 Historic environment
BE10	Archaeological value of class 1, 11 or 111	PLP35 Historic environment
BE11	Building materials	PLP24 Design
BE12	Space about buildings	PLP24 Design
BE13	Extensions to buildings	PLP24 Design
BE14	Extensions to terraced, semi-detached or closely spaced detached dwellings	PLP24 Design
BE15	Dormer extensions	PLP24 Design
BE16	Shopfronts	PLP25 Advertisements and shopfronts
BE17	New shopfronts in conservation areas or on listed buildings	PLP25 Advertisements and shopfronts
BE18	Security shutters for shop windows in town centres	PLP25 Advertisements and shopfronts
BE20	Access for disabled people	PLP24 Design
BE21	Access to open space by disabled people	PLP24 Design
BE22	Parking facilities for people with disabilities	PLP22 Parking
BE23	Crime prevention measures	PLP24 Design
EP3	Development affecting washland	PLP27 Flood risk
EP3A	Culverting and canalisation	PLP27 Flood risk
EP4	Noise sensitive locations	PLP52 Protection and improvement of environmental quality
EP6	Development and noise	PLP51 PLP52 Protection and improvement of environmental quality

Appendix 1 Replaced Unitary Development Plan Policies

EP7	Small turbines	PLP26 Renewable and low carbon energy
EP8	Medium and large turbines	PLP26 Renewable and low carbon energy
EP8A	Safeguarding wind turbines	PLP26 Renewable and low carbon energy
EP10	Energy efficient site development	PLP26 Renewable and low carbon energy
EP11	Ecological landscaping	Deleted – <u>No specific replacement</u>
EP12	Overhead power lines	Deleted – <u>No specific replacement</u>
EP30	Construction sites	Deleted – <u>No specific replacement</u>
M1	Mineral extraction and restoration measures	PLP36 <u>Proposals for mineral extraction</u> PLP37 <u>Site restoration and aftercare</u>
M1A	Aggregate supply	PLP36 <u>Proposals for mineral extraction</u>
M2	Locations for mineral extraction	PLP36 <u>Proposals for mineral extraction</u>
M3	Mineral extraction	PLP36 <u>Proposals for mineral extraction</u>
M4	Mineral extraction from former waste deposits	PLP36 <u>Proposals for mineral extraction</u>
M5	Safeguarded mineral reserves	PLP38 <u>Minerals safeguarding</u>
WD1	Waste storage, transfer, treatment, recycling and final disposal	PLP44 <u>New waste management facilities</u>
WD4	Use of agricultural land for waste disposal	Deleted on the basis that no requirement identified in <u>Minerals Needs Assessment</u>
WD5	Disposal of waste to landfill	PLP46 <u>Waste disposal</u>
WD6	Waste transfer, treatment and/or reduction sites	PLP44 <u>New waste management facilities</u>
WD7	Use of land for the receipt, storage, treatment, incineration and recovery of materials and transfer of waste	PLP47 <u>PLP44 New waste management facilities</u>
T1	Transport strategy	PLP19 <u>Strategic transport infrastructure</u> PLP20 <u>Sustainable travel and demand management</u> PLP23 <u>Core road and bus networks</u> PLP24 <u>PLP23 Core walking and cycling network</u>
T2	Priorities for transport improvements	PLP19 <u>Strategic transport infrastructure</u>
T6	The strategic highways network	PLP19 <u>Strategic transport infrastructure</u>
T10	Highway and accessibility considerations in new development	PLP24 <u>Design</u>

Appendix 1 Replaced Unitary Development Plan Policies

		PLP21 Highways <u>safety and access</u>
T13	Park ride	PLP22 Parking
T14	Pedestrian improvements	PLP21 Highways <u>safety and access</u> PLP24 Design
T15	Pedestrian improvements in Huddersfield, Batley and Holmfirth	PLP23 Core walking and cycling <u>network</u>
T16	Pedestrian routes and new developments	PLP5 Masterplanning <u>large sites</u> PLP21 Highways <u>safety and access</u> PLP23 Core walking and cycling <u>network</u> PLP24 Design
T17	Cyclists	PLP5 Masterplanning <u>large sites</u> PLP21 Highways <u>safety and access</u> PLP23 Core walking and cycling <u>network</u> PLP24 Design
T18	Strategic routes for pedestrians and cyclists	PLP23 Core walking and cycling <u>network</u>
T19	Off-street parking	PLP22 Parking
T20	Town centre car parking	PLP22 Parking
T23	Re-use of disused railways for transport purposes	PLP23 Core walking and cycling <u>network</u>
T24	Proposals for the enhancement of railway stations	PLP19 Strategic transport <u>infrastructure</u>
T25	Use of waterway network for freight movement	Deleted – No specific replacement
DL1	<u>Derelict and neglected land</u>	PLP7 <u>Efficient and effective use of land and buildings</u>
DL2	Priorities for the reclamation of derelict land	PLP7 <u>Efficient and effective use of land and buildings</u>
DL3	Derelict land reclamation sites	PLP7 <u>Efficient and effective use of land and buildings</u>
DL4	Improvement and re-use of neglected land	PLP7 <u>Efficient and effective use of land and buildings</u>
B1	Employment strategy	<u>Spatial Development Strategy</u>
P		PLP3 Location of new development
BP	Land for business and industry	PLP8 Safeguarding employment land and premises
BP	Buffer zones allocated for industry	PLP5 Masterplanning <u>large sites</u> PLP24 Design

Appendix 1 Replaced Unitary Development Plan Policies

B4	Change of use of premises and sites with established use, or last used for business and industry	PLP8 Safeguarding employment land and premises <i>PLP21 Highways and access</i> <i>PLP24 Design</i>
B5	Extensions to business premises	PLP24 Design
B6	Conversion of buildings and redevelopment in older industrial areas for B1	PLP8 Safeguarding employment land and premises
B11	Use of dwelling as a base for private hire vehicle	PLP21 Highways and access <i>PLP24 Design</i> <i>Deleted – No specific replacement</i>
B12	Use of residential premises for childminding	PLP21 Highways and access <i>PLP24 Design</i> <i>Deleted – No specific replacement</i>
B14	Major hotels and conference facilities	PLP13 Town centre uses
H1	Housing strategy	<i>Spatial Development Strategy</i>
H2	Housing regeneration areas	PLP3 Location of new development
H4	Conversion of residential property to other uses	<i>Deleted – No specific replacement</i> PLP21 Highways and access <i>PLP24 Design</i> PLP48 Community facilities and services
H6	Sites for new housing	PLP3 Location of new development
H9	Conversion to residential use	PLP21 Highways and access

Appendix 1 Replaced Unitary Development Plan Policies

		<p><u>PLP24 Design</u></p> <p><u>PLP48 Community facilities and services</u></p>
H9	Living over the shop	<p><u>PLP15 Residential use in town centres</u></p> <p><u>PLP21 Highways and access</u></p> <p><u>PLP24 Design</u></p>
H10	The provision of affordable housing	<p><u>PLP11 Housing mix</u></p> <p><u>and affordability-affordable housing</u></p>
H11	Affordable housing as an exception to policies of restraint	<p><u>PLP11 Housing mix</u></p> <p><u>and affordability-affordable housing</u></p>
H12	Arrangements for securing affordability	<p><u>PLP11 Housing mix</u></p> <p><u>and affordability-affordable housing</u></p>
H15	Houses for multiple occupation	<p><u>PLP21 Highways and access</u></p> <p><u>PLP24 Design</u></p>
H16	Residential homes for the elderly	<p><u>PLP11 Housing mix and affordable housing</u></p> <p><u>PLP11 Housing mix</u></p> <p><u>and affordability-affordable housing</u></p>
H18	Provision of open space for new housing	<p><u>PLP63 New open space</u></p>
C1	Community facilities	<p><u>PLP48 Community facilities and services</u></p>
C2	Special community needs	<p><u>PLP15 Residential in town centres</u></p>

Appendix 1 Replaced Unitary Development Plan Policies

		<i>PLP21 Highways and access</i>
		<i>PLP13 Town centre uses</i>
		<i>PLP48 Community facilities and services</i>
C3	Sites for new school facilities	<i>PLP49 Educational and health care needs</i>
C10	Associated outdoor play areas for day nurseries	<i>PLP24 Design</i>
C12	Childcare for visitors to facilities	<i>Deleted – No specific replacement</i>
C13	Provision for public toilets	<i>Deleted – No specific replacement</i>
S1	Shopping and service strategy	<i>Spatial Development Strategy</i>
		<i>PLP13 Town centre uses</i>
		<i>PLP17 Huddersfield Town Centre</i>
		<i>PLP18 Dewsbury Town Centre</i>
S4	Large new stores	<i>PLP13 Town centre uses</i>
S7	Retail sales to the public from builders merchants	<i>Deleted – No specific replacement</i>
S8A	Mill or factory premises	<i>PLP13 Town centre uses</i>
		<i>PLP21 Highways and access</i>
		<i>PLP24 Design</i>
S8B	Farm shops	<i>PLP10 Supporting the rural economy</i>
		<i>PLP13 Town centre uses</i>
		<i>PLP21 Highways and access</i>
		<i>PLP24 Design</i>
P	Service uses	<i>PLP14 Shopping frontages</i>
S4	Hot food takeaways	<i>PLP16 Food and drink uses and the evening economy</i>

Appendix 1 Replaced Unitary Development Plan Policies

		PLP47 Healthy, active and safe lifestyles
S15	Taxi booking offices	PLP21 Highways and access PLP24 Design <u>Deleted – No specific replacement</u>
R1	Recreation facilities	PLP47 Healthy, active and safe lifestyles PLP50 Sport and physical activity <u>No specific replacement</u>
R4	Sports stadia	PLP21 Highways and access PLP22 Parking PLP24 Design
R6	Public open space	PLP50 Sport and physical activity PLP61 Urban green space PLP63 New open space
R7A	Private playing fields	PLP50 Sport and physical activity PLP61 Urban green space
R9	Allotments	PLP47 Healthy, active and safe lifestyles
R12	Lower Spen Valley Country Park	<u>Deleted – No specific replacement</u>
R13	Rights of way and public access areas	PLP23 Core walking and cycling network PLP31 Strategic green infrastructure network
R15	Golf courses	PLP21 Highways and access PLP24 Design PLP33 Landscape

Appendix 1 Replaced Unitary Development Plan Policies

		<p><u>PLP54 PLP50 Sport and physical activity Policy PLP56 Facilities for outdoor sport, outdoor recreation and cemeteries</u></p> <p><u>PLP21 Highways and access</u></p> <p><u>PLP25 Design</u></p> <p><u>PLP32 Landscape</u></p> <p><u>PLP50 Sport and physical activity</u></p> <p><u>Policy PLP56 Facilities for outdoor sport, outdoor recreation and cemeteries</u></p>
R16	Golf driving ranges	<p><u>PLP23 Core walking and cycling network</u></p> <p><u>PLP24 Design</u></p> <p><u>PLP30 Biodiversity & Geodiversity</u></p> <p><u>PLP31 Strategic Green Infrastructure</u></p> <p><u>Network</u></p> <p><u>PLP32 Landscape</u></p>
R18	Canals and rivers	<p><u>Deleted – No specific replacement</u></p> <p><u>PLP35 Historic Environment</u></p> <p><u>PLP17 Huddersfield Town Centre</u></p> <p><u>PLP17 Huddersfield Town Centre</u></p> <p><u>Deleted – No specific replacement</u></p> <p><u>PLP17 Huddersfield Town Centre</u></p>
R20	Tunnel end, Marsden	
R21	Castle Hill, Huddersfield	
TC1	Role of Huddersfield Town Centre	
TC3	Pedestrian arcades and yards	
TC8	Class B1 Business uses	
TC10	Conversion of residential to B1	
		<p><u>PLP21 Highways and Access</u></p> <p><u>PLP24 Design</u></p>

Appendix 1 Replaced Unitary Development Plan Policies

TC12	Industry and warehousing	<u>PLP3 Location of new development</u> <u>employment land and premises</u> <u>PLP17 Huddersfield Town Centre</u>
TC17	Larchfield Mills Footbridge	<u>Deleted – no specific replacement</u>
TC18	Huddersfield Narrow Canal and Riverside	<u>PLP17 Huddersfield Town Centre Deleted - No specific replacement</u>
TC20	Buildings of character	<u>PLP35 Historic Environment</u>
TC22	Scale and massing of new development	<u>PLP24 Design</u>
TC24	Pedestrian links between the town centre and Chapel Hill and Aspley Basin	<u>PLP17 Huddersfield Town Centre Deleted - No specific replacement</u>
TC27	Huddersfield Technical College and Greenhead College	<u>Deleted – No specific replacement</u>
TC32	Pedestrian links	<u>PLP17 Huddersfield Town Centre</u> <u>PLP21 Highways safety and access</u>
TC33	Servicing	<u>PLP21 Highways and access</u> <u>PLP24 Design</u> <u>Deleted – No specific replacement</u>
TC35	Car parking – Fitzwilliam Street	<u>Deleted – No specific replacement</u>
TC37	Opportunity sites	<u>Deleted – No specific replacement</u>

Appendix 2 Monitoring framework

Table Modification SD1-MM146

Modification Ref	Page	Policy/Para /Table/Box	Tracked change				
SD1-MM146	Page 219	Appendix 2 Monitoring Framework PLP9b	Insert new monitoring indicator:				
			<u>ID</u>	<u>Policy</u>	<u>Delivery agencies</u>	<u>Indicator name</u>	<u>Target/Trend</u>
			PLP9b	Supporting skilled and flexible communities and workforce	Council, developers, educational establishments	Number of apprenticeship schemes or training programmes secured where the development meets threshold requirements	Positive trend

Table Modification SD1-MM147

Modification Ref	Page	Policy/Para /Table/Box	Tracked change				
SD1-MM147	Page 220	Appendix 2 Monitoring Framework PLP13b	Insert new monitoring indicator:				
			<u>ID</u>	<u>Policy</u>	<u>Delivery agencies</u>	<u>Indicator name</u>	<u>Target/Trend</u>

			<u>PLP13b</u>	<u>Town centre uses</u>	<u>Council, developers, RSLs, local businesses, inward investors</u>	<u>Total amount of additional convenience and comparison retail floorspace completed</u>	<u>Positive trend</u>
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Table Modification SD1-MM148

Modification Ref	Page	Policy/Para /Table/Box	Tracked change										
SD1-MM148	Page 220	Appendix 2 Monitoring Framework PLP13c	Insert new monitoring indicator: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th><u>ID</u></th> <th><u>Policy</u></th> <th><u>Delivery agencies</u></th> <th><u>Indicator name</u></th> <th><u>Target/Trend</u></th> </tr> </thead> <tbody> <tr> <td><u>PLP13c</u></td> <td><u>Town centre uses</u></td> <td><u>Council, developers, RSLs, local businesses, inward investors</u></td> <td><u>Total amount of additional leisure floorspace completed</u></td> <td><u>Positive trend</u></td> </tr> </tbody> </table>	<u>ID</u>	<u>Policy</u>	<u>Delivery agencies</u>	<u>Indicator name</u>	<u>Target/Trend</u>	<u>PLP13c</u>	<u>Town centre uses</u>	<u>Council, developers, RSLs, local businesses, inward investors</u>	<u>Total amount of additional leisure floorspace completed</u>	<u>Positive trend</u>
<u>ID</u>	<u>Policy</u>	<u>Delivery agencies</u>	<u>Indicator name</u>	<u>Target/Trend</u>									
<u>PLP13c</u>	<u>Town centre uses</u>	<u>Council, developers, RSLs, local businesses, inward investors</u>	<u>Total amount of additional leisure floorspace completed</u>	<u>Positive trend</u>									

Table Modification SD1-MM149

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

Appendix 2 Monitoring framework

SD1-MM149	Page 220	Appendix 2 Monitoring Framework PLP13d	Insert new monitoring indicator:				
			<u>ID</u>	<u>Policy</u>	<u>Delivery agencies</u>	<u>Indicator name</u>	<u>Target/Trend</u>
			PLP13d	Town centre uses	Council, developers, RSLs, local inward investors	Pedestrian footfall within town centres	Positive trend

Table Modification SD1-MM150

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM150	Page 221	Appendix 2 Monitoring Framework PLP24a - Indicator name	Delete text: "Percentage of appropriate planning applications taking account of design criteria <u>Number of appeals upheld on appeals made against the refusal of planning permission on design grounds</u> "

Table Modification SD1-MM151

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

SD1-MM151	Page 221	Appendix 2 Monitoring Framework PLP24a - Target/trend	Delete text: "400% <u>None</u> "
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Table Modification SD1-MM152

Modification Ref	Page	Policy/Para /Table/Box	Tracked change										
SD1-MM152	Page 222	Appendix 2 Monitoring Framework PLP35c	Insert new monitoring indicator: <table border="1" data-bbox="671 241 1026 1420"> <thead> <tr> <th><u>ID</u></th> <th><u>Policy</u></th> <th><u>Delivery agencies</u></th> <th><u>Indicator name</u></th> <th><u>Target/Trend</u></th> </tr> </thead> <tbody> <tr> <td><u>PLP35c</u></td> <td><u>Historic Environment</u></td> <td><u>Council, developers, Historic England</u></td> <td><u>Loss/additions to designated/non-designated heritage assets</u></td> <td><u>No target</u></td> </tr> </tbody> </table>	<u>ID</u>	<u>Policy</u>	<u>Delivery agencies</u>	<u>Indicator name</u>	<u>Target/Trend</u>	<u>PLP35c</u>	<u>Historic Environment</u>	<u>Council, developers, Historic England</u>	<u>Loss/additions to designated/non-designated heritage assets</u>	<u>No target</u>
<u>ID</u>	<u>Policy</u>	<u>Delivery agencies</u>	<u>Indicator name</u>	<u>Target/Trend</u>									
<u>PLP35c</u>	<u>Historic Environment</u>	<u>Council, developers, Historic England</u>	<u>Loss/additions to designated/non-designated heritage assets</u>	<u>No target</u>									

Table Modification SD1-MM153

Modification Ref	Page	Policy/Para /Table/Box	Tracked change

Appendix 2 Monitoring framework

SD1-MM153	Page 222	Appendix 2 Monitoring Framework Policy PLP36a - Target/Trend	Insert text: "Landbank of 7 years for sand and gravel; 10 years for crushed rock <u>and 25 years for clay and shale</u> "
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Table Modification SD1-MM154

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM154	Page 223	Appendix 2 Monitoring Framework Policy PLP36c - Target/trend	Delete and insert text: " <u>Positive trend-To make a positive contribution towards meeting the sub-regional apportionment for aggregate</u> "

Table Modification SD1-MM155

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM155	Page 223	Appendix 2 Monitoring Framework Policy PLP39a - Indicator name	Insert text: "Permissions granted <u>contrary to policy</u> for non <input type="checkbox"/> mineral uses on a safeguarded minerals infrastructure site"

Table Modification SD1-MM156

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM156	Page 223	Appendix 2 Monitoring Framework Policy PLP40a - Indicator name	Insert text: "Permissions granted <u>contrary to policy</u> for non-minerals uses on safeguarded minerals infrastructure sites"

Table Modification SD1-MM157

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM157	Page 223	Appendix 2 Monitoring Framework Policy PLP40a - Target/Trend	Delete and insert text: " <u>No-target Zero</u> "

Table Modification SD1-MM158

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM158	Page 223	Appendix 2 Monitoring Framework Policy PLP45a - Indicator name	Delete and insert text; " Amount of w <u>Waste management</u> facilities lost to other uses <u>contrary to policy</u> "

Appendix 3 Housing delivery and phasing table

Table Modification SD1-MM159

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM159	Page 227	Appendix 3 Paragraph 3.1	Insert text: "To demonstrate that the Local Plan will deliver sufficient homes to meet the housing requirement, this section sets out a phasing table. This <i>The following</i> phasing table is indicative only but demonstrates (along with the housing trajectory) that the local plan can demonstrate a five year supply of deliverable housing land including the buffer set out in national planning policy. <i>It also demonstrates that the housing requirement will be met over the plan period.</i> The phasing table has been used to inform the housing trajectory in the Housing chapter of the Local Plan."

Table Modification SD1-MM160

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM160	Page 228	Appendix 3 Phasing Table	Insert revised Appendix 3 Phasing Table: See Annex 1.

New Appendix 4 Small Open Spaces Protected by Policy PLP 61

Table Modification SD1-MM161

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM161	New Appendix	New Appendix 4 Small Open Spaces Protected by Policy PLP61	Insert new Appendix 4:

SD1 Kirklees Publication Draft Local Plan – Strategy and Policies

Appendix 4.1 - Small Open Spaces Protected Under Policy PLP 61

1. SMALL PARKS & RECREATION GROUNDS PROTECTED UNDER POLICY PLP 61

Table 1: Batley and Spen

Open Space Site No.	Open Space Class No.	Site Address	Size (ha)
275	25	Beck Lane Rest Garden, Heckmondwike	0.02
276	26	Goose Hill Rest Garden, Heckmondwike	0.04
278	28	Sparrow Park, Heckmondwike	0.07
279	29	Pavilion Gardens, Heckmondwike	0.02
962	766	East Bierley Memorial Park, East Bierley	0.05
1015	925	Cleckheaton Library, Cleckheaton	0.23

Table 2: Dewsbury and Mirfield Area

Open Space Site No.	Open Space Class No.	Site Address	Size (ha)
1004	779	Mirfield Library Gardens, Mirfield	0.12
1052	956	Moorside Avenue Play Area, Dewsbury	0.42

Table 3: Huddersfield Area

Open Space Site No.	Open Space Class No.	Site Address	Size (ha)
289	678	Alder Street Play Area, Fartown	0.18
291	1095	Springbank Crescent Recreation Ground, Huddersfield	0.08
325	399	Lowerhouses War Memorial, Lowerhouses	0.09
328	503	Land at the junction of Stile Common Road & Plane Street, Primrose Hill	0.12

Table 4: Kirklees Rural Area

Open Space Site No.	Open Space Class No.	Site Address	Size (ha)
254	1963	Dirker Avenue Recreation Ground, Marsden	0.14
259	285	Cliffe Street, Clayton West, Huddersfield	0.06
260	284	Clayton West War Memorial, Clayton West	0.06
265	291	Public garden at the junction of School Lane & Church Street, Emley	0.04
267	292	Upper Cumberworth Open Space, Upper Cumberworth	0.02
1122	1002	Sam Whitehead Gardens, Marsden	0.06
1251	2171	Holmside Gardens, Holmfirth	0.16
1253	2173	Kings Head Gardens, Holmfirth	0.04

2. SMALL AMENITY GREEN SPACES PROTECTED UNDER POLICY PLP 61

Table 5: Batley and Spen Area

Open Space Site No.	Open Space Class No.	Site Address	Size (ha)
948	823	Land adjacent 1-11 Peel Avenue, Batley	0.37

Open Space Site No.	Open Space Class No.	Site Address	Size (ha)
945	826	Lidgate Gardens, Batley	0.23
861	1229	Conway Crescent Recreation Ground, Batley	0.25
855	1207	Purlwell Gardens Open Space, Batley	0.37
1041	965	Land at the junction of Wood Street & Wellington Street, Batley	0.25
939	838	Land adjacent 89 – 119 Commonsides, Batley	0.25
894	1592	Millbrook Gardens Open Space, Batley	0.28
892	1576	Land adjacent 7 & 8 The Bower, Batley	0.3
890	1570	Brownhill Road Open Space, Birstall	0.28
336	1285	Land adjacent 32-54 Common Road, Healey, Batley	0.21
969	757	Land adjacent 2-40 Wesley Close, Birstall	0.33
1297	2325	Brow Wood Road Play Area, Upper Batley	0.24
846	1243	Richmond Grove Open Space, Gomersal	0.15
961	767	East Bierley Village Green, East Bierley	0.21
968	758	Land adjacent 23 Bampton Grove, Birstall	0.24
1445	2697	Threelands Play Area, Birkenshaw	0.15
964	763	Land adjacent 36-46 Ghyllroyd Drive, Birkenshaw	0.24
970	741	Land at the junction of Huddersfield Road & Bradford Road, Birstall	0.26
995	771	Moorside Recreation Ground, Hartshead	0.26
1435	2651	Land at junction of Fairfield Avenue & Delph Lane, Heckmondwike	0.22
281	31	Land rear of Berwick Avenue, Heckmondwike	0.24
174	20	Land off Commonsides, Roberttown	0.31
175	21	Open Space at Commonsides, Roberttown	0.61
52	1244	Land adjacent 429 Bradford Road, Littletown	0.24
1043	954	Land adjacent 9 - 14 Garden View, Littletown	0.24

Table 6: Dewsbury and Mirfield Area

Open Space Site No.	Open Space Class No.	Site Address	Size (ha)
1030	944	Land adjacent 6-30 Syke Ing Close, Dewsbury	0.21
1026	917	Land adjacent Highfield United Reform Church, High Road, Dewsbury	0.16

Open Space Site No	Open Space Class No.	Site Address	Size (ha)
1018	920	Land adjacent 28-36 Cross Road, Thornhill	0.26
1059	948	Land off Edge Top Road, Dewsbury	0.23
1069	866	Low Park Meadows Open Space, Low Road, Dewsbury Moor	0.07
1064	857	Land adjacent 135 Huddersfield Road, Westtown	0.21
1050	962	Land at School Lane, Dewsbury	0.23
1054	939	The Arena Centre, Moorlands Road, Dewsbury	0.21
1042	963	Land adjacent 2-64 Middle Road, Dewsbury	0.27
288	1490	Southway Island Open Space, Mirfield	0.18
1300	2334	The Pastures Play Area, Spinners Way, Lower Hopton	0.25
1010	772	Land adjacent 1-15 Kitson Hill Road, Mirfield	0.26

Table 7: Huddersfield Area

Open Space Site No.	Open Space Class No.	Site Address	Size (ha)
315	541	Canby Grove Open Space, Waterloo	0.21
318	538	Daw Royds Open Space, Almondbury	0.21
316	487	Land adjacent Ferndale Lodge, Aldoney, Almondbury	0.21
317	488	Open Space, Lancaster Crescent, Almondbury	0.3
321	594	Land adjacent 166-218 Fernside Avenue, Almondbury	0.25
1109	998	Land adjacent 73-83 Fixby Road, Fixby	0.39
991	989	Land between 25 & 37 North Cross Road, Cowcliffe	0.32
340	587	Land adjacent 15-45 Skelton Crescent, Crosland Moor	0.28
346	402	Moorside Avenue Recreation Ground Crosland Moor	0.2
337	397	Coppice Drive Open Space, Netherton	0.28
338	307	Thornton Lodge Open Space, Thornton Lodge	0.21
313	1124	Cross Fields Open Space, Dalton	0.16
865	1136	Fern Bank Open Space, Arlington Way, Dalton	0.24
944	834	Land adjacent Shaw Business Park, Silver Street, Huddersfield	0.32
922	792	Land between 181-259 Wakefield Road, Moldgreen	0.25
923	790	Church Lane Open Space, Moldgreen	0.17
916	799	Land adjacent Cow Hey Allotments, Dalton	0.06
912	690	Land south of Upper Brow Road, Paddock	0.92

Open Space Site No.	Open Space Class No.	Site Address	Size (ha)
290	679	Land adjacent Viaduct, Castlegate, Huddersfield	0.22
1309	2350	Haywood Avenue Open Space, Marsh	0.28
1336	2425	Cornet Close Play Area, Lindley	0.21
355	156	Mendip Avenue Open Space, Lindley	0.23
330	502	Castle Avenue Open Space, Newsome	0.25
331	500	Land adjacent 14 – 15 New Laithe Close, Lowerhouses	0.25
327	498	Hillside Crescent Recreation Ground, Newsome	0.26
909	1031	Fairlea Road Recreation Ground, Taylor Hill	0.24
302	515	Land adjacent 9-48 Bankfield Road, Huddersfield	0.35
910	728	Land adjacent 2-20 Berry View, Newsome	0.23
1095	893	Rashcliffe Hill Road Embankment, Huddersfield	0.67

Table 8: Kirklees Rural

Open Space Site No.	Open Space Class No.	Site Address	Size (ha)
1125	1006	Land adjacent Town Gate, Marsden	0.16
1219	2065	Pond, Off Hepworth Road, Hepworth	0.35
1218	2064	Hinchliffe Mill Pond, Water Street, Holmbridge	0.33
1189	1605	Land adjacent 33-99 Shelley Lane, Highburton	0.4
1260	2178	Shelley Village Green, Shepley	0.24

3. SMALL ALLOTMENTS PROTECTED UNDER POLICY PLP 61

Table 9: Batley and Spen

Open Space Site No.	Open Space Class No.	Site Address	Site (ha)
0738	1287	West Park Road Allotments, Healey, Batley	0.11

Open Space Site No.	Open Space Class No.	Site Address	Site (ha)
962	765	East Bierley Memorial Park Allotments, East Bierley	0.14
996	988	Whitechapel Road Allotments, Scholes, Cleckheaton	0.32

Table 10: Dewsbury and Mirfield

Open Space Site No.	Open space Class No.	Site Address	Site (ha)
1212	1919	Morton House Allotments, Thornhill Lees, Dewsbury	0.54
1055	940	Rectory View Allotments, Thornhill, Dewsbury	0.05
1073	862	Smith Road Allotments, Dewsbury Moor, Dewsbury	0.34

Table 11: Huddersfield

Open Space Site No.	Open space Class No.	Site Address	Site (ha)
1276	2299	Vale Close Allotments, Almondbury	0.09
1268	2291	Highgate Crescent Allotments, Lepton	0.11
957	994	Chestnut Street Allotments, Deighton	0.2
191	1126	Ashbrow Road Allotments, Sheepridge	0.49
916	800	Cow Hey Allotments, Dalton	0.16
927	829	Grosvenor Road Allotments, Dalton	0.16
926	787	Coniston Avenue Allotments, Dalton	0.2
1265	2288	Grand Cross Road Allotments, Dalton	0.12
298	685	Highfields Community Orchard, Edgerton	0.1
307	681	Smiths Avenue Allotments, Marsh	0.23
325	398	Longley Road Allotments, Lowerhouses	0.19

Open Space Site No.	Open space Class No.	Site Address	Site (ha)
1098	889	Taylor Hill Road Allotments, Newsome	0.13
194	408	Malvern Road Allotments, Primrose Hill	0.23
322	725	Somerset Road Allotments, Almondbury	0.18

Table 12: Kirklees Rural

Open Space Site No.	Open space Class No.	Site Address	Site (ha)
1129	1012	Park View Allotments, Marsden	0.28
1269	2292	Hollins Row Allotments, Slaithwaite	0.24
1021	932	Hoyle House Fold Allotments, Linthwaite	0.14
268	275	Long Lane Allotments, Clayton West	0.1
1264	2287	Clifton Lane Allotments, Meltham	0.12
1155	1399	Woodhead Road Allotments, Holmbridge, Holmfirth	0.38
835	1927	Kirkroyds Lane Allotments, New Mill	0.13

4. SMALL NATURAL/SEMI-NATURAL GREENSPACES PROTECTED UNDER POLICY PLP 61

Table 13: Dewsbury

Open Space Site Ref.	Open Space Class Ref.	Site Address	Size (ha)
1224	2135	Lees Hall Road Play Area, Lees Hall Road, Dewsbury	0.13
1069	867	Low Park Meadows Open Space, Low Road, Dewsbury	0.31
10316	2374	Sunny Bank Ponds LNR, The Coppice, Mirfield	0.16
10062	952	Land north of Edge Road, Thornhill Edge	0.3

Table 14: Huddersfield

Open Space Site Ref.	Open Space Class Ref.	Site Address	Size (ha)
351	417	Land adjacent Golcar Central Liberal Club, Church Street, Golcar	0.12
320	540	Southfield Road Open Space, Almondbury	0.28
326	497	Land north of 15 Hall Cross Road, Lowerhouses	0.25
1099	898	Land south of Fairlea Cottages, Taylor Hill Road, Newsome	0.2

Table 15: Kirklees Rural

Open Space Site Ref.	Open Space Class Ref.	Site Address	Size (ha)
1104	874	Land south of 48 Bristfield Road, Grange Moor	0.35

Appendix 4.2 - Small Open Spaces to be Considered Under Policy PLP 61

The following open spaces would require an open space assessment and retention as open space considered through policy PLP61

Table 16: Batley and Spen

Open Space Site Ref.	Open Space Class Ref.	Site Address	Size (ha)
862	1220	Warwick Road Play Area, Warwick Road, Batley Carr	0.06
863	1201	Benny Parr Close Open Space, Soothill	0.08
1310	2352	Springfield Avenue Play Area, Batley	0.09
852	1198	Beaumont Street Play Area, Mount Pleasant	0.11
938	837	Land adjacent 2 Clarence Street, Batley	0.17
1415	2546	Rotary Close Play Area, Batley Carr	0.08
893	1593	The Square, Fairview Avenue, Batley	0.12
1402	2520	Burnsall Road Play Area, Batley	0.10
1179	1442	Ashcroft Close Open Space, Staincliffe	0.15
844	1780	Bleak House Recreation Ground, Ealand Road, Carlinghow	0.11
967	759	Land adjacent 12-18 Priestly Square, Birstall	0.17
1296	2323	Millers Croft Play Area, Howden Clough	0.13
1009	773	Wickham Street Open Space, Cleckheaton	0.16
1013	922	Land adjacent 32-60 High Street, Cleckheaton	0.17
1014	921	Land adjacent 3 Mount Street, Cleckheaton	0.13
283	33	Land adjacent 3 Rhodes Avenue, Heckmondwike	0.15
1455	2696	Lobley Street Play Area, Batley	0.08
282	32	Little Green Lane Open Space, Heckmondwike	0.16
284	34	Land adjacent 31-59 Berwick Avenue, Heckmondwike	0.18
1075	1389	Land adjacent 30-36 Ruben Street, Hightown	0.18
1426	2599	Springfield Court Play Area, Roberttown	0.12
1332	2424	Aspen Close Open Space, Gomersal	0.14

Table 17: Dewsbury and Mirfield

Open Space Site Ref.	Open Space Class Ref.	Site Address	Size (ha)
1331	2380	Elsham Meadows Play Area, Earlsheaton	0.11
272	1331	Eightlands Play Area, Ashworth Road Eightlands	0.09
1035	909	Land adjacent 30 Canterbury Road, Dewsbury	0.19
1063	924	Boiler House Playing Field, Eightlands Road, Eightlands	0.15
1350	2399	Whitley Village Play Area, Whitley Road, Dewsbury	0.18
1057	936	Land adjacent 122 Overthorpe Road, Dewsbury	0.01
1024	926	Land adjacent 414-416 Lees Hall Road, Dewsbury	0.17
1407	2533	Providence Court Play Area, Thornhill Lees	0.16
1403	25	Park House Drive Play Area, Thornhill	0.03
1038	906	Land adjacent 134 Low Road, Dewsbury	0.18
1065	872	Land at the junction of John Street & Bell Street, Ravensthorpe	0.19
974	1025	Oastler Street Open Space, Westtown	0.13
1285	2355	Huddleston Court Play Area, Mirfield	0.01
287	1281	Fox Royd Drive Open Space, Mirfield	0.15
1084	849	Land adjacent 26-37 Bracken Close, Mirfield	0.15

Table 18: Huddersfield

Open Space Site Ref.	Open Space Class Ref.	Site Address	Size (ha)
1412	2541	Hanby Close Play Area, Fenay Bridge	0.1
314	585	Mitchell Avenue Open Space, Waterloo	0.11
965	761	Tenters Grove Play Area, Sheepridge	0.13
982	756	Land adjacent 40 & 50 St. Thomas Gardens, Bradley	0.13
058	754	Riddings Road Recreation Ground, Sheepridge	0.09
0341	2413	Sylvan Ridge Play Area, Brackenhall	0.08
0302	2337	Warrenfield Court Open Space, Deighton	0.05

Open Space Site Ref.	Open Space Class Ref.	Site Address	Size (ha)
1230	2143	Tom Lane Recreation Ground, Crosland Hill	0.09
1203	1682	Tom Lane Recreation Ground, Crosland Hill	0.1
342	378	Wellfield Bank Open Space, Crosland Moor	0.07
335	373	Juniper Grove Public Open Space & Play Area, Netherpton	0.12
333	306	Devonshire Street Open Space, Lockwood	0.1
1298	2327	Mason Court Play Area, Crosland Moor	0.1
1235	2154	Juniper Grove Open Space, Netherpton	0.03
1232	2148	Sunnyhill Avenue Play Area, Kirkheaton	0.06
1233	2151	Robson Drive Open Space, Dalton	0.16
912	809	North Carr Croft Open Space, Dalton	0.19
919	795	Land adjacent 196 Bradley Mills Road, Rawthorpe	0.18
924	789	Land adjacent Highroyd Lane, Moldgreen	0.16
1444	2672	Anne Smith Way Open Space, Birkby	0.07
1443	2671	Wheathouse Grove Play Area, Birkby	0.09
295	153	Land adjacent The Oakes, Willwood Avenue, Oakes	0.18
324	493	Fairlea Road Open Space, Taylor Hill	0.05
1348	2426	Bland Street Play Area, Lockwood	0.09
1227	2136	Bland Street Public Open Space, Lockwood	0.13

Table 19: Kirklees Rural

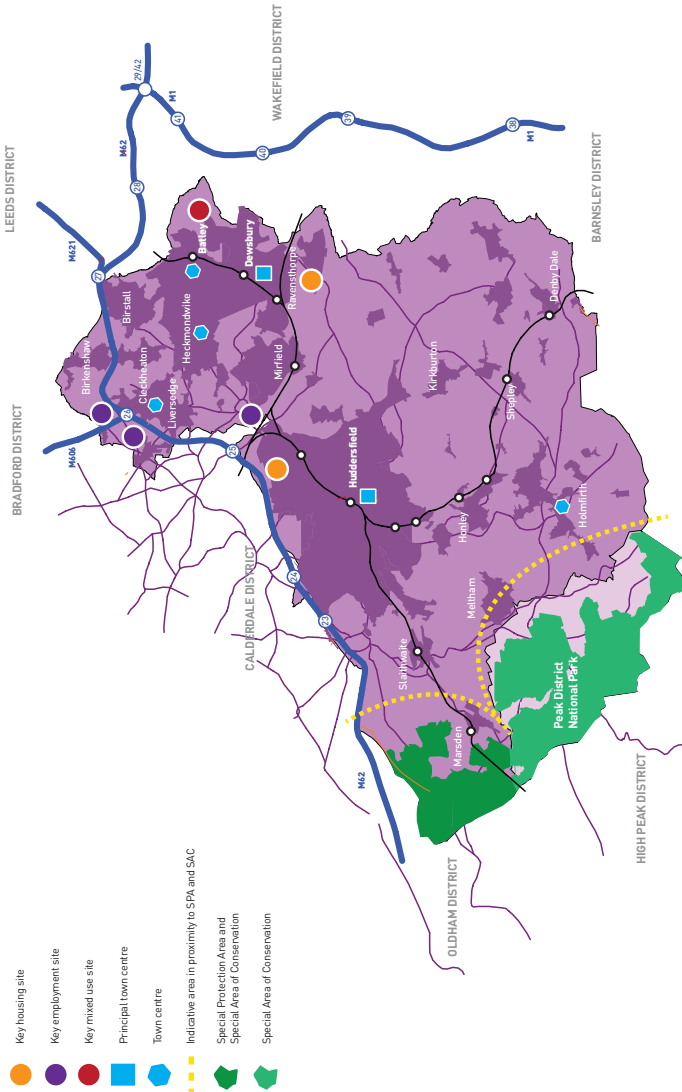
Open Space Site Ref.	Open Space Class No.	Site Address	Size (ha)
253	1968	Longlands Avenue Open Space, Slaithwaite	0.06
1107	887	Land adjacent 32 & 41 Whitehall Road, Linthwaite	0.17
1112	881	Springfield Recreation Ground, Springfield Avenue, Slaithwaite	0.07
1290	2339	The Ridgeways Play Area, Linthwaite	0.02

Open Space Site Ref. Class	Open Space No.	Site Address	Size (ha)
1135	1020	Land adjacent 35 Slant Gate, Linthwaite	0.17
350	1961	Scapegoat Hill Recreation Ground, High Street, Scapegoat Hill	0.03
1414	2543	Waingate Park Open Space, Linthwaite	0.02
1217	2043	Wellhouse Recreation Ground, Wellhouse Green, Wellhouse	0.17
261	288	Mill Pond, Cuttlehurst, Scissett	0.1
1374	2462	Bromley Bank Play Area, Denby Dale	0.04
1404	2524	Baildon Way Play Area, Skelmanthorpe	0.03
358	159	Fortis Way Open Space, Salendine Nook	0.12
1299	2329	New Street Play Area, Golcar	0.1
1441	2675	Towngate Fold Play Area, Meltham	0.05
1365	2446	Open Space adjacent Bridge Tavern, Woodhead Road, Holmbridge	0.02
1364	2445	Victoria Mills Open Space, Holmbridge	0.05
1442	2694	Woodland View Play Area, Thongsbridge	0.08
1343	2385	Grenoside View Play Area, Highburton	0.18

Local Plan Key Diagram

Table Modification SD1-MM162

Modification Ref	Page	Policy/Para /Table/Box	Tracked change
SD1-MM162	Page 248	Local Plan Key Diagram	Insert revised Local Plan Key Diagram



Local Plan allocations: Huddersfield

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H31	Land to the north west of, Woodsome Drive, Fenay Bridge, Huddersfield	2.27	68	#N/A								15	30	23									
H2684a	Land Adjacent , Pennistone Road/Woodsome Park, Lepton, Huddersfield	8.13	286	#N/A									25	50	50	50	50	50	11				
H2730a	Land south east of, Hermitage Park, Lepton, Huddersfield	8.94	312	#N/A									25			20	50	50	50	50	50	17	
H551	Land south of, Holme Avenue, Dalton, Huddersfield	0.64	22	2014/92369							15	7											
H616	Land west of, Fenay Bridge Road, Lepton, Huddersfield	0.94	32	#N/A								30	2										
H684	Land west of, Oak Tree Road, Fenay Bridge, Huddersfield	3.53	123	#N/A																	30	30	33
H754	Land north west of, Forest Road, Almondbury, Huddersfield	0.65	27	2016/90951						15	12												
H755	Land north west of, Bank End Lane, Dalton, Huddersfield	1.25	39	2016/93985							15	24											
H1679	Land north of, Fenay Lane, Almondbury, Huddersfield	7.83	274	#N/A										25	50	50	50	50	49				
H87	Land west of, Lower Quarry Road, Bradley, Huddersfield	0.87	30	#N/A								30											
H519	Land north and west of, Gernhill Avenue, Fixby, Huddersfield	10.79	377	#N/A								25	50	50	50	50	50	50	50	2			
H734	Land to the east of, Netheroyd Hill Road, Cowcliffe, Huddersfield	1.96	68	#N/A								15	30	23									
H809	Land north of, Ashbrow Road, Brackenhall, Huddersfield	4.65	162	2014/93625							25	50	50	37									

Annex 1 Housing Phasing Table

Local Plan allocations: Huddersfield

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan	
H1647	Land north of, Flint Street, Fartown, Huddersfield	1.29	45	#N/A													15	30						
H1656	Land south of, St Thomas Gardens, Bradley, Huddersfield	0.54	18	#N/A									15	3										
H1657	Land north of, Deighton Road, Deighton, Huddersfield	2.52	88	#N/A								15	30	30	13									
H1747	Land north of, Bradley Road, Bradley, Huddersfield	50.87	1,140	#N/A									40	40	80	130	150	150	150	130	120	150	40	437
H351	Land north of, Bradley Road, Bradley, Huddersfield	11.97	320	#N/A											40	40	40	40	40	40	40	40	61	
H94	Land to the west of, Henry Frederick Avenue, Netherton, Huddersfield	3.53	132	#N/A								15	30	30	30									
H102	Land to the west of, Netherton Moor Road, Netherton, Huddersfield	3.53	123	#N/A								25	50	48										
H481	Land north of, Blackmoorfoot Road, Crosland Hill, Huddersfield	3.34	116	#N/A								30	30	30	26									
H660	Land east of, Netherton Moor Road, Netherton, Huddersfield	4.45	155	#N/A									2	50	50	50	50	3						
H764	Land west of, Sunningdale Road, Crosland Moor, Huddersfield	0.62		#N/A																				
H1783	Land east of, Thewlis Lane, Crosland Hill, Huddersfield	14.11	243	#N/A																	43	50	50	257
H216	Land west of, Shop Lane, Kirkheaton, Huddersfield	1.41	48	#N/A								30	18											

Local Plan allocations: Huddersfield

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H276	Land west of, Moorside Road, Kirkheaton, Huddersfield	0.95	33	#N/A								30	3										
H439	Land south west of, Cockley Hill Lane, Kirkheaton, Huddersfield	2.01	60	#N/A								30	30										
H737	Land west of, Stead Lane, Kirkheaton, Huddersfield	2.50	87	#N/A								30	30	27									
H215	Land north of, Edgerton Road, Edgerton, Huddersfield	2.01	41	2014/93014					15	26													
H121	Land north of, New Hey Road, Salendine Nook, Huddersfield	0.43	15	#N/A															15				
H201	Land east of, Laund Road, Lindley, Huddersfield	0.82	21	2012/92070				12	9														
H202	Land north of, New Hey Road, Salendine Nook, Huddersfield	0.55	22	2015/90452						15	7												
H292	Land adjacent, Hollyfield Avenue, Quarmby, Huddersfield	0.77	27	2015/91093						15	12												
H706	Land east of, Halifax Road, Birchcliffe, Huddersfield	11.39	243	2014/93039					25	50	50	50	49						50	19			
H790	Land east of, Fern Lea Road, Lindley, Huddersfield	0.84	29	#N/A									29										
H1694	Land west of, Lidgett Street, Lindley, Huddersfield	0.58	20	2014/93632						20													
H101	Land north of, Jackroyd Lane, Newsome, Huddersfield	1.06	37	#N/A										30	7								
H1811	Land south east of, Blue Bell Hill, Newsome, Huddersfield	1.63	57	#N/A									15	30	12								

Annex 1 Housing Phasing Table

Local Plan allocations: Huddersfield

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H1731a	Land Adjacent , Orchard Terrace, Newsome, Huddersfield	0.53	18	#N/A										18									
H1935	Land south of, Cambridge Road, , Huddersfield	1.27	44	#N/A									15	29									
H3350	Land to the south east of, Knowle Road, Kirkheaton, Huddersfield	2.04	70	#N/A								15	30	25									
H2594a	Minerva Works, Crossley Lane, Kirkheaton, Huddersfield	6.33	194	2011/91152					15	30	30	30	30	30	30	29							
H3405	Land to the north west of, Ruth Street, Newsome, Huddersfield	1.08	69	#N/A								30	30	9									
H2685	Land at Stile Common School, Plane Street, Newsome, Huddersfield	0.94	32	#N/A								15	17										
H3397	Land north of, Blackmoorfoot Road, Crosland Moor, Huddersfield	12.65	684	#N/A										44	80	80	80	80	80	80	80	80	16
H641a	Land adjacent to Former Spotted Cow PH, New Hey Road, Salendine Nook, Huddersfield	0.88	32	#N/A						30	2												
MX1903	Land south of, Blackmoorfoot Road, Crosland Moor, Huddersfield	4.49	200	2014/93099											25								
MX2101	Land east of, Southgate, , Huddersfield	1.33	46	#N/A																			
MX1911	Land south of, Lindley Moor Road, Lindley, Huddersfield	32.16	443	2014/93136				38	63	50	50	50	50	50	42								

Local Plan allocations: Huddersfield

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
MX1906	Land north of, Trinity Street, , Huddersfield	2.44	45	#N/A								30	15										
H1728a	Land Adjacent , Plantation Drive, Newsome, Huddersfield	3.11	-	#N/A																			
H623	Land east of, Weatherhill Road, Birchcliffe, Huddersfield	1.07	-	#N/A																			
H789	Land west of, Tanyard Road, Salendine Nook, Huddersfield	0.75	-	#N/A																			

Sites grouped together for phasing

- Sites H1747 and H351 at Bradley
- Sites H102 and H660 at Netherton
- Sites H2730a and H2684a at Lepton

Annex 1 Housing Phasing Table

Sites with planning permission not yet built at 01/04/2017: Huddersfield

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
60456	Land to the north of 25, Fenay Drive, Fenay Bridge, Huddersfield	0.06	1	12006/90484	Det											1								
60476	Land to the east of 54, Rowley Lane, Lepton, Huddersfield	0.03	1	12014/91123	Det					1														
60544	76, Lascelles Hall Road, Lascelles Hall, Huddersfield	0.23	5	2010/92684	Ext											5								
60580	122, Woodlands Road East, Fenay Bridge, Huddersfield	0.04	1	12015/91189	Det					1														
60675	Adjacent 6, Common End Lane, Lepton, Huddersfield	0.096	1	12016/91761	Out							1												
60684	Adjacent 16, Longdon Avenue, Lepton, Huddersfield	0.041	1	12016/93998	Det					1														
60685	Land adjacent to 1, Highroyd, Lepton, Huddersfield	0.043	1	12016/94065	Det					1														
60686	108, Lascelles Hall Road, Lascelles Hall, Huddersfield	0.13	1	12015/93922	Det					1														
60687	Adjacent 109, Wakefield Road, Fenay Bridge, Huddersfield	0.02	1	12016/90062	Det					1														
80087	6, Stafford Hill Lane, Kirkheaton, Huddersfield	0.11	1	12014/92858	Det					1														
80092	8, Carr Mount, Kirkheaton, Huddersfield	0.126	2	2014/92181	Det					2														
80094	6, Prospect Cottage, Kirkheaton, Huddersfield	0.02	1	12014/90642	Det					1														
80095	North West Of Heaton Lodge Cottages, Helme Lane, Colnebridge, Huddersfield	0.14	1	12014/92076	Det					1														
80096	19, Lane Side, Kirkheaton, Huddersfield	0.109	2	2015/93178	Det					2														
80098	7/9, Hillside, Kirkheaton, Huddersfield	0.075	1	12016/91556	Det					1														
O0113	Land adjacent to 3, Station Road, Bradley, Huddersfield	0.02	1	12016/93896	Det					1														
O0120	Former gas Works Site, Gas Works Street, Huddersfield	0.13	27	2007/94438	Out							27												
O0121	1 & 3, Willow Lane, Fairtown, Huddersfield	0.008	1	12016/92831	Det						1													

Sites with planning permission not yet built at 01/04/2017: Huddersfield

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O0126	30 Former Palace Theatre, Kirkgate, , Huddersfield	0.12	17	2013/93956	Det					17														
O0128	Southern part of 9, Westgate, , Huddersfield	0.01	2	2012/93673	Det					2														
O0129	Land south west of 3, Station Road, Bradley, Huddersfield	0.06	3	2016/93896	Det						3													
O0130	Somerset Arms 53, Wakefield Road, Moldgreen, Huddersfield	0.039	1	2012/90723	Det					1														
O0139	Garage/store 9, Westgate, , Huddersfield	0.01	1	2014/93395	Det						1													
O0141	239, Leeds Road, , Huddersfield	0.013	2	2015/93090	Det						2													
O0142	The George Hotel, St Georges Square, , Huddersfield	0.115	11	2014/90692	Det						11													
O0143	3, Brooks Yard, , Huddersfield	0.006	1	2015/93973	Det						1													
O0144	Land to the south of 72, Whitacre Street, Deighton, Huddersfield	0.05	2	2016/93994	Out							2												
O0145	63, Deighton Road, Deighton, Huddersfield	0.342	1	2015/93290	Out							1												
O0146	6-8, John William Street, Huddersfield	0.038	6	2016/92187	Det						6													
O0147	Auto Electrical Services 29-31, Thistle Street, , Huddersfield	0.011	2	2016/91969	Det						2													
O0149	5-9, Brooks Yard, , Huddersfield	0.008	3	2017/90026	Det						3													
O0150	Oneills Sports Bar 2, Brooks Yard, , Huddersfield	0.017	4	2016/92361	Det						4													
O0151	9, Ramsden Street, , Huddersfield	0.033	5	2016/92084	CJPD						5													
O0152	411, Leeds Road, , Huddersfield	0.019	1	2016/91512	Det						1													
P0028	Land to the north of 48 52, Mountjoy Road, Edgerton, Huddersfield	0.177	1	2014/93029	Out							1												
P0029	Housing Allocation H8.7, Deveron Grove, Edgerton, Huddersfield	3.127	41	2014/93014	Out																			
P0122	Land to the east of 27, Woodthorpe Terrace, , Huddersfield	0.1	7	2014/91718	Det																			

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Sites with planning permission not yet built at 01/04/2017: Huddersfield

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P0239	Heaton Park House, Heaton Park House Heaton Road, Gledholt, Huddersfield	0.4	2	2011/91844	Ext											2								
P0242	8, Edgerton Green, Edgerton, Huddersfield	0.07	1	2012/90189	Ext											1								
P0291	2, Gorse Road, Marsh, Huddersfield	0.02	1	2011/92075	Det					1														
P0299B	62, Church Street, Paddock, Huddersfield	0.07	5	2010/91228	Ext											5								
P0300	60, Gledholt Bank, Gledholt, Huddersfield	0.03	1	2016/90577	Det						1													
P0323A	The Gables, Thornhill Road, Edgerton, Huddersfield	0.175	1	2010/91869	Det					1														
P0323B	Land within the curtilage of The Gables, Thornhill Road, Edgerton, Huddersfield	0.509	1	2012/93763	Det					1														
P0343	53, Brow Road, Paddock, Huddersfield	0.062	2	2015/91017	Out							2												
P0345	44 48, Westgate, Huddersfield	0.031	1	2013/90650	Det					1														
P0347	16A First Class Nursery, Portland Street, Huddersfield	0.011	1	2015/92663	Det						1													
P0350	84 Fitzwilliam House, Fitzwilliam Street, Huddersfield	0.042	4	2015/91243	Det					4														
P0352	Land north and west of 128, Gledholt Bank, Paddock, Huddersfield	0.013	3	2016/94203	Det						3													
P0353	26, Wentworth Street, Huddersfield	0.069	1	2012/92776	Det					1														
P0363	1, Belmont Street, Huddersfield	0.03	1	2014/91453	Det					1														
P0365	128, Trinity Street, Huddersfield	0.02	2	2016/91523	Det						2													
P0367	2 to 4, Portland Street, Huddersfield	0.022	4	2014/93061	Det						4													
P0369	12, Wren Street, Paddock, Huddersfield	0.046	3	2015/90931	Det						3													
P0370	Cote Royd House 7, Halifax Road, Edgerton, Huddersfield	0.38	7	2015/91154	Det						7													

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P0375	80, Fitzwilliam Street, Huddersfield	0.044	4	1 2015/90298	Det						4													
P0377	Gamma House, Henry Street, Huddersfield	0.05	1	1 2015/92914	Det						1													
P0378	Adjacent Marsh Conservative Club, Abb Street, Marsh, Huddersfield	0.031	1	1 2015/93638	Out							1												
P0380	18, Market Street, Paddock, Huddersfield	0.014	1	1 2016/91060	Det						1													
P0381	Garages off, Cleveland Road, Edgerton, Huddersfield	0.026	1	1 2016/93136	Det						1													
P0383	1, Sparks Road, Oakes, Huddersfield	0.174	10	10 2016/93628	Out							10												
P0384	Rear of 10a/10b, Grasmere Road, Gledholt, Huddersfield	0.116	4	4 2016/91463	Out							4												
Q0021G	Land to the west of 93, Croft Gardens, Birkby, Huddersfield	0.14	1	1 2014/92963	Out							1												
Q0070	Housing Allocation H8.34, Fixby Road, Fixby, Huddersfield	1.15	1	1 2009/92237	Det					1														
Q0159	Land to the east of 70 84, Broomfield Road, Fixby, Huddersfield	0.16	1	1 2014/93689	Det						1													
Q0183	Land to the east of 14, Netheroyd Hill Road, Fixby, Huddersfield	0.04	1	1 2014/92650	Out							1												
Q0202	Land to the east of 220, Halifax Old Road, Birkby, Huddersfield	0.07	1	1 2011/92860	Ext											1								
Q0205	Land to the north-west of 71, Lightridge Road, Fixby, Huddersfield	0.09	1	1 2016/91983	Out							1												
Q0224	Cowcliffe Hill Road, Fixby, Huddersfield	0.08	1	1 2016/91695	Det							1												
Q0228	3 & 4, Back Beacon Street, Birkby, Huddersfield	0.01	1	1 2015/90245	Det							1												
Q0229	47, Wheathouse Road, Birkby, Huddersfield	0.025	2	2 2014/91490	Det																			

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Q0244	Lower car park Birkby Grange, Birkby Hall Road, Birkby, Huddersfield	0.7	12	2015/90721	Det						12													
Q0258	Thirnhill Arms 229, Bradford Road, Fartown, Huddersfield	0.047	3	2012/90330	Det				3															
Q0261	349, Bradford Road, , Huddersfield	0.03	1	2016/91990	Det						1													
Q0268	41, Ashbrow Road, , Huddersfield	0.452	13	2014/92363	Out							13												
Q0272	14, Broomfield Road, Fixby, Huddersfield	0.11	1	2015/91837	Det						1													
Q0273	12, Central Avenue, Fartown, Huddersfield	0.052	3	2014/90652	Det						3													
Q0274	Land to the north of 160, Birkby Hall Road, Birkby, Huddersfield	0.061	2	2016/91223	Det						2													
R0068	Housing Allocation H8.33, Ashbrow Road, Sheepridge, Huddersfield	4.448	207	2014/93625	Out																			
R0098	140-142, Deighton Road, Deighton, Huddersfield	0.101	1	2014/92412	Det						1													
R0106	Sheepbridge Post Office 86, Sheepbridge Road, , Huddersfield	0.048	3	2014/91303	Det						3													
R0111	52 to 54, Bradley Road, Bradley, Huddersfield	0.088	1	2015/90982	Det						1													
R0113	Land to the north of 32, Bradley Road, Bradley, Huddersfield	0.575	9	2016/91688	Out							9												
R0114	The Woolpack 190, Deighton Road, Deighton, Huddersfield	0.054	1	2016/91778	Det					1														
S0046B	Land to the north of 32, Rawthorpe Terrace, Rawthorpe, Huddersfield	0.08	8	2015/93569	Det						8													
S0071A	Parcel A Housing Allocation H8.45, Crossley Lane, Dalton, Huddersfield	2.329	60	2011/91152	Det						30	30												
S0112	Parcel C Land to the north of, Crossley Lane, Dalton, Huddersfield	1.01	36	2011/91152	Det																			
S0113	Parcel B Land to the north west of, Cold Royd Lane, Dalton, Huddersfield	0.88	35	2011/91152	Det																			

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S0122	267 - 269, Wakefield Road, Moldgreen, Huddersfield	0.021	2	2013/93640	Det					2														
S0123	18-22, Jagger Hill, Huddersfield	0.625	1	2013/92361	Det					1														
S0126	Land North and South of, Crossley Lane, Dalton, Huddersfield	4.191	126	2015/90430	Out																			
S0127	10, Broad Lane, Moldgreen, Huddersfield	0.238	26	2016/90551	CJPD						26													
S0129	First Floor 589a, Wakefield Road, Waterloo, Huddersfield	0.015	1	2016/90903	CJPD						3													
S0131	Highroyd Care Home, Highroyd Lane, Moldgreen, Huddersfield	0.12	2	2016/93274	Det						2													
S0132	Deal House 603, Wakefield Road, Waterloo, Huddersfield	0.227	3	2015/93799	Det					3														
T0029	Land to the south of 1 23, Holme Avenue, Dalton, Huddersfield	0.642	19	2014/92369	Out																			
T0082	Land to the west of 1 - 3, Beaumont Street, Moldgreen, Huddersfield	0.038	3	2012/93659	Det					3														
T0123	Land adjacent 152, Fleminghouse Lane, Almondbury, Huddersfield	0.077	1	2016/92746	Out							1												
T0182	12, Bank End Lane, Almondbury, Huddersfield	1.245	41	2016/93985	Out																			
T0199	44, Kaye Lane, Almondbury, Huddersfield	0.038	1	2015/93353	Det						1													
T0203	Oaklands Resource Centre, Coach House Drive, Dalton, Huddersfield	0.161	2	2016/91363	Det					2														
T0207	3, 5 and 7, Westgate, Almondbury, Huddersfield	0.209	6	2015/90394	Det						6													
T0208	18, Somerset Crescent, Moldgreen, Huddersfield	0.012	6	2015/91073	Det						6													
T0209	82, Forest Road, Dalton, Huddersfield	0.065	1	2015/93304	Det						1													
T0210	126, Ravensknowie Road, Dalton, Huddersfield	0.031	4	2014/93980	Det						4													
T0212	5, Thorpe Lane, Almondbury, Huddersfield	0.102	1	2016/93357	Det						1													

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T0213	Land on, Forest Road, Almondbury, Huddersfield	0.647	27	2016/90951	Det																			
U0118	Land to the south of 30, Manor Street, Ashenhurst, Huddersfield	0.034	2	2015/92805	Out						2													
U0224	Land to the south of Fairfield Mills, Colne Road, , Huddersfield	0.39	30	2012/90591	Det					30														
U0231	Land to the west of Fenwick House, Colne Road, , Huddersfield	0.23	38	2012/90591	Det					30	8													
U0254	The Crimea PH 84, Cross Lane, Primrose Hill, Huddersfield	0.06	1	2012/92113	Det					1														
U0265	34, Longley Lane, Almondbury, Huddersfield	0.02	1	2016/91989	Det					1														
U0266	Land to the north of 83, Jackroyd Lane, Newsome, Huddersfield	0.1	1	2016/90686	Det						1													
U0271	1, Occupation Road, Newsome, Huddersfield	0.035	1	2009/92642	Ext											1								
U0283A	Phase 1 residential Waterfront Quarter, Chapel Hill and Manchester Road, , Huddersfield	0.212	290	2015/92411	Det						50	50	50	50	50	40								
U0283B	Phase 1 Waterfront Quarter, Chapel Hill and Manchester Road, , Huddersfield	0.474	252	2014/90411	Det					50	50	50	50	50	2									
U0286	Armitage Bridge Lodge, Armitage Road, Armitage Bridge, Huddersfield	0.14	1	2012/91954	Det					1														
U0294	1, Hillside Crescent, Newsome, Huddersfield	0.047	2	2011/92731	Ext											2								
U0307	Fly Boat Inn 6, Colne Street, Aspley, Huddersfield	0.03	3	2012/91654	Det					3														
U0312	Ramsden House, New Street, , Huddersfield	0.118	45	2014/93905	Det						30	15												
U0315	47a, Colne Road, , Huddersfield	0.164	10	2016/91757	Det					10														
U0317	46, Towngate, Newsome, Huddersfield	0.006	1	2014/91659	Det					1														

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U0320	46, Stile Common Road, Primrose Hill, Huddersfield	0.032	2	2014/92919	Det						2													
U0321	52, Wakefield Road, Huddersfield	0.059	45	2016/91626	Det						30	15												
U0322	5, Moss Street, Newsome, Huddersfield	0.039	4	2015/92806	Out							4												
U0323	Land South Broomfield House, Fifth Street, Huddersfield	0.103	40	2016/92767	Det					30	10													
U0324	West of Queensgate House, Queensgate, Huddersfield	0.274	60	2014/91958	Out							30	30											
U0326	49, Colne Road, Huddersfield	0.051	3	2013/90796	Det					3														
U0328	Phase 1 Waterfront Quarter, Chapel Hill and Manchester Road, Huddersfield	0.096	168	2016/91026	Det					30	30	30	30	30	18									
U0329	St Stephens Church, Victoria Road, Lockwood, Huddersfield	0.172	1	2016/90940	Det						1													
U0330	201, Longley, Lowhouses, Huddersfield	0.013	1	2016/94247	Det					1														
U0331	Milnes Butchers 83, Longley Road, Lowerhouses, Huddersfield	0.021	1	2016/92735	Det						1													
U0332	38, Wakefield Road, Aspley, Huddersfield	0.081	14	2015/91642	Det						14													
U0334	Land to the north of 27A, Prince Street, Primrose Hill, Huddersfield	0.022	1	2016/90321	Det						1													
U0335	61, Newsome Road, Newsome, Huddersfield	0.023	4	2016/93432	Det						4													
V0198	Grounds of 68, Dryclough Road, Crosland Moor, Huddersfield	0.05	1	2011/92210	Det					1														
V0210	Land to the south of 19, Yew Green Avenue, Lockwood, Huddersfield	0.06	1	2007/94560	Det					1														
V0237	Former Paddock Field Mill, Off Row Street, Crosland Moor, Huddersfield	0.49	19	2015/92227	Det					19														
V0271	Top of Hill Farm, School Hill, Crosland, Huddersfield	0.301	5	2015/92039	Det					5														

Annex 1 Housing Phasing Table

Sites with planning permission not yet built at 01/04/2017: Huddersfield

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
V0283	Land adjacent 97, Bourne View Road, Netherton, Huddersfield	0.386	1	12014/93641	Det					1													
V0287	Barn West of 11b, Dry Clough Road, Crosland Moor, Huddersfield	0.02	1	12014/90527	Det			1															
V0288	The old Farmhouse 31, Bourn View Road, Neatherton, Huddersfield	0.069	1	12013/92090	Out						1												
V0292	Former St Luke's Hospital, Blackmoorfoot Road, Crosland Moor, Huddersfield	9.202	200	2014/93099	Out																		
V0293	6, Dryclough Road, Crosland Moor, Huddersfield	0.069	1	12015/92323	Out						1												
V0294	Spring Farm, Nether Moor Road, Huddersfield	0.035	1	12015/92893	Det				1														
V0297	Craig Heath 7, Beaumont Park Road, Beaumont Park, Huddersfield	0.081	1	12016/92786	Out						1												
Z0254	Housing Allocation H8.60, New Hey Road, Salendine Nook, Huddersfield	0.615	22	2015/90452	Out																		
Z0258	Housing Allocation H8.59, Laund Road, Lindley, Huddersfield	0.8	9	2012/92070	Det																		
Z0263A	Housing Allocation H8.17 (phase 1), Cowrakes Road, Lindley, Huddersfield	10.561	18	2011/91519	Det				18														
Z0263B	Housing Allocation H8.17 (Phase 2), Cowrakes Road, Lindley, Huddersfield	0.961	8	2011/91519	Det				8														
Z0300	Land within the curtilage of 120, Laund Road, Lindley, Huddersfield	0.24	10	2014/93584	Det					10													
Z0333	Land to the north of 29, Moorlands Crescent, Mount, Huddersfield	0.02	1	2011/91654	Ext										1								
Z0348	87, Wellington Street, Oakes, Huddersfield	0.01	2	2007/94121	Ext										2								
Z0357	Middle Burn Farm, Bum Road, Birchcliffe, Huddersfield	0.07	1	2014/91117	Det																		

Sites with planning permission not yet built at 01/04/2017: Huddersfield

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
Z0363	Land adjacent to 269, New Hey Road, Huddersfield	0.03	1	12015/92955	Det						1													
Z0371	Land to the rear of 126, Halifax Road, Birchcliffe, Huddersfield	0.02	1	12008/93978	Ext											1								
Z0374	Land adjacent to 320, New Hey Road, Oakes, Huddersfield	0.081	1	12016/90141	Out							1												
Z0382	21, Thorncliffe Street, Lindley, Huddersfield	0.01	1	12011/91636	Det					1														
Z0390	Land north of 79, Baker Street, Oakes, Huddersfield	0.009	1	12016/90181	Det						1													
Z0398	12 POL, Warren House Lane, Birchcliffe, Huddersfield	0.08	1	12013/90267	Det						1													
Z0399	3, Cowrakes Road, Lindley, Huddersfield	0.347	1	12012/91560	Det						1													
Z0401	2A, Haigh House Hill, Lindley Moor, Huddersfield	0.058	1	12016/90468	Det					1														
Z0402	6, Inglewood Avenue, Birkby, Huddersfield	0.105	1	12013/93939	Det						1													
Z0403	North East of 30, New Hey Road, Huddersfield	0.025	1	12014/91931	Out							1												
Z0408	B8.1, Lindley Moor Road, Huddersfield	10.7	151	12014/93136	Det																			
Z0409	Land at Ainley Top, Yew Tree Road and Burn Road, Huddersfield	9.821	190	12014/93039	Out																			
Z0410	Oaknead TC, Lidgett Street, Huddersfield	0.784	14	12014/93632	Out																			
Z0411	Land South of 42.50, Hollyfield Avenue, Quarmby, Huddersfield	0.769	22	12015/91093	Out																			
Z0412	Land North of 40, Adam Court, Huddersfield	0.04	1	12016/90215	Out							1												
Z0413	rear 2, Romsey Close, Lindley, Huddersfield	0.207	1	12015/91428	Det						1													
Z0419	2-4, Peat Ponds, Salendine Nook, Huddersfield	0.347	6	12016/91309	Out							6												
Z0420	98, Burn Road, Birchcliffe, Huddersfield	0.719	4	12016/90073	Out																			

Local Plan allocations: Dewsbury and Mirfield

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H307	Land to the east of, Long Lane, Earlsheaton, Dewsbury	0.45	15	#N/A								15											
H367	Magma Ceramics, Preston Street, Earlsheaton, Dewsbury	1.16	40	#N/A															30	10			
H559	Land to the east of, Leeds Road, Chidswell, Batley	7.98	280	#N/A								20	35	35	35	35	35						
H813	Land st, School Street, Chickenley, Dewsbury	1.92	49	2015/92628					30	19													
H1937	, Cliff Street , Dewsbury	1.36	47	#N/A									15	30	2								
H2148	Land at, Providence Street, Earlsheaton, Dewsbury	0.86	30	#N/A								30											
H776	Land at, Oxford Road and Reservoir Street , Dewsbury	0.77	26	#N/A								15	11										
H778	Land off, Huddersfield Road, , Dewsbury	0.51	11	2013/93196						11													
H1664	Red Laithes Court, Red Laithes Lane, Ravensthorpe, Dewsbury	0.45	15	#N/A										15									
H85	Land to the north of 10, Kimberley Street, Thornhill Lees, Dewsbury	0.63	22	#N/A								22											
H192	Headfield Mills, Savile Road, Savile Town, Dewsbury	1.02	35	#N/A								30	5										
H269	Land north west of, Forge Lane, Thornhill Lees, Dewsbury	2.64	93	#N/A								30	30	30	3								

Annex 1 Housing Phasing Table

Local Plan allocations: Dewsbury and Mirfield

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan	
H1754	Land off, Smithy Parade, , Dewsbury	0.62	21	#N/A								15	6											
H661a	Land to the east of, High Street, , Batley	1.76	61	#N/A								15	30	16										
H1660	Land east of, Heckmondwike Road, Dewsbury Moor, Dewsbury	1.54	53	#N/A								15	30	8										
H2576	Land to the south of, Red Deer Park Lane, Birstfield, Dewsbury	1.18	42	#N/A								15	27											
H2646	, Lock Street, Thornhill, Dewsbury	2.72	104	2013/90249						15	30	30	29											
H46	Rams RLFC, Owl Lane, Shaw Cross, Dewsbury	13.84	206	2014/90780			66	12	50	50	28													
H3379	Land to the north of, Hall Lane, Thornhill, Dewsbury	1.11	38	2014/92815							15	23												
H2089	Land to the south of, Ravensthorpe Road, Thornhill Lees, Dewsbury	142.90	1,869	#N/A							18	94	102	26	183	205	207	195	211	209	210	209	210	2131
H40	Land to the south west of Sheep Ings Farm, Granny Lane, , Mirfield	2.02	70	#N/A								15	30	25										
H197	Former Allotments, Leeds Road, , Mirfield	0.65	22	#N/A								22												
H205	Land to the east of, Slipper Lane, Mirfield,	0.41	21	#N/A								15	6											
H333	Land to the east of, Northorpe Lane, , Mirfield	1.39	48	#N/A								15	30	3										

Local Plan allocations: Dewsbury and Mirfield

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H794	Land at, Flash Lane and Dunbottle Lane, , Mirfield	2.03	71	#N/A								15	30	26									
H357	Land adjacent to , Rumble Road, , Dewsbury	4.45	149	2016/93514						15	30	30	30	30	14								
MX1929	Land at, Slipper Lane, Leeds Road, Mirfield	6.11	166	2014/90688						15	30	30	30	30	30	1							
MX3394	Lees House Farm, Leeds Road, , Dewsbury	1.09	38	2007/92400								15	23										

Annex 1 Housing Phasing Table

Sites with planning permission not yet built at 01/04/2017: Dewsbury and Mirfield

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
B0565	51, High Street, Hanging Heaton, Batley	0.111	1	12015/93715	Det						1													
D0042	Land to the east of 7, West Park Street, Dewsbury	0.069	1	12011/92932	Det						1													
D0051	17, Reservoir Street, Dewsbury Moor, Dewsbury	0.1	1	12014/90478	Det				1															
D0076	Land to the east of 38, Princess Street, Chickenley, Dewsbury	1.665	49	2015/92628	Det																			
D0088	Adj 23, Oastler Street, Dewsbury	0.05	2	2015/93356	Out							2												
D0112	Land to the west and south of 51a, Low Road, Dewsbury Moor, Dewsbury	0.522	14	2014/90676	Det				14															
D0120	Land between 13 and 15, Park Road, Dewsbury	0.08	1	2015/92932	Det						1													
D0237	Curtilage of 89, Chidswell Lane, Dewsbury	0.04	1	2016/93569	Det						1													
D0239	The Vicarage, Boothroyd Lane, Dewsbury Moor, Dewsbury	0.18	5	2016/93712	Det															5				
D0290	Former Dewsbury Moor WMC, Low Road, Dewsbury Moor, Dewsbury	0.076	7	2016/93170	Det						7													
D0294	Land to the south-west of 1, Park St, Dewsbury	0.03	1	2016/90934	Det						1													
D0325	Land to the south of 35, Wellington Road, Dewsbury	0.04	14	2005/91777	Ext															14				
D0332	Land to the east of 100-104, Syke Lane, Dewsbury	0.16	8	2013/93574	Det				8															
D0347	10, Union Street, Dewsbury	0.03	3	2003/93645	Ext																	3		
D0352	Land to the east of 39, Reservoir Street, Dewsbury	0.19	3	2014/91334	Det						3													
D0368	Syke Ing Mills 16, Syke Ing Cottages, Earlsheaton, Dewsbury	1.3	26	2011/90359	Det				26															
D0396	8, Rathlin Road, Hanging Heaton, Dewsbury	0.03	1	2008/92688	Ext																	1		
D0405	25, Northgate, Dewsbury	0.07	24	2015/93965	Det						24													
D0426	6, School Street, Dewsbury	0.008	2	2015/92234	Det						2													

Sites with planning permission not yet built at 01/04/2017: Dewsbury and Mirfield

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
D0437	Old Auction Rooms, School Street, Dewsbury	0.015	8	2012/93686	Det						8													
D0438	52-62, Daisy Hill, Dewsbury	0.035	5	2013/90099	Det					5														
D0442	81-83, Daisy Hill, Dewsbury	0.036	2	2017/90071	Det					2														
D0443	Dewsbury Register Office, Wellington Road, Dewsbury	0.037	7	2015/92911	Det						7													
D0447	20, West Park Street, Dewsbury	0.088	1	2013/92368	Det					1														
D0448	150, Staincliffe Road, Dewsbury	0.01	2	2013/93938	Det					2														
D0450	1, Oates Street, Dewsbury	0.012	1	2014/93328	C.JPD						1													
D0452	Riddings Mill, Wakefield Road, Dewsbury	0.237	1	2014/93114	Det					1														
D0454	Land South of Dewsbury Rams RFLC, Owl Lane, Dewsbury	7.3	128	2014/90780	Det																			
D0455	30, Leeds Road, Dewsbury	0.01	1	2014/91577	Det						1													
D0456	101, Old Westgate, Dewsbury	0.012	3	2014/93188	Det						3													
D0460	Land east of 196, Wakefield Road, Earlsheaton, Dewsbury	0.129	3	2011/93394	Det						3													
D0461	Land off, Batty Street, Dewsbury	0.12	4	2015/90068	Out							4												
D0462	The dewsbury reporter 17, Wellington Road, Dewsbury	0.026	10	2015/90702	C.JPD					10														
D0465	Adj 2, Camilla Court, Earlsheaton, Dewsbury	0.019	1	2016/93032	Det						1													
D0466	13 17, Corporation Street, Dewsbury	0.01	2	2015/93603	Det						2													
D0467	28, Church Street, Dewsbury	0.045	3	2015/90579	Det						3													
D0468	56, Frances Road, Earlsheaton, Dewsbury	0.036	1	2013/91583	Det						1													
D0469	1a, Camroyd Street, Huddersfield	0.005	1	2015/90967	Det						1													
D0471	30, Oxford Road, Dewsbury	0.336	1	2015/92307	Det						1													
D0472	36, Oxford Road, Dewsbury	0.317	1	2014/93001	Det						1													
D0473	The Old Post Office, Wakefield Road, Dewsbury	0.104	27	2016/90605	Det						27													

Annex 1 Housing Phasing Table

Sites with planning permission not yet built at 01/04/2017: Dewsbury and Mirfield

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
D0474	Wesley Chambers, Union Street, , Dewsbury	0.0265	5	2017/90004	CJPD						5													
D0475	Yorkshire House, South Street, , Dewsbury	0.095	32	2016/92503	CJPD				30		2													
D0476	640 Wakefield Road, Earlsheaton, Dewsbury	0.016	3	2016/92330	Det				3															
D0477	5 & 7, Park Avenue, West Town, Dewsbury	0.055	2	2016/92745	Det						2													
D0478	2, Springfield Terrace, , Dewsbury	0.01	1	2016/92756	Det				1															
D0479	Crown Works, Staincliffe Road, Westborough, Dewsbury	0.078	7	2016/93266	Det						7													
D0480	60, High Road, , Dewsbury	0.064	1	2016/91937	Det				1															
D0481	Former Dewsbury Working Mens Club 11, Oates Street, , Dewsbury	0.05	10	2016/92853	Det						10													
D0482	72, Daisy Hill, , Dewsbury	0.012	3	2016/93020	Det						3													
D0483	The Meeting Rooms, Boothroyd Lane, , Dewsbury	0.065	1	2016/93731	Det						1													
E0115	The Combs, Hall Lane, Thornhill, Dewsbury	1.074	30	2014/92815	Out																			
E0210A	Land south east of, Forge Lane, , Dewsbury	5.71	169	2013/92657	Out							30	30	30	30	30	19							
E0220	Land to the east of 43, Edge Road, Thornhill Edge, Dewsbury	0.064	1	2016/93208	Det						1													
E0224	Land opposite 160, Foxroyd Lane, Thornhill, Dewsbury	0.053	2	2014/90856	Det						2													
E0225	249, Lees Hall Road, Thornhill Lees, Dewsbury	0.165	2	2014/90027	Det						2													
E0231	Land South of 61, Lees Hall Road, Thornhill Lees, Dewsbury	0.575	15	2014/91487	Det						15													
E0265	Dewsbury	0.048	1	2013/90021	Det					1														
E0266	Plots 1 and 4 Holly Hall, Foxroyd Lane, Thornhill, Dewsbury	0.1	2	2013/93083	Det					2														
E0269	Thornhill Community Centre, Combs Road, Thornhill, Dewsbury	0.15	1	2007/92333	Det					1														

Sites with planning permission not yet built at 01/04/2017: Dewsbury and Mirfield

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E0276	Meadowside, Falfhouse Lane, Whitley, Dewsbury	0.06	1	12015/90184	Det						1													
E0277	Rear of Edge Top WMC, Whitley Road, Thornhill, Dewsbury	0.02	3	2014/93748	Det						3													
E0288	Land South East of 16, The Slings, Dewsbury	0.9	24	2010/92630	Det				24															
E0293	Land south east of 49, Overthorpe Road, Dewsbury	0.22	7	2010/93530	Ext											7								
E0296	Land to the east of 64, What Street, Savile Town, Dewsbury	0.08	4	2016/90357	Det						4													
E0300	Sly Mount, Long Causeway, Thornhill Lees, Dewsbury	0.1	1	2016/90777	Out							1												
E0301	14, Lodge Farm Close, Thornhill Lees, Dewsbury	0.257	3	2015/93952	Out							3												
E0302	199, Headfield Road, Savile Town, Dewsbury	0.024	1	2013/92615	Det					1														
E0303	Back Lane, Scopsley Lane, Whitley, Dewsbury	1.02	1	2015/90432	Det						1													
E0307	Orchard Farm Barn, Back Lane, Briesfield, Dewsbury	0.113	2	2014/91018	Det						2													
E0308	Poplar Farm, Briesfield Road, Briesfield, Dewsbury	0.218	4	2014/92154	Out							4												
E0309	Land North of 39, Daleside, Thornhill Edge, Dewsbury	0.05	1	2014/93082	Det					1														
E0310	Land North of 9, Cardwell Terrace, Saville Town, Dewsbury	0.04	1	2016/92943	Det						1													
E0311	Former Thornhill Pumping Station, Dewsbury, Thornhill, Dewsbury	0.097	1	2014/92348	Out							1												
E0315	Briesfield Village Hall, Briesfield Road, Briesfield, Dewsbury	0.036	1	2015/93628	Det						1													
E0316	Adj, Lock Street, Thornhill, Dewsbury	2.514	104	2013/90249	Out																			
E0317	Overthorpe Park Depot, Edge Top Road, Dewsbury	0.118	8	2016/93326	Det						8													
E0318	13, Mountain Road, Dewsbury	0.03	1	2016/93827	Det						1													
E0319	48, Whitley Road, Thornhill, Dewsbury	0.133	5	2014/93850	Det							5												

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Sites with planning permission not yet built at 01/04/2017: Dewsbury and Mirfield

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F0020	Adj 163, North Road, Ravenshorpe, Dewsbury	0.1	3	2014/93991	Out						3													
F0041A	Land to the west of Fir Cottage, Huddersfield Road, Ravenshorpe, Dewsbury	0.435	11	2013/93196	Out																			
F0069	619a, Huddersfield Road, Ravenshorpe Dewsbury, Dewsbury	0.02	4	2014/93417	Det				4															
F0074	West of 894, Huddersfield Road, Ravenshorpe, Dewsbury	0.128	2	2015/90863	Out							2												
F0075	656, Huddersfield Road, Ravenshorpe, Dewsbury	0.04	1	2015/92746	Det						1													
F0078	Rhodes Tailors, Neatherfield Road, Ravenshorpe, Dewsbury	0.01	10	2016/92418	Det						10													
F0079	191, North Road, Ravenshorpe, Dewsbury	0.054	6	2015/90613	Det						6													
J0054A	Land to the North West Butt End Mills, Chadwick Fold Lane, Lower Hopton, Mirfield	5.93	137	2006/92410	Det											30	30	30	30	17				
J0068	Former Plantation Rugs, Steanard Lane, Lower Hopton, Mirfield	0.41	3	2014/92431	Det					3														
J0071	Hopton United Reformed Church, Calder Road, Lower Hopton, Mirfield	0.68	7	2010/93092	Det					7														
J0074	12, Calder Road, Lower Hopton, Mirfield	0.096	12	2016/92212	Det																			
J0076	18, Granny Lane, Lower Hopton, Mirfield	0.096	2	2016/90021	Det						2													
J0077	4, Sands Lane, , Mirfield	0.076	1	2015/92334	Det						1													
J0078	2, Jackroyd Lane, Lower Hopton, Mirfield	0.11	1	2015/93668	Det						1													
J0079	Headlands 42, Hopton Lane, , Mirfield	0.089	3	2016/90958	Det						3													
M0186	7, Princess Street, , Mirfield	0.13	2	2015/91352	Det						2													
M0217	Wellhouse Farm, Wellhouse Lane, , Mirfield	0.082	1	2014/93414	Det						1													

Sites with planning permission not yet built at 01/04/2017: Dewsbury and Mirfield

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M0237	Land to the south of Marlwood, Greenside Road, , Mirfield	0.26	5	2013/92189	Det						5													
M0263	Adj 9, Old Bank Road, , Mirfield	0.03	1	2016/92771	Det						1													
M0267	Land to the north-west of 16, Pinfold Lane, , Mirfield	0.05	1	2016/91976	Det						1													
M0285	Land to the south of 8, Huddersfield Road, , Mirfield	0.09	2	2016/92763	Det						2													
M0289	1, Blake Hall Drive, , Mirfield	0.03	1	2015/93829	Det						1													
M0327	Land to the east of 1, Savile Place, , Mirfield	0.03	1	2013/91203	Det					1														
M0347	Land to the south-east of Primrose Farm 274, Crossley Lane, , Mirfield	0.04	1	2016/90068	Det						1													
M0348	109 111, Sunnybank Road, , Mirfield	0.136	1	2007/91891	Det					1														
M0362	Land adjacent to 6, Bronte Grove, , Mirfield	0.05	1	2014/92541	Det						1													
M0363	Land to the north of 55b, Towngate, Towngate, Mirfield	0.186	5	2016/93751	Out							5												
M0370	Land at, Slipper Lane and Leeds Road, , Mirfield	6.02	166	2014/90688	Det																			
M0375	4A, Crowlees Road, , Mirfield	0.29	2	2012/92659	Det					2														
M0376	Primrose Farm, Crossley Lane, , Mirfield	0.04	1	2016/91429	Det						1													
M0389	14, Bracken Hill, , Mirfield	0.03	1	2015/91816	Det						1													
M0393	1, Knowl Road, , Mirfield	0.025	3	2014/93793	Det						3													
M0395	St Pauls Lock, Newgate, , Mirfield	0.456	36	2015/93097	Det					30	6													
M0401	35, Shill Bank Lane, , Mirfield	0.03	1	2014/92404	Out							1												
M0405	13 Westfield Assessment Centre, Westfield Road, , Mirfield	0.215	2	2014/92675	Det						2													
M0406	Grounds of Westfield Assessment Centre, Westfields, , Mirfield	1.085	11	2014/92673	Out							11												
M0411	114, West Royd Avenue, , Mirfield	0.037	1	2017/90010	Det						1													
M0412	The Old Rectory 15, Pinfold Lane, , Mirfield	0.042	1	2016/93260	Det						1													

Annex 1 Housing Phasing Table

Sites with planning permission not yet built at 01/04/2017: Dewsbury and Mirfield

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
M0414	15, Bright Street , Liversedge	0.052	3	2015/93723	Det						3													
M0415	12, Bracken Hill , Mirfield	0.067	1	2015/94016	Det						1													

Application Type

- Det** Detailed Planning Permission
- Out** Outline Planning Permission
- Ext** Extant Planning Permission
- CJPD** Class J Permitted Development

Local Plan Allocations: Batley and Spen

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H662	Land at rear of 52, Upper Batley Low Lane, , Batley	0.95	33	#N/A								15	18										
H758	Land off, Soothill Lane, Lower Soothill, Batley	15.19	393	2015/92908										25	50	50	50	50	50	50	50	18	
H1938	Wards Hill, , Batley,	0.55	19	#N/A										19									
H323	Land to the west and south of Lady Anne Business Park, Lady Ann Road, Soothill , Batley	2.77	97	#N/A							30	30	30	7									
H2647	Land to the east of, Pickles Street, Batley Carr, Batley	0.76	33	2014/91721							15	18											
H124	Land at Squirrel Hill Reservoir, Staincliffe Road, Dewsbury Moor, Dewsbury	0.88	30	#N/A															15	15			
H760	Land Adjacent , Halifax Road, Staincliffe, Batley	0.66	23	#N/A								15	8										
H1696	Land Adjacent , Mayman Lane, Mount Pleasant, Batley	1.19	41	#N/A									15	26									
H1702	Land Adjacent , Mayman Lane, Mount Pleasant, Batley	0.56	19	#N/A									15	4									
H1763	Fire and Rescue Station , Carllinghow Lane, Batley,	0.40	14	2014/93942						14													
H527	Land west of 19, Staincliffe Hall Road, Staincliffe, Batley	0.67	23	#N/A								23											
H11	Land to the north east of, Hightfield Drive, Birstall, Batley	1.05	36	#N/A								30	6										
H138	Land south of, Mill Street, Birstall, Batley	7.50	262	#N/A									50	50	50	50	50	12					

Annex 1 Housing Phasing Table

Local Plan Allocations: Batley and Spen

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H172	Rescue Service Headquarters, Bradford Road, Birkenshaw, Bradford	1.26	30	2014/93173							15	15											
H173	Land adjacent to 17, Whitehall Road West, Birkenshaw, Bradford	0.69	24	#N/A								24											
H193	Holme House, Oxford Road, Gomersal, Cleckheaton	0.60	21	#N/A								15	6										
H203	Thornfield, Prospect Lane, Birkenshaw,	0.41	14	2015/93238						14													
H224	Former Cemex Site, Smithies Moor Lane, Birstall, Batley	0.38	21	2014/93236						15	6												
H531	Land south west of, Soureby Cross Way, East Bierley, Bradford	1.70	59	#N/A								15	30	14									
H601	Land to south east of Park House Healthcare, Whitehall Road West, Birkenshaw, Cleckheaton	3.33	116	#N/A						15	30	30	30	11									
H761	Land Adjacent , Raikes Lane, Birstall,	1.73	55	#N/A								15	30	10									
H796	Land Adjacent , Old Lane, Birkenshaw,	0.82	28	#N/A							15	13											
H218	Bluehills Farm, Whitehall Road West, Birkenshaw, Bradford	3.46	123	#N/A								15	30	30	18								
H162	Cleckheaton Bowling Club, Park View , Cleckheaton	0.67	22	2015/90022				19	3														
H49a	Land adjacent Brick Hill Farm, Oddfellows Street, Scholes, Cleckheaton	0.98	34	#N/A								15	19										
H69	Merchant Fields, Hunsworth Lane, Cleckheaton	11.60	413	#N/A								25	50	50	50	50	50	50	50	38			

Local Plan Allocations: Batley and Spen

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H508	Land to the west of Whitechapel Middle School, Whitechapel Road, Cleckheaton	3.12	122	#N/A								15	30	30	30	17							
H509	Brook House Mill, Balme Road, Cleckheaton	0.72	25	#N/A								25											
H640	Land adjacent to, Walroyd Road, Cleckheaton	0.70	24	#N/A								24											
H708	Land Adjacent, Ashbourne Drive, Liversedge,	2.33	53	#N/A								30	23										
H762	Land Adjacent, Rooks Avenue, Cleckheaton	1.68	58	#N/A								15	30	13									
H1704	Land Adjacent, Highmoor Lane, Hartshead, Liversedge	1.55	56	#N/A								15	30	11									
H1983	Land north of Tesco Superstore, Northgate, Cleckheaton	1.38	48	#N/A							30	18											
H2066	Warren Cottage 916, Halifax Road, Scholes, Cleckheaton	0.51	17	#N/A								15	2										
H2645	Francis W Birkett, Hightown Road, Cleckheaton	1.38	48	2016/92535						15	30	3											
H145	Spensorough Industrial Estate, Parker Street, Liversedge	0.52	28	2013/91771						15	13												
H612	Land north of 2 - 4, Traith Court, White Lee, Batley	1.06	24	2014/93425				17	7														
H1772	Land east of, Boundary Street, Heckmondwike	1.58	30	#N/A								30											
H134	Land at Headlands Farm, Headlands Road, Liversedge	0.58	20	#N/A								20											

Annex 1 Housing Phasing Table

Local Plan Allocations: Batley and Spen

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H198	Land to the south of, Second Avenue, Hightown, Liversedge	3.60	125	#N/A								15	30	30	30	20							
H242	Land north of 72, Peep Green Road, Hartshhead, Liversedge	0.44	15	#N/A								15											
H278	Land off, Lands Beck Way, , Liversedge	0.78	27	#N/A								15	12										
H489	Land at 7, Church Lane, Gomersal, Cleckheaton	0.60	22	#N/A								15	7										
H567	Stubley Farm, Leeds Road, , Heckmondwike	1.33	46	#N/A								15	30	1									
H591	Land to the west of Cliffe Mount, Ferrand Lane, Gomersal, Bradford	3.84	135	#N/A								15	30	30	30	30							
H2159	Land off, Primrose Lane, , Liversedge	2.49	87	#N/A								30	30	27									
H2537a	Land Adjacent, Halifax Road, Hightown, Liversedge	1.20	42	#N/A								15	27										
H2584	Land to the south of, Halifax Road, Hightown, Liversedge	0.66	14	#N/A						14													
H2627	Highgrove Beds, Spen Lane, Gomersal, Cleckheaton	1.45	45	#N/A								30	15										
H2667	Land at Gomersal Primary School, Oxford Road, Gomersal, Cleckheaton	1.42	48	#N/A									15	30	3								
H2590a*	Land off, New Lane, , Cleckheaton	1.54	0	2014/93073																			
H709	Land to the south and south east of 17-43, Fairfield Court, Hightown, Liversedge	1.08	37	#N/A								30	7										

Local Plan Allocations: Batley and Spen

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
MX1905	Land east of, Leeds Road, Chidswell, Dewsbury	58.66	1,535	#N/A									37	90	198	200	180	179	201	155	160	135	
MX1907	Moorlands Business Centre, Balme Road, Cleckheaton	0.23	8	#N/A								8											
MX3349	Land Adjacent, Westgate, Cleckheaton	6.08	223	2010/91431								25	50	50	50	48							

*The site has no capacity attributed to it as this is identified in the Planning permission (ref: C0288)

Sites grouped together for phasing

Sites H1696 and H1702 at Mount Pleasant, Batley

Annex 1 Housing Phasing Table

Sites with planning permission not yet built at 01/04/2017: Batley and Spen

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
A0055	Land to the south of 54, Kirkgate, Birstall, Batley	0.071	2	2016/93681	Det						2													
A0109	Land to the east of 34, Moat Hill, Howden Clough, Batley	0.248	10	2014/93805	Det						10													
A0171	219, Raikes Lane, Birstall, Batley	0.03	1	2015/92134	Det						1													
A0188	Sovereign House 19, Gelderd Road, Birstall, Batley	0.363	14	2013/92787	Out							14												
A0202	384a, Leeds Road, Batley	0.38	11	2015/93747	Det						11													
A0209	Land East of 61-63, Hill Crescent, Birstall, Batley	0.07	3	2014/93367	Det					3														
A0221	50, Lowood Road, Birstall, Batley	0.071	4	2013/93075	Det					4														
A0226	219, Raikes Lane, Birstall, Batley	0.046	2	2014/90111	Det						2													
A0228	2, Field Head Lane, Batley	0.278	6	2013/93585	Out							6												
A0231	Land S 52, Upper Batley Low Lane, Batley	0.151	1	2015/92059	Det						1													
A0232	1066, Bradford Road, Batley	0.157	2	2015/92666	Det						2													
A0233	Land East 99, Milroyd Crescent, Birstall, Batley	0.094	1	2015/93755	Out							1												
A0234	Land North of 1086, Bradford Road, Birstall, Batley	0.09	1	2016/94250	Det						1													
A0235	25, Garfitt Hill, Gomersal, Cleckheaton	0.16	1	2016/92949	Det						1													
B0143	Housing Allocation H11.10, White Lee Road, Batley	1.056	7	2014/93425	Det																			
B0316	Sunnybank Farm, Sunnybank Road, Batley	0.01	1	2017/90106	Det						1													
B0332	Healey Nursery School, Healey Lane, Batley	0.555	15	2014/92328	Out							15												
B0335C	Housing Allocation 11.1 (Part A), Grange Road, Lower Soothill, Batley	12.835	140	2015/92908	Out																			
B0338	Land to the west of 8, Oaks Road, Soothill, Batley	0.02	2	2010/91594	Ext											2								
B0349	Land to the east of 26, Track Rd, Batley	0.983	4	2015/92068	Out																			

Sites with planning permission not yet built at 01/04/2017: Batley and Spen

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
B0385	Land to the north of 2, Healey Lane, , Batley	0.17	5	2008/90558	Det					5														
B0388	Land to the south-east of 10, Hopewell Street, , Batley	0.201	15	2014/90998	Out											15								
B0416	1, Station Road, , Batley	0.03	5	2015/93361	Det					5														
B0437	7, Heaton Road, , Batley	0.16	3	2006/92640	Ext											3								
B0450A	Soothill Hall 50-60, Oaks Road, Soothill, Batley	0.05	2	2007/91969	Ext											2								
B0450B	Soothill Hall 50-60, Oaks Road, Soothill, Batley	0.01	1	2007/91969	Ext											1								
B0454	Lees House Farm, Leeds Road, Chidswell, Dewsbury	0.29	5	2007/92400	Det																			
B0457	Land to the north of 47, Cresswell Lane, , Heckmondwike	0.03	1	2015/90699	Det						1													
B0472	1, Newley Avenue, , Batley	0.02	3	2014/92472	Det					3														
B0473	Land East of 91, Mill Lane, Hanging Heaton, Batley	0.025	2	2014/93823	Det						2													
B0481	LandNorth East of 12, GrosvenorRoad, , Batley	0.23	1	2016/90915	Det						1													
B0486B	Land to the south of Blakeridge Mills, Mayman Lane, , Batley	1.136	120	2006/91249	Ext											30	30	30	30					
B0486E	Blakeridge Mills complex, Mayman Lane, , Batley	2.816	210	2013/90287	Det					50	50	50	50	10										
B0488	Land West of 82, Healey Lane, , Batley	0.037	2	2016/93160	Det						2													
B0490	Land South of The Vicarage, Churchfield Street, , Batley	0.07	1	2014/92522	Det						1													
B0518	421, Bradford Road, , Batley	0.062	8	2011/90509	Ext											8								
B0532	Land NW of 1 to 15, Bridge Street, , Batley	0.5	21	2014/93236	Det																			
B0543	New Ing Mills, Field Lane, , Batley	0.161	15	2013/93575	Det						15													
B0546	Jessop Mill, Station Road, , Batley	0.066	20	2014/92635	Det						20													

Annex 1 Housing Phasing Table

Sites with planning permission not yet built at 01/04/2017: Batley and Spen

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
B0548	Dewsbury Arts Centre, Upper Road, Batley Carr, Batley	0.253	8	2015/92255	Det						8													
B0549	7a, Bell Vue, , Batley	0.019	1	2014/93601	Det						1													
B0551	207 Grounds of Dryfield House, Healey Lane, , Batley	0.799	7	2013/93396	Out							7												
B0552	207 Dryfield House, Healey Lane, , Batley	0.066	5	2013/93399	Det						5													
B0553	Spatfield Mills, Upper Road, , Batley	0.765	33	2014/91721	Out																			
B0554	East of 24 26, Thornhill Road, Staincliffe, Batley	0.131	3	2014/93933	Out							3												
B0555	Former Batley Fire Station, Carlinghow Lane, , Batley	0.398	11	2014/93942	Out																			
B0556	Land NW of 18, Holland Street, , Batley	0.109	4	2016/92627	Det							4												
B0557	Land East of 53, Norfolk Street, , Batley	0.053	2	2015/92807	Out							2												
B0559	High Barn, Hey Beck Lane, Woodkirk, Dewsbury	0.09	1	2015/92887	Det							1												
B0561	25a 37, Commercial Street, , Batley	0.097	8	2015/90616	Det							8												
B0562	Indian Nights 29, Wellington Street, , Batley	0.04	3	2015/91689	Det					3														
B0566	Malvern Lodge 10, Old Hall Road, , Batley	0.322	1	2015/90996	Det							1												
B0568	5, Blemheim Drive, Upper Batley, Batley	0.123	2	2016/91278	Det							2												
B0569	Land South West of Sunny Bank Riding School, Sunny Bank Road, Upper Batley, Batley	0.154	1	2016/91351	Det							1												
B0570	Soothill Manor, Soothill Lane, Soothill, Batley	0.25	1	2016/92140	Det							1												
B0571	143, Carlinghow Lane, Carlinghow, Batley	0.01	1	2016/92751	Det							1												
B0572	2, George Street, , Batley	0.08	1	2016/92887	Det							1												

Sites with planning permission not yet built at 01/04/2017: Batley and Spen

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
C0145A	Phase 1 Housing Allocation H14.20, Westgate, , Cleckheaton	4.36	150	2010/91431	Out																			
C0145B	Phase 2 Housing Allocation H14.20, Westgate, , Cleckheaton	2.16	67	2010/91431	Out																			
C0176	Grounds of Oldfield Nook,, Scholes Lane, Scholes, Cleckheaton	0.52	4	2016/90646	Det					4														
C0191	Land to the north of Manor Court, Scholes Lane, Scholes, Cleckheaton	0.072	1	2015/93319	Out						1													
C0217	111 & 113, Westfield Lane, Wyke, Cleckheaton	0.197	5	2015/91280	Out						5													
C0244	Prospect Mills, Prospect Street, , Cleckheaton	0.54	42	2009/92304	Det											30	12							
C0246	Land to the east of 1096, Halifax Road, Scholes, Cleckheaton	0.05	1	2012/91851	Det				1															
C0253	South of 47, Booth Street, , Cleckheaton	0.022	1	2014/90650	Det					1														
C0263	111, Westgate, , Cleckheaton	0.014	2	2013/90726	Det					2														
C0264	North East of 14, Fairfield Street, , Cleckheaton	0.057	2	2016/92218	Det						2													
C0270	Land East of 681, Halifax Road, , Cleckheaton	0.031	1	2015/92927	Out							1												
C0271	Land East of 1060, Halifax Road, Hartshead Moor, Cleckheaton	0.157	4	2015/93058	Out							4												
C0272	Land North of 29, Holdsworth Street, , Cleckheaton	0.025	1	2015/93099	Det						1													
C0273	4, Upper Green Avenue, Scholes, Cleckheaton	0.044	1	2015/90358	Det					1														
C0274	Land South 138, Scholes Lane, Scholes, Cleckheaton	0.07	1	2016/90829	Det						1													
C0275	Cleckheaton Mills, Bradford Road, , Cleckheaton	2.658	114	2014/92998	Det						30	30	30	24										
C0276	Primrose Farm, Primrose Lane, , Cleckheaton	0.141	3	2015/90805	Det						3													
C0278	Mount Pleasant Farm 34, Gomersal Lane, , Cleckheaton	0.15	1	2014/93764	Det						1													
C0279	1, Carr Street, , Cleckheaton	0.039	3	2014/90165	Det						3													

Annex 1 Housing Phasing Table

Sites with planning permission not yet built at 01/04/2017: Batley and Spen

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
C0280	Cleckheaton Bowling Club, Park View, Cleckheaton	0.669	4	2015/90022	Det																			
C0282	Land North of 4, Carr Street, Cleckheaton	0.059	4	2015/93472	Det					4														
C0283	Land East 79, Westgate, Cleckheaton	0.124	6	2014/92070	Det					6														
C0284	The Whitcliffe Hotel, Prospect Road, Cleckheaton	0.598	15	2015/90020	Det					15														
C0285	Land East of 49, Brokke Street, Cleckheaton	0.031	1	2016/91631	Det					1														
C0286	Mount Pleasant Farm, Gomersal Lane, Cleckheaton	0.015	1	2016/94318	CJPD					1														
C0287	Land South of 321 & 323, Whitehall Road, Scholes, Cleckheaton	0.114	2	2017/90237	Det					2														
C0288	Land East of 20 - 40, New Lane, Hartshead, Cleckheaton	1.5	39	2014/93073	Det					30	9													
D0032	Landadj to 91, Upper Road, Batley Carr, Batley	0.09	4	2016/90861	Det					4														
D0463	Brewerton Lane, Dewsbury Moor, Dewsbury	0.126	4	2014/93864	Out						4													
G0026	Land to the south of 9, Knowles Lane, Gomersal, Cleckheaton	0.04	3	2014/91218	Det						3													
G0264	Land to the east of 33, Beech Walk, Birkenshaw, Cleckheaton	0.073	4	2016/93604	Det						4													
G0292	Land to the north-east of 66, Old Lane, Birkenshaw, Cleckheaton	0.09	1	2010/91393	Det				1															
G0295	Land to the west of 81, Station Lane, Birkenshaw, Cleckheaton	0.29	3	2014/91263	Det						3													
G0304	Thornfield, Prospect Lane, Birkenshaw, Cleckheaton	0.4	5	2015/93238	Det																			
G0313	Birkenshaw Methodist Church, Bradford Road, Birkenshaw, Cleckheaton	0.07	1	2010/92553	Det					1														
G0324	Holly House 231A, Oxford Road, Gomersal, Cleckheaton	0.095	1	2012/90327	Det					1														
G0326	Land to the west of 83, Drub Lane, Gomersal, Cleckheaton	0.06	1	2013/92365	Det					1														

Sites with planning permission not yet built at 01/04/2017: Batley and Spen

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
G0332	35, Prospect Lane, Birkenshaw, Cleckheaton	0.058	1	12016/92676	Det					1														
G0334	287, Oxford Road, Gomersal, Cleckheaton	0.038	4	2015/90540	Det					4														
G0335	4, Mazebrook, Drub, Cleckheaton	0.057	1	2013/91870	Det						1													
G0337	Land West of 293, West Lane, Gomersal, Cleckheaton	0.238	4	2013/91321	Det					4														
G0339	20, Park view, Birkenshaw, Cleckheaton	0.037	1	2014/93679	Det						1													
G0340	North West of 1, Croft Street, Birkenshaw, Cleckheaton	0.023	2	2014/91861	Det						2													
G0343	Land North East of 938, Bradford Road, East Bierley, Cleckheaton	0.047	1	2015/90095	Out							1												
G0344	South of 287, Oxford Road, Gomersal, Cleckheaton	0.065	1	2014/91082	Det						1													
G0346	57, Old Lane, Birkenshaw, Cleckheaton	0.067	1	2015/91848	Det					1														
G0347	Springfield Farm, Hodgson Lane, Birkenshaw, Cleckheaton	0.358	4	2015/93432	Det						4													
G0348	Former Maccess Office Site, Spen Lane, Gomersal, Cleckheaton	0.355	36	2015/91956	Det					30	6													
G0349	150, Latham Lane, Gomersal, Cleckheaton	0.062	1	2015/90930	Det						1													
G0350	77, Latham Lane, Gomersal, Cleckheaton	0.198	2	2016/92340	Det						2													
G0351	Ashfield House 63, Oxford Road, Gomersal, Cleckheaton	0.139	1	2015/90740	Det						1													
G0352	672a, Bradford Road, Gomersal, Cleckheaton	0.23	8	2016/91214	Det						8													
G0353	333, Drub Lane, Gomersal, Cleckheaton	0.198	1	2016/91946	Det						1													
G0354	West Yorkshire Fire & Rescue Service Head Quarters, Bradford Road, Birkenshaw, Cleckheaton	1.482	30	2014/93173	Out																			
G0356	Land SE of 678b, Bradford Road, Birkenshaw, Cleckheaton	0.092	1	2016/90511	Out						1													

Annex 1 Housing Phasing Table

Sites with planning permission not yet built at 01/04/2017: Batley and Spen

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H0012	Land to the north-east of 27, Upper George Street, , Heckmondwike	0.05	3	2016/90814	Det						3													
H0162	Land to the south of 10, Grove Road, , Heckmondwike	0.015	1	2013/93525	Det						1													
H0178	20/22, Market Street, , Heckmondwike	0.01	2	2016/94264	Det						2													
H0197	Land to the west of 11, Field Close, , Heckmondwike	0.09	2	2013/93499	Det				2															
H0199	54/56, Market Place, , Heckmondwike	0.02	4	2014/91077	Det						4													
H0209	land North of 210, White Lee Road, , Heckmondwike	0.046	1	2014/90596	Det						1													
H0215	9 to 11, Cemetery Road, , Heckmondwike	0.02	4	2015/90483	Det						4													
H0216	The Crown Hotel 517, Wakefield Road, Millbridge, Liversedge	0.038	2	2011/90419	Det				2															
H0219	221, Leeds Old Road, , Batley	0.019	10	2016/91997	Det						10													
H0221	Moorend Working Men's Club The Hollins, Moorend Lane, , Dewsbury	0.185	2	2016/90164	Det				2															
H0231	Former Council offices 3, Oldfield Road, , Heckmondwike	0.025	3	2016/93579	CJPD				3															
H0234	The Brighton Hotel, Brighton Street, , Heckmondwike	0.056	2	2014/90879	Det						2													
H0235	36A, New North Road, , Heckmondwike	0.062	1	2014/91520	Det						1													
H0237	49, Cemetery Road, , Heckmondwike	0.012	2	2015/93873	Det				2															
H0238	Land South of 29, Hollingbank Lane, , Heckmondwike	0.112	2	2016/93944	Det				2															
H0239	Land North of 45, Brighton Street, , Heckmondwike	0.13	4	2015/92809	Out							4												
H0240	36, Longfield Road, , Heckmondwike	0.053	2	2016/91740	Det						2													
K0021	Land to the north of 2, St Andrews Crescent, Oakenshaw, Cleckheaton	0.142	3	2014/90378	Out											3								

Sites with planning permission not yet built at 01/04/2017: Batley and Spen

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K0054	Land West of 145, Toftshaw Lane, East Bierley, Cleckheaton	0.05	2	2016/93393	Out							2												
K0079	Land to the south of 4, Savile Street, Cleckheaton	0.216	8	2016/93113	Det						8													
K0090	South East of 31, Marsland Court, Hunsworth, Cleckheaton	0.086	4	2016/93980	Det						4													
K0092	Cliff Hollins Riding School, Cliff Hollins Lane, East Bierley, Cleckheaton	0.065	1	2016/90988	Det						1													
K0093	Valley View Beck Farm, Cliff Hollins Lane, East Bierley, Cleckheaton	0.072	1	2016/92848	Det						1													
L0005	Land to the north of 40-46, Church Road, Roberttown, Liversedge	0.242	6	2015/91717	Out							6												
L0011	Adj 151, Halifax Road, Liversedge	0.066	2	2014/93859	Out															2				
L0218	The Nook, Forge Lane, Norrithorpe, Liversedge	0.15	3	2016/91767	Det																			
L0256	Langley Mills, Roberttown Lane, Roberttown, Liversedge	0.3	3	2003/91590	Det																			
L0305	375, Halifax Road, Hightown, Liversedge	0.038	1	2015/93554	Det																			
L0324	144 and 146, Roberttown Lane, Roberttown, Liversedge	0.01	1	2008/92988	Det																			
L0351	The Barn Bullace Trees Farm, Bullace Trees Lane, Roberttown, Liversedge	0.16	2	2016/90148	Det																			
L0357	15, Moorside, Cleckheaton	0.05	1	2014/90108	Ext																			
L0358	Calder Mould Services, Headlands Road, Liversedge	1.163	37	2016/93112	Out							30	7											
L0359	28, James Street, Liversedge	0.088	1	2016/90845	Det						1													
L0362	North of 51, Fall Lane, Hartshead, Liversedge	0.066	1	2014/91810	Det						1													
L0364	778, Halifax Road, Liversedge	0.081	1	2013/93951	Det																			
L0365	5, Thorn Garth, Moorbottom, Cleckheaton	0.091	1	2014/92502	Det																			

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Sites with planning permission not yet built at 01/04/2017: Batley and Spen

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L0366	432, Halifax Road, Hightown, Liversedge	0.018	2	2014/90610	Det					2														
L0367	Triangle Farm 1, Bullace Trees Lane, Robertown Lane, Liversedge	0.058	1	2014/90982	Det						1													
L0369	Yorkshire Rubber Linings Ltd Unit 5, Union Road, , Liversedge	0.517	28	2013/91771	Det																			
L0371	Albion Inn, Knowler Hill, Millbridge, Liversedge	0.049	1	2015/91483	Det					1														
L0373	Rear of 6, Peep Green Road, Hartshead, Liversedge	0.081	1	2015/93713	Det					1														
L0374	Lower Hall Farm, Lower Hall Lane, Hightown, Liversedge	0.131	1	2015/91472	Det						1													
L0376	Former Valley Works, Union Street, , Heckmondwike	0.853	34	2014/91677	Det						30	4												
L0377	Francis W Birkett, Hightown Road, , Cleckheaton	1.351	44	2016/92535	Det																			
L0378	Strawberry Bank Nursing Home, Strawberry Bank, Millbridge, Liversedge	0.211	7	2015/90209	Out							7												
L0379	Rear of 29, Union Road, , Liversedge Land opposite 13, Tanner Street, Hightown, Liversedge	0.383	13	2015/91397	Out							13												
L0380	Charlton House 30, Robertown Lane, Norrithorpe, Liversedge	0.024	1	2015/93991	Out							1												
L0381	Lockwood Discount Carpet 21-23, Leeds Road, , Liversedge	0.028	1	2016/92615	Det						1													
L0382	Scite House 377, Halifax Road, Hightown, Liversedge	0.103	3	2016/93012	Det						3													
L0383	Land South of 4, Low House Fold, Hightown, Liversedge	0.063	3	2014/93919	Det						3													
L0384	Mock Hall 59, Leeds Road, , Mirfield	0.808	1	2017/90265	Det						1													
M0391	7, Far Common Road, , Mirfield	0.058	2	2015/93008	Det					3														
M0392	107, Leeds Road, , Mirfield	0.172	1	2011/92268	Det					2														
M0413	Land to the north-east of 8, Listing Drive, Littleton, Liversedge	0.127	5	2015/92739	Det																			
N0030																								

Sites with planning permission not yet built at 01/04/2017: Batley and Spen

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Application Type

- Det** Detailed Planning Permission
- Out** Outline Planning Permission
- Ext** Extant Planning Permission
- CJPD** Class J Permitted Development

Annex 1 Housing Phasing Table

Local Plan allocations: Kirklees Rural

Site Reference	Address	Net area	Plan period site capacity	Application reference at 01/04/17	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
H213	Black Rock Mills, Waingate, Linthwaite, Huddersfield	4.25	113	2015/93867				10	30	30	30	13											
H221	Land east of, Howgate Road, Slaithwaite, Huddersfield	0.87	36	2010/92767				11	25														
H356	Land to the north of, Lingards Road, Slaithwaite, Huddersfield	2.59	36	2014/93946						15	21												
H712	Land south of, Hillside View, Linthwaite, Huddersfield	2.07	65	2014/93289						15	30	20											
H763	Land North West of, Gordon Street, Slaithwaite, Huddersfield	0.72	25	#N/A							15	10											
H1709	Land to the east of, Upper Clough, Linthwaite, Huddersfield	1.56	53	#N/A								15	30	8									
H1776	Land to the South of, The Lodge, Linthwaite, Huddersfield	4.91	170	#N/A							15	30	30	30	30	30	30	5					
H2649	Land to the South west of, Victoria Terrace, Marsden, Huddersfield	0.82	28	#N/A								28											
H2652	Former Gees Garage, New Hey Road, Outlane, Huddersfield	0.84	29	#N/A								29											
H17	Park Mill Houses 2 and 4, Wakefield Road, Clayton West, Huddersfield	0.75	26	#N/A									26										
H39a	Land to the north of, Strike Lane, Skelmanthorpe, Huddersfield	1.12	39	#N/A																	30	9	
H72	Land off, Station Road, Skelmanthorpe, Huddersfield	1.28	44	#N/A								15	29										
H222	Land to the north east of, Pilling Lane, Scissett, Huddersfield	9.23	200	2014/91699						25	50	50	50	25									

Local Plan allocations: Kirklees Rural

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H233	Land north of, Barnsley Road, Denby Dale,	2.07	72	#N/A									10	30	30	2							
H358	Land to the east of, Wentworth Drive, Emley, Huddersfield	1.28	44	#N/A							30		14										
H454a	Land to the west of Manor House Farm, Wakefield Road, Clayton West, Huddersfield	0.98	34	#N/A							30		4										
H498	Manor House Farm, Manor Road, Clayton West, Huddersfield	0.59	20	#N/A									20										
H502	Land south of, Huddersfield Road, Skelmanthorpe, Huddersfield	5.81	189	2014/92889							7		15	30	30	30	30	30	17				
H634	Land to the West of Inkerman Court, Barnsley Road, Denby Dale, Huddersfield	1.02	35	#N/A								15	20										
H688	Land to the north of, Commercial Road, Skelmanthorpe, Huddersfield	3.11	88	2014/91628			2	23	30														
H689	Land to the north of, Wood Nook, Denby Dale, Huddersfield	1.06	29	2013/93721							15	14											
H690	Land at Cliff Hill, Leak Hall Crescent, Denby Dale, Huddersfield	3.24	113	#N/A								30	30	30	23								
H788	Land to the West of, Willow Close, Skelmanthorpe, Huddersfield	0.82	28	#N/A															28				
H1784	Land to the East of Denby Dale Railway Station, Station Road, Denby Dale, Huddersfield	0.58	19	2015/93360							15	4											
H3325a	Park Mill, Manor Road, Clayton West, Huddersfield	2.60	91	#N/A									15	30	30	15	1						

Annex 1 Housing Phasing Table

Local Plan allocations: Kirklees Rural

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H116	Land to the south of, Parkwood Road, Golcar, Huddersfield	4.48	125	2014/92021						15	30	30	30	20										
H174	Land north of, Manchester Road, Linthwaite, Huddersfield	0.64	22	#N/A								22												
H199	Land at, Queens Road West, Milnsbridge, Huddersfield	1.67	58	#N/A								30	28											
H303	Land west of, Ashford Park, Golcar, Huddersfield	0.60	18	2016/90383							15	3												
H549	Land to the south of, Swallow Lane, Golcar, Huddersfield	1.41	49	#N/A								30	19											
H550	Land to the east of, Fullwood Drive, Golcar, Huddersfield	0.41	8	2014/90450							8													
H633	Land South West of, Vicarage Road, Longwood, Huddersfield	3.24	113	#N/A								30	30	30	23									
H779	Land to the north of, Leymoor Road, Golcar, Huddersfield	0.63	20	2014/92878				16	4															
H780	Land to the East of, Main Avenue, Cowlersley, Huddersfield	2.18	76	#N/A									15	30	30	1								
H3395	Land between Carr Top Lane, Brook Lane, Golcar, Huddersfield	0.63	16	2015/90507							15	1												
H48	Travel Station Yard, Station Road, Honley, Holmfirth	0.42	14	#N/A								14												
H67	Land to the south of, Helme Lane, Meltham, Holmfirth	5.50	172	2014/93959					30	30	30	30	30	22										
H129	Land to the East of, Woodhouse Road, Brockholes, Holmfirth	6.92	124	2013/93373							15	30	30	30	19									
H178	Land to the south of, Southwood Avenue, Honley, Holmfirth	0.68	17	#N/A								17												

Local Plan allocations: Kirklees Rural

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H200	Land to the South of, Mill Moor Road, Meltham, Huddersfield	0.44	13	2015/93847					13														
H2586	Site of former Thirstin Mills, Thirstin Road, Honley, Holmfirth	0.95	24	#N/A							24												
H342	Land to the North of, Mill Moor Road, Meltham, Holmfirth	1.07	37	#N/A							15	22											
H343	Land to the North of, Helme Lane, Meltham, Holmfirth	1.18	46	2016/93411							15	30	1										
H584	Land to the south of, Gynn Lane, Honley, Holmfirth	2.49	50	#N/A								15	30	5									
H664	Land to the north of, Sootgate Road, Honley, Holmfirth	3.35	93	#N/A							20	35	38										
H784	Land north of 105 - 135, Mill Moor Road, Meltham, Holmfirth	1.03	32	2015/93861					30	2													
H785	Land to the east of, Colders Lane, Meltham, Holmfirth	1.02	27	2012/90096							15	12											
H786	Land to the north east of, Westcroft, Honley, Holmfirth	0.44	15	#N/A								15											
H47	Land to the south of, Vicarage Meadows, Cinderhills, Holmfirth	0.98	14	2016/93458						14													
H50	Bridge Mills, New Road, , Holmfirth	1.30	45	#N/A											30	15							
H130	Land to the west of , St Mary's Rise and St Mary's Way, Netherthong, Holmfirth	0.86	21	2014/92737							15	6											
H214	Land north-west of, New Mill Road, , Holmfirth	0.45	15	94/93468						15													
H284	Land to the east of, Holme View Avenue and Pennine Close, Upperthong, Holmfirth	0.95	27	2013/93879																			

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Local Plan allocations: Kirklees Rural

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H288a	Land at, Dunford Road, Hade Edge, Holmfirth	2.50	66	#N/A						30	30	6											
H294	Land to the east of , St Mary's Avenue, Netherthong, Holmfirth	1.06	32	2016/93365					15	17													
H597	Land to the south of , Sandy Gate, Scholes, Holmfirth	0.80	28	#N/A							28												
H297	Land to the east of, Ryecroft Lane, Scholes, Holmfirth	1.37	39	#N/A					15	24													
H626	Land to the west of , Bankfield Drive, Holmbridge, Holmfirth	0.66	23	#N/A							23												
H715	Land to the West of, Wesley Avenue, Netherthong, Holmfirth	1.09	38	#N/A							30	8											
H727a	Land to the West of, Miry Lane, Thongsbridge, Holmfirth	1.12	39	2014/93593						15	24												
H728	Land to the West of, Stoney Bank Lane, Thongsbridge, Holmfirth	2.02	53	2014/93248						30	23												
H729	Land at, Tenter Hill Road, New Mill, Holmfirth	2.64	81	2015/90811			3	19				30	29										
H730	Land to the West of, Royds Avenue, New Mill, Holmfirth	1.53	53	#N/A															30	23			
H787	Land to the South of Former Midlothian Garage, New Mill Road, , Holmfirth	0.57	12	#N/A															12				
H2585	Land to the south of, Water Street, Holmbridge, Holmfirth	0.62	19	#N/A							15	4											
H2587	Former Midlothian Garage, New Mill Road, , Holmfirth	2.02	56	2015/93824						15	30	11											
H44	Land to the south of , Cross Lane (east), Stocksnoor, Huddersfield	0.63	17	2015/90200					15	2													
H70	Land to the north of , Long Lane, Shepley, Huddersfield	0.46	12	2017/90098						4													

Local Plan allocations: Kirklees Rural

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H120	Park Farm, Manor Road, Farnley Tyas, Huddersfield	0.44	7	#N/A						7													
H128	Land to the north and east of Urban Terrace, Denby Lane, Grange Moor, Huddersfield	0.65	22	#N/A								15	7										
H313	Land to the south of , Burton Acres Lane, Kirkburton, Huddersfield	3.97	97	#N/A						15	30	30	22										
H339	Land to the east of , Abbey Road North, Shepley, Huddersfield	0.46	16	#N/A										14	2								
H518	Land at Yew Tree Farm, The Village, Farnley Tyas, Huddersfield	0.48	16	#N/A								16											
H538	Land to the south of , Cross Lane (west), Stocks Moor, Huddersfield	0.72	25	#N/A								25											
H583	Land to the north of, Barnsley Road, Flockton, Huddersfield	1.67	47	2016/92811							15	30	2										
H609	Land to the north of , Barnsley Road, Flockton,	2.58	87	2016/91158							15	30	12										
H638	Land to the north of, Tinker Lane, Lepton, Huddersfield	0.87	30	#N/A								15	15										
H652	Land to the North West of Eastfield Mills, Abbey Road North, Shepley, Huddersfield	2.61	91	#N/A								15	30	30	16								
H817	Land at , Manor House, Flockton, Wakefield	1.01	24	2014/93480							15	9											
H1774	Land to the East of Manor House Farm, The Village, Thurstonland, Huddersfield	0.41	14	#N/A								14											
H331	Land at, Lancaster Lane, Brookholes, Holmfirth	0.47	-	#N/A																			

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Local Plan allocations: Kirklees Rural

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H119a	Land to the south of 5 - 25, Clay Well, Golcar, Huddersfield	0.64	14	#N/A							14												
H628	Land to the west of, Huddersfield Road, Meltham, Holmfirth	1.44	41	#N/A							15	26											
MX1919	Bank Bottom Mills, Mount Road, Marsden, Huddersfield	1.10	38	#N/A								30	8										
MX1920	New Mills, Brougham Road, Marsden, Huddersfield	0.85	29	#N/A								29											
MX1912a	Dobroyd Mills, Hepworth Road, Hepworth, Holmfirth	3.45	75	#N/A								30	30										
MDGB2134	Land at Storthes Hall, Kirkburton, Huddersfield	19.22	505	2016/90711								40	40	40	40	40	40	40	40	40	40	40	25

Sites grouped together for phasing

	Sites H213 and H1709 at Linthwaite
	Sites H454a and H498 at Clayton West
	Sites H233 and H634 at Denby Dale
	Sites H339 and H652 at Shepley

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10039	Crosland Park Housing Allocation H1.7, Royd House Lane, Linthwaite, Huddersfield	9.7	312	99/93273	Ext						50	50	50	50	50	50	12							
10220C	Old Bank Works, Old Bank, Slaithwaite, Huddersfield	0.292	13	2009/92286	Ext											13								
10231	Land to the west of The Mallards, Ned Lane, Slaithwaite, Huddersfield	0.07	1	2014/91956	Det					1														
10255	Land to the south-west of 99, Manchester Road, Slaithwaite, Huddersfield	0.07	1	2013/92899	Det					1														
10260	2, Netherend Road, Slaithwaite, Huddersfield	0.07	1	2007/91123	Det						1													
10270	15, Ainley Place, Slaithwaite, Huddersfield	0.04	1	2015/91638	Det						1													
10271A	Blackrock Mills, Waingate, Linthwaite, Huddersfield	3.036	103	2015/93867	Det																			
10277	Barn East of 4, Worts Hill Back o Wall, Pole Moor, Huddersfield	0.03	1	2010/93082	Ext						1													
10283	Land east of 99A, Manchester Road, Slaithwaite, Huddersfield	0.072	1	2012/92655	Det						1													
10284	12 Hill Top Farm Top of the Hill, Lingards Road, Slaithwaite, Huddersfield	0.03	1	2012/91983	Det						1													
10286	108, Radcliffe Road, Slaithwaite, Huddersfield	0.022	2	2015/91451	Det						2													
10287	Longfield Dyeworks, Manchester Road, Linthwaite, Huddersfield	0.441	16	2013/93773	Det						16													
10293	James Dyson Ltd., Manchester Road, Linthwaite, Huddersfield	0.317	13	2014/91813	Det						13													
10296	Land rear of 101-111, Banks Road, Linthwaite, Huddersfield	0.63	18	2015/94008	Det						18													
10297	4, Downing Street, Linthwaite, Huddersfield	0.07	1	2014/93040	Det						1													
10298	High Beeches 685, Manchester Road, Linthwaite, Huddersfield	0.077	1	2016/93564	Out							1												

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10304	117, Royd House Lane, Linthwaite, Huddersfield	0.035	1	12014/92384	Out							1												
10305	15, Hill Top Fold, , Huddersfield	0.02	1	12014/92403	Det						1													
10306	828, Manchester Road, Linthwaite, Huddersfield	0.006	1	12014/93260	Det						1													
10309	Land North of 32, Hawthorn Road, Slatthwaite, Huddersfield	0.237	3	2014/91449	Out						3													
10310	Land SW 113, Manchester Road, Slatthwaite, Heckmondwike	0.07	2	2014/93986	Out							2												
10311	Land SW 45, Lingards Road, Slatthwaite, Huddersfield	1.787	27	2014/93946	Out																			
10312	Land North of 184a, Cowersley Lane, , Huddersfield	0.105	1	12015/90492	Out							1												
10313	Land NW 172, Gillroyd Lane, , Huddersfield	0.761	20	2014/93289	Out																			
10316	Pleasant Ppastures, New Hey Road, Slatthwaite, Huddersfield	0.055	1	12015/92641	CJPD						1													
10317	Land SE 20 22, Howgate Road, , Huddersfield	0.768	25	2010/92767	Det																			
10318	15, Ingfield Terrace, Slatthwaite, Huddersfield	0.01	1	12016/94128	Det					1														
10319	Land Between 588 & 620, Manchester Road, Linthwaite, Huddersfield	0.14	10	2015/93591	Out							10												
10320	1, New Street, Slatthwaite, Huddersfield	0.01	1	12017/90137	Det						1													
10321	Land Adjacent to Grove House, Stones Lane, Linthwaite, Huddersfield	0.155	1	12016/90379	Det						1													
10322	Land to the east of 12, Mallard Way, Slatthwaite, Huddersfield	0.064	3	2016/93304	Det						3													
10323	Idlegate, Pole Gate, Slatthwaite, Huddersfield	0.04	1	12016/90859	Det						1													
10324	Lower Top of the Hill, Rye Field Lane, Scammonden, Huddersfield	0.09	2	2016/92996	Det						2													
10325	Black Rock Farm, Upper Clough Road, Linthwaite, Huddersfield	0.082	2	2016/94251	Det						2													

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10326	Black Rock House and Former 18 Waingate, Lower Clough, Linthwaite, Huddersfield	0.216	6	2016/92337	Det																			
10327	184a, Cowersley Lane, Linthwaite, Huddersfield	0.03	1	2016/91503	Out						1													
10328	High Beeches 585, Manchester Road, Linthwaite, Huddersfield	0.053	1	2015/94019	Det					1														
20052	Land to the SW of Netherley Cottage, Old Mount Road, Marsden, Huddersfield	0.05	1	2015/90497	Det					1														
20121	Intake Head Farm, Manchester Road, Marsden, Huddersfield	0.05	1	2014/93249	Det					1														
20124	1, Wood Bottom, Marsden, Huddersfield	0.49	8	2015/93750	Det					8														
20125	Ainsley Cottage, Ainsley Lane, Marsden, Huddersfield	0.06	1	2015/93549	Det					1														
30306	Land within the curtilage of 2, Cheviot Avenue, Meltham, Holmfirth	0.03	2	2016/90798	Det					2														
30342	Housing Allocation H2.3, Mill Moor Road, Meltham, Huddersfield	1.349	28	2015/93861	Det																			
30353A	Housing Allocation H2.12, Colders Lane, Meltham, Huddersfield	1.014	27	2012/90096	Out																			
30365	Land to the west of Brigg House Mill, Mean Lane, Meltham, Holmfirth	0.065	4	2016/90700	Out						4													
30377	Land within the curtilage of 15, Golcar Brow Road, Meltham, Holmfirth	0.03	1	2014/90660	Out											1								
30385	Block A, Mean Lane, Meltham, Huddersfield	0.064	2	2015/92572	Out							2												
30389	81, Wessenden Head Road, Meltham, Huddersfield	0.02	1	2012/92824	Ext											1								
30390	Albion Mills, Mill Moor Road, Meltham, Holmfirth	0.45	4	2014/92634	Det					4														
30399	Plot 6, Bishops Way, Meltham, Holmfirth	0.04	1	2011/90715	Det						1													

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30402	Land within the curtilage of 125, Slaithwaite Road, Meltham, Holmfirth	0.08	2	2016/91993	Det						2													
30407	Land north of 49, Helme Lane, Meltham, Holmfirth	0.02	1	2014/92112	Det						1													
30422	Waithe Close Farm, Thick Hollins Road, Meltham, Holmfirth	0.06	1	2015/90742	Det						1													
30432	Land at Station Road, Meltham, Holmfirth	0.647	2	2014/91714	Det						2													
30433	Land south of, Helme Lane, Meltham, Holmfirth	3.25	88	2014/93959	Det																			
30435	21a, Station Street, Meltham, Holmfirth	0.02	2	2014/90494	Det						2													
30437	Adj 77, Wessenden Head Road, Meltham, Holmfirth	0.331	1	2014/92280	Det						1													
30438	Workshop, Helmet Lane, Meltham Lane, Holmfirth	0.062	3	2015/90915	Det						3													
30439	16, Wessenden Head Road, Meltham, Holmfirth	0.005	1	2015/91166	Det						1													
30441	Heady Fields, Wilshaw Road, Meltham, Holmfirth	0.189	4	2014/93995	Det						4													
30443	Land adj Carter Plantation, Thick Hollins Road, Upperthong, Holmfirth	0.199	1	2015/90927	Det						1													
30444	Land at Station Road, Meltham, Holmfirth	0.319	4	2015/92638	Det						4													
30445	Former Albion Mills, Mill Moor Road, Meltham, Holmfirth	0.033	1	2015/91980	Det						1													
30446	South of 17, Damley Close, , Holmfirth	0.034	1	2015/91317	Det						1													
30447	Land rear of 125, Helme Lane, Meltham, Holmfirth	1.284	44	2016/93411	Out																			
30450	Waithe Close Farm, Thick Hollins Road, Meltham, Holmfirth	0.089	1	2016/91798	CJPD						1													
30452	Land to the west of 133, Mill Moor Road, Meltham, Holmfirth	0.438	13	2015/93847	Det																			
30453	9, Gill Birks, Meltham, Holmfirth	0.08	1	2016/93900	Det						1													

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30454	Barn off, Bradshaw Road, Upperthong, Holmfirth	0.02	1	12016/94310	CJPD						1													
40111F	Land south of Station House, Summervale, , Holmfirth	0.08	1	12016/90422	Det											1								
40130D	Housing Allocation H3.31, Woodhead Road, , Holmfirth	2.42	44	95/91223	Det					30	14													
40133	Land west of 15, Modd Lane, , Holmfirth	0.04	1	12011/91701	Det						1													
40192A	Land to North of Rose Bank, Stoney Bank Road, Thongsbridge, Holmfirth	0.067	1	12015/92899	Det						1													
40192C	Three Gables 24, Springwood Road, Thongsbridge, Holmfirth	0.114	1	12015/93029	Out							1												
40211B	Plot 5, Broad Lane, Upperthong, Holmfirth	0.11	1	12015/93021	Det					1														
40310	Land to the west of 4, Mily Lane, Netherthong, Holmfirth	0.03	1	12012/92744	Det						1													
40387	Housing Allocation H3.16, New Mill Road, , Holmfirth	2.51	42	94/93468	Det																			
40403A	Land to the south of 274 Plots 1 & 2, Huddersfield Road, Thongsbridge, Holmfirth	0.11	2	2005/91785	Ext											2								
40408	Land south of 5, White Wells Road, Scholes, Holmfirth	0.05	1	12016/91311	Out							1												
40521A	Land to the south of 31, Broad Lane, Upperthong, Holmfirth	0.3	4	2009/93174	Ext											4								
40568	Land to the north of 1, Longlands Bank, Thongsbridge, Holmfirth	0.05	1	12014/91761	Det						1													
40572	Land to the west of Inglistones, Sude Hill, New Mill, Holmfirth	0.07	1	12014/90373	Det						1													
40580	Down Yonder, Liphill Bank Road, Burnlee, Holmfirth	0.043	2	12015/90670	Out							2												
40596	Land to the north of 37, Dobb Top Road, Holmbridge, Holmfirth	0.19	2	2006/94163	Ext																			
40601A	Former site of Littlewood Garage Station, Station Road, , Holmfirth	0.16	2	2008/94148	Det																			

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40601B	Former site of Littlewood Garage Station, Station Road, , Holmfirth	0.078	7	2006/93094	Ext						7													
40615	Thongsbridge Mills, Huddersfield Road, Thongsbridge, Holmfirth	0.4	25	2006/92394	Ext											25								
40621	Land to the north-east of 53-63, South Lane, , Holmfirth	0.5	5	2012/93885	Det						5													
40624	Little Beck, Dobb Lane, Holmbridge, Holmfirth	0.17	1	2014/92376	Det						1													
40648	106, Greenfield Road, , Holmfirth	0.529	8	2015/94106	Out							8												
40654	Ward Place, Brow Lane, , Holmfirth	0.89	2	2008/90988	Det					2														
40666	Rosewood House, Bradshaw Road, , Holmfirth	0.11	1	2014/93723	Det						1													
40714	26, Cliff Road, , Holmfirth	0.013	1	2016/90510	Det						1													
40716	1, Spring Lane, , Holmfirth	0.044	1	2016/91502	Out							1												
40720	Willow Grove, Cliff Road, Wooddale, Holmfirth	0.148	3	2016/91484	Det						3													
40724	The Moorings, Binns Lane, Upperthong, Holmfirth	0.111	1	2016/90662	Det						1													
40726	Prickleden Mills, Woodhead Road, , Holmfirth	0.43	46	2014/93971	Det						30	16												
40727	Sude Hill Mill, Sude Hill, New Mill, Holmfirth	0.153	12	2016/92628	Det						12													
40728	adj. Fieldhead, Hill Lane, , Holmfirth	0.043	1	2014/91785	Det						1													
40731	land Adj. to 50, Underbank End Road, , Holmfirth	0.057	1	2011/92353	Det						1													
40732	Holly Mount, New Mill Road, Wooddale, Holmfirth	0.198	2	2013/93645	Det						2													
40734	Rear of Pentlands, New Mill Road, , Holmfirth	0.209	4	2014/91492	Out							4												
40736	31, Upper Bank End Road, , Holmfirth	0.143	2	2014/93226	Out							2												
40737	Springwood House, Sheffield Road, New Mill, Holmfirth	0.073	1	2015/92902	Det						1													
40738	Land to the east of 3, St Marys Avenue, Netherthong, Holmfirth	1.075	32	2016/93365	Det																			

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40740	Land adjacent to 4, Hollin Brigg Lane, Holmbridge, Holmfirth	0.026	1	1 2014/91194	Out							1												
40741	42, Liphill Bank Road, Burnlee, Holmfirth	0.022	1	1 2014/91295	Out							1												
40743	Springwood House, Sheffield Road, New Mill, Holmfirth	0.054	1	1 2016/91395	Det						1													
40744	New House Farm, Penistone Road, Haide Edge, Holmfirth	0.125	1	1 2014/92440	Det						1													
40745	Ox Lee, Ox Lee Lane, , Holmfirth	0.314	4	4 2011/92912	Det						4													
40747	2, Low Gate, , Holmfirth	0.006	2	2 2014/93616	Det						2													
40752	Land South of 125 POL site, UpperthongLane, Upperthong, Holmfirth	0.953	11	11 2013/93879	Det																			
40753	5, Scar fold, , Holmfirth	0.014	2	2 2015/91874	Det						2													
40754	Abinger Farm, Scholes Moor Road, Scholes, Holmfirth	0.203	2	2 2015/93383	Det						2													
40755	Abinger Farm, Scholes Moor Road, Scholes, Holmfirth	0.189	4	4 2015/91505	Det						4													
40757	19 & 23, Liphill Bank Road, , Holmfirth	0.063	2	2 2014/90190	Det						2													
40758	Chemical Works, Liphill Bank Road, , Holmfirth	0.277	3	3 2014/90189	Det						3													
40759	Woodfield, New mill road, New Mill, Holmfirth	0.232	3	3 2015/92079	Det						3													
40760	Daisy Lee Farm, Daisy lee lane, Haide Edge, Holmfirth	0.388	1	1 2014/93911	Det						1													
40762	220, Dunford Road, , Holmfirth	0.023	1	1 2015/90389	Det						1													
40764	Digley Hollow, Woodhead Road, Holmbridge, Holmfirth	0.257	3	3 2016/92516	Det						3													
40766	The Old Mistal West Royd Farm, Ley Bank, Fulstone, Holmfirth	0.099	1	1 2015/92008	Det						1													
40769	Three Valleys, Cold Hill Lane, New Mill, Holmfirth	0.587	4	4 2015/90903	Out							4												
40770	Adj 26, Broad Lane, Upperthong, Holmfirth	0.166	3	3 2015/91661	Out																			

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40771	adj 38, Broad Lane, Upperthong, Holmfirth	0.352	8	2015/91726	Out							8												
40772	Land off, Stoney Bank Lane, , Holmfirth	2.418	53	2014/93248	Out																			
40773	Rear of 17, Miry Lane, Thongsbridge, Holmfirth	0.367	11	2014/93593	Out																			
40774	Brooklands Nursery, Totties Lane, Totties, Holmfirth	0.05	1	2015/90366	Out						1													
40775	Land off, Vicarage Meadows, , Holmfirth	0.978	18	2016/93458	Det																			
40776	adj Best Revenge, Huddersfield Road, New Mill, Holmfirth	0.06	1	2014/93719	Det					1														
40777	Land adj 42, Penistone Road, New Mill, Holmfirth	0.077	1	2014/93203	Out					1														
40778	Croft House 82, Upperthong Lane, , Holmfirth	0.126	2	2015/90146	Det					2														
40779	38, Broad Lane, Upperthong, Holmfirth	0.096	3	2015/91303	Det					3														
40782	Land South of 56, Sude Hill Terrace, New Mill, Holmfirth	0.076	2	2014/93192	Out							2												
40784	Bamforths Warehouse, Station Road, Holmfirth	0.11	3	2015/91697	Det					3														
40785	Oakfield, Copper Lane, , Holmfirth	0.1	1	2016/91416	Det					1														
40787	Woodville, Calf Hill Road, Thongsbridge, Holmfirth	1.14	4	2015/93001	Det					4														
40788	141A, Church Street, Netherthong, Holmfirth	0.03	1	2016/91343	Det						1													
40789	Adjacent 141, Church Street, Netherthong, Holmfirth	0.074	2	2016/91356	Det					2														
40790	Harroyd Farm, Dean Brook Road, Netherthong, Holmfirth	0.245	1	2015/92303	Det					1														
40791	17, Miry Lane, Thongsbridge, Holmfirth	0.049	2	2016/90284	Det					2														
40793	31, St Georges Road, Scholes, Holmfirth	0.152	1	2015/93871	Det					1														
40794	Upper Waterside Farm, Royd Lane, Holmbridge, Holmfirth	0.073	1	2016/93796	Det					1														

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40795	New Dunsley Poultry Farm, Brow Lane, , Holmfirth	1.754	6	2015/93850	Det						6													
40796	220, Dunford Road, , Holmfirth	0.007	1	2016/91401	Det						1													
40797	69, Dunford Road, , Holmfirth	0.01	1	2016/93103	Det						1													
40799	Adjacent 181, Woodhead Road, Holmbridge, Holmfirth	0.119	2	2014/93795	Det						2													
40802	32, Paris Road, Scholes, Holmfirth	0.07	1	2015/91839	Det						1													
40803	Upper Millshaw Farm, Millshaw Lane, Hepworth, Holmfirth	0.54	3	2016/92046	Det						3													
40804	Wood Pit Farm, Stalley Royd Lane, Jackson Bridge, Holmfirth	0.066	1	2015/93703	Det						1													
40805	Land to the west of New White House Farm, Bedding Edge Road, Hepworth, Holmfirth	0.07	1	2017/90058	Det																			
40806	Springhead Farm, Scholes Moor Road, Had Edge, Holmfirth	0.08	1	2016/90502	Det						1													
40807	Greave Farm, Greave Road, Hade Edge, Holmfirth	0.209	1	2015/94114	Det						1													
40808	4 Cartworth Fold, Cartworth Lane, , Holmfirth	0.02	1	2015/91254	Det						1													
40809	Longley Edge Farm, Longley Lane, Longley, Holmfirth	0.23	4	2016/91894	Out							4												
40810	Former Midlothian Garage, New Mill Road, , Holmfirth	2.659	56	2015/93824	Out																			
40811	2, Cliff Road, , Holmfirth	0.045	1	2016/93816	Out						1													
40813	Land Behind 1 to 7, Butt Lane, Hepworth, Holmfirth	0.309	4	2015/92993	Out							4												
40814	Land north of 20, Cartworth Road, , Holmfirth	0.101	1	2016/90185	Out							1												
40815	Kestral, Kingfisher, Hawthorne, Holly & Curlew Cottages, Stubbins Lane, Holmbridge, Holmfirth	0.05	3	2016/90026	Det																			
40816	Land West 8, St Marys Way, Netherthong, Holmfirth	0.446	5	2014/92737	Out																			
40817	9-13, Hollowgate, , Holmfirth	0.023	2	2015/94041	Det																			

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50024F	Western portion Housing Allocation H3.2, Long Lane, Honley, Huddersfield	0.92	10	99/93218	Det					10														
50060A	Land within the curtilage of 6 14, Woodhead Road, Honley, Holmfirth	0.09	2	2014/93492	Det											2								
50107	Land to the west of 9, Well Hill, Honley, Huddersfield	0.08	1	2015/91391	Out											1								
50186	Land to the south of 238, New Mill Road, Brockholes, Huddersfield	0.466	14	2016/90146	Out							14												
50209	Victoria Works, Fisher Green, Honley, Huddersfield	0.193	17	2016/92812	Det						17													
50219	Turnpike House, Old Turnpike, Honley, Huddersfield	0.09	2	2013/90747	Det						2													
50228	land in the curtilage of 8, Well Hill, Honley, Holmfirth	0.06	1	2014/92513	Det						1													
50230	275, New Mill Road, Brockholes, Holmfirth	0.2	2	2011/93307	Det						2													
50240	Wood Bottom Farm, Bent Ley Road, Meltham, Holmfirth	0.07	1	2016/91451	Det						1													
50249	The Elms, Brockholes Lane, Brockholes, Holmfirth	0.18	1	2016/92647	Det						1													
50250	Holmlea 80, Long Lane, Honley, Holmfirth	0.08	1	2015/94062	Det						1													
50251	Carlins Farm, Oldfield Road, Holmfirth	0.142	1	2016/91693	Det						1													
50252	Upper Reins Barn, Reins, Honley, Holmfirth	0.142	1	2012/93180	Det						1													
50253	Ivy Cottage, Oldfield Road, Honley, Holmfirth	0.14	1	2015/93659	Det						1													
50257	Land off, Woodhead Road, Honley, Holmfirth	2.616	51	2013/93373	Out																			
50259	Holmlea 80, Long lane, Honley, Holmfirth	0.096	1	2015/90939	Det						1													
50261	Land North of 238, Lancaster Lane, Brockholes, Holmfirth	0.499	22	2016/90138	Out							22												

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50262	319, New Mill, Brockholes, Holmfirth	0.057	3	2016/92775	Det						3													
60100	Land to the west and north of 48, Marsh Lane, Shepley, Huddersfield	0.18	4	2014/91439	Out											4								
60360	Land to the south-west of 33, Turnshaw Road, Kirkburton, Huddersfield	0.163	1	2015/91396	Det						1													
60377	Land to the west of 182, Barnsley Road, Flockton, Huddersfield	0.1	1	2016/93999	Det						1													
60411D	Manor House Housing Allocation 4.14, Barnsley Road, Flockton, Huddersfield	0.439	4	2014/93480	Out																			
60477A	Land to the east of 46, Barnsley Road, Flockton, Huddersfield	0.05	1	2013/93921	Out							1												
60493	Land to the south of 40, North Road, Kirkburton, Huddersfield	0.182	4	2016/93935	Det						4													
60501	Land to the south of 20, Abbey Road North, Shepley, Huddersfield	1.5	50	2002/91944	Ext											30	20							
60506	Site of Pickles & Swallow Ltd, Pinfield Lane, Flockton, Huddersfield	0.2	4	2015/92200	Det											4								
60534	Rosa Villa 84, Barnsley Road, Flockton, Huddersfield	0.13	2	2015/92085	Out							2												
60538	Land to the south of 5, Garner Lane, Highburton, Huddersfield	0.1	1	2010/90070	Ext											1								
60564A	Phase 1 Continuing Care Retirement Community, Storthes Hall Lane, Kirkburton, Huddersfield	6.568	120	2016/90711	Det																			
60564C	Continuing Care Retirement Home Phase 2, Storthes Hall Lane, Kirkburton, Huddersfield	7.181	150	2016/90711	Det																			
60564D	Continuing Care Retirement Home Phase 3, Storthes Hall Lane, Kirkburton, Huddersfield	1.566	30	2016/90711	Det																			

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60567	119, Station Road, Shepley, Huddersfield	0.3	2	2011/91470	Det						2													
60568	2a, Holmfirth Road, Shepley, Huddersfield	0.19	1	2011/91002	Det				1															
60585	Windy Gap Barn, Green Bank Lane, Little Lepton, Huddersfield	0.08	1	2014/91610	Det						1													
60587	Land to the north east of 25, Hardcastle Lane, Flockton, Huddersfield	0.06	1	2008/92297	Det											1								
60614	Land to the west of 306, Barnsley Road, Flockton, Huddersfield	0.115	2	2015/93881	Det						2													
60615	Plot to the west of 14, Lane Head Lane, Kirkburton, Huddersfield	0.074	1	2013/91441	Det						1													
60616	18, Abbey Road, Shepley, Huddersfield	0.15	1	2015/90148	Det						1													
60621	198, Marsh Lane, Shepley, Huddersfield	0.015	1	2011/92683	Det						1													
60625	2, Low Common, Farnley Tyas, Huddersfield	0.037	2	2010/92518	Det						2													
60637	Oaklands 8a, Turnshaw Road, Kirkburton, Huddersfield	0.141	1	2012/92226	Det						1													
60638	Beech Farm House, Manor Road, Farnley Tyas, Huddersfield	0.8	2	2011/92253	Det					2														
60652	Land South of 23, Cross Lane, Stocks Moor, Huddersfield	0.626	17	2015/90200	Det																			
60653	Land North of 3, Field Head, Shepley, Huddersfield	0.234	8	2017/90098	Det																			
60657	Adjoining 9, Manor Road, Farnley Tyas, Huddersfield	0.009	1	2014/92457	Det						1													
60658	Ing Head Barn, Ing Head Lane, Thurstonland, Huddersfield	0.04	1	2014/91159	Det						1													
60666	Falbrook House, Falbrook Lane, Whitely, Dewsbury	0.213	1	2015/90273	Det						1													
60667	25, Barnsley Road, Flockton, Huddersfield	0.159	1	2015/91968	Det						1													
60668	28, Haigh Lane, Flockton, Huddersfield	0.096	1	2016/91542	Det						1													

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60669	Haigh Lane Nurseries, Haigh Lane, Flockton, Huddersfield	0.279	3	2015/90003	Det						3													
60672	The Park, Kirkburton, Kirkburton, Huddersfield	0.054	2	2015/91213	Det						2													
60674	Land at New Hey Moor, Abbey Road, Shepley, Huddersfield	0.259	2	2016/92457	Det					2														
60677	2, Royd House, Almondbury, Huddersfield	0.182	2	2015/92012	Det						2													
60678	Adjacent 6, Bamsley Road, Flockton, Huddersfield	0.045	1	2015/90578	Det						1													
60679	Flockton Hall Farm, Bamsley Road, Flockton, Huddersfield	1.753	46	2016/92811	Det																			
60680	2, Thornes Fold, Lepton, Huddersfield	0.075	2	2015/94032	Det						2													
60681	Windy Bank Cottage, Liley Lane, Upper Hopton, Mirfield	0.321	1	2015/93057	Det						1													
60682	Land to the north of Flockton Green Working Mens Club, Bamsley Road, Flockton, Huddersfield	2.628	87	2016/91158	Det																			
60683	Flockton Green Working Mens Club, Bamsley Road, Flockton, Huddersfield	0.163	1	2016/91464	Det						1													
60688	Adjacent 7, Town Gate, Highburton, Huddersfield	0.099	1	2016/90108	Det						1													
60690	Land North east of 6, Northfield Lane, Highburton, Huddersfield	0.119	1	2016/90675	Det						1													
60691	Land North East of 4, Northfield Lane, Highburton, Huddersfield	0.064	1	2016/90755	Det						1													
60692	Old Hallas Farm, Paddock Road, Kirkburton, Huddersfield	1.309	1	2016/91053	Det						1													
60693	Beech Farm 21, Manor Road, Farnley Tyas, Huddersfield	0.081	1	2016/90892	Det						1													
60694	85b, Marsh Lane, Shepley, Huddersfield	0.036	1	2015/93692	Det						1													
60695	Woodend Farm, Wood Lane, Thurstonland, Huddersfield	0.1	1	2016/94073	Det						1													

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60696	8, Providential Street, Flockton, Huddersfield	0.08	1	12016/91650	Det						1													
70190	Rear of, Manor Croft, Skelmanthorpe, Huddersfield	0.101	6	2011/92509	Det					6														
70191	Land to the east of 51, Huddersfield Road, Skelmanthorpe, Huddersfield	0.246	6	2014/92889	Out																			
70217	Land to the north of 9A, Bank Lane, Denby Dale, Huddersfield	0.28	3	2015/91583	Det					3														
70387a	Housing Allocation H5.10, Barnsley Road, Scissett, Huddersfield	1.64	1	2002/94033	Det					1														
70399	Land to the south and east of The Cliff, High Street, Clayton West, Huddersfield	0.44	4	2015/94096	Out											4								
70435	Brendon House, Bilham Road, Clayton West, Huddersfield	0.12	1	2015/92345	Det						1													
70441	Land to the south of 12a, Bank Lane, Denby Dale, Huddersfield	0.1	2	2015/91674	Out											2								
70446	Garden of 158, Denby Lane, Upper Denby, Huddersfield	0.03	1	2014/91191	Det											1								
70450	Land to the South of 19b, Rishworth Avenue, Emley, Huddersfield	0.027	1	2016/91599	Det						1													
70510	Land to the north of 2, Scott Hill, Clayton West, Huddersfield	0.1	2	2006/90122	Det											2								
70516	Thorncliffe Grange Farm, Thorncliffe Lane, Emley, Huddersfield	0.15	1	2005/92068	Det											1								
70530	Taylor Hill Farm, Park Lane, Emley, Huddersfield	0.31	2	2003/93486	Det											2								
70536	Glicar Farm, Kiln Lane, Emley, Huddersfield	1.1	2	2007/92035	Det						2													
70539	Highfield House, Clough Road, Flockton, Huddersfield	0.04	1	2010/92094	Det						1													
70551	38 40 44, Saville Road, Skelmanthorpe, Huddersfield	0.13	1	2014/92625	Det																			

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70553	6, Viking Avenue, Emley, Huddersfield	0.04	1	1 2011/91146	Ext											1								
70560	Land to the east of 1 West View, Leak Hall Road, Denby Dale, Huddersfield	0.05	1	1 2013/90185	Det					1														
70566	Offices to the south west of Aden House, Long Lane, Clayton West, Huddersfield	0.04	2	2 2015/93002	Det					2														
70568	York House 198, Barnsley Road, Denby Dale, Huddersfield	0.15	5	5 2015/90695	Out							5												
70582	Land west of Leapfrogs, Elm Street, Skelmanthorpe, Huddersfield	0.04	2	2 2015/92377	Out							2												
70596	The Barn Pingle Nook Farm, Common Lane, Denby Dale, Huddersfield	0.01	1	1 2016/90317	C.JPD						1													
70600	40, Scott Hill, Clayton West, Huddersfield	0.04	2	2 2013/93776	Det						2													
70609	67, Cair Hill Road, Upper Cumberworth, Huddersfield	0.11	2	2 2016/90295	Det					2														
70610	62, Barnsley Road, Upper Cumberworth, Huddersfield	0.18	3	3 2014/93354	Det					3														
70615	Scissett Mount, Busker Lane, Scissett, Huddersfield	0.3	12	12 2012/92381	Ext											12								
70618	1, Holmfield Terrace, Clayton West, Huddersfield	0.03	1	1 2011/91289	Det						1													
70621	Land to the east of 23, Jagger Lane, Emley Moor, Huddersfield	0.28	2	2 2012/90390	Ext											2								
70623	Still Waters, Wallrolds, Denby Dale, Huddersfield	0.07	1	1 2015/93225	Det						1													
70628	South of 37, Huddersfield Road, Skelmanthorpe, Huddersfield	0.149	2	2 2016/91566	Det						2													
70629	POL, Pilling Lane Holly Road, Scissett, Huddersfield	9.34	200	200 2014/91699	Det																			
70635	Elmleigh Farmhouse 24, Stringer House Lane, Emley, Huddersfield	0.146	1	1 2016/91430	Det						1													
70637	Woodhouse Barn, Woodhouse Lane, Emley, Huddersfield	0.146	1	1 2016/91433	Det						1													

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70642	337-339 Denby Dale News, Wakefield Road, Denby Dale, Huddersfield	0.035	2	2013/90946	Det						2													
70644	Former Skelmanthorpe Wesleyan Reform Church, Gib Lane, Skelmanthorpe, Huddersfield	0.125	7	2013/93535	Det						7													
70649	Dry Hill Farm, Hill Lane, Huddersfield	0.067	1	2014/93557	CJPD						1													
70650	Land North East of 12, Pennine Way, Scissett, Huddersfield	0.129	1	2015/93022	Det						1													
70652	345, Wakefield Road, Denby Dale, Huddersfield	0.031	3	2013/91795	Det						3													
70653	Land off, Blenheim Chase, Scissett, Huddersfield	0.09	2	2014/90188	Out							2												
70655	5a and 6, Leak Hall Crescent, Denby Dale, Huddersfield	0.128	4	2014/93845	Out							4												
70656	Land off, Cliffwood Rise, Clayton west, Huddersfield	0.207	5	2015/90104	Det						5													
70658	230, Cumberworth Lane, Denby Dale, Huddersfield	0.638	3	2015/90207	Out							3												
70659	107, Carr Hill Road, Upper cumberworth, Huddersfield	0.083	2	2015/93192	CJPD						2													
70661	Land north of, Commercial Road, Skelmanthorpe, Huddersfield	3.525	60	2014/91628	Det																			
70664	44, Dearnside Road, Denby Dale, Huddersfield	0.095	1	2015/91494	Det						1													
70665	Land off, Clough House Lane, Denby Dale, Huddersfield	0.061	1	2015/91740	Det						1													
70666	Adi 12, Brook Meadows, Denby Dale, Huddersfield	0.053	1	2015/91953	Det						1													
70669	Upper woodhouse farm, Ash Lane, Emley, Huddersfield	0.118	1	2015/92756	Det						1													
70670	Upper Woodhouse Farm, Ash Lane, Emley, Huddersfield	0.107	2	2015/90346	Det						2													
70671	9a, Windmill Hill, Emley Moor, Huddersfield	0.167	1	2015/92338	Det						1													

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70672	Long Royd, Commercial Road, Skelmanthorpe, Huddersfield	0.283	3	2015/93664	Out																			
70673	Land adjacent to Denby Dale Station, Wood Lane, Denby Dale, Huddersfield	0.313	5	2015/93360	Out																			
70674	Wood Nook, Wakefield Road, Denby Dale, Huddersfield	1.141	29	2013/93721	Det																			
70675	Land on, Barnsley Road, Scisset, 33, Barnsley Road, Upper Cumberworth, Huddersfield	0.06	1	2016/94164	Det						1													
70676	Dry Hill Farm, Dry Hill Lane, Denby Dale, Huddersfield	0.128	1	2016/91558	Det						1													
70678	Dry Hill Farm, Dry Hill Lane, Denby Dale, Huddersfield	0.063	1	2016/93033	C.JPD						1													
70679	Dry Hill Farm, Dry Hill Lane, Denby Dale, Huddersfield	0.1	1	2016/91863	C.JPD						1													
80077	Whitley Willows (Phase 2), Sands Lane, Lepton, Huddersfield	1.18	2	2006/92227	Det					2														
90061	Copley House Farm, Copley Lane, Shelley, Huddersfield	0.3	1	2006/94849	Det											1								
90064	119, Huddersfield Road, Shelley, Huddersfield	0.05	1	2008/90936	Ext											1								
90069	Land to the south east of 497, Penistone Road, Shelley, Huddersfield	0.024	1	2015/93396	Det																			
90070	1, Jubilee Avenue, Shelley, Huddersfield	0.028	1	2013/92962	Det						1													
90071	Land East of 53, Far Bank, Shelley, Huddersfield	0.07	1	2016/93244	Det						1													
90072	21, Far Bank, Shelley, Huddersfield	0.079	1	2016/91325	Det						1													
90075	Adjacent 30, Westerley Lane, Shelley, Huddersfield	0.059	2	2015/92586	Out							2												
90076	3, Shelley Woodhouse Lane, Shelley, Huddersfield	0.135	1	2016/92001	Det						1													
90077	Land East 59, Far Bank, Shelly, Huddersfield	0.261	2	2016/90756	Det																			

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P0231	Land to the west of 127, Longwood Road, Longwood, Huddersfield	0.04	2	2014/92437	Out							2												
P0277	Imperial Mills, Alexandra Road West, Paddock, Huddersfield	0.107	6	2015/91993	Det						6													
P0356	2 The Angel Hotel, Longwood Road, Paddock, Huddersfield	0.019	1	2015/90456	Det						1													
W0108A	Land to the north of 38-64 and 92-112, Cowlersley Lane, Cowlersley, Huddersfield	0.653	25	2016/90399	Det					25														
W0108B	Land to the north of 2-10, Yew Tree Lane, Cowlersley, Huddersfield	0.544	17	2016/90399	Det					17														
W0112	Land to the south of 31, Scar Lane, Milnsbridge, Huddersfield	1.06	53	2012/90721	Ext											30	23							
W0114	Land to the east of 108, Market Street, Milnsbridge, Huddersfield	0.07	1	2013/92336	Det					1														
W0122	651, Manchester Road, Milnsbridge, Huddersfield	0.03	1	2014/92420	Det						1													
W0133	4, Cowlersley Lane, Cowlersley, Huddersfield	0.04	3	2011/90175	Det					3														
W0141	Land NW of 1, Warneford Road, Cowlersley, Huddersfield	0.028	1	2016/94076	Det						1													
W0142	Post Office Hotel 11, Market Street, Milnsbridge, Huddersfield	0.113	4	2014/92101	Det						4													
W0143	Adj 106, Royd Street, Milnsbridge, Huddersfield	0.189	4	2015/91261	Det						4													
W0144	Coine Valley Tool Hire 5, Pickford Street, Milnsbridge, Huddersfield	0.013	1	2016/90835	Det						1													
W0145	17-19, Morley Lane, Milnsbridge, Huddersfield	0.029	2	2015/94117	Det						2													
W0146	Land between 27 and 31, Pickford Street, Milnsbridge, Huddersfield	0.017	2	2015/92152	Det						2													
W0147	156, Cowlersley Lane, Cowlersley, Huddersfield	0.06	4	2016/90962	Det						4													

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X0187	Land to the south of Oakwell, Lowestwood Lane, Wellhouse, Huddersfield	0.33	1	2009/93641	Det					1														
X0212	Land to the south of 2, Green Gardens, Golcar, Huddersfield	0.032	1	2016/91780	Out						1													
X0216	Parkwood Mills, Grove Street, Longwood, Huddersfield	1.95	49	2009/90619	Det					30	19													
X0230	The Dental Surgery, Swallow Lane, Golcar, Huddersfield	0.06	1	2008/93719	Ext											1								
X0245	108, Lower Wellhouse Road, Wellhouse, Huddersfield	0.01	1	2013/93507	Det					1														
X0247	330, Leymoor Road, Golcar, Huddersfield	0.075	1	2016/90153	Det						1													
X0248	414, Leymoor Road, Golcar, Huddersfield	0.047	3	2013/93078	Det						3													
X0249	Land North of 14 - 19, Grange Road, Golcar, Huddersfield	3.561	94	2014/92021	Det																			
X0250	Land SE 20, Fullwood Drive, Golcar, Huddersfield	0.417	8	2014/90450	Out																			
X0251	Land South of 39 49, Carr Top Lane, Golcar, Huddersfield	0.725	16	2015/90507	Out																			
X0252	Hi Pylon Works, Slades Road, Bolster Moor, Huddersfield	0.285	8	2015/93066	Out							8												
X0255	Land south west of 23, Ashdford Park, Golcar, Huddersfield	0.655	18	2016/90383	Out																			
X0256	Land at 1, Carr Top Lane, Golcar, Huddersfield	0.07	1	2016/90245	Det						1													
Y0024	Land to the west and north of 101 117, Prospect Road, Longwood, Huddersfield	0.35	2	2014/93870	Det					2														
Y0080	Land to the north of 30a, Longwood Gate, Longwood, Huddersfield	0.02	1	2011/90914	Ext											1								
Y0093	land to the north west of 12, Orchard Street West, Longwood, Huddersfield	0.11	5	2016/92882	Det						5													
Y0100	Adjacent 11, Bailroyd Lane, Longwood, Huddersfield	0.031	1	2016/91714	Out							1												

Annex 1 Housing Phasing Table

Sites with planning permission not yet built at 01/04/2017: Kirklees Rural

Site ref	Address	Net area (ha)	Dwellings	Application Reference (As at 01/04/17)	Application type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post Plan
Y0101	Land East of 93a, Prospect Road, Longwood, Huddersfield	0.034	1	12016/92994	Out							1												
Z0376	5, Stainland Road, Outlane, Huddersfield	0.17	3	2016/91059	Out							3												
Z0395	Land between 961 to 963, New Hey Road, Outlane, Huddersfield	0.081	1	12014/90077	Det				1															
Z0415	Upper Snow Lea Farm, Lamb Hall Road, Longwood, Huddersfield	0.106	1	12015/90002	Det						1													
Z0417	Former Industrial Building, Holmefield Road, Longwood, Huddersfield	0.197	1	12015/93689	Det						1													
Z0418	Land North of 12a, Round Ings Road, Outlane, Huddersfield	0.022	1	12015/92205	Out						1													
Z0421	Land adjacent 174, Lamb Hall Road, Longwood, Huddersfield	0.038	1	12016/93200	Out							1												

Application Type

- Det Detailed Planning Permission
- Out Outline Planning Permission
- Ext Extant Planning Permission
- CJPD Class J Permitted Development

Kirklees Local Plan

SD2 Kirklees Local Plan Allocations and Designations Main Modifications




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Document Introduction

This document sets out Main Modifications required to make the Plan sound and/or legally compliant and capable of adoption. Indicative site maps are included in the schedule to aid understanding but do not form part of the MMs.

Modifications are indicated as follows: deletions are shown as a ~~strike through~~ and new text is shown underlined and in italics. Modifications to the Local Plan Policies Map are incorporated into SD2 Kirklees Local Plan Allocations and Designations Main Modifications.

Map legend – The following legend has been provided to assist with the interpretation of the indicative policies maps included in the schedule for those modifications that resulted in a change to the policies map.

<p>Green Belt and Green Infrastructure</p> <ul style="list-style-type: none">  Peak District National Park  Green Belt  Strategic Green Infrastructure (SGI)  Urban Green Space (UGS)  Local Green Space (LocGS)  Add to Green Belt (AGB) <p>Housing, Employment & Other Significant Development</p> <ul style="list-style-type: none">  Employment (E)  Priority Employment Areas (B&S, D&M, HUD, KR)  Housing (H)  Mixed Use (MX)  Land at Storthes Hall (MDGB)  Gypsies And Travellers & Travelling Showpeople (GTTS)  Safeguarded Land (SL) <p>Heritage Assets</p> <ul style="list-style-type: none">  Archaeological Sites (Class 2) (AS)  Conservation Area  Registered Battlefield (RB)  Registered Parks and Gardens (RPG)  Scheduled Monuments (SM) <p>Minerals & Waste</p> <ul style="list-style-type: none">  Minerals Areas of Search (ME)  Minerals Extraction Sites (ME)  Minerals Preferred Areas (ME)  Minerals Infrastructure (MI)  Waste Site (W)  Waste Site (Safeguarded) (WS) 	<p>Natural Environment</p> <ul style="list-style-type: none">  Special Protection Area  Special Area of Conservation  Site of Special Scientific Interest  Local Wildlife Sites (LWS)  Local Geological Sites (LGS)  Dark Peak Nature Improvement Area <p>Shopping Centres</p> <ul style="list-style-type: none">  Principal Town Centre  Town Centre  District Centre  Local Centre <p>Transport</p> <ul style="list-style-type: none">  Highways England Transport Scheme <p>Core Walking, Cycling and Riding Network</p> <ul style="list-style-type: none">  Existing  Proposed  Indicative <p>Transport Scheme (TS)</p> <ul style="list-style-type: none">  Junction improvement  Committed transport improvement scheme  TSS - Mirfield to Dewsbury to Leeds & North Kirklees Growth Zone <p><small>Sites references relate to allocations and policies in: Publication Draft Local Plan - Allocations & Designations and Strategy & Policies</small></p>
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1 Introduction

1 Introduction

No modifications proposed

2 Employment Allocations

Table Modification SD2-MM1

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM1	Page 6		Paragraph 2.1	Delete and insert text: "The following chapter provides details of the sites, <u>which are identified on the proposals map</u> , are allocated for use as employment <u>use</u> in the Local Plan. These sites have been allocated allocations have been set out to meet the employment requirement set out in Section 7 of the Local Plan (Part 1). The reports listed <u>under each allocation</u> in the site boxes should accompany planning applications submitted on these sites although this is not an exhaustive list."

Table Modification SD2-MM2

Modification Ref	Page	Site	Para/table/box	Tracked change

2 Employment Allocations

SD2-MM2	Page 6		New Paragraphs to be inserted after paragraph 2.1	<p>Insert text: <u>"2.2 The term 'employment use' includes: The B use class employment uses derived from the Town and Country Planning (Use Classes) Order Guide 1987 (as amended). These are:</u></p> <ul style="list-style-type: none"> • <u>B1 Business</u> <u>(a) Offices (other than those that fall within A2 (Professional and Financial Services)</u> <u>(b) Research and Development of products or processes</u> <u>(c) Light Industry</u> • <u>B2 General Industry</u> • <u>B8 Storage and Distribution</u> <p><u>2.3 All of the employment allocations within the plan are in out of centre locations, therefore offices (B1a), as a main town centre use, would not be appropriate on employment allocations. It is accepted that some element of office use will be required on the employment allocations to provide the necessary administrative function to the main operation, these offices would be considered as ancillary but it would need to be demonstrated that the quantum of office is justified and entirely in relation to the primary use. Any proposal for office use on the employment allocations, that are not considered as ancillary would need to comply with Policy PLP13 of the Local Plan, which requires a Sequential Test to be submitted and in some cases an Impact Assessment."</u></p>
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Table Modification SD2-MM3

Modification Ref	Page	Site	Para/table/box	Tracked change
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SD2-MM3	Page 6		New policy PLP 64 Allocations after new paragraph 2.3	<p>Insert new policy: <u>Policy PLP 64 Employment allocations</u></p> <p><u>"The sites listed below are allocated for employment uses (as defined above) in the Local Plan. Planning permission will be expected to be granted if proposals accord with the development principles set out in the relevant site boxes, relevant development plan policies and as shown on the Policies Map.</u></p> <p><u>Proposals for office use on these allocations, that are not considered as ancillary would need to comply with Policy PLP13 of the Local Plan."</u></p>
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Table Modification SD2-MM4

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM4	Page 7	E1836	Other site specific considerations	<p>Delete text:</p> <ul style="list-style-type: none"> • This site is owned by Kirklees Council, and as such it could deliver enhanced green infrastructure and offer design and quality of a higher standard • Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity"

Table Modification SD2-MM5

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM5	Page 7	E1837	Indicative capacity (sq.m)	Delete and insert text: "5,504 <u>7,423</u> "

2 Employment Allocations

Table Modification SD2-MM6

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM6	Page 7	E1837	Other site specific considerations	Delete text: "• This site is owned by Kirklees Council, and as such it could deliver enhanced green infrastructure and offer design and quality of a higher standard."

Table Modification SD2-MM7

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM7	Page 8	E1899	Indicative capacity (sq.m)	Delete and insert text: "2,367 <u>1,639</u> "

Table Modification SD2-MM8

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM8	Page 8	E1899	Reports required	Insert text: "• <u>Transport Assessment</u> "

Table Modification SD2-MM9

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM9	Page 8	E1899	Other site specific considerations	Delete text: "• This site is owned by Kirklees Council, and as such it could deliver enhanced green infrastructure and offer design and quality of a higher standard."
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Table Modification SD2-MM10

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM10	Page 9	E1879	Reports required	Insert text: "• <u>Transport Assessment</u> "

Table Modification SD2-MM11

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM11	Page 10	E1873	Reports required	Delete and insert text: "• <u>Transport Statement • Transport Assessment</u> "

2 Employment Allocations

Table Modification SD2-MM12

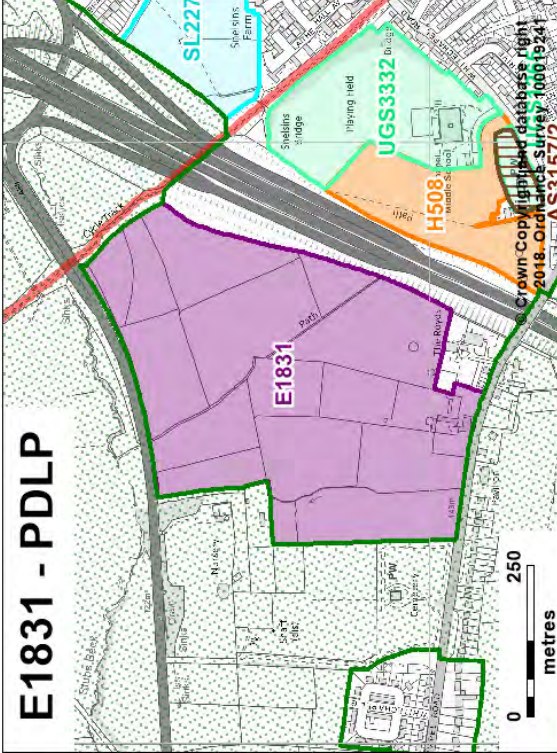
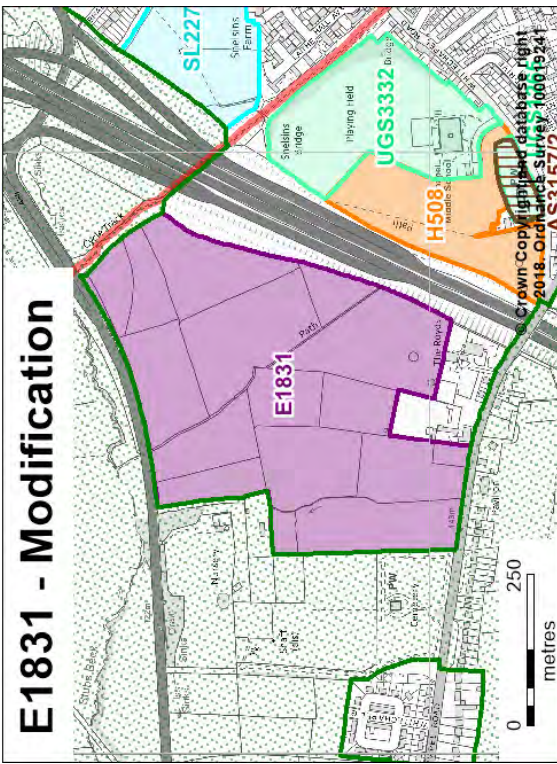
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM12	Page 10	E1831	Gross site area (Ha)	Delete and insert text: <u>"24.57 23.53"</u>
				

Table Modification SD2-MM13

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM13	Page 10	E1831	Net site area (Ha)	Delete and insert text: <u>"24.57 10.68 - High pressure gas pipeline and buffer removed from developable area"</u>

Table Modification SD2-MM14

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM14	Page 11	E1831	Indicative capacity (sq.m)	Delete and insert text: 41,020 <u>37,380</u>

Table Modification SD2-MM15

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM15	Page 11	E1831	Other site specific considerations	Delete and insert text: <ul style="list-style-type: none"> Residential amenity will need safeguarding through sensitive siting of buildings and landscape buffer areas <u>along Whitechapel Road</u>. <u>A masterplan is required for this site to be prepared in accordance with policies in the Local Plan.</u> <u>Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity.</u>

Table Modification SD2-MM16

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM16	Page 12	E1985a	Indicative capacity (sq.m)	Delete and insert text: "46,451 <u>35,284</u> "

2 Employment Allocations

Table Modification SD2-MM17

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM17	Page 12	E1985a	Other site specific considerations	Delete and insert text: <ul style="list-style-type: none"> • “Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity.” • “A <u>masterplan</u> is required for this site to be <u>prepared in accordance with policies in the Local Plan.</u>”

Table Modification SD2-MM18

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM18	Page 13	E1876	Indicative capacity (sq.m)	Delete and insert text: “5,320 <u>6.291</u> ”

Table Modification SD2-MM19

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM19	Page 13	E1876	Reports required	Delete and insert text: “• <u>Transport Statement • Transport Assessment</u> ”

Table Modification SD2-MM20

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM20	Page 13	E1876	Other site specific considerations	Delete text: " This site is owned by Kirklees Council, and as such it could deliver enhanced green infrastructure and offer design and quality of a higher standard! "
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Table Modification SD2-MM21

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM21	Page 13	E1832c	Site address	Delete and insert text: Land north and west of the Three Nuns Pub and the former <u>Former Cooper</u> Bridge Waste Water Treatment Works, Leeds Road, Mirfield

2 Employment Allocations

Table Modification SD2-MM22

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM22	Page 13	E1832c	Gross site area (Ha)	Delete and insert text: <u>45.79</u> <u>8.49</u>

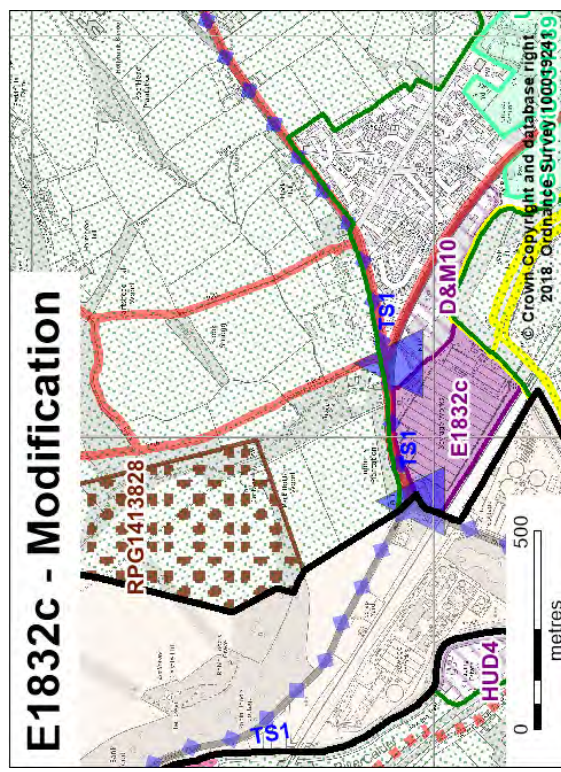
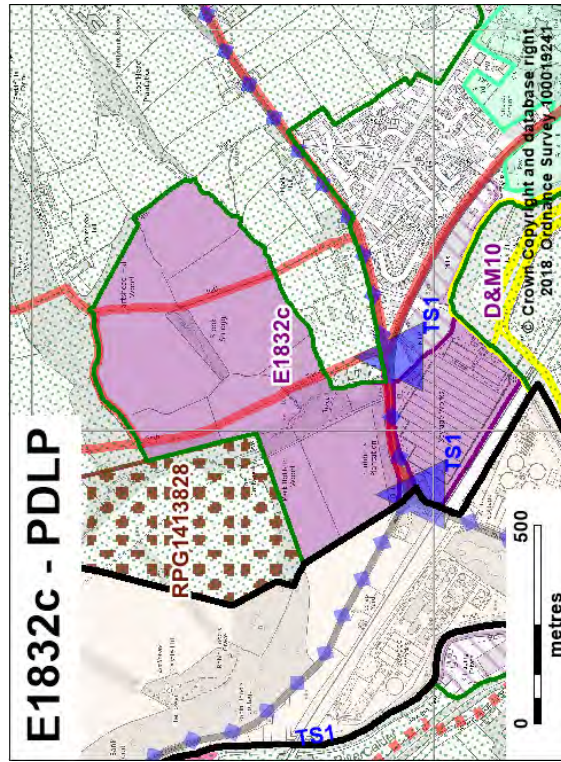


Table Modification SD2-MM23

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM23	Page 13	E1832c	Net site area (Ha)	Delete and insert text: 35.18 <u>4.26</u> - developable area reduced to take account of flood zone 3ai and an area of BAP Priority Habitats and Wildlife Habitat Network

Table Modification SD2-MM24

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM24	Page 14	E1832c	Constraints	Delete text: <ul style="list-style-type: none"> Public rights of way cross the site Site is close to a historic park and garden Part/all of the site is within a High Risk Goal Referral Area Protected trees on part of the site

Table Modification SD2-MM25

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM25	Page 14	E1832c	Indicative capacity (sq.m)	Delete and insert text: 462,187 <u>14,910</u>

Table Modification SD2-MM26

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM26	Page 14	E1832c	Reports required	Delete text: <ul style="list-style-type: none"> Heritage Impact Assessment Predetermination archaeological assessment Coal Mining Risk Assessment

2 Employment Allocations

Table Modification SD2-MM27

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM27	Page 14	E1832c	Other site specific considerations	<p>Delete and insert text:</p> <ul style="list-style-type: none"> • Landscape character assessment has been undertaken for this site which should be considered in the development masterplan • The setting of designated heritage assets and residential <u>Residential</u> amenity will need safeguarding through sensitive siting of buildings and landscape buffer areas • Development of this site has the potential for a severe impact on the Strategic Road Network. Measures will be required to reduce and mitigate that impact. The transport assessment will need to demonstrate that any committed schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, development may need to deliver or contribute to additional schemes identified by Highways England and included in the Infrastructure Delivery Plan (IDP) or other appropriate schemes. • <u>A masterplan is required for this site to be prepared in accordance with policies in the Local Plan.</u>

Table Modification SD2-MM28

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM28	Page 15	E2333a	Site text box	Delete employment allocation E2333a and show as Green Belt

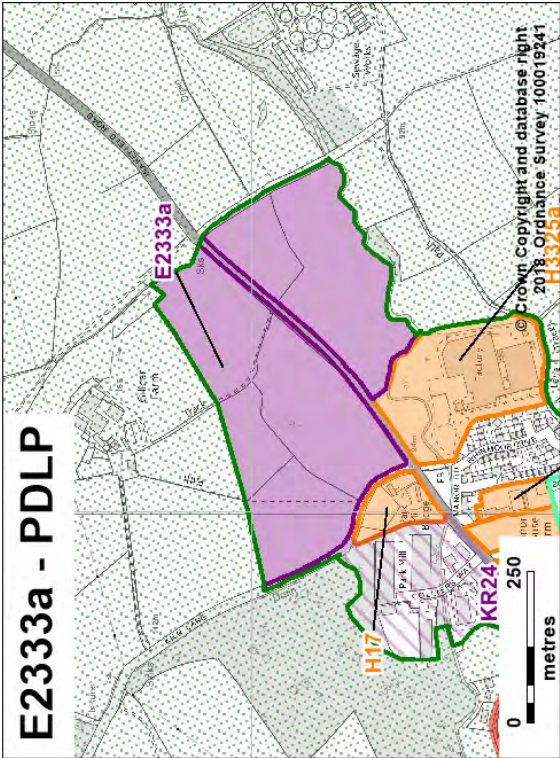
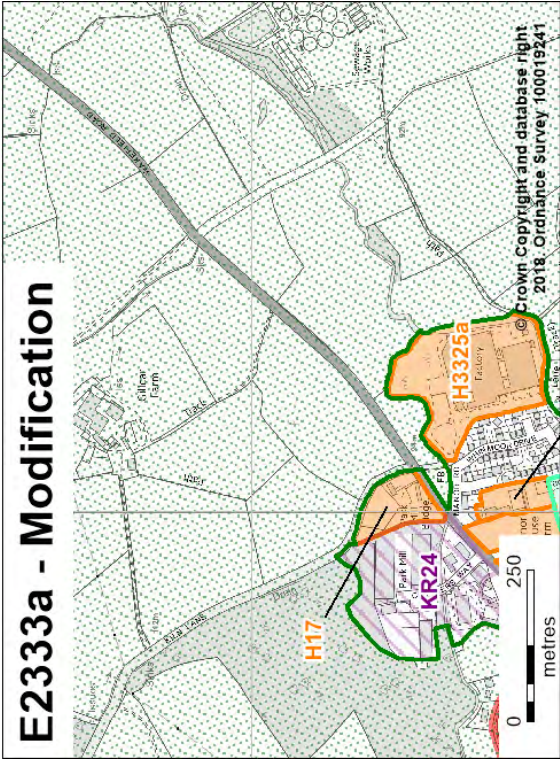
<p>E2333a - PDLP</p> 	<p>E2333a - Modification</p> 
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Table Modification SD2-MM29

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM29	Page 16	E1829	Net site area (Ha)	Delete and insert text: "1.49 1.26 - 0.23ha 10m buffer from River Holme removed from developable area"

2 Employment Allocations

Table Modification SD2-MM30

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM30	Page 16	E1829	Indicative capacity (sq.m)	Delete and insert text: "5,215 <u>4,410</u> "

Table Modification SD2-MM31

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM31	Page 16	E1829	Reports required	Delete and insert text: " • <u>Transport Statement • Transport Assessment</u> "

Table Modification SD2-MM32

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM32	Page 16	E1829	Other site specific considerations	Delete and insert text: " • <u>Replacement playing pitch provision or mitigation measures of equivalent value will be required to meet local needs having regard to the most up-to-date evidence for sport and recreational needs. Replacement playing pitch provision or mitigation measures of equivalent or better quantity and quality will be required in a suitable location unless an assessment clearly shows the site to be surplus to requirements having regard to the most up-to-date evidence for sport and recreation needs</u> "

Table Modification SD2-MM33

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM33	Page 17	E1866	Reports required	Insert text: "Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u> "

Table Modification SD2-MM34

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM34	Page 18	E1900	Net site area (Ha)	Delete and insert text: " 2.20 -- area of 2.37 - 10m buffer from BAP Priority habitat area and planning permission 2014/92964 removed from the developable area and planning permission 2014/93100 taken into account."

Table Modification SD2-MM35

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM35	Page 18	E1900	Constraints	Insert text: " <u>Site lies adjacent to UK BAP Priority Habitat</u> "

2 Employment Allocations

Table Modification SD2-MM36

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM36	Page 18	E1900	Indicative capacity (sq.m)	Delete and insert text: 7,700 <u>8,295</u>

Table Modification SD2-MM37

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM37	Page 18	E1900	Reports required	Delete and insert text: "•Transport Statement • <u>Transport Assessment"</u>

Table Modification SD2-MM38

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM38	Page 18	E1871	Existing use	Delete entire row and text: "UDP Business and Industry allocation (B3.4) – unused/vacant land"

Table Modification SD2-MM39

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM39	Page 19	E1871	Reports required	Insert text: " <u>Transport Assessment</u> "
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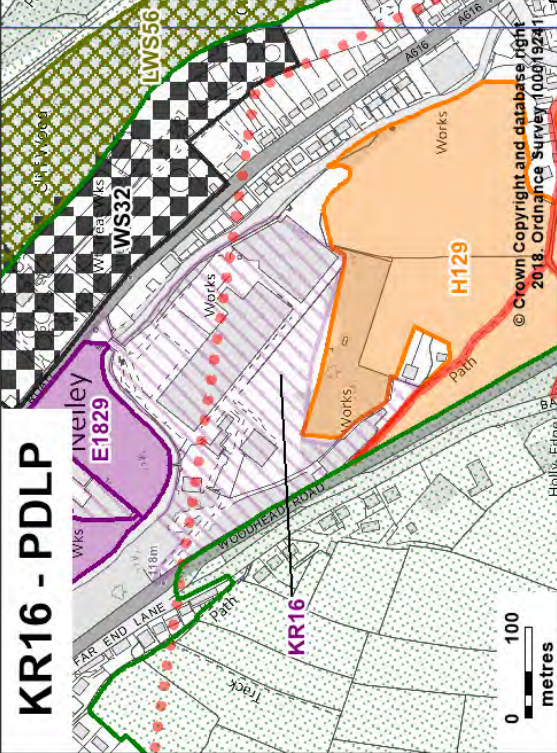
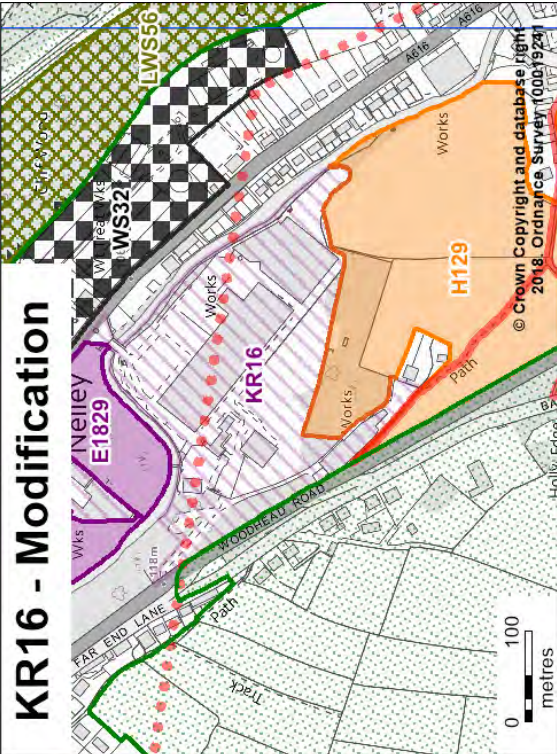
3 Priority Employment Areas

3 Priority Employment Areas

Table Modification SD2-MM40

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM40	Page 23	KR5	Size (ha)	Delete and insert text: "2.25 2.22"

Table Modification SD2-MM41

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM41	Page 23	KR16	Size (ha)	Delete and insert text: "6-24 6.73"
				

4 Housing Allocations

4 Housing Allocations

Table Modification SD2-MM42

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM42	Page 25		New policy box to be inserted after paragraph 4.1	<p>Insert new policy PLP 65:</p> <p><u>"Policy PLP 65 Housing allocations</u></p> <p><i>The sites listed below are allocated for housing in the Local Plan. Planning permission will be expected to be granted if proposals accord with the development principles set out in the relevant site boxes, relevant development plan policies and as shown on the Policies Map."</i></p>

4.1 Huddersfield Sub-Area

Table Modification SD2-MM43

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM43	Page 26	H2684a	Other site specific considerations	<p>Insert text:</p> <p><u>"• A joint masterplan is required with adjacent site H2730a to be prepared in accordance with policies in the Local Plan</u></p> <p><u>• Avoidance, mitigation and/or compensation measures may be required to address any identified adverse ecological impacts in line with Policy PLP30. Such measures may involve the retention of habitats and provision of a habitat corridor to be included within a masterplan for the site"</u></p>

4 Housing Allocations

Table Modification SD2-MM44

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM44	Page 26	H2730a	Gross site area (Ha)	Delete and insert text: "42.46 <u>12.51</u> "
<p>H2730a - PDLP</p>		<p>H2730a - Modification</p>		

Table Modification SD2-MM45

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM45	Page 26	H2730a	Constraints	Delete and insert text: <ul style="list-style-type: none"> Public rights of way <u>run</u> acrosses the site <u>The site lies close to a Grade II listed building</u> <u>The trees alongside the public footpath are protected by a TPO</u>

Table Modification SD2-MM46

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM46	Page 27	H2730a	Other site specific considerations	<p>Insert text:</p> <ul style="list-style-type: none"> <u>"• A joint masterplan is required with adjacent site H2684a to be prepared in accordance with policies in the Local Plan</u> <u>• Avoidance, mitigation and/or compensation measures may be required to address any identified adverse ecological impacts in line with Policy PLP30. Such measures may involve the retention of habitats and provision of a habitat corridor to be included within a masterplan for the site.</u> <u>• In order to safeguard the setting of the Grade II Listed Building known as Crow Trees, no development shall take place on the field/area marked as moderate significance in Councils HIA to the west of the public footpath that runs across the site</u> <u>• Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development to minimise harm to the setting of heritage assets, taking into account the evidence presented in the Council's Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process.</u> <u>• The public footpath, the historic field boundary and the trees protected by TPOs to the south of Crow Trees shall be retained as part of any development proposals"</u>

Table Modification SD2-MM47

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM47	Page 28	H616	Reports required	<p>Insert text:</p> <ul style="list-style-type: none"> <u>"• Transport Assessment"</u>

4 Housing Allocations

Table Modification SD2-MM48

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM48	Page 29	H754	Indicative capacity	Delete and insert text: " <u>22</u> <u>27</u> dwellings"

Table Modification SD2-MM49

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM49	Page 30	H755	Indicative capacity	Delete and insert text: " <u>43</u> <u>39</u> dwellings"

Table Modification SD2-MM50

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM50	Page 30	H1679	Reports required	Insert text: " <u>• Ecological Assessment</u> "

Table Modification SD2-MM51

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM51	Page 30	H1679	Other site specific considerations	Delete text: “This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard.”
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Table Modification SD2-MM52

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM52	Page 31	H351	Site text box	Delete site allocation text box, to be replaced with a combined site box for H351 and H1747(SD2-MM63). Please note this allocation is not being deleted.

Table Modification SD2-MM53

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM53	Page 33	H519	Other site specific considerations	Delete and insert text: “Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity. <u>N/A</u> ”

Table Modification SD2-MM54

Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM54	Page 34	H734	Other site specific considerations	Delete text: “This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard.”
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Table Modification SD2-MM55

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM55	Page 34	H809	Other site specific considerations	Delete and insert text: “This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. •Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity. <u>N/A</u> ”

Table Modification SD2-MM56

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM56	Page 35	H1647	Constraints	Insert text: • <u>Site in Flood Zone 2</u>

Table Modification SD2-MM57

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM57	Page 35	H1647	Reports required	Insert text: " <u>Transport Statement</u> "
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Table Modification SD2-MM58

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM58	Page 35	H1647	Other site specific considerations	Delete and insert text: "• This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u> "

Table Modification SD2-MM59

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM59	Page 36	H1656	Other site specific considerations	Delete and insert text: "• Replacement recreation facilities or mitigation measures of equivalent value will be required to meet local needs having regard to the most up to date evidence for sport and recreational needs • <u>A replacement multi-use-games area of equivalent or better quantity and quality will be required in a suitable location unless an assessment clearly shows the site to be surplus to requirements</u> • This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard."

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Table Modification SD2-MM60

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM60	Page 36	H1657	Constraints	<p>Insert text:</p> <ul style="list-style-type: none"> <u>Public rights of way to north and west of the site</u>

Table Modification SD2-MM61

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM61	Page 36	H1657	Other site specific considerations	<p>Delete text:</p> <p>"• This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard."</p>

Table Modification SD2-MM62

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM62	Page 37	H1747	Site text box	<p>Delete site allocation text box, to be replaced with a combined site box for H351 and H1747 (SD2-MM63). Please note this allocation is not being deleted.</p>

Table Modification SD2-MM63

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM63	Page 37	H1747/351	New site allocation text box
<p>Site no Site address Ownership Gross site area (Ha) Net site area (Ha) Constraints</p>			
<p><u>H1747 / H351</u> <u>Land north of Bradley Road, Bradley, Huddersfield</u> <u>Part council and part private</u> 68.34 <u>62.84 - ponds and buffer area to the north of the site removed from the developable area</u></p> <ul style="list-style-type: none"> ● <u>Multiple access points required</u> ● <u>Additional mitigation on the wider highway network may be required</u> ● <u>Public right of way crosses the site</u> ● <u>Ordinary watercourses cross the site</u> ● <u>Odour source near site - landfill site to the north-east</u> ● <u>Noise sources near site - noise from road traffic on Bradford Road, Bradley Road and M62</u> ● <u>Air quality issues</u> ● <u>Potentially contaminated land</u> ● <u>Part of this site is within the Wildlife Habitat Network</u> ● <u>Part of this site contains a Habitat of Principal Importance</u> 			

4 Housing Allocations

	<ul style="list-style-type: none"> ● <u>Site is close to listed buildings</u> ● <u>Part/all of site within High Risk Coal Referral area</u> ● <u>Power lines cross the site</u> ● <u>Site is in an area that affects the setting of Castle Hill</u> ● <u>Western part of this site includes an archaeological site</u>
<u>Proposed allocation</u>	<u>Housing</u>
<u>Indicative capacity</u>	<u>1,460 dwellings with potential for a further 498 dwellings beyond the plan period.</u>
<u>Reports required</u>	<ul style="list-style-type: none"> ● <u>Transport Assessment</u> ● <u>Travel Plan</u> ● <u>Flood Risk Assessment</u> ● <u>Contamination report (Phase 1 and 2)</u> ● <u>Odour assessment</u> ● <u>Noise assessment</u> ● <u>Air Quality Impact Assessment</u> ● <u>Heritage Impact Assessment</u> ● <u>Health Impact Assessment</u> ● <u>Coal Mining Risk Assessment</u> ● <u>Aboriginal Survey</u> ● <u>Ecological Assessment</u>

<ul style="list-style-type: none"> ● <u>Surface water drainage report</u> ● <u>Pre-determination archaeological assessment</u> 	<ul style="list-style-type: none"> ● <u>A masterplan is required for this site to be prepared in accordance with policies in the Local Plan.</u> ● <u>The provision of a new 2 form entry primary school will be required on this site to meet the demands of the development during and beyond the plan period.</u> ● <u>The provision of secondary school places will be monitored and delivered to meet demand as new housing is delivered during and beyond the plan period.</u> ● <u>Early Years and Childcare provision will be required relating to this allocation.</u> ● <u>Landscape character assessment has been undertaken which should be considered in the development masterplan.</u> ● <u>Where an ecological assessment shows the presence of protected species, this area of the site will be safeguarded from development.</u> ● <u>Consider the opportunities to promote community gardens and allotments.</u> ● <u>Links required to core cycling network.</u> ● <u>This site requires the provision of multiple access points and will need to be carefully phased to ensure it complies with other policies in the Local Plan regarding transport.</u> ● <u>The spine road through this site should be linked to the Bradley Relief Road that is part of TS1. PLP 19. The council will monitor the implementation of the early phases of delivery to manage the options and need for strategic highways intervention in advance of the 750th dwelling.</u> ● <u>Additional mitigation on the wider highway network will be required. Development of this site has the potential for a significant impact on the Strategic Road Network. Measures will be required to reduce and mitigate that impact. The transport assessment will need to demonstrate</u>
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4 Housing Allocations

- that any committed schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, development may need to contribute to additional schemes identified by Highways England and included in the Infrastructure Delivery Plan (IDP) or other appropriate schemes. If development is dependent upon construction of a committed scheme, then development will need to be phased to take place following scheme opening.
- In accordance with PLP13 (part a, paragraph 4) the creation of a new local centre (including uses such as retail, community uses and a health and well-being facility) commensurate with the scale of growth proposed will be supported, subject to the sequential test and impact assessment.
- Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development, taking into account the evidence presented in the Council's Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process.
- The layout of the site in proximity to Shepherd's Thorn Lane and Shepherds Thorn Farm should provide a more appropriate setting for the listed building giving consideration to a layout which takes into account the areas of 'high' and 'considerable' significance (including the rural approach to the listed building) in the Heritage Impact Assessment. The original buildings at of Shepherds Thorn Farm should be retained and reused as part of any development proposals where possible.
- The development of this site must allow for a repurposed 9 hole course combined with a floodlit driving range, clubhouse and two full sized 3G pitches. Proposals should aim to ensure there is no gap in golfing provision on the site.

Table Modification SD2-MM64

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM64	Page 39	H94	Other site specific considerations	Delete text: "Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity."
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Table Modification SD2-MM65

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM65	Page 39	H102	Constraints	Delete and insert text: <ul style="list-style-type: none"> Additional mitigation on wider highway network may be required <u>Site is close to Spring wood Local Wildlife Site and Ancient Woodland</u> <u>Site is near to Honley Conservation Area</u>

Table Modification SD2-MM66

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM66	Page 40	H102	Reports required	Insert text: " <u>Ecological Assessment</u> "

Table Modification SD2-MM67

Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM67	Page 40	H102	Other site specific considerations	<p>Delete and insert text:</p> <p><u>"In order to preserve the setting of Honley Conservation Area, a landscaped buffer shall be provided to the south eastern boundary of the site.</u></p> <ul style="list-style-type: none"> <u>Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development, to minimise the impact on views from Honley Conservation Area, taking into account the evidence presented in the Council's Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process.</u> <u>Additional mitigation on the wider local highway network may be required.</u> <u>Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity."</u>
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Table Modification SD2-MM68

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM68	Page 40	H481	Reports required	<p>Insert text:</p> <p><u>"Ecological Assessment"</u></p>

Table Modification SD2-MM69

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM69	Page 41	H481	Other site specific considerations	<p>Delete text:</p> <p><u>"Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity."</u></p>

Table Modification SD2-MM70

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM70	Page 41	H660	Constraints	<p>Delete and insert text:</p> <ul style="list-style-type: none"> • Additional mitigation on wider highway network may be required • <u>Site lies close to Ancient Woodland</u> • Site is next to Wildlife Habitat Network • Site lies <u>near</u> adjacent to the Honley Conservation Area

Table Modification SD2-MM71

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM71	Page 41	H660	Reports required	<p>Insert text:</p> <ul style="list-style-type: none"> • <u>Ecological Assessment</u>

Table Modification SD2-MM72

Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM72	Page 41	H660	Other site specific considerations	<p>Delete and insert text:</p> <p>"•Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity:</p> <ul style="list-style-type: none"> • <u>In order to preserve the setting of Honley Conservation Area, a landscaped buffer shall be provided to the south eastern boundary of the site.</u> • <u>Additional mitigation on wider local highway network may be required.</u> • <u>Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development to minimise the impact on views from Honley Conservation Area, taking into account the evidence presented in the Council's Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process.</u>
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Table Modification SD2-MM73

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM73	Page 42	H764	Site text box	Delete housing allocation H764 and allocate as Urban Green Space as part of UGS1199

Table Modification SD2-MM74

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM74	Page 43	H1783	Other site specific considerations	Delete text: "• Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity. • A masterplan is required for this site to be prepared in accordance with policies in the Local Plan"

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Table Modification SD2-MM75

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM75	Page 44	H216	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM76

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM76	Page 44	H439	Reports required	Insert text: " <u>Ecological Assessment</u> "

Table Modification SD2-MM77

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM77	Page 46	H215	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM78

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM78	Page 48	H202	Constraints	Insert text: • <u>Overland drainage route to north of site</u>
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Table Modification SD2-MM79

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM79	Page 48	H202	Indicative capacity	Delete and insert text: 49 22 dwellings

Table Modification SD2-MM80

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM80	Page 48	H202	Other site specific considerations	Delete and insert text: " N/A • <u>Buffer to be provided to protect overland drainage route to the north</u> "

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Table Modification SD2-MM81

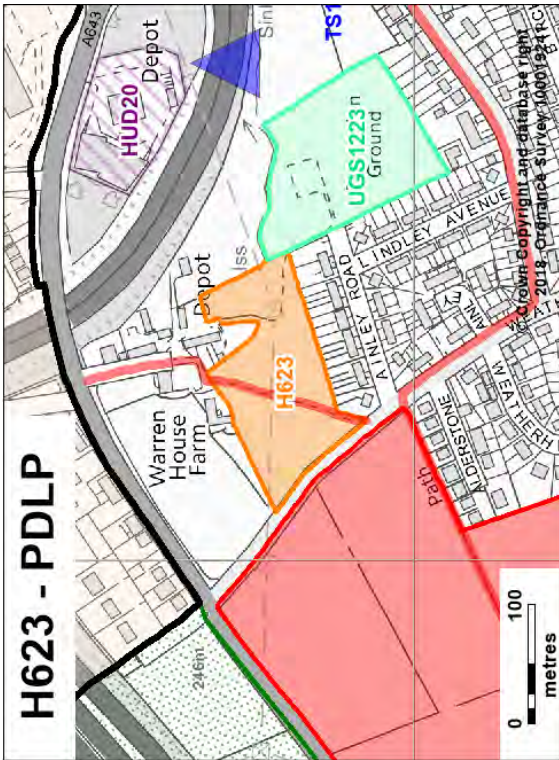
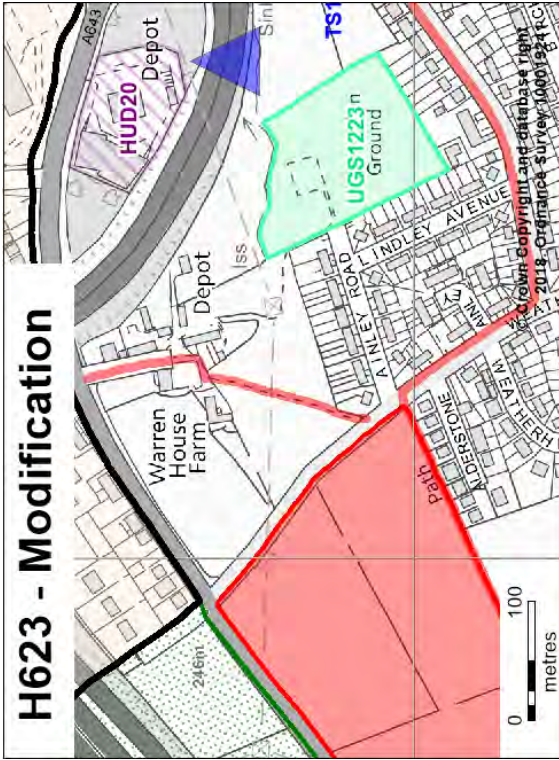
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM81	Page 49	H623	Site text box	Delete housing allocation H623 and show as unallocated
<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>H623 - PDLP</p>  </div> <div style="text-align: center;"> <p>H623 - Modification</p>  </div> </div>				

Table Modification SD2-MM82

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM82	Page 49	H706	Net site area (Ha)	Delete and insert text: "42.94 <u>11.39</u> - developable area reduced due to presence of UK BAP habitats, most of which are covered by protected trees <i>and to reduce impact on Grade II listed buildings</i> ."

Table Modification SD2-MM83

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM83	Page 50	H706	Constraints	Insert text: <ul style="list-style-type: none"> <u>Two Grade II listed buildings lie to the north of the site</u>

Table Modification SD2-MM84

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM84	Page 50	H706	Indicative capacity	Delete and insert text: "392 243 dwellings"

Table Modification SD2-MM85

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM85	Page 50	H706	Other site specific considerations	Delete and insert text: ". This development has the potential for a severe adverse impact on the operation of the Strategic Road Network and will require physical mitigation measures and travel plans in order to minimise the impact of the traffic generated. Highways England has a number of planned improvements to the Strategic Road Network funded as part of the government's Road Investment Strategy (RIS). These schemes will provide additional capacity at congested locations. Development proposals will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed

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<p>investment, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan or other appropriate schemes. Construction of the site should also be phased to take place following completion of the committed RIS improvements:</p> <ul style="list-style-type: none"> <u>• In order to safeguard the setting of the Grade II Listed Buildings known as Middle Burn Farm and Lower Burn Farm, no development shall take place on the field/area marked as high significance in Councils HIA to the south of the listed buildings.</u> <u>• Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development to minimise harm to the setting of the Listed Buildings, taking into account the evidence presented in the Councils Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process."</u> 			
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Table Modification SD2-MM86

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM86	Page 50	H789	Site text box	Delete housing allocation H789 and show as unallocated

H789 - PDLP

H789 - Modification

Table Modification SD2-MM87

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM87	Page 51	H790	Reports required	Insert text: <u>"• Transport Statement"</u>

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Table Modification SD2-MM88

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM88	Page 51	H790	Other site specific considerations	Delete and insert text: " This site is owned by Kirklees Council, and as such it could deliver enhanced green infrastructure and offer design and quality of a higher standard. <u>N/A</u>"

Table Modification SD2-MM89

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM89	Page 52	H1694	Other site specific considerations	Delete and insert text: " This site is owned by Kirklees Council, and as such it could deliver enhanced green infrastructure and offer design and quality of a higher standard. <u>N/A</u>"

Table Modification SD2-MM90

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM90	Page 52	H101	Gross site area (Ha)	Delete and insert text: 4.85 <u>1.06</u>

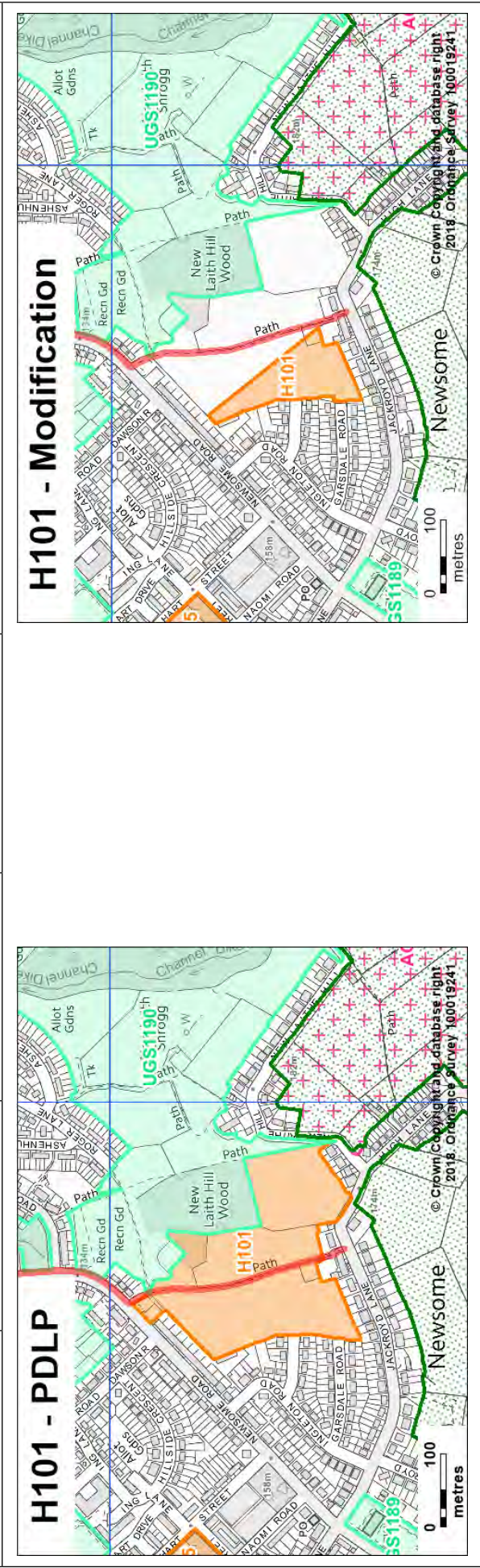


Table Modification SD2-MM91

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM91	Page 52	H101	Net site area (Ha)	Delete and insert text: "4.29--Area of BAP Priority Habitat removed from developable area" <u>1.06</u>

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Table Modification SD2-MM92

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM92	Page 52	H101	Constraints	<p>Delete and insert text:</p> <ul style="list-style-type: none"> • Additional mitigation on wider highway network may be required • Part/all of <u>the</u> site is within a High Risk Coal Referral Area • Two public sewers cross the site

Table Modification SD2-MM93

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM93	Page 52	H101	Indicative capacity	Delete and insert text: "450 <u>37</u> dwellings"

Table Modification SD2-MM94

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM94	Page 52	H101	Reports required	<p>Delete text:</p> <ul style="list-style-type: none"> • Transport Assessment • Travel Plan

Table Modification SD2-MM95

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM95	Page 53	H101	Other site specific considerations	<p>Delete and insert text:</p> <ul style="list-style-type: none"> • This site is owned by Kirklees Council, and as such it could deliver enhanced green infrastructure and offer design and quality of a higher standard • <u>Proposals should be designed to ensure that they would not harm elements which contribute to the significance of Castle Hill.</u>
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Table Modification SD2-MM96

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM96	Page 53	H1811	Net site area (Ha)	Delete and insert text: "2.38 <u>1.63 - developable area reduced due to listed building "</u>

Table Modification SD2-MM97

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM97	Page 53	H1811	Constraints	Delete and insert text: "• <u>Site is close to a listed building A Grade II Listed Building lies to the north of the site"</u>

Table Modification SD2-MM98

Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM98	Page 53	H1811	Indicative capacity	Delete and insert text: "82 <u>57</u> dwellings"
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Table Modification SD2-MM99

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM99	Page 53	H1811	Reports required	Insert text: " <u>Ecological Assessment</u> "

Table Modification SD2-MM100

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM100	Page 53	H1811	Other site specific considerations	Delete and insert text: <ul style="list-style-type: none"> "• This site is owned by Kirklees Council, and as such it could deliver enhanced green infrastructure and offer design and quality of a higher standard • <u>In order to safeguard the setting of the Grade II Listed Buildings known as Taylor Hill working men's club, no development shall take place on the area marked as moderate significance in Councils HIA to the south east of the listed buildings.</u> • <u>Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development to minimise harm to the setting of the Listed Building, taking into account the evidence presented in the Councils Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process.</u>"

Table Modification SD2-MM101

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM101	Page 54	H1731a	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM102

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM102	Page 54	H1731a	Other site specific considerations	Delete and insert text: <ul style="list-style-type: none"> • "This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u>"

Table Modification SD2-MM103

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM103	Page 54	H1935	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM104

Modification Ref	Page	Site	Para/table/box	Tracked change

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SD2-MM104	Page 55	H1935	Other site specific considerations	Delete and insert text: <ul style="list-style-type: none"> • This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u>
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Table Modification SD2-MM105

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM105	Page 55	H3350	Reports required	Insert text: <ul style="list-style-type: none"> • <u>Ecological Assessment</u>

Table Modification SD2-MM106

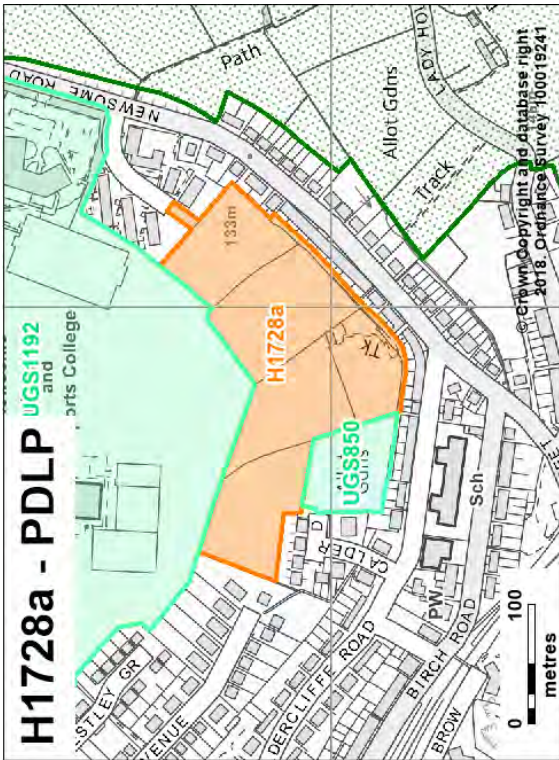
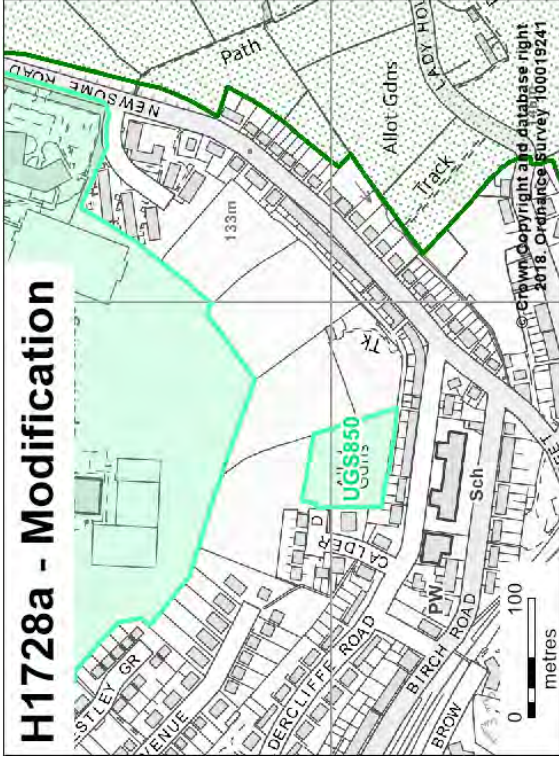
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM106	Page 57	H1728a	Site text box	Delete housing allocation H1728a and show as unallocated
 <p>H1728a - PDLP</p>		 <p>H1728a - Modification</p>		

Table Modification SD2-MM107

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM107	Page 58	H3397	New site allocation text box	Insert new housing allocation H3397:
<p>Page no</p>		<p>H3397</p>		

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<u>Site address</u>	<u>Land north of Blackmoorfoot Road, Crosland Moor, Huddersfield</u>
<u>Ownership</u>	<u>Private</u>
<u>Gross site area (Ha)</u>	<u>29.46</u>
<u>Net site area (Ha)</u>	<u>25.30 - Area of BAP Priority Habitats removed from the developable area</u>
<u>Constraints</u>	<ul style="list-style-type: none"> ● <u>The provision of a pedestrian footway is required across the site frontage</u> ● <u>Improvements to local highway links may be required</u> ● <u>Potentially contaminated land</u> ● <u>Air quality issues</u> ● <u>Odour source near site - road traffic noise, licensed premises and industrial works</u> ● <u>Noise source near site - road traffic noise, licensed premises and industrial works</u> ● <u>Site is close to listed buildings</u> ● <u>Site is in an area that affects the setting of Castle Hill</u>
<u>Proposed allocation</u>	<u>Housing</u>
<u>Indicative capacity</u>	<u>684 dwellings during the local plan period with potential for a further 16 dwellings beyond the plan period.</u>
<u>Reports required</u>	<ul style="list-style-type: none"> ● <u>Transport Assessment</u> ● <u>Travel Plan</u>

<ul style="list-style-type: none"> ● <u>Contamination report (Phase 1 and 2)</u> ● <u>Air Quality Impact Assessment</u> ● <u>Noise assessment</u> ● <u>Odour assessment</u> ● <u>Flood Risk Assessment</u> ● <u>Health Impact Assessment</u> ● <u>Heritage Impact Assessment</u> ● <u>Ecology Assessment</u> 	
<ul style="list-style-type: none"> ● <u>Landscape character assessment has been undertaken for this site which should be considered in the development masterplan</u> ● <u>Provision to be made within the masterplan to access the north eastern portion of the site via the access from Blackmoorfoot Road/Felks Stile Road</u> 	<p><u>Other site specific considerations</u></p>

4 Housing Allocations

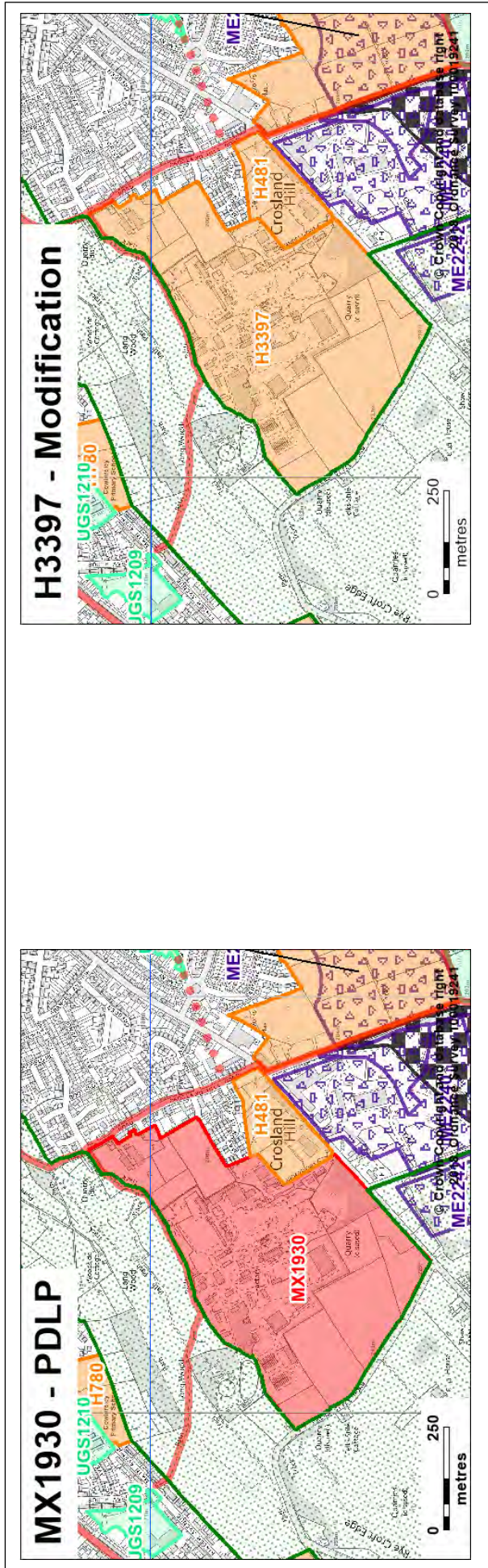
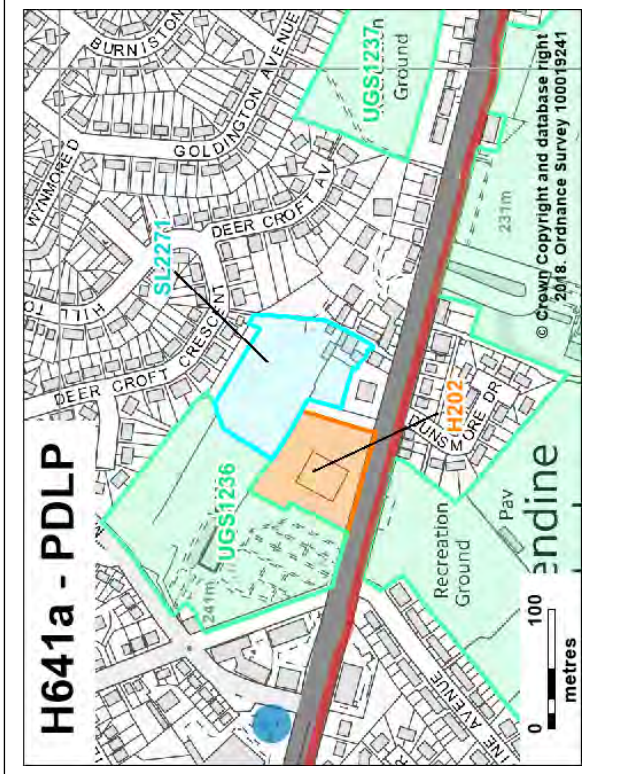
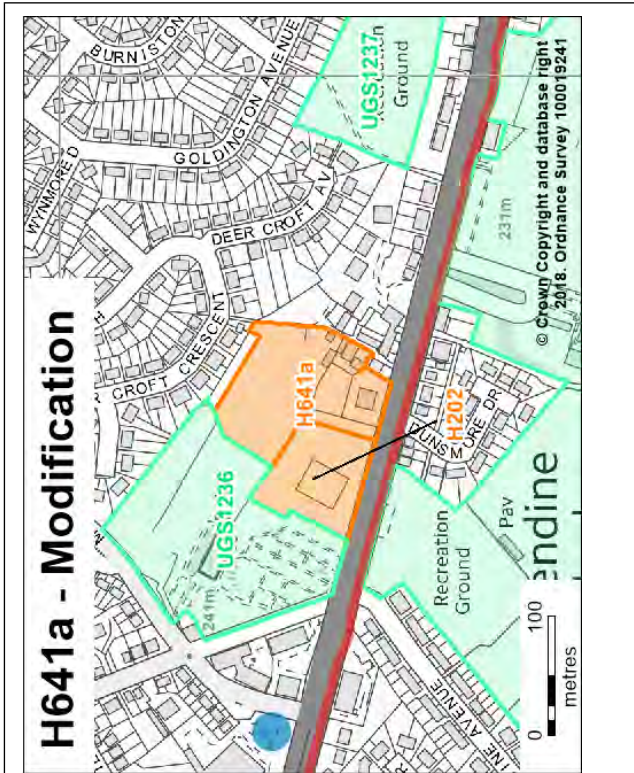


Table Modification SD2-MM108

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM108	Page 58	H641a	New site allocation text box	Insert new housing allocation H641a:
<u>Site no</u>		<u>H641a</u>		
<u>Site address</u>			<u>Land north of New Hey Road, Salendine Nook</u>	
<u>Ownership</u>			<u>Private</u>	
<u>Gross site area (Ha)</u>			<u>1.09ha</u>	
<u>Net site area (Ha)</u>			<u>1.09ha</u>	

<p><u>Constraints</u></p>	<ul style="list-style-type: none"> ● <u>Site is close to listed buildings</u> ● <u>Noise source near site - Road traffic noise from New Hey Road</u>
<p><u>Proposed allocation</u></p>	<p><u>Housing</u></p>
<p><u>Indicative capacity</u></p>	<p><u>32 dwellings</u></p>
<p><u>Reports required</u></p>	<ul style="list-style-type: none"> ● <u>Transport Assessment</u> ● <u>Noise assessment</u> ● <u>Flood Risk Assessment</u> ● <u>Contamination report (Phase 1)</u> ● <u>Drainage masterplan</u> ● <u>Health Impact Assessment</u> ● <u>Heritage Impact Assessment</u>
<p><u>Other site specific considerations</u></p>	<ul style="list-style-type: none"> ● <u>Potential watercourse along southern boundary of site</u>

4 Housing Allocations



4.2 Dewsbury and Mirfield Sub-Area

Table Modification SD2-MM109

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM109	Page 59	H367	Reports required	Insert text: "• <u>Transport Statement</u> "

Table Modification SD2-MM110

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM110	Page 60	H559	Indicative capacity	Delete and insert text: "279 <u>280</u> dwellings"

Table Modification SD2-MM111

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM111	Page 60	H559	Other site specific considerations	Delete and insert text: "• <u>Access to MX1905 to be provided as part of this allocation</u> <u>Access to MX1905 to be provided as part of this allocation including, no right turn onto Chidswell Lane and the provision of a new roundabout at the junction with the B6128 (Owl Lane).</u> • <u>A landscaped buffer will be provided along the southern boundary of the site.</u> • <u>A masterplan is required for this site to be prepared in accordance with policies in the Local Plan.</u>

4 Housing Allocations

				<ul style="list-style-type: none"> <u>Additional mitigation on the wider highway network will be required. Development of this site has the potential for a significant impact on the Strategic Road Network. Measures will be required to reduce and mitigate that impact. The transport assessment will need to demonstrate that any committed schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, development may need to contribute to additional schemes identified by Highways England and included in the Infrastructure Delivery Plan (IDP) or other appropriate schemes. If development is dependent upon construction of a committed scheme, then development will need to be phased to take place following scheme opening</u>
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Table Modification SD2-MM112

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM112	Page 60	H813	Other site specific considerations	<p>Delete and insert text:</p> <p>"• This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard <u>N/A</u>"</p>

Table Modification SD2-MM113

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM113	Page 61	H1937	Reports required	<p>Insert text:</p> <p>"• <u>Transport Statement</u>"</p>

Table Modification SD2-MM114

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM114	Page 61	H1937	Other site specific considerations	Delete text: ". This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard"

Table Modification SD2-MM115

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM115	Page 62	H2148	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM116

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM116	Page 62	H776	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM117

Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM117	Page 62	H776	Other site specific considerations	Delete and insert text: ". This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u> "
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Table Modification SD2-MM118

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM118	Page 63	H1664	Other site specific considerations	Delete and insert text: ". This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u> "

Table Modification SD2-MM119

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM119	Page 64	H85	Constraints	Insert text: " <u>• Part of the site is in flood zone 2</u> "

Table Modification SD2-MM120

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM120	Page 64	H85	Reports required	Insert text: <u>"Transport Statement</u> <u>• Flood Risk Assessment"</u>
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Table Modification SD2-MM121

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM121	Page 64	H95	Site text box	Delete housing allocation H95 and show as unallocated

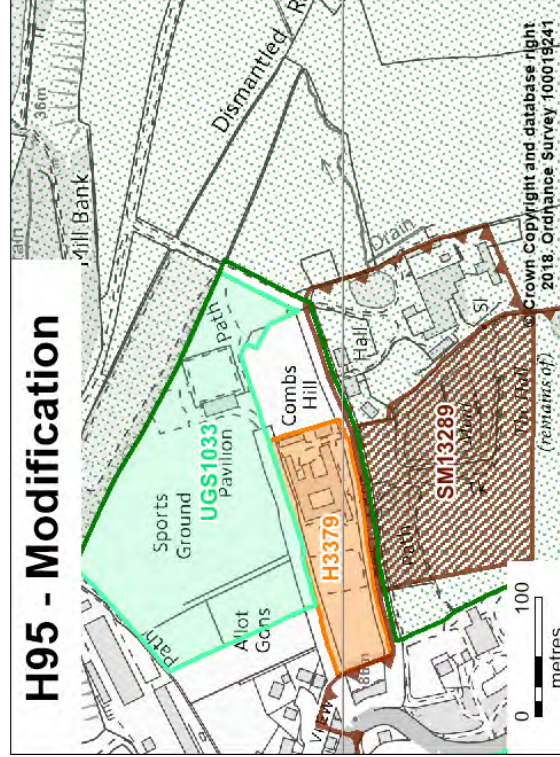
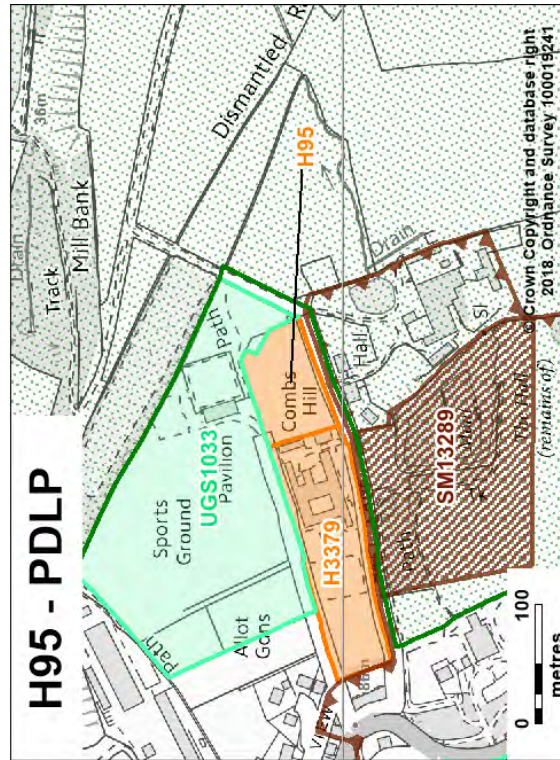


Table Modification SD2-MM122

Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM122	Page 65	H192	Reports required	Insert text: " <u>Transport Statement</u> "
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Table Modification SD2-MM123

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM123	Page 67	H1754	Other site specific considerations	Delete and insert text: <ul style="list-style-type: none"> • "This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u>"

Table Modification SD2-MM124

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM124	Page 68	H1660	Net site area (Ha)	Delete and insert text: " <u>4.79 1.54 - developable area reduced due to protected trees on part of site</u> "

Table Modification SD2-MM125

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM125	Page 68	H1660	Indicative capacity	Delete and insert text: " <u>62 53 dwellings</u> "

Table Modification SD2-MM126

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM126	Page 68	H1660	Constraints	Insert text: " <u>Protected trees on part of site</u> "

Table Modification SD2-MM127

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM127	Page 68	H1660	Other site specific considerations	Delete and insert text: " <u>Children's playground which could be incorporated into layout of housing site</u> <ul style="list-style-type: none"> <u>The children's playground should be retained within the site or a replacement playground of equivalent or better quantity and quality will be required in a suitable location unless an assessment clearly shows the site to be surplus to requirements having regard to the most up-to-date evidence for recreation needs</u>

Table Modification SD2-MM128

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM128	Page 70	H46	Other site specific considerations	Delete and insert text: " <u>This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. N/A</u> "

4 Housing Allocations

Table Modification SD2-MM129

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM129	Page 72	H2089	Indicative capacity	Delete and insert text: “2,340 <u>1,869</u> dwellings during the local plan period with potential for a further 4,690 <u>2,131</u> dwellings beyond the plan period”

Table Modification SD2-MM130

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM130	Page 72	H2089	Other site specific considerations	Delete and insert text: <ul style="list-style-type: none"> • The provision of two new primary schools will be required and secondary schools provision either on this site or in the locality should be considered during the plan period. • <u>The provision of one new 2 form entry primary school will be required during the plan period with further 2 form entry capacity required beyond the plan period.</u> • <u>The provision of secondary school places will be monitored and delivered to meet demand as new housing is delivered during and beyond the plan period. The masterplan will safeguard land for future secondary school provision beyond the plan period should the need arise.</u> • <u>Early Years and Childcare provision will be required relating to this allocation.</u> • Proposals for this site should <u>also contribute towards</u> take account of: • Delivery of new community hubs

• This development has the potential for a severe adverse impact on the operation of the Strategic Road Network and will require physical mitigation measures and travel plans in order to minimise the impact of the traffic generated. Highways England has a number of planned improvements to the Strategic Road Network funded as part of the government's Road Investment Strategy (RIS). These schemes will provide additional capacity at congested locations. Development proposals will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan or other appropriate schemes.

Construction of the site should also be phased to take place following completion of the committed RIS improvements.

- Additional mitigation on the wider highway network will be required.

Development of this site has the potential for a significant impact on the Strategic Road Network. Measures will be required to reduce and mitigate that impact. The transport assessment will need to demonstrate that any committed schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, development may need to contribute to additional schemes identified by Highways England and included in the Infrastructure Delivery Plan (IDP) or other appropriate schemes. If development is dependent upon construction of a committed scheme, then development will need to be phased to take place following scheme opening.

- In accordance with PLP13 (part a, paragraph 4) the creation of a new local centre commensurate with the scale of growth proposed will be supported, subject to the sequential test and impact assessment.
- Proposals for this site will need to take account of TS5 Mirfield to Dewsbury to Leeds and North Kirklees Growth Zone
- The council will monitor the implementation of the early phases of delivery to manage the options and need for strategic highways intervention in advance of the 2000th dwelling

4 Housing Allocations

					<ul style="list-style-type: none"> • <u>A landscape buffer along the southern boundary of the site is required</u> • <u>A masterplan is required for this site to be prepared in accordance with policies in the Local Plan.</u>
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Table Modification SD2-MM131

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM131	Page 73	H40	Net site area (Ha)	Delete and insert text: "2.12- 2.02 Flood zone 3 and HIA area of <u>high significance</u> removed from developable area"

Table Modification SD2-MM132

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM132	Page 73	H40	Indicative capacity	Delete and insert text: "74 <u>70</u> dwellings"

Table Modification SD2-MM133

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM133	Page 73	H40	Other site specific considerations	Insert text: " <u>Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development to minimise harm to the setting of the Listed Building, taking into account the evidence presented</u> "

					<p><u>in the Council's Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process.</u></p> <ul style="list-style-type: none"> <u>In order to safeguard the setting of the Grade II Listed Building known as Sheep Ings Farmhouse, no development shall take place on the field/area marked as high significance in council's HIA to the east of the track running south from Granny Lane across the site."</u>
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Table Modification SD2-MM134

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM134	Page 74	H197	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM135

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM135	Page 76	H794	Other site specific considerations	Delete and insert text: " <u>This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. N/A</u> "

Table Modification SD2-MM136

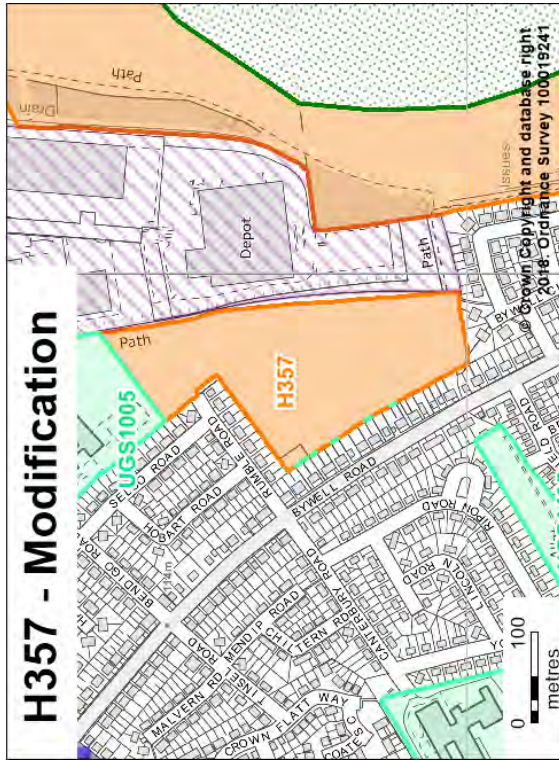
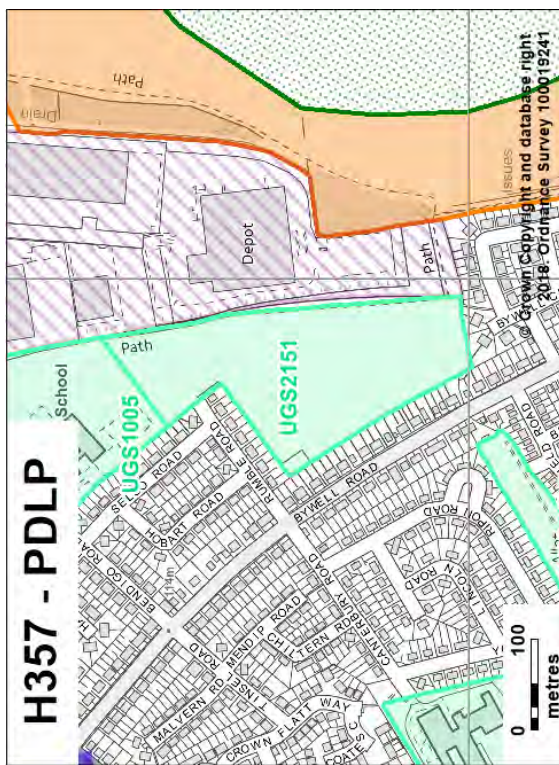
Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM136	Page 76	H357	New site allocation text box	Insert new housing allocation H357:
<u>Site no</u>				<u>H357</u>
<u>Site address</u>				<u>Land south and east of, Rumble Road, Bywell, Dewsbury</u>
<u>Ownership</u>				<u>Private</u>
<u>Gross site area (Ha)</u>				<u>4.52</u>
<u>Net site area (Ha)</u>				<u>4.52</u>
<u>Constraints</u>				<ul style="list-style-type: none"> ● <u>Noise source near site – Shaw Cross Business Park</u> ● <u>Part/all of the site lies within a High Risk Coal Referral Area</u> ● <u>Public Right of Way on eastern boundary</u>
<u>Proposed allocation</u>				<u>Housing</u>
<u>Indicative capacity</u>				<u>149 dwellings</u>
<u>Reports required</u>				<ul style="list-style-type: none"> ● <u>Transport Assessment</u> ● <u>Contaminated Land phase 1</u> ● <u>Low emission travel plan</u> ● <u>Noise assessment</u> ● <u>Health Impact Assessment</u>

Other site specific considerations

N/A



4.3 Batley and Spen Sub-Area

Table Modification SD2-MM137

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM137	Page 76	H662	Other site specific considerations	Delete and insert text: "• Site would benefit from a drainage masterplan <u>N/A</u> "

Table Modification SD2-MM138

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM138	Page 77	H758	Other site specific considerations	Delete text: "• Part of this site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. • Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity."

Table Modification SD2-MM139

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM139	Page 78	H1938	Other site specific considerations	Delete and insert text: "• This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u> "

Table Modification SD2-MM140

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM140	Page 78	H323	Constraints	<p>Delete and insert text:</p> <ul style="list-style-type: none"> • Risk of noise impact • <u>Noise source near site - Lady Anne Industrial Estate, Railway line</u> • <u>TPO's on site</u>

Table Modification SD2-MM141

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM141	Page 79	H2647	Constraints	<p>Insert text:</p> <p>"• <u>Potentially contaminated land</u>"</p>

Table Modification SD2-MM142

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM142	Page 80	H760	Other site specific considerations	<p>Delete and insert text:</p> <p>"N/A • <u>Consider the retention of land fronting Halifax Road as part of the open space provision</u>"</p>

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Table Modification SD2-MM143

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM143	Page 80	H1696	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM144

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM144	Page 81	H1696	Other site specific considerations	Delete and insert text: ". This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u> "

Table Modification SD2-MM145

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM145	Page 81	H1702	Other site specific considerations	Delete and insert text: ". This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u> "

Table Modification SD2-MM146

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM146	Page 82	H527	Other site specific considerations	Delete and insert text: "N/A • <u>Safety issues identified on surrounding road network - Halifax Road/Staincliffe Hall Road traffic signal junction</u> "

Table Modification SD2-MM147

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM147	Page 83	H138	Other site specific considerations	Delete and insert text: "• Replacement playing pitch provision will be required to meet the needs of existing users • <u>Replacement playing pitch provision or mitigation measures of equivalent or better quantity and quality will be required in a suitable location unless an assessment clearly shows the site to be surplus to requirements having regard to the most up-to-date evidence for sport and recreation needs</u> • <u>Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity"</u>

Table Modification SD2-MM148

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM148	Page 84	H172	Net site area (Ha)	Delete and insert text: 4.58 " <u>1.26 - Area of protected trees removed from the developable area</u> "

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Table Modification SD2-MM149

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM149	Page 84	H172	Indicative capacity	Delete and insert text: " <u>55 30 dwellings</u> "

Table Modification SD2-MM150

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM150	Page 88	H761	Net site area (Ha)	Delete and insert text: 2.46 <u>1.73</u>

Table Modification SD2-MM151

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM151	Page 88	H761	Constraints	Delete and insert text: <ul style="list-style-type: none"> • <u>The site</u> is close to a <u>Grade II*</u> listed buildings • <u>Part of the site lies within the Birstall Conservation Area</u>"

Table Modification SD2-MM152

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM152	Page 88	H761	Indicative capacity	Delete and insert text: 75 <u>55</u> dwellings
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Table Modification SD2-MM153

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM153	Page 88	H761	Other site specific considerations	Delete and insert text: N/A <ul style="list-style-type: none"> • <u>With the exception of an access road the area of land to the east of Birstall Old Hall, identified in the councils HIA as being of moderate significance, should remain as open land.</u> • <u>There should be a sensitive approach to existing views to ensure that development preserves and enhances the setting of Birstall Old Hall.</u> • <u>Consider the retention of land fronting Raikes Lane as part of the open space provision.</u>

Table Modification SD2-MM154

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM154	Page 89	H796	Reports required	Insert text: "• <u>Transport Statement</u> "

Table Modification SD2-MM155

Modification Ref	Page	Site	Para/table/box	Tracked change

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SD2-MM155	Page 89	H218	Constraints	Insert text: • <u>PROW runs through the south western edge of the site</u>
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Table Modification SD2-MM156

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM156	Page 90	H162	Reports required	Insert text: "• <u>Transport Statement</u> "

Table Modification SD2-MM157

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM157	Page 91	H49a	Constraints	Delete and insert text: "• Third party land required to achieve sufficient visibility splays • <u>PROW located on the eastern, western and southern boundaries of the site</u> "

Table Modification SD2-MM158

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM158	Page 91	H49a	Reports required	Insert text: "• <u>Transport Statement</u> "

Table Modification SD2-MM159

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM159	Page 91	H69	Net site area (Ha)	Delete and insert text: "11.82 <u>11.65</u> - Area of BAP priority habitat removed from the developable area <u>0.45 ha</u> has been removed from the developable area to enable the retention of existing hedgerows and a vegetated buffer adjacent to the Nann Hall Beck at the northeast of the allocation."

Table Modification SD2-MM160

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM160	Page 91	H69	Constraints	Insert text: • <u>PROW crosses the north eastern corner of the site</u>

Table Modification SD2-MM161

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM161	Page 92	H69	Other site specific considerations	Delete and insert text: ". This development has the potential for a severe adverse impact on the operation of the Strategic Road Network and will require physical mitigation measures and travel plans in order to minimise the impact of the traffic generated. Highways England has a number of planned improvements to the Strategic Road Network funded as part of the government's Road Investment Strategy (RIS). These schemes will provide additional capacity at congested locations. Development proposals will need to demonstrate

4 Housing Allocations

				<p>that any committed RIS schemes are sufficient to deal with the additional demand generated by that site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan or other appropriate schemes. Construction of the site should also be phased to take place following completion of the committed RIS improvements.</p> <ul style="list-style-type: none"> • <u>Additional mitigation on the wider highway network will be required. Development of this site has the potential for a significant impact on the Strategic Road Network. Measures will be required to reduce and mitigate that impact. The transport assessment will need to demonstrate that any committed schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, development may need to contribute to additional schemes identified by Highways England and included in the Infrastructure Delivery Plan (IDP) or other appropriate schemes. If development is dependent upon construction of a committed scheme, then development will need to be phased to take place following scheme opening.</u> • <u>Rivers and hedgerows are both Habitats of Principle Importance under section 41 of the Natural Environment and Rural Communities Act 2006. Any application for this site will include a buffer from Nann Hall Beck to provide an opportunity for enhancement of the local ecological network. This buffer shall not form part of any domestic curtilage and enhancement can best be provided in this location by creating a flower rich grassland with scattered scrub.</u>
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Table Modification SD2-MM162

Modification Ref	Page	Site	Para/table/box	Tracked change
Page 525				

SD2-MM162	Page 92	H508	Net site area (Ha)	Delete and insert text: 4.5 <u>3.12</u>
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Table Modification SD2-MM163

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM163	Page 92	H508	Indicative capacity	Delete and insert text: "470 <u>122</u> dwellings"

Table Modification SD2-MM164

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM164	Page 93	H508	Other site specific considerations	Delete and insert text: <ul style="list-style-type: none"> • Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity. • <u>The site can be accessed through the area of land identified as of high significance within the council's Heritage Impact Assessment. There should be a sensitive approach to the design of the access in order to minimise harm to the character of this area and the setting of the church. The remainder of the area of high significance should be left "open" for community uses.</u> • <u>The area of moderate significance as defined in the council's HIA should be retained as open land.</u> • <u>There should be a sensitive approach to building orientation, massing, height, density and layout on the site in order to minimise harm to the significance of the Church and its setting, taking into account the evidence</u>

Table Modification SD2-MM167

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM167	Page 95	H810	Site text box	Delete housing allocation H810 and show as unallocated

<p>H810 - PDLP</p>	<p>H810 - Modification</p>
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Table Modification SD2-MM168

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM168	Page 96	H1704	Other site specific considerations	Delete and insert text: ". This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u> "

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Table Modification SD2-MM169

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM169	Page 97	H1983	Reports required	Insert text: "• <u>Transport Statement</u> "

Table Modification SD2-MM170

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM170	Page 98	H2645	Reports required	Insert text: "• <u>Transport Statement</u> "

Table Modification SD2-MM171

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM171	Page 99	H783	Site text box	Delete housing allocation H783 and allocate as urban green space as part of UGS1056

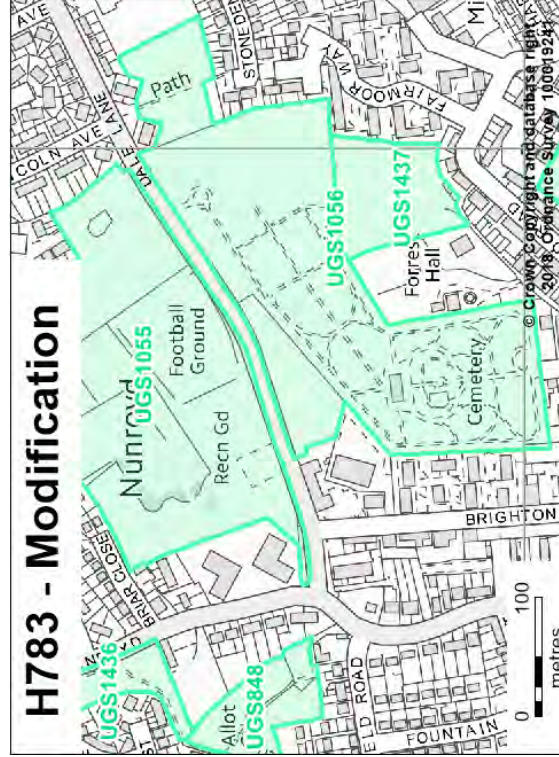
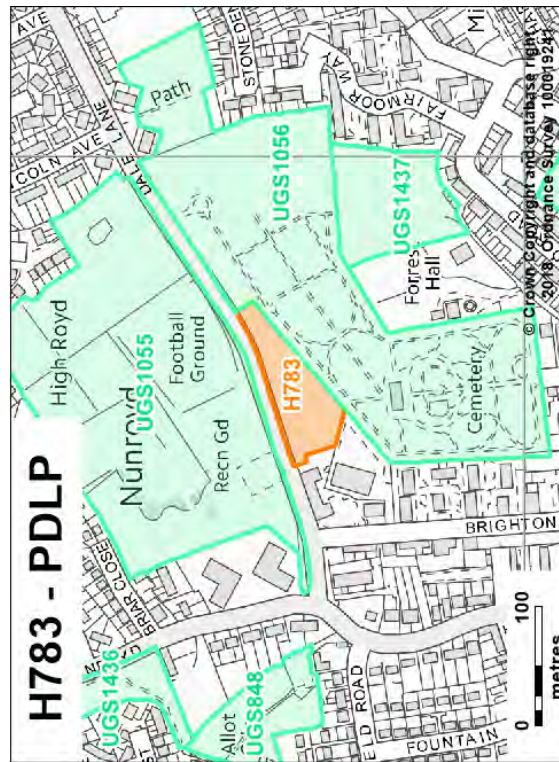


Table Modification SD2-MM172

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM172	Page 100	H1772	Net site area (Ha)	Delete and insert text: "0.98--high flood risk areas removed from the developable area 1.58"

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Table Modification SD2-MM173

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM173	Page 100	H1772	Constraints	Insert text: • <u>Part of the site falls within HSE middle zone</u>

Table Modification SD2-MM174

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM174	Page 100	H1772	Indicative capacity	Delete and insert text: "34 <u>30</u> dwellings"

Table Modification SD2-MM175

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM175	Page 100	H1772	Other site specific considerations	Delete and insert text: "→No residential development to take place in flood zone 3 <u>N/A</u> "

Table Modification SD2-MM176

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM176	Page 102	H198	Other site specific considerations	<p>Insert text: <u>"• The existing multi-use-games area (MUGA) should be retained within the site or a replacement MUGA of equivalent or better quantity and quality will be required in a suitable location unless an assessment clearly shows the site to be surplus to requirements.</u> <u>• There should be a sensitive approach to building orientation, massing, height, density, and layout on the site in order to minimise harm to Thornbush farm to preserve existing views towards and from Thornbush Farmhouse and Barn.</u> <u>• The setting of the footpath should be preserved or enhanced by development."</u></p>
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4 Housing Allocations

Table Modification SD2-MM177

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM177	Page 103	H442	Site text box	Delete housing allocation H442 and show as green belt

Table Modification SD2-MM178

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM178	Page 104	H567	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM179

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM179	Page 105	H591	Constraints	Delete text: "•Third party land required to achieve sufficient visibility splays" "•Noise source near site"

Table Modification SD2-MM180

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM180	Page 105	H591	Reports required	Insert text: "• <u>Coal mining risk assessment</u> "

Table Modification SD2-MM181

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM181	Page 105	H591	Other site specific considerations	Delete and insert text: N/A • <u>Site access must be from Cliffe Lane not Ferrand Lane</u> • <u>There should be a sensitive approach to the design and landscaping of the site in order to maintain the agricultural character of Ferrand Lane</u>

Table Modification SD2-MM182

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM182	Page 105	H591	Other site specific considerations	Delete and insert text: N/A • <u>Site access must be from Cliffe Lane not Ferrand Lane</u> • <u>There should be a sensitive approach to the design and landscaping of the site in order to maintain the agricultural character of Ferrand Lane</u>

4 Housing Allocations

SD2-MM182	Page 106	H2537	Gross site area (Ha)	Delete and insert text: "0.8 <u>1.2</u> "

Table Modification SD2-MM183

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM183	Page 106	H2537	Net site area (Ha)	Delete and insert text: "0.8 <u>1.2</u> "

Table Modification SD2-MM184

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM184	Page 106	H2537	Constraints	Insert text: " <u>Public right of way crosses the site and borders the site to the east (maintain integrity of the Public footpath (part of Luddite Trail))</u> "
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Table Modification SD2-MM185

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM185	Page 106	H2537	Indicative capacity	Delete and insert text: " <u>23 42 dwellings</u> "

Table Modification SD2-MM186

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM186	Page 106	H2537	Other site specific considerations	Delete and insert text: " <u>N/A • Access must be made available to H709</u> "

Table Modification SD2-MM187

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM187	Page 107	H2627	Reports required	Insert text: " <u>Transport Statement</u> "

4 Housing Allocations

Table Modification SD2-MM188

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM188	Page 108	H2667	Reports required	Insert text: " <u>• Transport Statement</u> "

Table Modification SD2-MM189

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM189	Page 108	H2667	Other site specific considerations	Delete and insert text: " <u>• This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard</u> <u>• This site would benefit from a drainage masterplan</u> <u>• Replacement playing pitch provision or mitigation measures of equivalent or better quantity and quality will be required in a suitable location unless an assessment clearly shows the site to be surplus to requirements having regard to the most up-to-date evidence for sport and recreation needs</u> <u>• The original buildings, walls and railings of the former Gomersal Primary School shall be retained and reused as part of any development proposals where possible unless adequate justification is provided for their loss. in accordance with PLP7 and PLP24.</u> <u>• Boundary wall and access to the footpath at the rear of the church to be retained as part of the scheme"</u>

Table Modification SD2-MM190

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM190	Page 108	H2590a	New site allocation text box	Insert new housing allocation H2590a:
<u>Site no</u>		<u>H2590a</u>		
<u>Site address</u>		<u>Land off New Lane, Cleckheaton</u>		
<u>Ownership</u>		<u>Private</u>		
<u>Gross site area (Ha)</u>		<u>1.82</u>		
<u>Net site area (Ha)</u>		<u>1.54 - area of TPO's removed from developable area</u>		
<u>Constraints</u>		<ul style="list-style-type: none"> ● <u>Site is on potentially contaminated land</u> ● <u>Noise source near site – road traffic noise</u> ● <u>Part/all of the site is within a high risk coal referral area</u> ● <u>TPOs on site</u> 		
<u>Proposed allocation</u>		<u>Housing</u>		
<u>Indicative capacity</u>		<u>39</u>		
<u>Reports required</u>		<ul style="list-style-type: none"> ● <u>Contamination report (Phase 1 and 2)</u> ● <u>Travel plan</u> ● <u>Coal mining risk assessment</u> 		
<u>Other site specific considerations</u>		<u>N/A</u>		

4 Housing Allocations

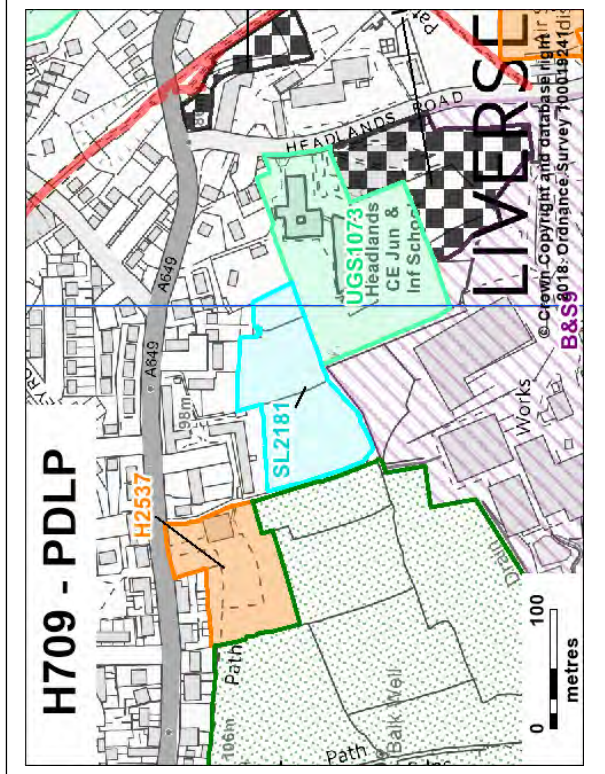
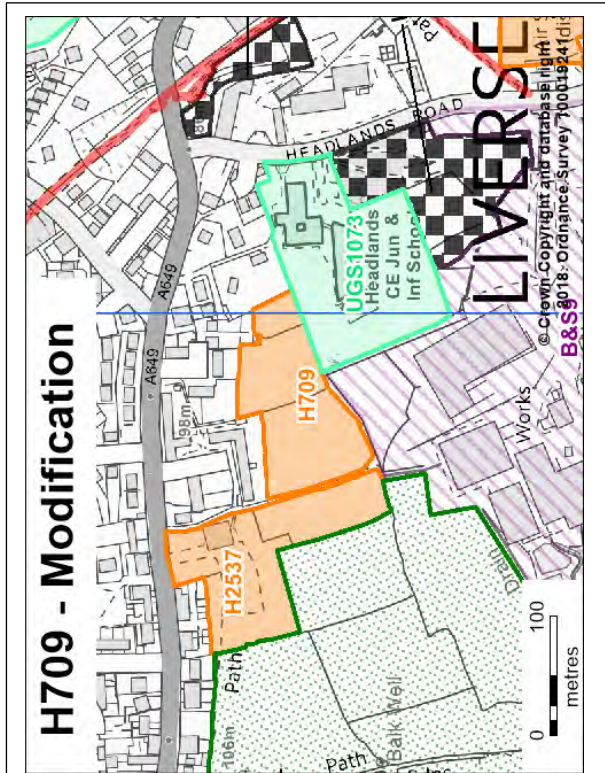
<p>H2590a - PDLP 100r Side</p>	<p>H2590a - Modification 100r Side</p>
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Table Modification SD2-MM191

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM191	Page 108	H709	New site allocation text box	Insert new housing allocation H709:
<u>Site no</u>		<u>H709</u>		
<u>Site address</u>		<u>Land to south and south east of, 17 – 43 Fairfield Court Hightown</u>		
<u>Ownership</u>		<u>Part Council, Part Private</u>		
<u>Gross site area (Ha)</u>		<u>1.08</u>		
<u>Net site area (Ha)</u>		<u>1.08</u>		

<p><u>Constraints</u></p>	<ul style="list-style-type: none"> ● <u>Site is close to listed building</u> ● <u>Site is on potentially contaminated land</u> ● <u>Noise sources near site – industry noise and school</u> ● <u>Part/all of the site is within a high risk coal referral area</u>
<p><u>Proposed allocation</u></p>	<p><u>Housing</u></p>
<p><u>Indicative capacity</u></p>	<p><u>37</u></p>
<p><u>Reports required</u></p>	<ul style="list-style-type: none"> ● <u>Contamination report (Phase 1 and 2)</u> ● <u>Noise assessment</u> ● <u>Coal mining risk assessment</u>
<p><u>Other site specific considerations</u></p>	<ul style="list-style-type: none"> ● <u>Access to be achieved through adjoining housing allocation H2537</u>

4 Housing Allocations



4.4 Kirklees Rural Sub-Area

Table Modification SD2-MM192

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM192	Page 108	H213	Indicative capacity	Delete and insert text: "236 <u>113</u> dwellings."

Table Modification SD2-MM193

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM193	Page 109	H221	Reports required	Insert text: ". <u>Transport Statement</u> "

4 Housing Allocations

Table Modification SD2-MM194

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM194	Page 109	H356	Gross site area (Ha) Net site area (Ha)	Delete and insert text: "2.59 <u>2.31</u> " Delete and insert text: "2.59 <u>2.31</u> "

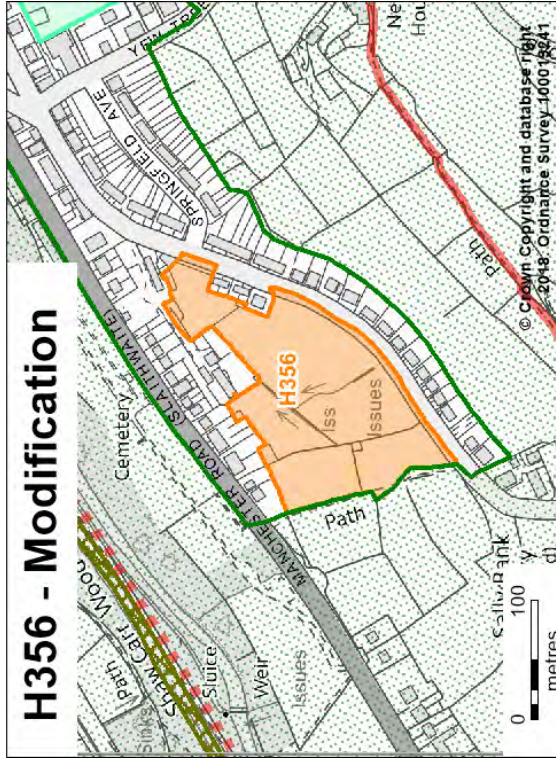
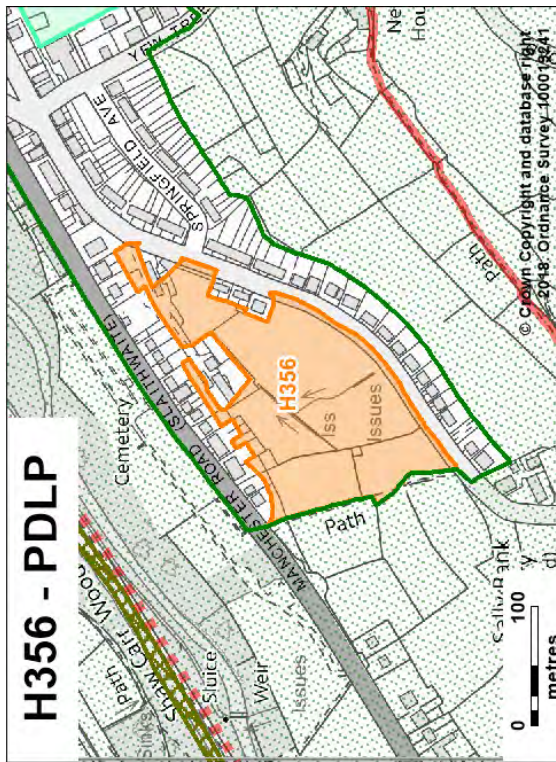


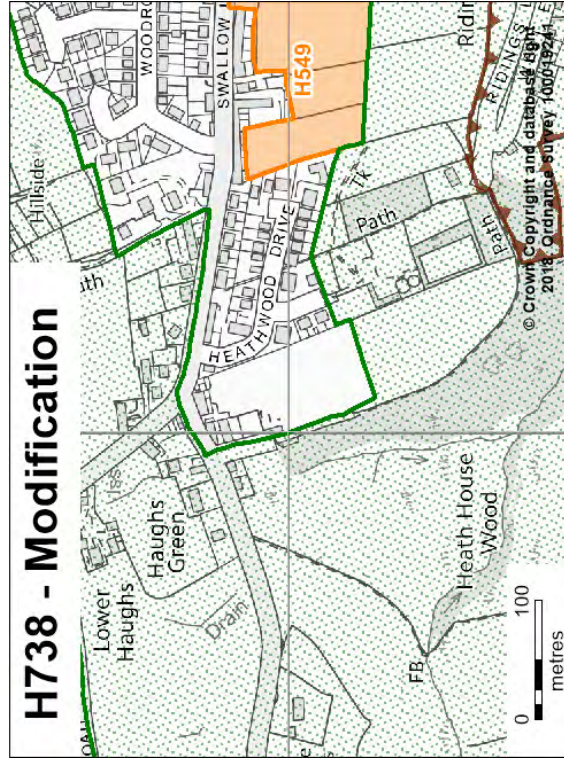
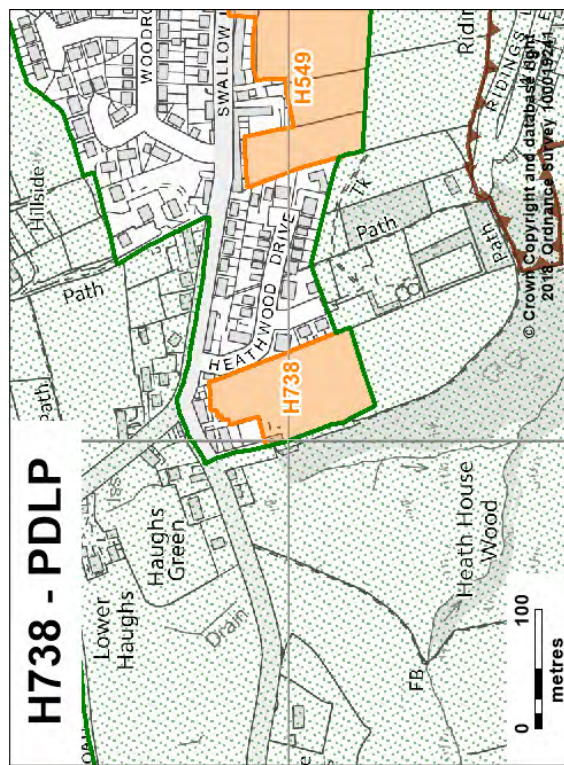
Table Modification SD2-MM195

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM195	Page 110	H356	Reports required	Insert text: <ul style="list-style-type: none"> Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u> <u>Transport Statement</u>
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Table Modification SD2-MM196

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM196	Page 111	H738	Site text box	Delete housing allocation H738 and show as unallocated



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Table Modification SD2-MM197

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM197	Page 111	H763	Net site area (Ha)	Delete and insert text: " <u>0.82 0.72 - developable area reduced to safeguard the setting of listed buildings to the west and north of the site</u> "

Table Modification SD2-MM198

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM198	Page 112	H763	Indicative capacity	Delete and insert text: " <u>28-25 dwellings</u> "

Table Modification SD2-MM199

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM199	Page 112	H763	Reports required	Insert text: " <u>. Transport Statement</u> "

Table Modification SD2-MM200

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM200	Page 112	H763	Other site specific considerations	Insert text: <ul style="list-style-type: none"> • <u>The existing tree belt along the sites northern boundary shall be retained to safeguard the setting of the listed buildings on Manchester Road</u> • <u>The layout of the site along Hollins Row should safeguard the setting and views towards Providence Baptist Chapel!</u>
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Table Modification SD2-MM201

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM201	Page 112	H763	Other site specific considerations	Delete text: <ul style="list-style-type: none"> • This site is part owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard.

Table Modification SD2-MM202

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM202	Page 112	H1709	Constraints	Delete text: <ul style="list-style-type: none"> • Odour source near site • Noise source near site

Table Modification SD2-MM203

Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM203	Page 112	H1709	Reports required	Delete text: "• Odour assessment • Noise assessment "
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Table Modification SD2-MM204

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM204	Page 112	H1709	Other site specific considerations	Delete and insert text: "• This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. • <u>The stone wall along the site frontage to be set back and rebuilt to allow provision of footways along the site frontage.</u> "

Table Modification SD2-MM205

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM205	Page 113	H1776	Net site area (Ha)	Delete and insert text: " 5.99 4.91 - developable area reduced to have regard to the topography, with the south east area of the site kept open to form a continuation of the open steep hill from the east of the site "

Table Modification SD2-MM206

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM206	Page 113	H1776	Indicative capacity	Delete and insert text: "209 <u>170</u> dwellings"
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Table Modification SD2-MM207

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM207	Page 113	H2649	Net site area (Ha)	Delete and insert text: "4.05 <u>0.82</u> - <u>developable area reduced to take into account the change in levels on this site and the impact on the listed buildings and conservation area</u> "

Table Modification SD2-MM208

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM208	Page 113	H2649	Constraints	Insert text: <ul style="list-style-type: none"> • <u>Site is within a Conservation Area</u> • <u>Site is close to a listed building</u>

Table Modification SD2-MM209

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM209	Page 114	H2649	Indicative capacity	Delete and insert text: "35 <u>28</u> dwellings"

4 Housing Allocations

Table Modification SD2-MM210

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM210	Page 114	H2649	Other site specific considerations	<p>Insert text:</p> <ul style="list-style-type: none"> <u>The former fire station building shall be retained and reused as part of any development proposals, unless adequate justification is provided for it's loss, in accordance with PLP7 and PLP24</u> <u>The public right of way through the centre of the site should be retained and enhanced</u> <u>The south/south-east of the site should be kept open from development, taking into account the evidence presented in the Council's Heritage Impact Assessment</u>

Table Modification SD2-MM211

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM211	Page 115	H17	Reports required	<p>Insert text:</p> <p><u>"Transport Statement"</u></p>

Table Modification SD2-MM212

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM212	Page 117	H222	Other site specific considerations	<p>Delete text:</p> <p><u>"Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity."</u></p>

Table Modification SD2-MM213

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM213	Page 118	H358	Other site specific considerations	<p>Delete and insert text: "N/A • <u>Development on the site shall ensure access to the Millennium Green is retained</u> • <u>The Public Right of Way shall be retained</u>"</p>

Table Modification SD2-MM214

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM214	Page 119	H454a	Other site specific considerations	<p>Insert text: "• <u>Development of the site shall retain car-parking and access to Clayton West Cricket Club</u>"</p>

Table Modification SD2-MM215

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM215	Page 119	H498	Other site specific considerations	<p>Delete text: "Access to the site would need to be taken through site H454A"</p>

4 Housing Allocations

Table Modification SD2-MM216

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM216	Page 120	H502	Indicative capacity	Delete and insert text: "203 <u>189</u> dwellings"

Table Modification SD2-MM217

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM217	Page 120	H502	Other site specific considerations	Delete and insert text: ". Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity. • <u>Landscap</u> e measures are required to mitigate against the visual impact of the development at the edge of the settlement."

Table Modification SD2-MM218

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM218	Page 120	H502	Constraints	Delete text: ". Third party land required to achieve sufficient visibility splays "

Table Modification SD2-MM219

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM219	Page 121	H688	Other site specific considerations	Delete and insert text: "Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity. <u>N/A</u> "
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Table Modification SD2-MM220

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM220	Page 122	H690	Constraints	Insert text: ". The provision of a pedestrian footway is required across the site frontage at <u>Leak Hall Lane</u> "

Table Modification SD2-MM221

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM221	Page 123	H690	Other site specific considerations	Delete and insert text: "Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity. <u>N/A</u> "

Table Modification SD2-MM222

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM222	Page 123	H768	Constraints	Insert text: ". <u>Site is adjacent to a Conservation Area</u> "

4 Housing Allocations

Table Modification SD2-MM223

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM223	Page 123	H768	Other site specific considerations	<p>Delete and insert text: "N/A</p> <ul style="list-style-type: none"> <u>The layout of the central part of the site should safeguard the setting and views towards the eastern elevation of the Church of St Aiden.</u> <u>The trees along the site's western boundary shall be retained in order to safeguard the character of the adjacent Conservation Area."</u>

Table Modification SD2-MM224

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM224	Page 124	H1784	Other site specific considerations	<p>Delete and insert text: "N/A • <u>Development proposals should consider opportunities to provide additional cycle and car parking for the adjacent railway station."</u></p>

Table Modification SD2-MM225

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM225	Page 124	H3325a	Gross site area (Ha)	Delete and insert text: "4.52 3.79"

Table Modification SD2-MM226

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM226	Page 124	H3325a	Net site area (Ha)	Delete and insert text: "3.40 2.60 - flood zone 3 removed from the developable area"

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Table Modification SD2-MM227

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM227	Page 124	H3325a	Indicative capacity	Delete and insert text: " <u>422 91 dwellings</u> "

Table Modification SD2-MM228

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM228	Page 126	H199	Reports required	Insert text: " <u>• Ecological Assessment</u> "

Table Modification SD2-MM229

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM229	Page 127	H549	Reports required	Insert text: " <u>• Transport Statement</u> "

Table Modification SD2-MM230

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM230	Page 130	H780	Reports required	Insert text: "• <u>Transport Statement Transport Assessment</u> "
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Table Modification SD2-MM231

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM231	Page 130	H780	Other site specific considerations	Delete and insert text: "• This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. <u>N/A</u> "

4 Housing Allocations

Table Modification SD2-MM232

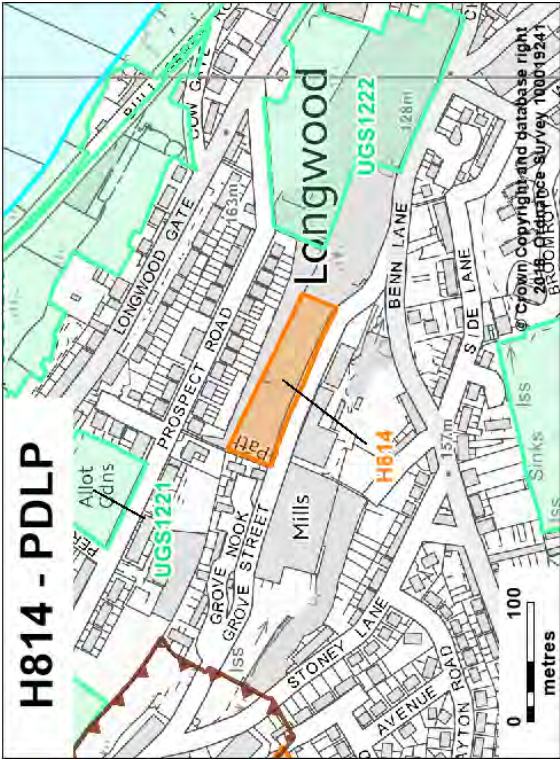
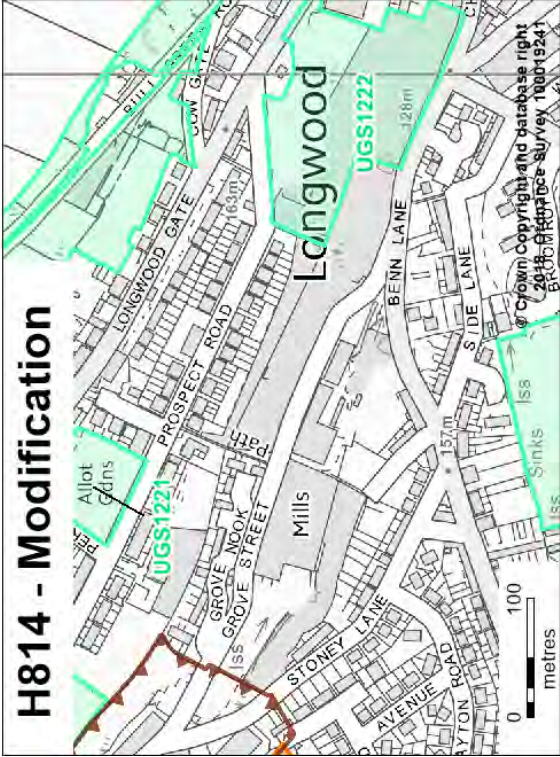
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM232	Page 130	H814	Site text box	Delete housing allocation H814 and show as unallocated
 <p>H814 - PDLP</p>		 <p>H814 - Modification</p>		

Table Modification SD2-MM233

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM233	Page 133	H67	Reports required	Insert text: "• Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u> "
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Table Modification SD2-MM234

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM234	Page 134	H178	Indicative capacity	Delete and insert text: 23 <u>17</u> dwellings

Table Modification SD2-MM235

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM235	Page 134	H178	Reports required	Insert text: "• <u>Transport Statement</u> "

Table Modification SD2-MM236

Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM236	Page 134	H178	Other site specific considerations	Delete and insert text: N/A • <u>An access road into the site that extends outside of the site boundary may be required if this is necessary to achieve safe access.</u>
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Table Modification SD2-MM237

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM237	Page 135	H200	Reports required	Insert text: "• Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u> • <u>Transport Statement"</u>

Table Modification SD2-MM238

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM238	Page 136	H342	Reports required	Delete and insert text: "N/A • <u>Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u> • <u>Transport Statement"</u>

Table Modification SD2-MM239

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM239	Page 137	H343	Reports required	<p>Insert text:</p> <ul style="list-style-type: none"> Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u> <u>Transport Statement</u>"

Table Modification SD2-MM240

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM240	Page 137	H584	Constraints	<p>Insert text:</p> <ul style="list-style-type: none"> <u>"Protected trees along the northern boundary of this site"</u>

Table Modification SD2-MM241

Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM241	Page 138	H584	Other site specific considerations	<p>Insert text:</p> <ul style="list-style-type: none"> <u>The woodland and stream along the northern boundary should be retained apart from the land required to achieve access</u> <u>Development should be set back from the 'significant tree belt' just outside the site boundary to the north-west as identified in the Heritage Impact Assessment.</u> <u>The north-western corner of the site should also be kept free from development to safeguard the setting of the Grade II Listed Building</u>
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Table Modification SD2-MM242

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM242	Page 138	H664	Constraints	<p>Delete and insert text:</p> <ul style="list-style-type: none"> Ecological Assessment <u>Part of this site contains <i>This site is adjacent to</i> a Habitat of Principal Importance</u> Heritage Impact Assessment

Table Modification SD2-MM243

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM243	Page 138	H664	Reports required	<p>Insert text:</p> <ul style="list-style-type: none"> <u>"Ecological Assessment"</u>

Table Modification SD2-MM244

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM244	Page 138	H664	Other site specific considerations	<p>Delete and insert text: N/A</p> <ul style="list-style-type: none"> <u>Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development in order to minimise harm to the significance of the Listed Building, taking into account the evidence presented in the Council's Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process.</u> <u>In order to safeguard the setting of the Listed Building, no development should take place in the areas of 'high' and 'considerable' significance as identified in the Council's Heritage Impact Assessment.</u>

Table Modification SD2-MM245

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM245	Page 139	H784	Reports required	<p>Insert text: "• <u>Transport Statement</u>"</p>

Table Modification SD2-MM246

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM246	Page 140	H785	Reports required	<p>Insert text: "• <u>Transport Statement</u>"</p>

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Table Modification SD2-MM247

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM247	Page 140	H786	Reports required	Insert text: " <u>• Transport Statement</u> "

Table Modification SD2-MM248

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM248	Page 141	H47	Reports required	Insert text: " <u>• Transport Assessment</u> "

Table Modification SD2-MM249

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM249	Page 142	H50	Other site specific considerations	Insert text: " <u>• The original buildings shall be retained and reused as part of any development proposals, unless adequate justification is provided for their loss, in accordance with PLP7 and PLP24.</u> "

Table Modification SD2-MM250

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM250	Page 142	H130	Reports required	Insert text: " <u>Transport Statement</u> "
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Table Modification SD2-MM251

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM251	Page 145	H288a	Reports required	Insert text: "• Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u> "

Table Modification SD2-MM252

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM252	Page 146	H297	Indicative capacity	Delete and insert text: " <u>47 39 dwellings</u> "

Table Modification SD2-MM253

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM253	Page 146	H297	Reports required	Insert text: " <u>Transport Statement</u> "

4 Housing Allocations

Table Modification SD2-MM254

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM254	Page 146	H597	Gross site area (Ha)	Delete and insert text: " 4.04 <u>0.8</u> "

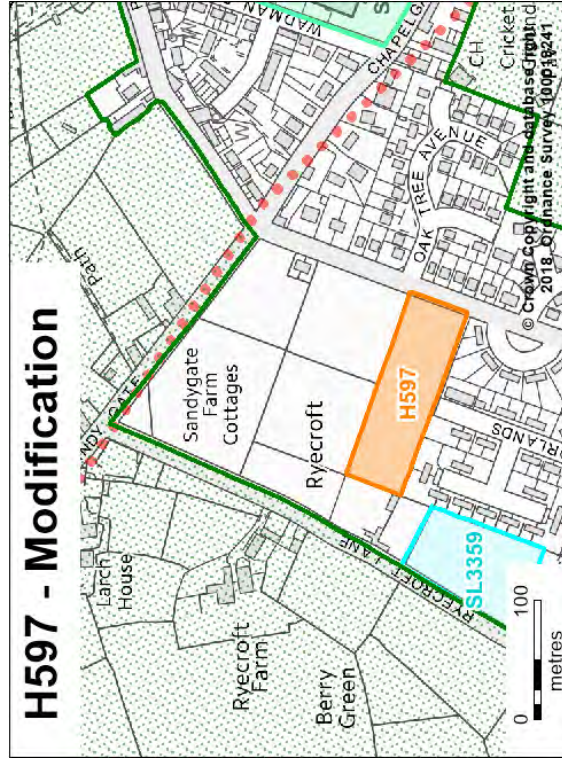
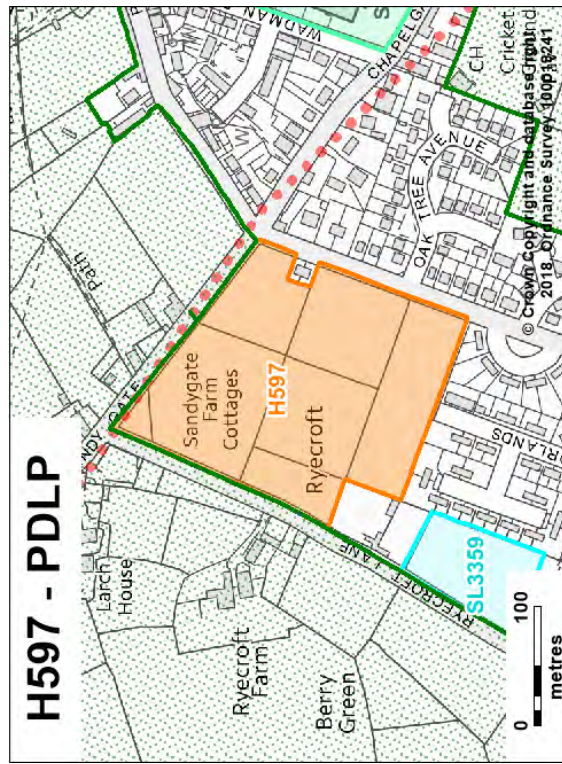


Table Modification SD2-MM255

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM255	Page 146	H597	Net site area (Ha)	Delete and insert text: " 4.04 <u>0.8</u> "

Table Modification SD2-MM256

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM256	Page 146	H597	Indicative capacity	Delete and insert text: "144 <u>28</u> dwellings"

Table Modification SD2-MM257

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM257	Page 146	H597	Reports required	Delete text: • Flood Risk Assessment

Table Modification SD2-MM258

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM258	Page 147	H597	Other site specific considerations	Delete and insert text: "N/A" • <u>Access to the site should be provided via Moorlands</u> • <u>The boundary walls to the site shall be retained as part of any development proposals.</u>

Table Modification SD2-MM259

Modification Ref	Page	Site	Para/table/box	Tracked change

4 Housing Allocations

SD2-MM259	Page 147	H626	Constraints	Delete and insert text: "• Public right of way crosses the <u>to the south of this site</u> "
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Table Modification SD2-MM260

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM260	Page 147	H626	Reports required	Insert text: "• Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u> • <u>Transport Statement</u> "

Table Modification SD2-MM261

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM261	Page 148	H715	Net site area (Ha)	Delete and insert text: " 4.24 1.09 - <u>developable area reduced to reflect the steep area of the site and to preserve the setting of the conservation area</u> "

Table Modification SD2-MM262

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM262	Page 148	H715	Indicative capacity	Delete and insert text: " 43 <u>38</u> dwellings"
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Table Modification SD2-MM263

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM263	Page 148	H715	Other site specific considerations	Delete and insert text: "N/A • <u>The northern part of this site immediately adjacent to Miry Lane should remain open to safeguard the setting of the Conservation Area.</u> "

Table Modification SD2-MM264

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM264	Page 149	H728	Reports required	Insert text: "• <u>Transport Statement</u> "

Table Modification SD2-MM265

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM265	Page 150	H729	Other site specific considerations	Delete and insert text: "N/A • <u>Consideration should be given to the retention and enhancement of access to the playing fields to the north of this site</u> "

4 Housing Allocations

Table Modification SD2-MM266

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM266	Page 150	H730	Net site area (Ha)	Delete and insert text: "2.13 <u>1.53</u> - Allotments and northern area of the site adjacent to Kirkroyds Lane removed from the developable area."

Table Modification SD2-MM267

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM267	Page 150	H730	Constraints	Insert text: "• <u>Protected trees on the northern and north-western boundaries of this site.</u> • <u>Site is close to Listed Buildings</u> "

Table Modification SD2-MM268

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM268	Page 150	H730	Indicative capacity	Delete and insert text: "74 <u>53</u> dwellings"

Table Modification SD2-MM269

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM269				

SD2-MM269	Page 150	H730	Other site specific considerations	<p>Delete and insert text:</p> <ul style="list-style-type: none"> • This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. • <u>The existing walls within the site shall be retained and reused as part of any development proposals, unless adequate justification is provided for their loss, in accordance with PLP7 and PLP24.</u> • <u>In order to safeguard the setting of the Conservation Area and Listed Buildings, no development should take place in the areas of 'high' and 'moderate' significance as identified in the Council's Heritage Impact Assessment. This includes the northern part of this site adjacent to Kirkroyds Lane and Little Lane.</u>
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Table Modification SD2-MM270

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM270	Page 150	H730	Reports required	Insert text: "• <u>Drainage report</u> "

Table Modification SD2-MM271

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM271	Page 151	H2585	Reports required	Insert text: "• <u>Transport Statement</u> "

4 Housing Allocations

Table Modification SD2-MM272

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM272	Page 152	H2585	Other site specific considerations	Delete and insert text: "N/A • <u>The original buildings shall be retained and reused as part of any development proposals, unless adequate justification is provided for their loss, in accordance with PLP7 and PLP24.</u> "

Table Modification SD2-MM273

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM273	Page 152	H2587	Net site area (Ha)	Delete and insert text: " 2.44 2.02 - Habitats of Principal Importance removed from developable area "

Table Modification SD2-MM274

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM274	Page 153	H44	Reports required	Insert text: "• <u>Transport Statement</u> "

Table Modification SD2-MM275

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM275	Page 153	H70	Reports required	Insert text: " <u>Transport Statement</u> "
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Table Modification SD2-MM276

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM276	Page 154	H120	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM277

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM277	Page 155	H128	Reports required	Insert text: " <u>Transport Statement</u> "

Table Modification SD2-MM278

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM278	Page 155	H128	Other site specific considerations	Delete and insert text: " <u>This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard. N/A</u> "

4 Housing Allocations

Table Modification SD2-MM279

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM279	Page 155	H313	Indicative capacity	Delete and insert text: " 438 <u>97</u> dwellings"

Table Modification SD2-MM280

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM280	Page 156	H339	Reports required	Insert text: " <u>• Transport Statement</u> "

Table Modification SD2-MM281

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM281	Page 157	H538	Reports required	Insert text: " <u>• Transport Statement</u> "

Table Modification SD2-MM282

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM282	Page 158	H583	Reports required	Insert text: " <u>Transport Statement</u> "
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Table Modification SD2-MM283

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM283	Page 161	H1774	Gross site area (Ha)	Delete and insert text: 4.24 <u>0.41</u>

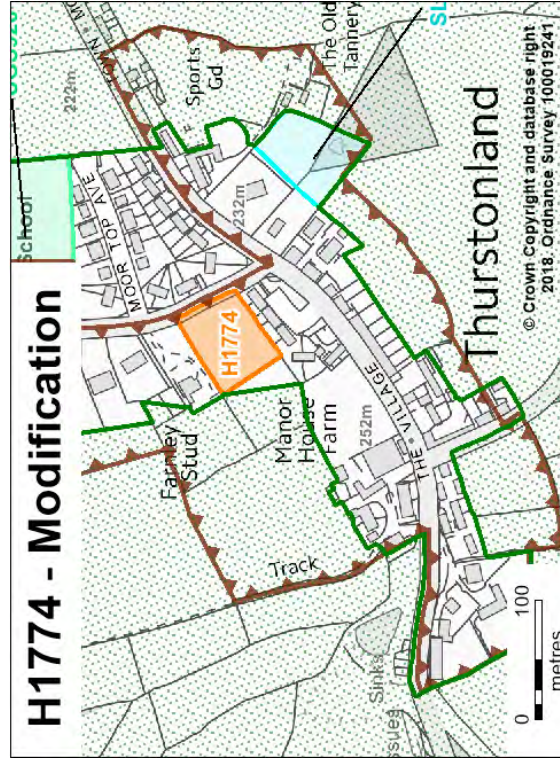
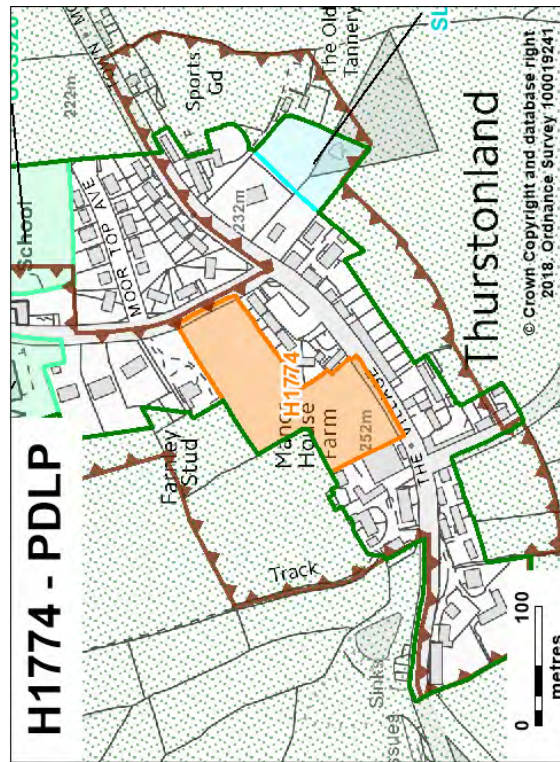


Table Modification SD2-MM284

Modification Ref	Page	Site	Para/table/box	Tracked change
Page 574				

4 Housing Allocations

SD2-MM284	Page 161	H1774	Net site area (Ha)	Delete and insert text: 4.24 <u>0.41</u>
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Table Modification SD2-MM285

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM285	Page 161	H1774	Constraints	Delete and insert text: • Site is close to <u>within</u> a conservation area

Table Modification SD2-MM286

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM286	Page 161	H1774	Indicative capacity	Delete and insert text: "42 <u>14</u> dwellings"

Table Modification SD2-MM287

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM287	Page 161	H1774	Reports required	Delete text: • Flood Risk Assessment

Table Modification SD2-MM288

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM288	Page 161	H1774	Other site specific considerations	Delete and insert text: "N/A • <u>Existing walls along the site boundary shall be retained (apart from changes required to achieve access) and reused as part of any development proposals, unless adequate justification is provided for their loss, in accordance with PLP7 and PLP24."</u>

Table Modification SD2-MM289

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM289	Page 161	H331	New site allocation text box	Insert new housing allocation H331:
<u>Site no</u>			<u>H331</u>	
<u>Site address</u>			<u>Land off, River Holme View, Brockholes</u>	
<u>Ownership</u>			<u>Private</u>	
<u>Gross site area (Ha)</u>			<u>0.47</u>	
<u>Net site area (Ha)</u>			<u>0.31 – area of habitats of principal importance (mixed deciduous woodland) and part of site in flood zone 3</u>	

4 Housing Allocations

<u>Constraints</u>	<ul style="list-style-type: none"> ● <u>Part of this site contains Habitats of Principal Importance</u> ● <u>Public right of way runs along the western boundary of the site.</u> ● <u>Part of site within Flood Zones 2 and 3</u> ● <u>A combined sewer crosses the site</u>
<u>Proposed allocation</u>	<u>Housing</u>
<u>Indicative capacity</u>	<u>14 dwellings</u>
<u>Reports required</u>	<ul style="list-style-type: none"> ● <u>Contamination report (Phase 1)</u> ● <u>Flood Risk Assessment</u> ● <u>Ecological Assessment</u>
<u>Other site specific considerations</u>	<ul style="list-style-type: none"> ● <u>Site adjoins the Wildlife Habitat Network</u>



Table Modification SD2-MM290

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM290	Page 161	H119a	New site allocation text box	Insert new housing allocation H119a:
<u>Site no</u>		<u>H119a</u>		
<u>Site address</u>			<u>Land to the South of 5 - 25 Clay Well, Golcar, Huddersfield</u>	
<u>Ownership</u>			<u>Private</u>	
<u>Gross site area (Ha)</u>			<u>0.64</u>	

4 Housing Allocations

<u>Net site area (Ha)</u>	<u>0.43 – area of habitats of principal importance (mixed deciduous woodland)</u>
<u>Constraints</u>	<ul style="list-style-type: none"> ● <u>Part of this site contains Habitats of Principal Importance</u> ● <u>Public right of way runs along the western boundary of the site.</u> ● <u>The site is within a conservation area</u>
<u>Proposed allocation</u>	<u>Housing</u>
<u>Indicative capacity</u>	<u>14 dwellings</u>
<u>Reports required</u>	<ul style="list-style-type: none"> ● <u>Contamination report (Phase 1)</u> ● <u>Travel Plan</u> ● <u>Air Quality Impact Assessment</u>
<u>Other site specific considerations</u>	<ul style="list-style-type: none"> ● <u>Access to the site would need to be taken through H550</u>

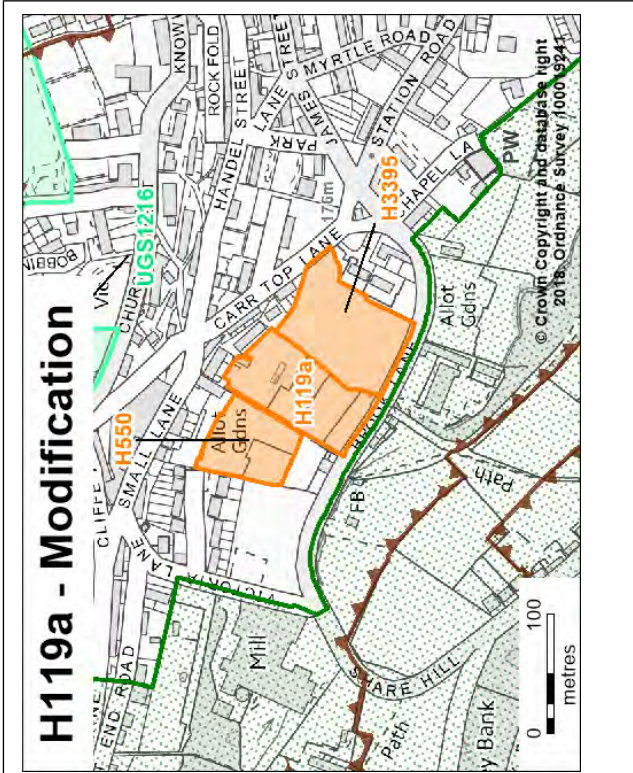
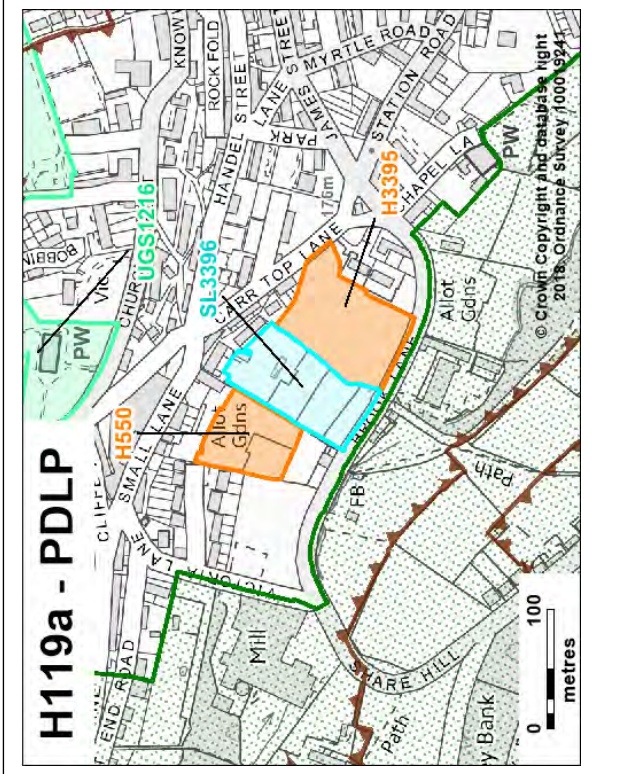


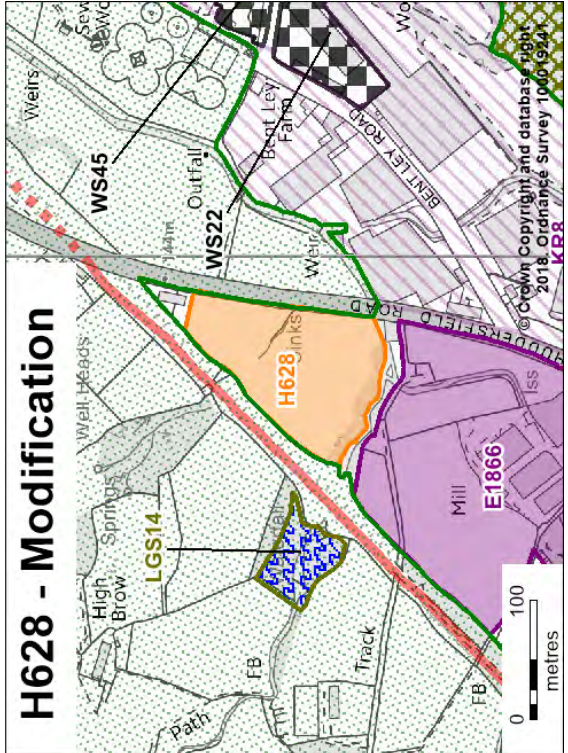
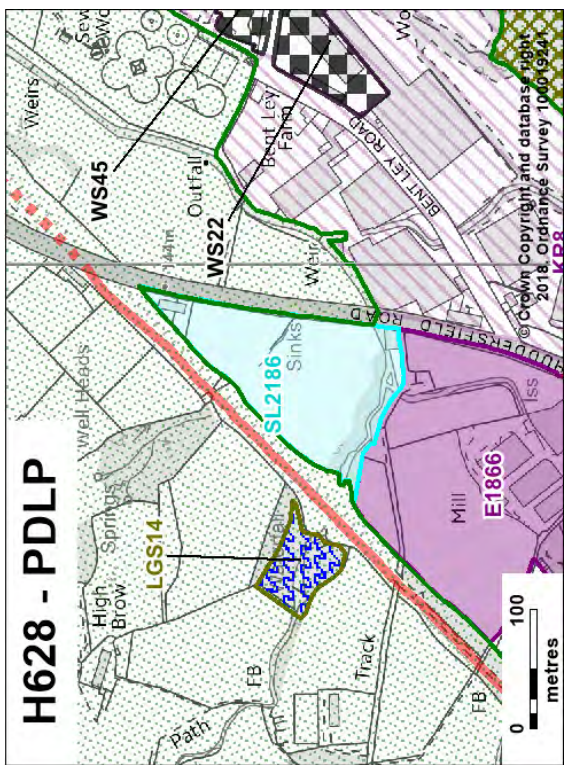
Table Modification SD2-MM291

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM291	Page 161	H628	New site allocation text box	Insert new housing allocation H628:
<u>Site no</u>			<u>H628</u>	
<u>Site address</u>			<u>Land north of Huddersfield Road, Meltham</u>	
<u>Powership</u>			<u>Private</u>	

4 Housing Allocations

<u>Gross site area (Ha)</u>	<u>1.44</u>
<u>Net site area (Ha)</u>	<u>1.18 – area of mixed deciduous woodland, protected trees and small area of high flood risk removed from the developable area</u>
<u>Constraints</u>	<ul style="list-style-type: none"> • <u>Noise source near site (industry)</u> • <u>Odour source near site (industry)</u> • <u>Protected trees in southern part of the site</u> • <u>Small part of the site is within flood zones 2 and 3</u> • <u>Listed building to the south of this site</u>
<u>Proposed allocation</u>	<u>Housing</u>
<u>Indicative capacity</u>	<u>41 dwellings</u>
<u>Reports required</u>	<ul style="list-style-type: none"> • <u>Transport Assessment</u> • <u>Noise Assessment</u> • <u>Odour Assessment</u> • <u>Flood Risk Assessment</u> • <u>Health Impact Assessment</u>

	<ul style="list-style-type: none"> • <u>Aboriginal Assessment</u> • <u>Heritage Impact Assessment</u>
<ul style="list-style-type: none"> • <u>Site adjoins the Wildlife Habitat Network</u> • <u>Site is adjacent to the Core Walking and Cycling Network</u> 	<p><u>Other site specific considerations</u></p>



4.5 Accommodation for Travellers

Table Modification SD2-MM292

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM292	Page 162		New policy box to be inserted at start of section 4.5	Insert new policy: "Policy PLP 66 Accommodation for travellers <u>The sites listed below are allocated for traveller accommodation in the Local Plan. Planning permission will be expected to be granted if proposals accord with the development principles set out in the relevant site boxes, relevant development plan policies and as shown on the Policies Map."</u>

Table Modification SD2-MM293

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM293	Page 162	GTTS1957	Gross site area (Ha)	Insert text: <u>"2.63 (existing site extends to 0.87ha, 1.76ha additional land allocated)"</u>

Table Modification SD2-MM294

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM294	Page 162	GTTS1957	Reports required	Delete text: <u>"• Low-emission travel plan"</u> .

5 Mixed Use

Table Modification SD2-MM295

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM295	Page 164		New policy box to be inserted at start of section 4.5	Insert new policy: " <u>Policy PLP 67</u> <u>Mixed use allocations</u> <u>The sites listed below are allocated for mixed use development in the Local Plan. Planning permission will be expected to be granted if proposals accord with the development principles set out in the relevant site boxes. relevant development plan policies and as shown on the Policies Map.</u> "

Table Modification SD2-MM296

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM296	Page 164	MX1903	Proposed allocation	Insert text: " <u>Mixed use - housing and retail (additional retail and/or leisure beyond that already permitted (2014/93099 retail units open use class A1) would be subject to policy PLP13)</u> "

Table Modification SD2-MM297

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM297	Page 164	MX1903	Other site specific considerations	<p>Delete and insert text:</p> <ul style="list-style-type: none"> •The flood risk vulnerability of proposed uses will be considered and an exception test may still be required as part of a planning application as set out in national planning policy •Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity •Adjacent to the Wildlife Habitat Network <p><u>N/A</u></p>
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Table Modification SD2-MM298

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM298	Page 165	MX1930	Site text box	Delete mixed use allocation MX1930 and allocate as housing H3397

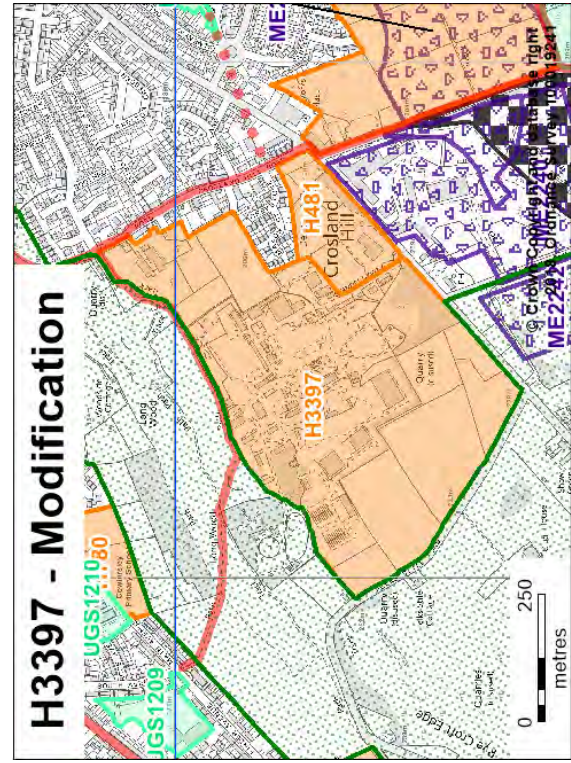
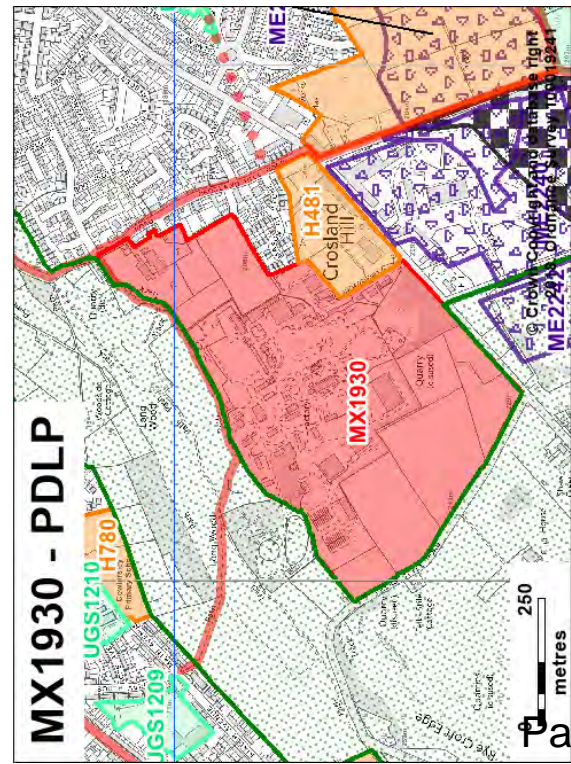


Table Modification SD2-MM299

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM299	Page 166	MX2101	Proposed allocation	Insert text: "Mixed use - <u>housing, employment and retail (subject to policy PLP13)</u> "

Table Modification SD2-MM300

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM300	Page 167	MX2101	Other site specific considerations	Delete text: " The flood risk vulnerability of proposed uses will be considered and an exception test may still be required as part of a planning application as set out in national planning policy "

Table Modification SD2-MM301

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM301	Page 167	MX1911	Gross site area (Ha)	Delete and insert text: "36.92 <u>32.16</u> "

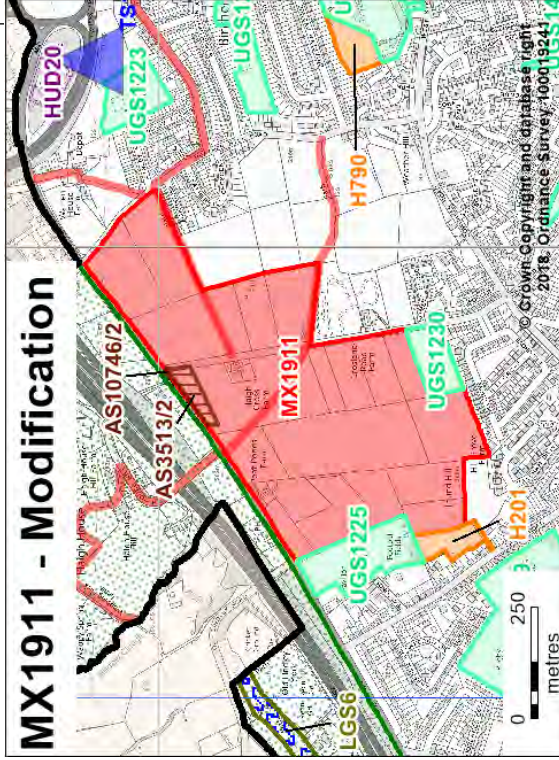
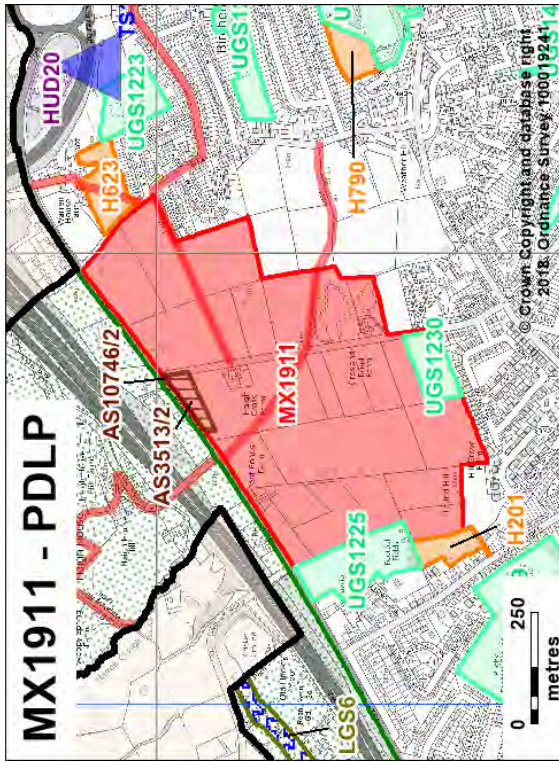


Table Modification SD2-MM302

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM302	Page 167	MX1911	Net site area (Ha)	Delete and insert text: "25.46 --Power lines and archaeological interest area removed from developable area <u>32.16</u> "

Table Modification SD2-MM303

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM303	Page 167	MX1911	Proposed allocation	Insert text: "Mixed use - <u>housing and employment</u> "
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Table Modification SD2-MM304

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM304	Page 167	MX1911	Indicative capacity: Housing	Delete and insert text: "533 <u>443</u> dwellings"

Table Modification SD2-MM305

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM305	Page 167	MX1911	Indicative capacity: Employment (sq.m.)	Delete and insert text: "53,125 <u>41,702</u> "

Table Modification SD2-MM306

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM306	Page 168	MX1911	Other site specific considerations	Delete text: ". The flood risk vulnerability of proposed uses will be considered and an exception test may still be required as part of a planning application as set out in national planning policy" ". This development has the potential for a severe adverse impact on the operation of the Strategic Road Network and will require physical mitigation measures and travel plans in order to minimise the impact of the traffic generated. Highways England has a number of planned improvements to the Strategic Road Network funded as part of the government's Road Investment Strategy (RIS). These schemes will provide additional capacity at

					congested locations. Development proposals will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan or other appropriate schemes. Construction of the site should also be phased to take place following completion of the committed RIS improvements"
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Table Modification SD2-MM307

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM307	Page 168	MX1906	Net site area (Ha)	Delete and insert text: " 1.29 -developable area amended to reflect the range of uses expected on this site: <u>2.44</u> "

Table Modification SD2-MM308

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM308	Page 168	MX1906	Constraints	Delete and insert text: " Site is close to listed buildings • <u>Grade II* listed former Huddersfield Infirmary building is within the site</u> • <u>Grade II listed statue within the site</u> "

Table Modification SD2-MM309

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM309	Page 168	MX1906	Proposed allocation	Insert text: <u>"Mixed use - housing, employment and retail (additional retail and/or leisure beyond that already permitted (2015/93827 Erection of food retail store) would be subject to policy PLP13)"</u>
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Table Modification SD2-MM310

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM310	Page 168	MX1906	Indicative capacity: Employment (sq.m.)	Insert new row and text: <u>2.013</u>

Table Modification SD2-MM311

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM311	Page 169	MX1906	Other site specific considerations	Delete and insert text: <ul style="list-style-type: none"> Subway and Gconnection improvements to the town centre The flood risk vulnerability of proposed uses will be considered and an exception test may still be required as part of a planning application as set out in national planning policy <u>Development proposals will be required to retain and reuse the Grade II* former Infirmary buildings. Any new buildings or other structures should conserve these elements which contribute to the significance of the Listed Buildings on this site and the character of the Conservation Area</u> <u>Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development to conserve those elements which contribute to the significance of the heritage</u>

					<u>assets on this site, taking into account the updated Heritage Impact Assessment submitted by the applicant as part of the planning application process.</u>
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Table Modification SD2-MM312

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM312	Page 169	MX1929	Proposed allocation	Insert text: "Mixed use - <u>housing and employment</u> "

Table Modification SD2-MM313

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM313	Page 170	MX1929	Other site specific considerations	Delete text: "The flood risk vulnerability of proposed uses will be considered and an exception test may still be required as part of a planning application as set out in national planning policy"

Table Modification SD2-MM314

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM314	Page 170	MX3394	Proposed allocation	Insert text: "Mixed use - <u>housing and employment</u> "

Table Modification SD2-MM315

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM315	Page 170	MX3394	Other site specific considerations	<p>Delete and insert text:</p> <ul style="list-style-type: none"> • "Assess <u>Access</u> to MX1905 to be provided as part of this allocation • The flood risk vulnerability of proposed uses will be considered and an exception test may still be required as part of a planning application as set out in national planning policy"
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Table Modification SD2-MM316

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM316	Page 171	MX1905	Proposed allocation	Insert text: "Mixed use - <i>housing and employment</i> "

Table Modification SD2-MM317

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM317	Page 172	MX1905	Other site specific considerations	<p>Delete and insert text:</p> <p>"• The flood risk vulnerability of proposed uses will be considered and an exception test may still be required as part of a planning application as set out in national planning policy"</p> <ul style="list-style-type: none"> • This development has the potential for a severe adverse impact on the operation of the Strategic Road Network and will require physical mitigation measures and travel plans in order to minimise the impact of the traffic generated. Highways England has a number of planned improvements to the Strategic Road Network funded as part of the government's Road Investment Strategy (RIS). These schemes will provide additional capacity at congested locations. Development proposals will need to demonstrate that any committed RIS

				<p>schemes are sufficient to deal with the additional demand generated by that site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan or other appropriate schemes. Construction of the site should also be phased to take place following completion of the committed RfS improvements.”</p> <p><u>“• Additional mitigation on the wider highway network will be required. Development of this site has the potential for a significant impact on the Strategic Road Network. Measures will be required to reduce and mitigate that impact. The transport assessment will need to demonstrate that any committed schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, development may need to contribute to additional schemes identified by Highways England and included in the Infrastructure Delivery Plan (IDP) or other appropriate schemes. If development is dependent upon construction of a committed scheme, then development will need to be phased to take place following scheme opening”</u></p>
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Table Modification SD2-MM318

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM318	Page 172	MX1905	Other site specific considerations	Insert text: • The provision of a new primary school will be required on this site and secondary school provision either on this site or in the locality should be

				<p>considered during the plan period. Early Years and Childcare provision will also be required relating to this allocation</p> <ul style="list-style-type: none"> <u>The provision of a new 2 form entry primary school will be required on this site</u> <u>The provision of secondary school places will be monitored and delivered to meet demand as new housing is delivered during and beyond the plan period.</u> <u>Early Years and Childcare provision will also be required relating to this allocation</u> This site requires the provision of multiple access points and will need to be carefully phased to ensure it complies with other policies in the Local Plan regarding transport. <u>Access to H559 will be provided as part of this allocation, including no left turn onto Chidswell Lane and the provision of a new roundabout at the junction with the B6128 (Owl Lane).</u> <u>In accordance with PLP13 (part a, paragraph 4) the creation of a new local centre commensurate with the scale of growth proposed will be supported, subject to the sequential test and impact assessment</u> <u>A masterplan is required for this site to be prepared in accordance with policies in the Local Plan</u> <u>A buffer will be required to protect the ancient woodlands at Dum Wood and Dogloitch Wood</u>
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Table Modification SD2-MM319

Modification Ref	Page	Site	Para/table/box	Tracked change
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SD2-MM319	Page 173	MX1907	Proposed allocation	Insert text: "Mixed use - <u>housing, employment and retail (additional retail and/or leisure beyond that already on site would be subject to Policy PLP13)</u> "
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Table Modification SD2-MM320

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM320	Page 173	MX1907	Indicative capacity: Employment (sq.m.)	Insert text: <u>Retention of existing floorspace and is already occupied</u>

Table Modification SD2-MM321

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM321	Page 173	MX3349	Proposed allocation	Insert text: Mixed use - <u>housing, employment and retail (additional retail and/or leisure beyond that already on site would be subject to Policy PLP13)</u>

Table Modification SD2-MM322

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM322	Page 174	MX3349	Indicative capacity: Employment (sq.m.)	Insert text: <u>Retention of existing floorspace and is already occupied</u>

Table Modification SD2-MM323

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM323	Page 174	MX3349	Other site specific considerations	Delete text: "Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity."
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Table Modification SD2-MM324

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM324	Page 175	MX1919	Proposed allocation	Insert text: " <u>Mixed use - housing and employment</u> "

Table Modification SD2-MM325

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM325	Page 175	MX1919	Reports required	Insert text: " <u>. Transport Statement</u> "

Table Modification SD2-MM326

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM326	Page 175	MX1919	Other site specific considerations	Insert text: " <u>The original buildings of Bank Bottom Mills shall be retained and reused as part of any development proposals, unless adequate justification is provided for their loss, in accordance with PLP7 and PLP24.</u> "

Table Modification SD2-MM327

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM327	Page 175	MX1920	Proposed allocation	Insert text: <u>Mixed use - housing, employment and retail (subject to policy PLP13)</u>
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Table Modification SD2-MM328

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM328	Page 175	MX1920	Reports required	Insert text: <u>"• Transport Statement"</u>

Table Modification SD2-MM329

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM329	Page 176	MX1920	Other site specific considerations	Insert text: <u>"• The original buildings of New Mills shall be retained and reused as part of any development proposals, unless adequate justification is provided for their loss, in accordance with PLP7 and PLP24."</u>

Table Modification SD2-MM330

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM330	Page 176	MX1912a	Proposed allocation	Insert text: <u>Mixed use - housing and employment</u>

Table Modification SD2-MM331

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM331	Page 176	MX1912a	Indicative capacity: Housing	Delete and insert text: <u>"60 75 dwellings"</u>

Table Modification SD2-MM332

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM332	Page 176	MX1912a	Indicative capacity: Employment (sq.m.)	Delete and insert text: "944 880"

Table Modification SD2-MM333

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM333	Page 177	MX1912a	Other site specific considerations	Delete and insert text: "• <u>The original buildings shall be retained and reused as part of any development proposals, unless adequate justification is provided for their loss, in accordance with PLP7 and PLP24</u> • Environmental health concerns if B8 uses proposed for this site "

6 Town Centre Proposals

No modifications proposed

SD2-MM334 – Modification deleted

Reason: The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. Accordingly, the Council's published proposed modification SD2-MM334 has been omitted from the schedule of MMs in the Appendix as it only relates to a change to the Lindley District Centre boundary within the Policies Map.

7 Transport

Table Modification SD2-MM335

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM335	Page 209	TS5	After 1st Paragraph	Insert text: <u>"There will be improvements to the A644 and its environs. This may include the provision of a new highway to the south of Dewsbury through the housing allocation site and a new highway link to the existing network."</u>

Table Modification SD2-MM336

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM336	Page 211	TS9	After Mirfield Rail Station Parking	Insert text: <u>"Dewsbury Rail Station</u> <u>The Station is strategically important as part of the North Kirklees Enterprise Zone A range of options have been identified to achieve the following objectives:</u> <ul style="list-style-type: none"> • <u>Better integration with Dewsbury town centre addressing the segregation created by the Dewsbury Ring Road</u> • <u>Improved accessibility to the station by walking and cycling</u> • <u>Better linkages with the bus station</u> • <u>Cosmetic enhancements to improve the quality of the rail station</u> <u>Options including: Enhancement of the public realm to create a gateway entrance to the station. Enhancement of the seating, signage and information within the station. Provision of a new/enhanced entrance canopy to the station to better define gateway and increase the levels of car parking. Improved cycle parking facilities and connection to the wider cycle network route.</u> <u>Batley Rail Station</u>

				<p><u>A range of options to improve the station environment such as, providing step-free access to platform 2, weather proofing the waiting facilities and improving the appearance of the station. These will be coupled with an access improvement strategy that looks to improve the wayfinding and accessibility for pedestrians through better signage, the provision of improved footways and bus interchange potential.</u></p> <p><u>In addition car and cycle parking will be improved and provide bus access to forecourt, improve cyclist facilities and extend parking as far as possible. These improvements will contribute to ensuring that:</u></p> <ul style="list-style-type: none"> <u>• the station contributes towards the economic growth of West Yorkshire</u> <u>• the station plays a role in attracting inward investment and supporting the regeneration of its wider catchment the station forms an active part of an integrated transport system"</u>
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Table Modification SD2-MM337

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM337	Page 212	TS11	TS11 Strategic Road Network Improvements	<p>Delete and insert text:</p> <p>Highways England has identified two schemes to be delivered in this Roads Investment period as required to accommodate the traffic growth on the strategic network as a result of Kirklees and neighbouring local planning authorities development growth aspirations. In addition there are seven <u>two</u> more schemes identified in Kirklees that will be required in the plan period, making nine <u>4</u> schemes in total.</p> <p>Impact for Kirklees: All schemes will improve links to other major centres in the North of England. The M62/M606 scheme in particular will provide for future housing and employment growth in the local area and improves connectivity to the M62 and in particular the M606 and Bradford. The M62 junction 27 scheme will compliment Kirklees' TS1 scheme, enhancing connectivity for existing and potential residents of Kirklees to Leeds, the Strategic Road Network and destinations beyond.</p> <p>Scheme Detail: Junction or route improvements at the following locations:</p>

<p><u>Road Investment Strategy</u></p> <ul style="list-style-type: none"> • <u>M62/M606/A58/A638 (Chain Bar) (within the boundary of Kirklees Metropolitan District)</u> • <u>M62 Junctions 20-25 Smart Motorway (within the boundaries of Rochdale, Calderdale and Kirklees Metropolitan Districts)</u> <p><u>West Yorkshire Infrastructure Study</u></p> <ul style="list-style-type: none"> • <u>M62 Junction 24 (Northern dumb-bell and link to Ainley Top)</u> • <u>M62 Junction 27 (Southern dumb-bell)</u> • <u>M62 junction 24: Increased capacity to address issues on the westbound off slip (within the boundary of Calderdale Metropolitan District)</u> • <u>M62 junction 25: Increased capacity and potential signalisation (in conjunction with the Kirklees Cooper Bridge scheme) (within the boundary of Calderdale Metropolitan District)</u> • <u>M62 junction 27: Increased capacity on the east and westbound off-slips along with capacity enhancements to the southern dumbbell (within the boundaries of Kirklees and Leeds Metropolitan Districts)</u> • <u>M62 junction 28: Increased capacity on the circulatory carriageway and potential ramp metering (within the boundary of Leeds Metropolitan District)</u> • <u>M62 junction 24: Capacity enhancement of the gyratory (within the boundary of Kirklees Metropolitan District)</u> • <u>M62 junction 26: Further capacity enhancements may be required to the westbound off slip and to control the flow from the M606 to M62 (this will be dependent on the eventual scope of the RIS1 scheme for Chain Bar) (within the boundary of Kirklees Metropolitan District)</u> • <u>M62 junction 27: Significant improvement needed, likely to require a major reconfiguration of the junction (within the boundaries of Kirklees and Leeds Metropolitan Districts)"</u> 			
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8 Environmental Designations

8 Environmental Designations

Table Modification SD2-MM338

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM338	Page 214	LGS12	Local Geological Sites Table Kirklees Rural	Delete Local Geological Site LGS12

Table Modification SD2-MM339

Modification Ref	Page	Site	Para/table/box	Tracked change

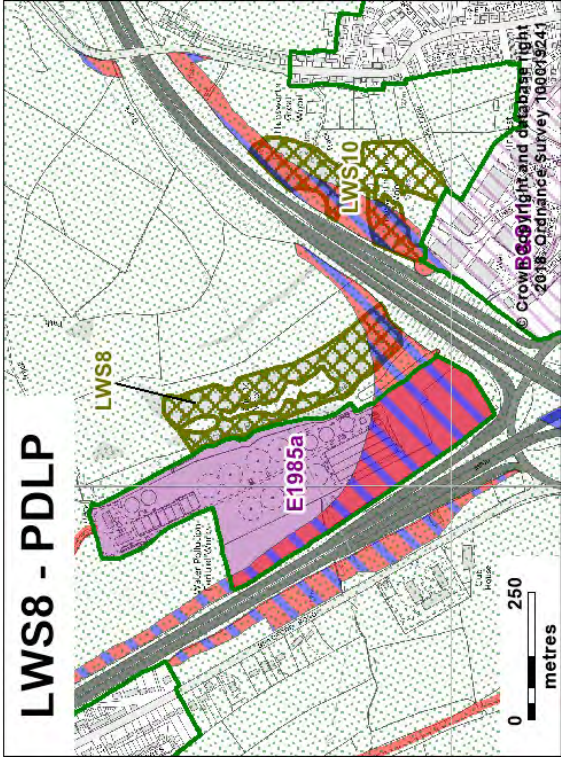
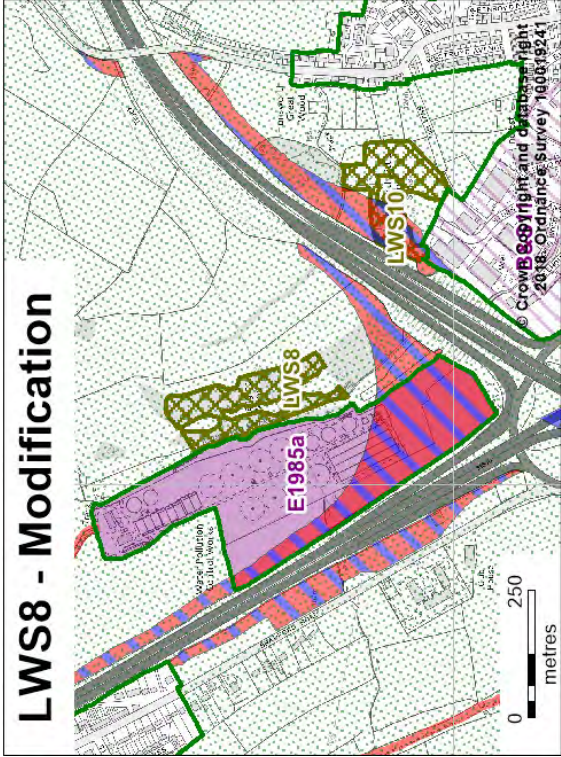
SD2-MM339	Page 215	LWS8	Area (ha)	Delete and insert text: "3.86 <u>2.39</u> "
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>LWS8 - PDLP</p>  </div> <div style="width: 48%;"> <p>LWS8 - Modification</p>  </div> </div>				

Table Modification SD2-MM340

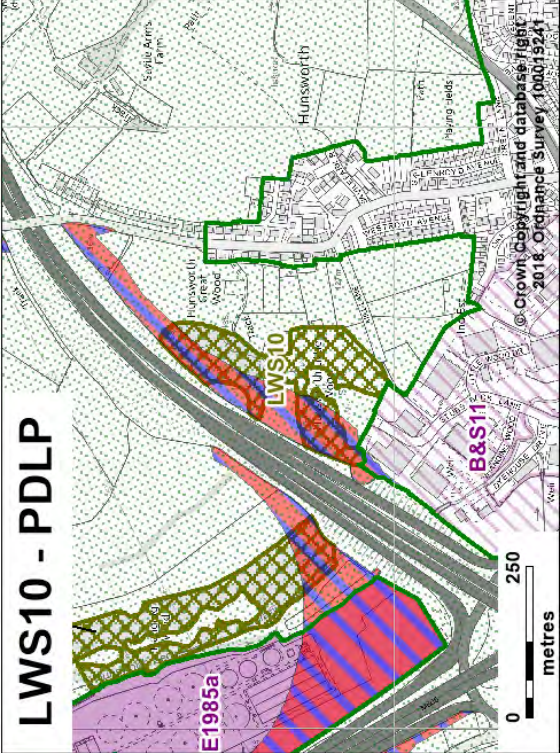
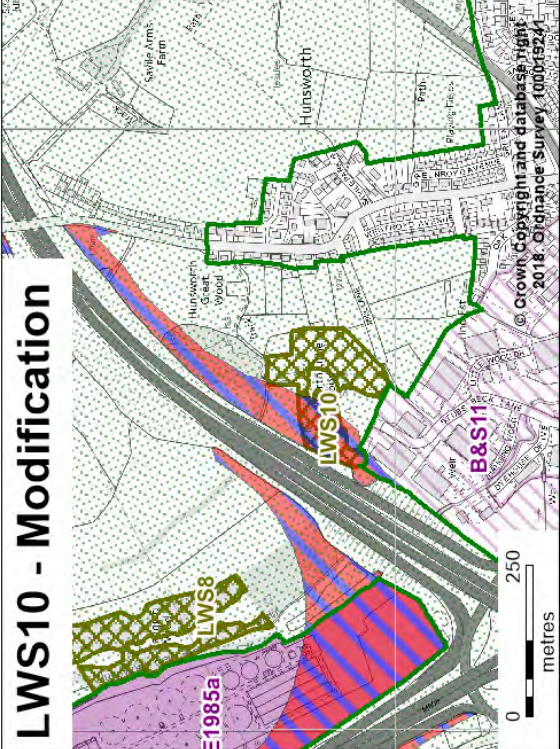
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM340	Page 215	LWS10	Area (ha)	Delete and insert text: " 3.54 <u>2.16</u> "
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p data-bbox="470 1809 518 2128">LWS10 - PDLP</p>  </div> <div style="width: 48%;"> <p data-bbox="470 660 518 1131">LWS10 - Modification</p>  </div> </div>				

Table Modification SD2-MM341

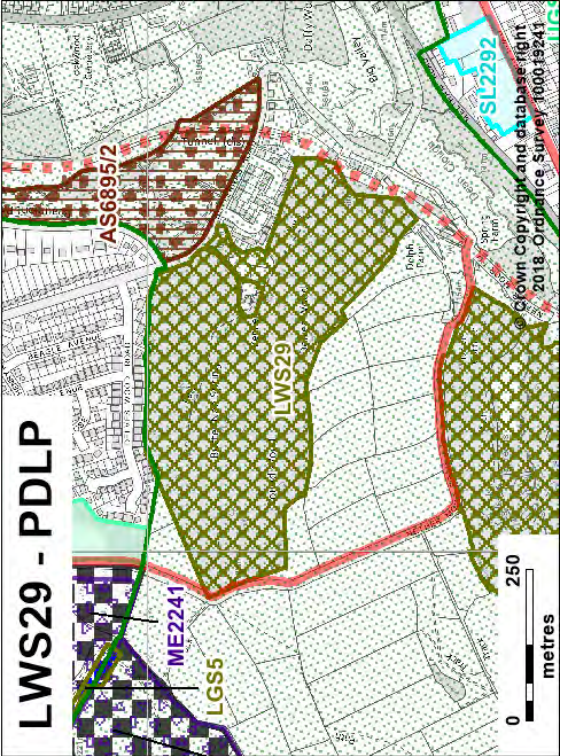
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM341	Page 216	LWS29	Area (ha)	Delete and insert text: "46.75 16.66"
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>LWS29 - PDLP</p>  </div> <div style="width: 48%;"> <p>LWS29 - Modification</p>  </div> </div>				

Table Modification SD2-MM342

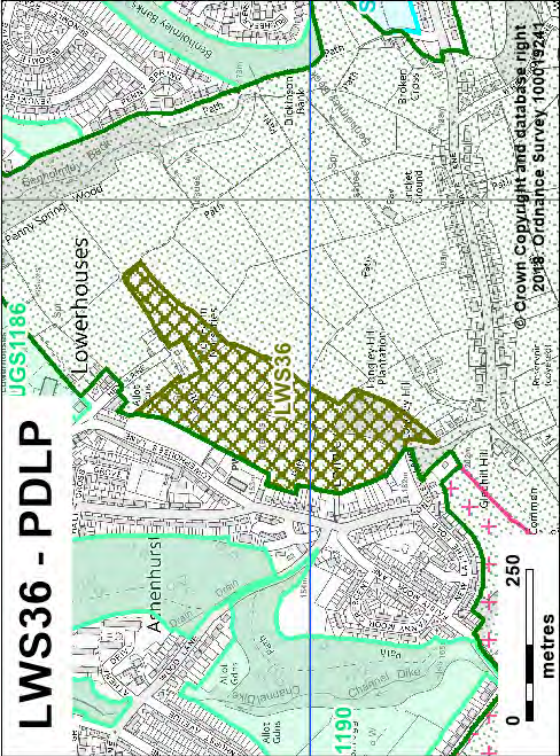
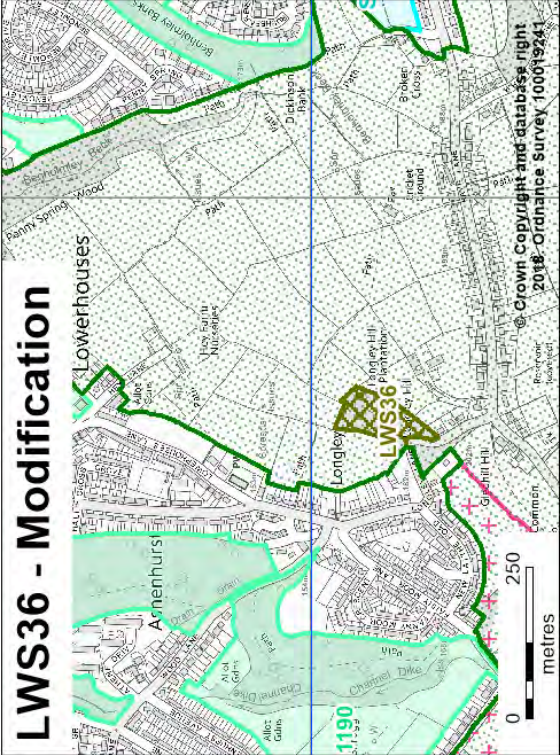
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM342	Page 217	LWS36	Area (ha)	Delete and insert text: "7.25 <u>0.88</u> "
 <p>LWS36 - PDLP</p>		 <p>LWS36 - Modification</p>		

Table Modification SD2-MM343

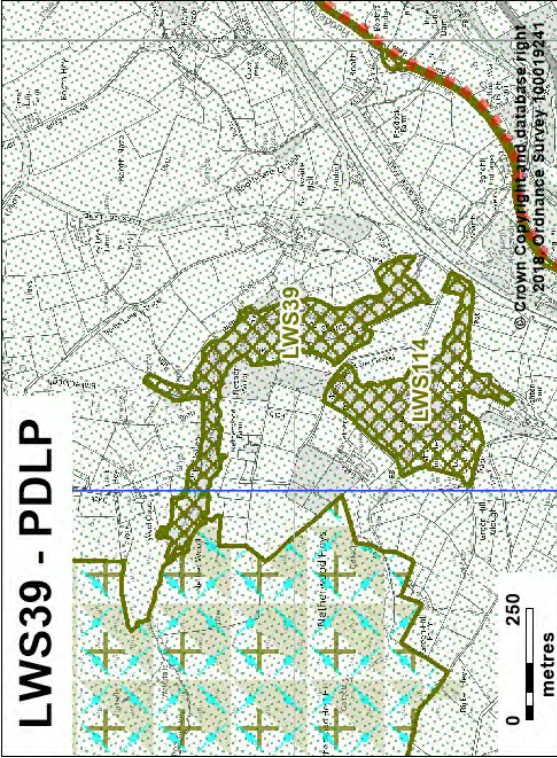
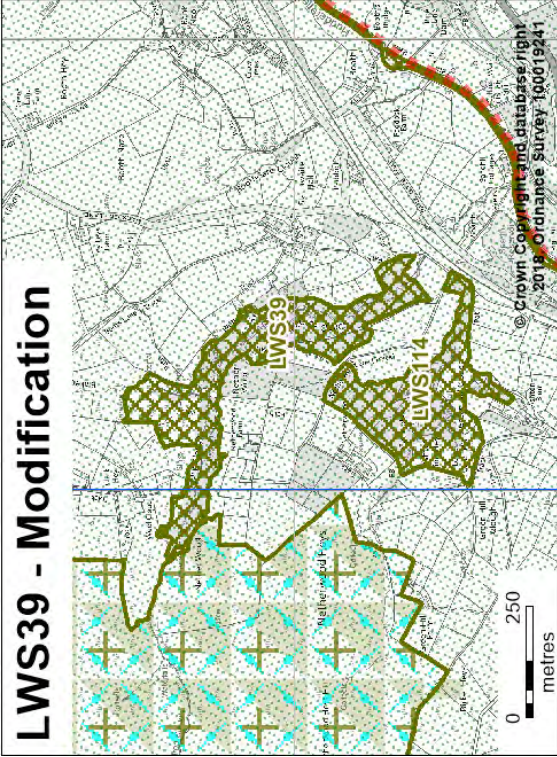
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM343	Page 217	LWS39	Area (ha)	Delete and insert text: "7.34 <u>8.94</u> "
<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p>LWS39 - PDLP</p> </div> <div style="text-align: center;">  <p>LWS39 - Modification</p> </div> </div>				

Table Modification SD2-MM344

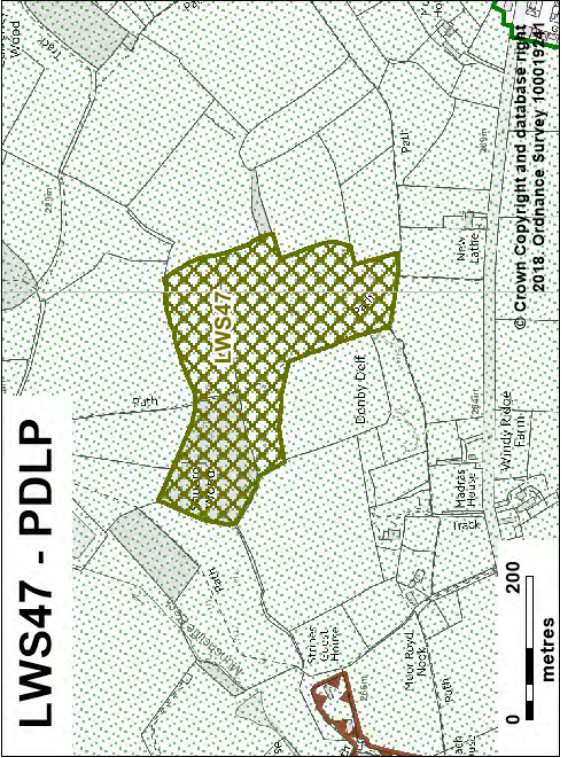
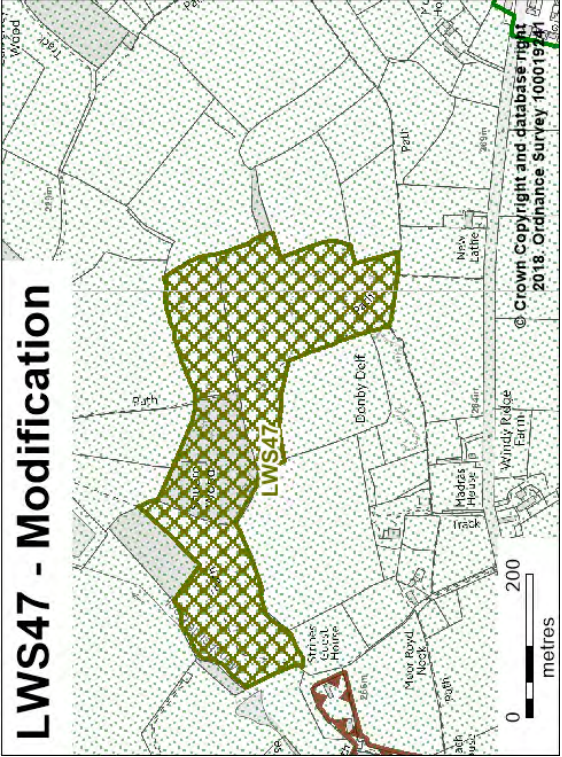
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM344	Page 217	LWS47	Area (ha)	Delete and insert text: "7.10 9.63"
<p>LWS47 - PDLP</p> 		<p>LWS47 - Modification</p> 		

Table Modification SD2-MM345

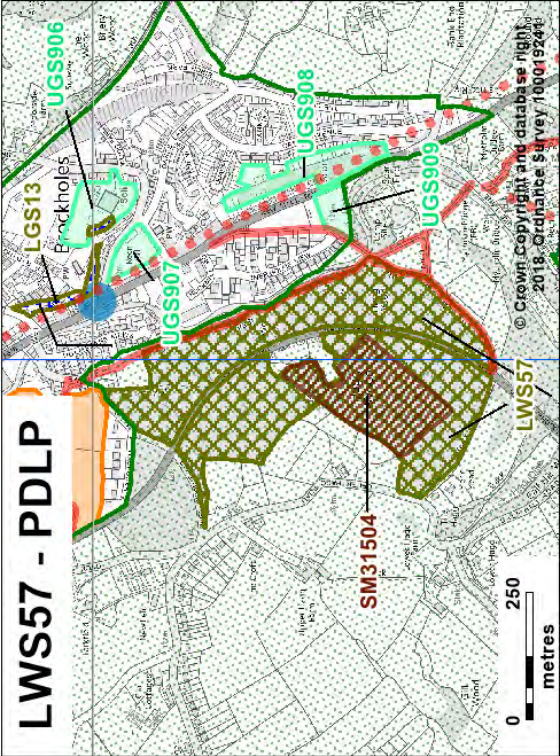
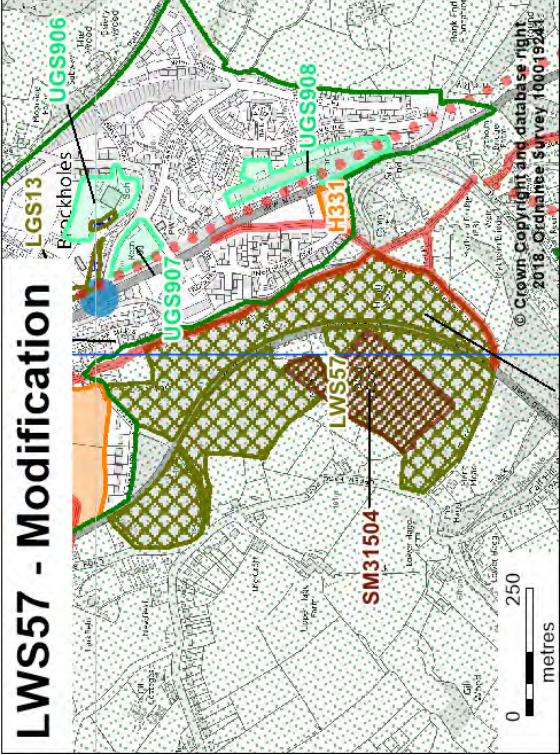
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM345	Page 218	LWS57	Area (ha)	Delete and insert text: " <u>47.79</u> <u>19.77</u> "
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>LWS57 - PDLP</p>  </div> <div style="width: 48%;"> <p>LWS57 - Modification</p>  </div> </div>				

Table Modification SD2-MM346

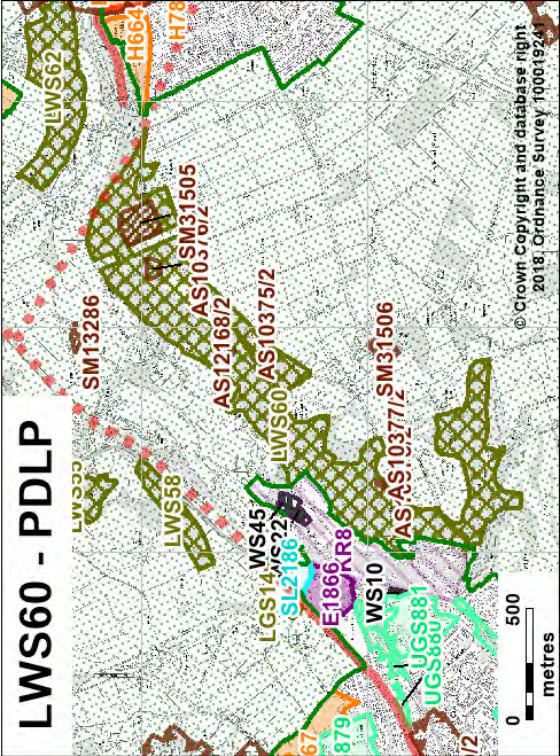
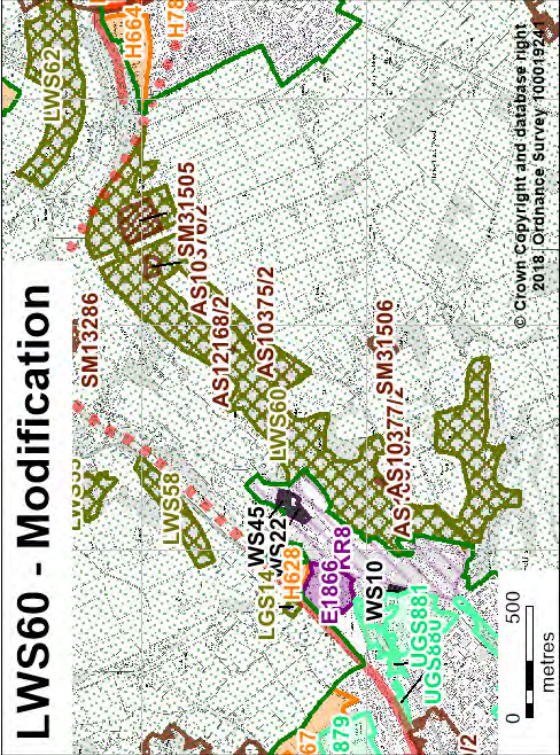
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM346	Page 218	LWS60	Area (ha)	Delete and insert text: " 70.24 <u>66.74</u> "
 <p>LWS60 - PDLP</p>		 <p>LWS60 - Modification</p>		

Table Modification SD2-MM347

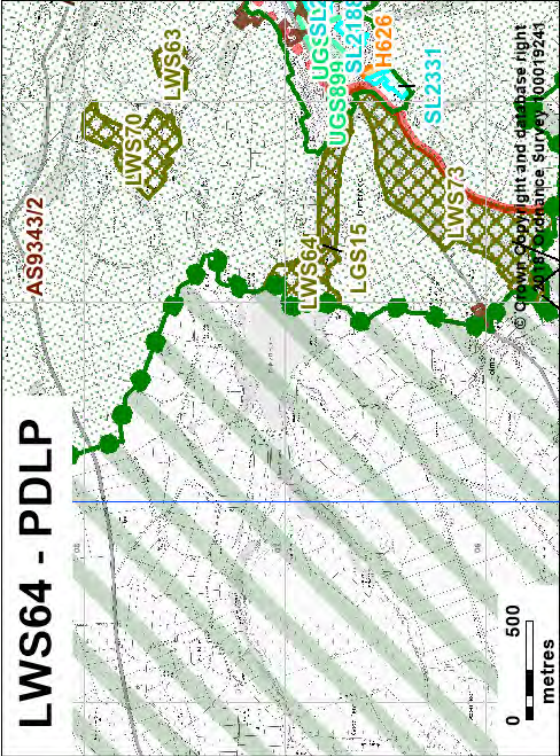
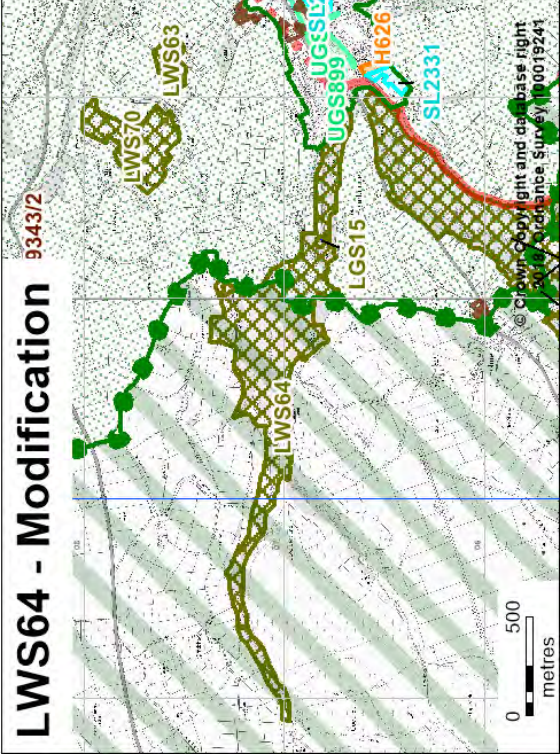
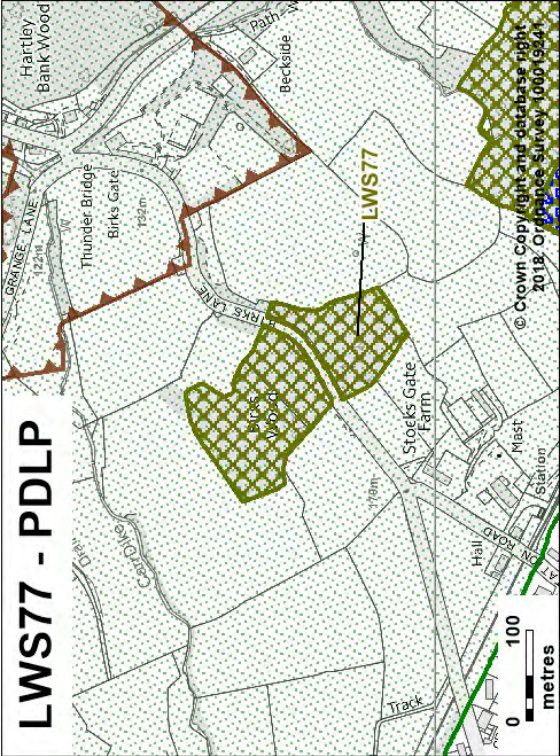
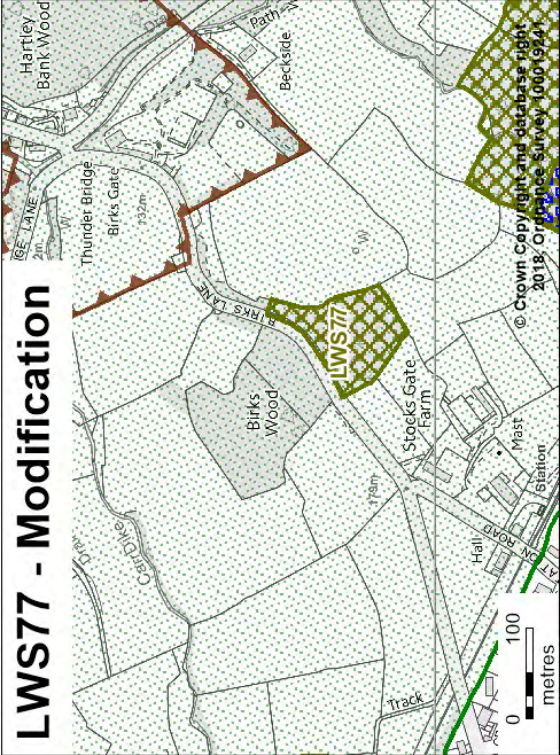
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM347	Page 218	LWS64	Area (ha)	Delete and insert text: " 49-04 <u>12.81</u> (<i>within LPA</i>)"
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>LWS64 - PDLP</p>  </div> <div style="width: 48%;"> <p>LWS64 - Modification</p>  </div> </div>				

Table Modification SD2-MM348

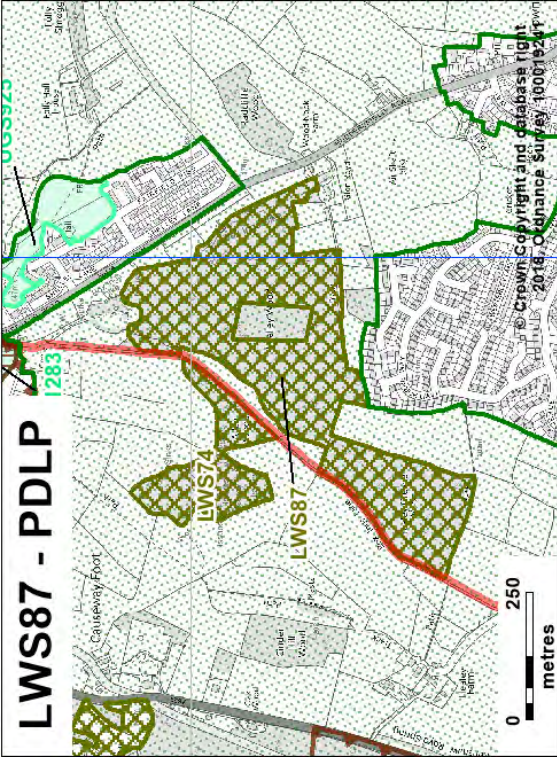
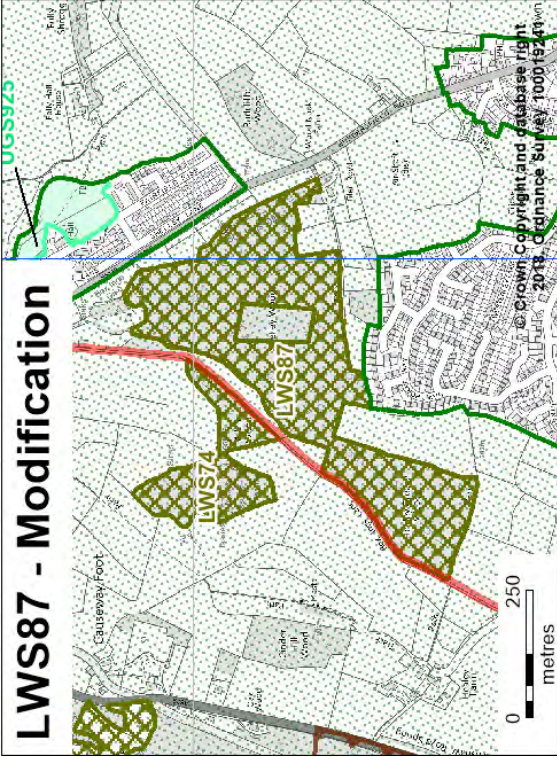
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM348	Page 218	LWS73	Area (ha)	Delete and insert text: <u>"299.19 30.84 (within LPA)"</u>
<div style="display: flex; justify-content: space-around;"> <div data-bbox="459 1397 1018 2152"> </div> <div data-bbox="459 383 1018 1137"> </div> </div>				

Table Modification SD2-MM349

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM349	Page 218	LWS77	Area (ha)	Delete and insert text: "2.66 <u>0.96</u> "
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>LWS77 - PDLP</p>  </div> <div style="width: 48%;"> <p>LWS77 - Modification</p>  </div> </div>				

8 Environmental Designations

Table Modification SD2-MM350

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM350	Page 219	LWS87	Area (ha)	Delete and insert text: "45.64 <u>15.28</u> "
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;">  <p>LWS87 - PDLP</p> </div> <div style="width: 48%;">  <p>LWS87 - Modification</p> </div> </div>				

9 Historic Designations

Table Modification SD2-MM351

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM351	Page 220		Paragraph 9.1	<p>Delete and insert text:</p> <p><u>"This section sets out historic designations Certain heritage assets, including ancient monuments, conservation areas, historic battlefields, historic parks and gardens and archaeological following sites, as are shown on the Policies Map under Policy PLP35. Please note that the Local Plan Policies Map does not show all designated and non-designated heritage assets in the district, such as listed buildings. Applicants are advised to consult with the Local Planning Authority and/or Historic England to determine whether development proposals might affect a heritage asset.</u></p> <p>These designations are referred to specifically in the following Local Plan policy (Part 1):</p> <ul style="list-style-type: none"> • Historic environment"

10 Mineral Allocations

10 Mineral Allocations

Table Modification SD2-MM352

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM352	Page 229		New policy box to be inserted before paragraph 10.1	Insert new policy: " <u>Policy PLP 68</u> <u>Minerals areas of search</u> <u>The sites listed below are allocated for minerals areas of search in the Local Plan. Planning permission will be expected to be granted if proposals accord with the development principles set out in the relevant site boxes, relevant development plan policies and as shown on the Policies Map.</u> "

Table Modification SD2-MM353

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM353	Page 233		New policy box to be inserted before paragraph 10.2	Insert new policy: " <u>Policy PLP 69</u> <u>Minerals extraction sites</u> <u>The sites listed below are allocated as minerals extraction sites in the Local Plan. Planning permission will be expected to be granted if proposals accord with the development principles set out in the relevant site boxes, relevant development plan policies and as shown on the Policies Map.</u> "

Table Modification SD2-MM354

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM354	Page 233	ME1965a	Constraints	Insert text: " <u>• River Dearne and The Park Dike cross the site</u> <u>• Yorkshire Water infrastructure crossing site</u> "

Table Modification SD2-MM355

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM355	Page 233	ME1965a	Reports required	Insert text: " <u>Hydrological Risk Assessment required to assess impacts on ground water and surface water regimes</u> "

Table Modification SD2-MM356

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM356	Page 233	ME1965a	Site address	Delete and insert text: " Appleton Quarry Land at <u>Dearne Grange</u> , Park Head Lane, Haddingley, Shepley"

Table Modification SD2-MM357

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM357	Page 234	ME1965a	Other site specific considerations	Insert text: • <u>Secure adequate measures to protect Yorkshire Water infrastructure</u>

10 Mineral Allocations

Table Modification SD2-MM358

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM358	Page 238	ME2248b	Gross site area (Ha)	Delete and insert text: " <u>28.53</u> <u>28.69</u> "

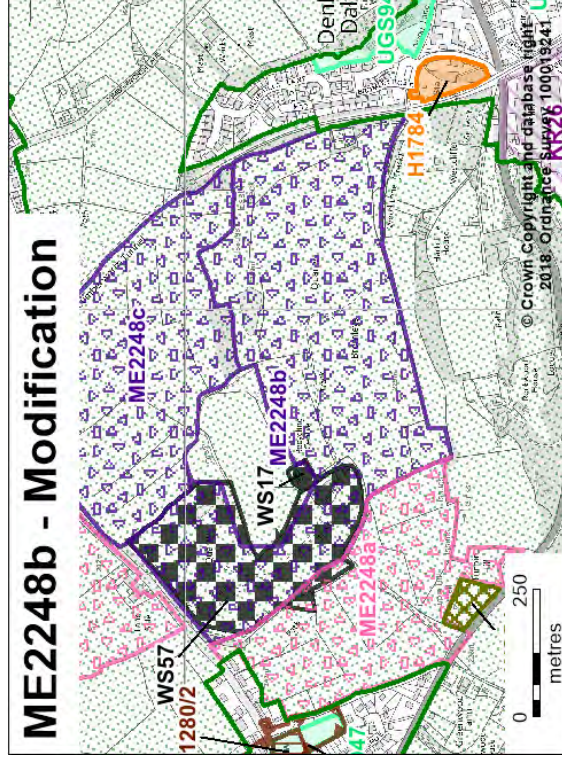
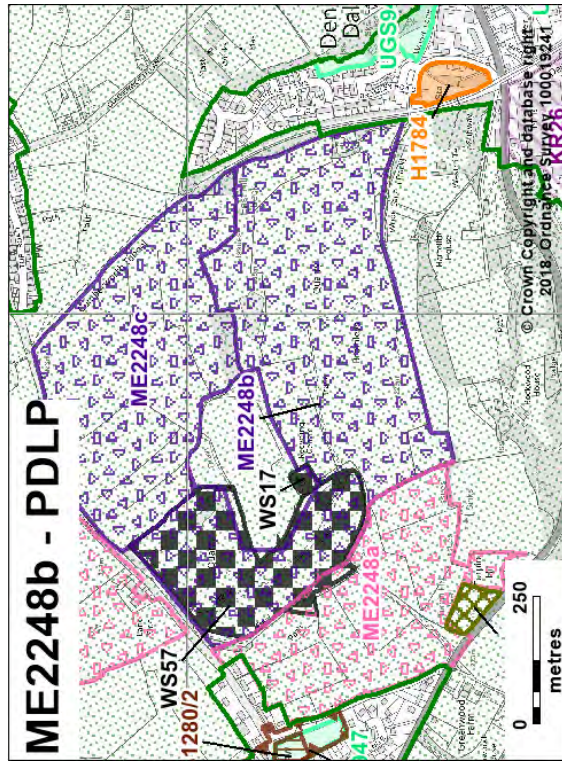


Table Modification SD2-MM359

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM359	Page 238	ME2248b	Net site area (ha)	Delete and insert text: " <u>28.53</u> <u>28.69</u> "

Table Modification SD2-MM360

Modification Ref	Page	Site	Para/table/box	Tracked change

SD2-MM360	Page 247		New policy box to be inserted before paragraph 10.3	Insert new policy: <u>"Policy PLP 70 Minerals preferred areas"</u> <u>The sites listed below are allocated as minerals preferred areas in the Local Plan. Planning permission will be expected to be granted if proposals accord with the development principles set out in the relevant site boxes, relevant development plan policies and as shown on the Policies Map."</u>
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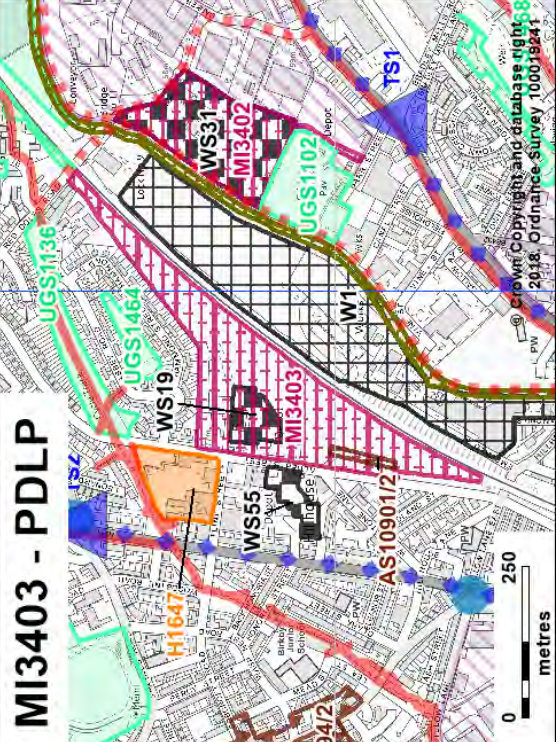
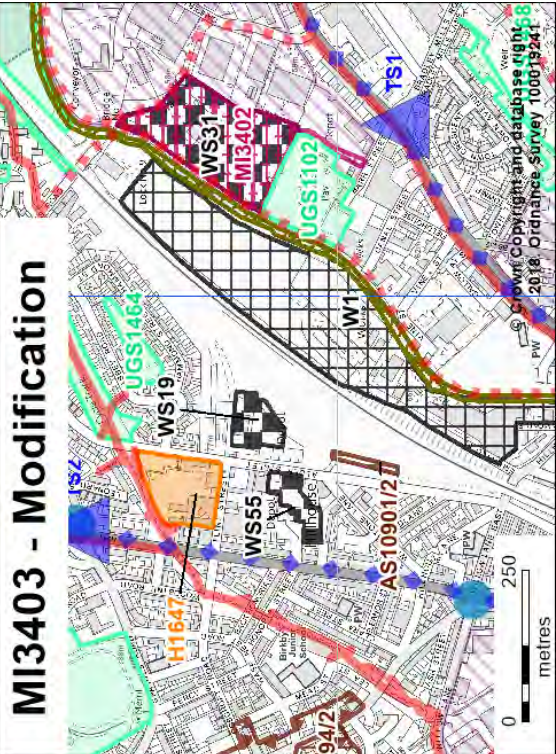
Table Modification SD2-MM361

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM361	Page 247	ME1966	Reports required	Insert text: <u>"Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30."</u>

Table Modification SD2-MM362

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM362	Page 250		New policy box to be inserted before paragraph 10.4	Insert new policy: <u>"Policy PLP 71 Minerals infrastructure sites"</u> <u>The sites listed below are allocated as minerals infrastructure sites in the Local Plan. Planning permission will be expected to be granted if proposals accord with the development principles set out in the relevant site boxes, relevant development plan policies and as shown on the Policies Map."</u>

Table Modification SD2-MM363

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM363	Page 253	MI3403	Site text box	Delete Minerals Infrastructure Site MI3403 and show as unallocated
<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p>MI3403 - PDLP</p> </div> <div style="text-align: center;">  <p>MI3403 - Modification</p> </div> </div>				

11 Waste Allocations

Table Modification SD2-MM364

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM364	Page 254		New policy box to be inserted before paragraph 11.1	Insert new policy: <u>"Policy PLP 72 Strategic waste management site</u> <u>The site listed below is allocated as a strategic waste management site in the Local Plan. Planning permission will be expected to be granted if proposals accord with the development principles set out in the site box below, relevant development plan policies and as shown on the Policies Map."</u>

Table Modification SD2-MM365

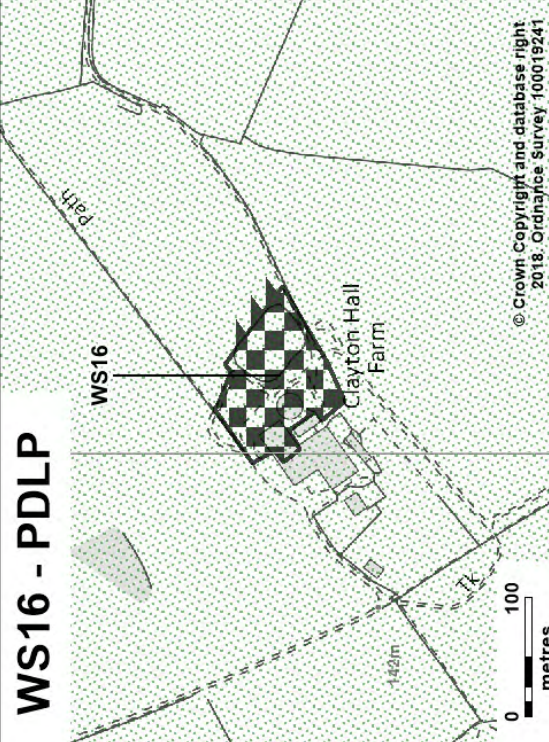
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM365	Page 254		Paragraph 11.2	Insert text: <u>"The following existing waste management sites are safeguarded for continued waste management purposes, under Policy PLP45:"</u>

11 Waste Allocations

Table Modification SD2-MM366

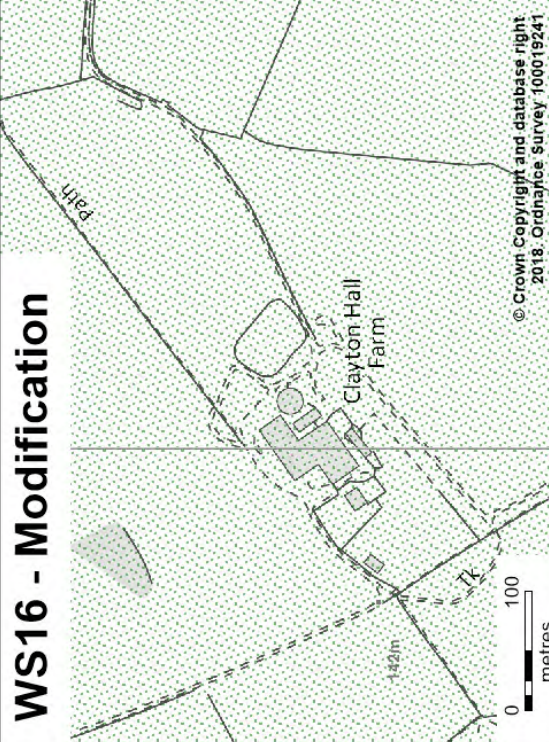
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM366	Page 257	WS16	Table Kirklees Rural Safeguarded Waste Management Sites	Delete Waste allocation WS16: WS16 Clayton Hall Farm, Clayton West, Huddersfield 0.87 Denby Dale.

WS16 - PDLP



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WS16 - Modification



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12 Land at Storthes Hall

Table Modification SD2-MM367

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM367	Page 259		New policy box to be inserted before paragraph 12.1	Insert new policy: <u>Policy PLP 73</u> <u>Land at Storthes Hall</u> <i>The site listed below is allocated as a major developed site in the green belt under Policy PLP59. Planning permission will be expected to be granted if proposals accord with the development principles set out in the site box below, relevant development plan policies and as shown on the Policies Map.</i>

Table Modification SD2-MM368

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM368	Page 259	MDGB2134	Net site area (Ha)	Insert text: "19.22 - protected trees, <u>priority habitat</u> and listed building removed from the developable area"

Table Modification SD2-MM369

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM369	Page 259	MDGB2134	Constraints	Insert text: "• <u>Part of this site lies within a UK BAP priority habitat</u> "

Table Modification SD2-MM370

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM370	Page 259	MDGB2134	Other site specific considerations	<p>Delete and insert text:</p> <p>"• Within the site delineated on the policies map as 'Land at Storthes Hall', the Council will encourage <u>there are two land parcels with different land uses. The southern part of the site has been largely cleared and currently has planning permission for 300 dwellings and a care home. The northern part of the site is currently operating as student accommodation.</u></p> <ul style="list-style-type: none"> • Redevelopment proposals that <u>are must be supported by a full and comprehensive masterplan for each part of the site which must include consideration of impact on openness in accordance with green belt policy. in order that the proper planning of the site as a whole can be considered.</u> • <u>Non designated heritage assets shall be retained and reused as part of any development proposals, unless adequate justification is provided for their loss, in accordance with PLP7 and PLP24.</u> • <u>The setting of the Grade II Listed Lodge building, gate piers and gates should be safeguarded as part of development proposals.</u> • <u>BAP Priority Habitat should be retained in accordance with Local Plan policy PLP 30 and national planning policy</u>

13 Safeguarded Land

Table Modification SD2-MM371

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM371	Page 261		Paragraph 13.1	<p>Delete and insert text:</p> <p>"The following chapter provides details of the sites designated as safeguarded land in the Local Plan which will potentially accommodate development beyond the end of the plan period, <i>under Policy PLP6</i>. The identification of safeguarded land will ensure that green belt boundaries will last beyond the end of the local plan period. These designations have been set out to meet the requirements of the following policy within the Local Plan:</p> <ul style="list-style-type: none"> •Safeguarded Land (Land to be safeguarded for potential future development)"

13 Safeguarded Land

Table Modification SD2-MM372

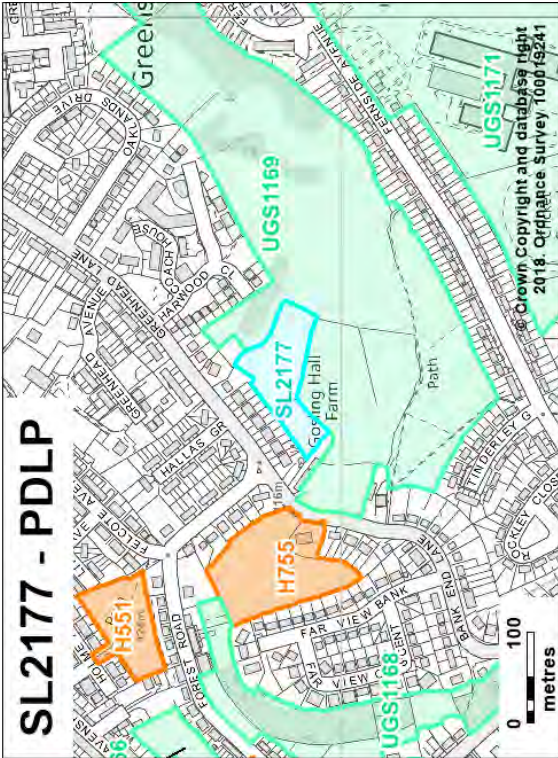
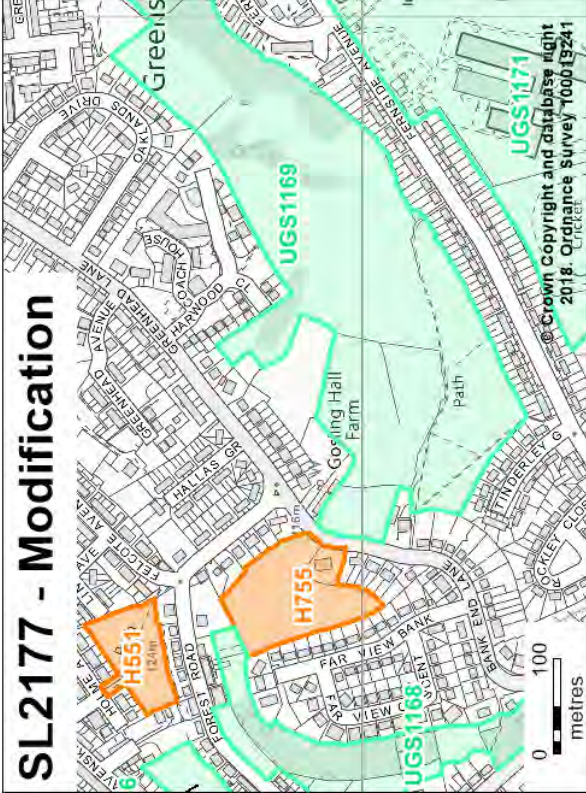
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM372	Page 261	SL2177	Site text box	Delete Safeguarded Land allocation SL2177 and show as unallocated
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>SL2177 - PDLP</p>  </div> <div style="width: 48%;"> <p>SL2177 - Modification</p>  </div> </div>				

Table Modification SD2-MM373

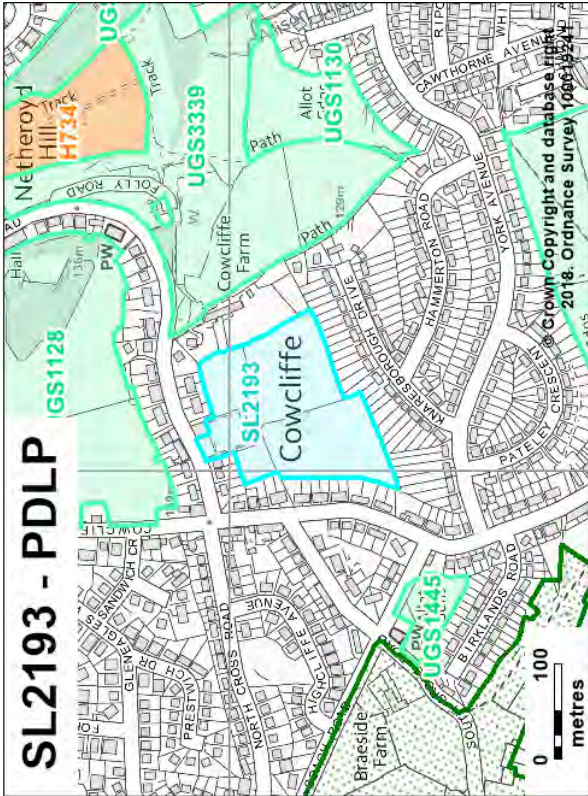
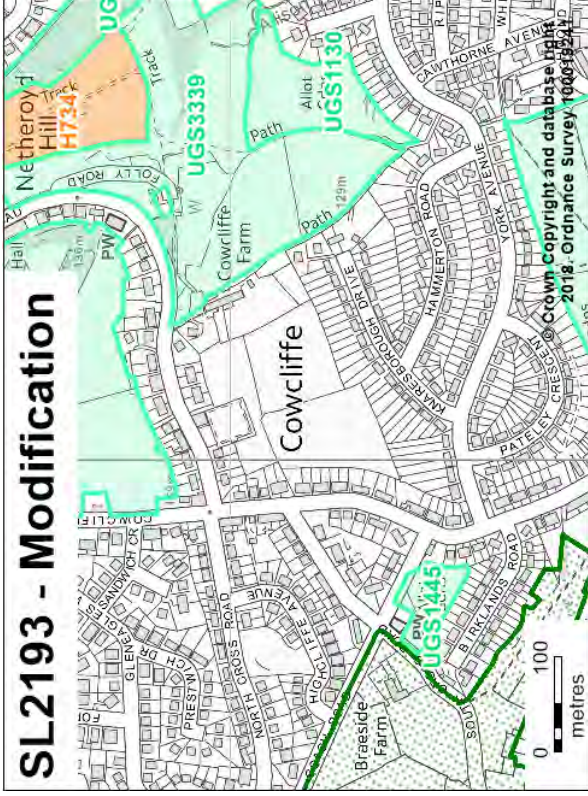
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM373	Page 261	SL2193	Site text box	Delete Safeguarded Land allocation SL2193 and show as unallocated
<p>SL2193 - PDLP</p> 		<p>SL2193 - Modification</p> 		

Table Modification SD2-MM374

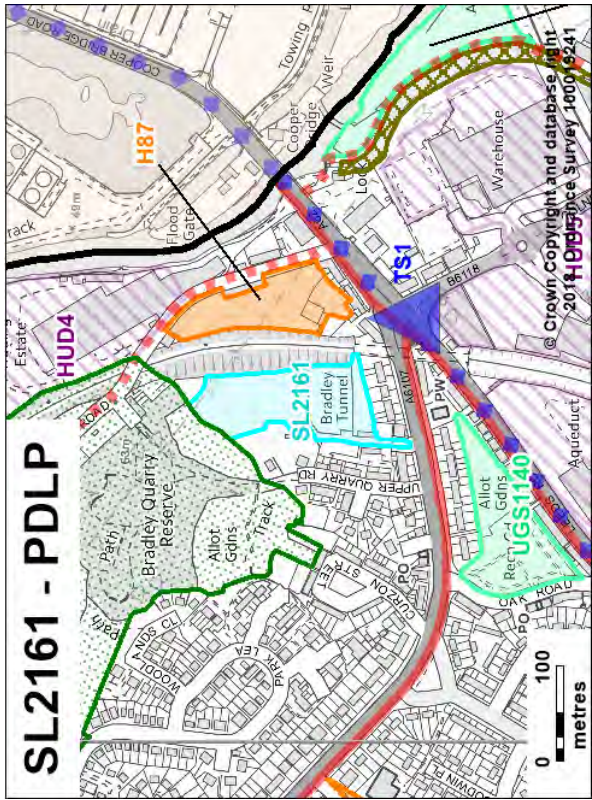
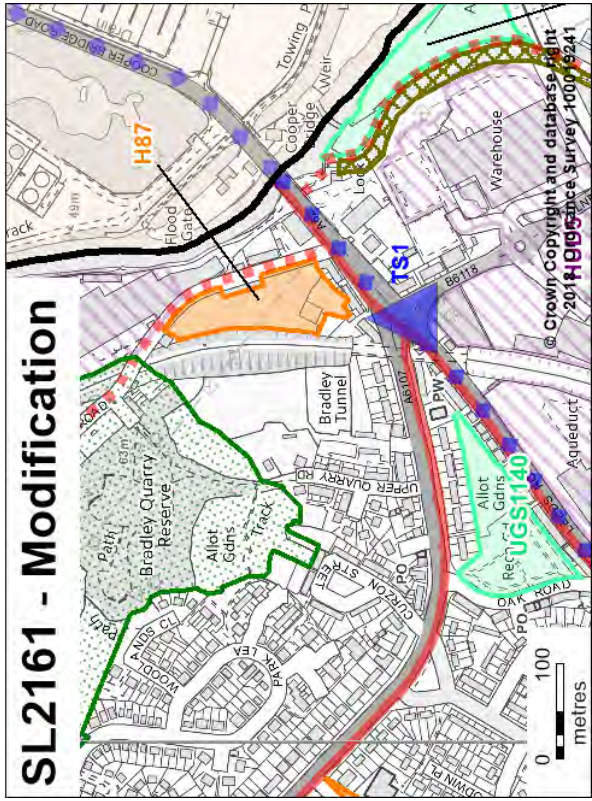
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM374	Page 261	SL2161	Site text box	Delete Safeguarded Land allocation SL2161 and show as unallocated
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;">  <p>SL2161 - PDLP</p> </div> <div style="width: 48%;">  <p>SL2161 - Modification</p> </div> </div>				

Table Modification SD2 - MM375

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM375	Page 262	SL2292	Site text box	Delete Safeguarded Land allocation SL2292 and show as unallocated
<div style="display: flex; justify-content: space-around;"> <div data-bbox="416 1357 1010 2152"> <p>SL2292 - PDLP</p> </div> <div data-bbox="416 360 1010 1155"> <p>SL2292 - Modification</p> </div> </div>				

Table Modification SD2 - MM376

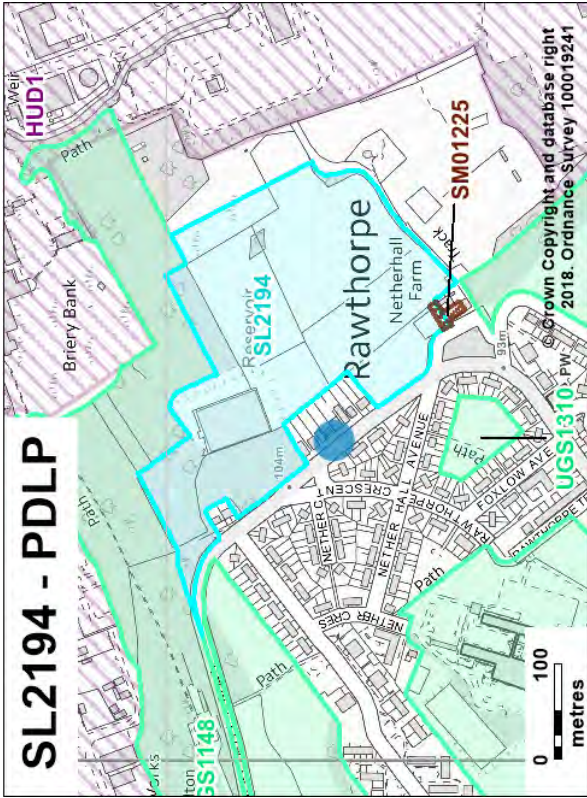
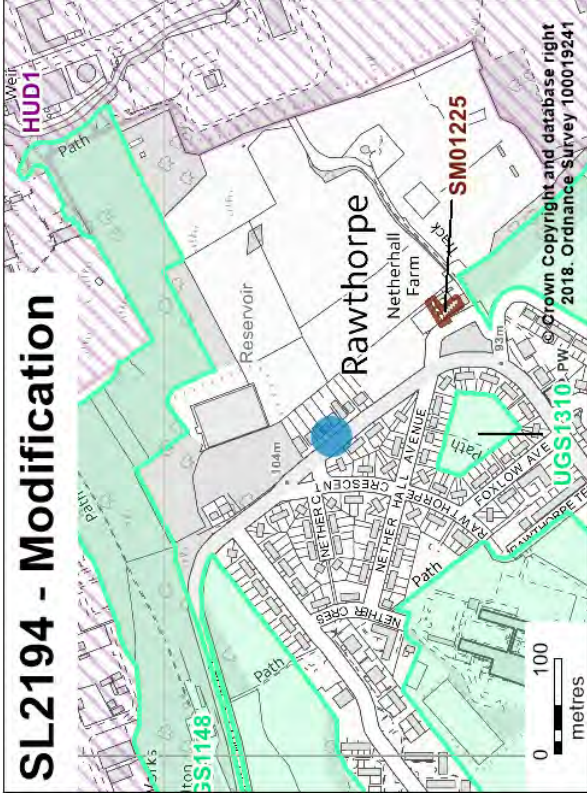
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM376	Page 262	SL2194	Site text box	Delete Safeguarded Land allocation SL2194 and show as unallocated
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p data-bbox="427 1787 480 2130">SL2194 - PDLP</p>  </div> <div style="width: 48%;"> <p data-bbox="427 656 480 1151">SL2194 - Modification</p>  </div> </div>				

Table Modification SD2 - MM377

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM377	Page 262	SL2268	Site text box	Delete Safeguarded Land allocation SL2268 and show as unallocated
<div style="display: flex; justify-content: space-around;"> <div data-bbox="416 1355 1007 2152"> <p>SL2268 - PDLP</p> </div> <div data-bbox="416 360 1007 1155"> <p>SL2268 - Modification</p> </div> </div>				

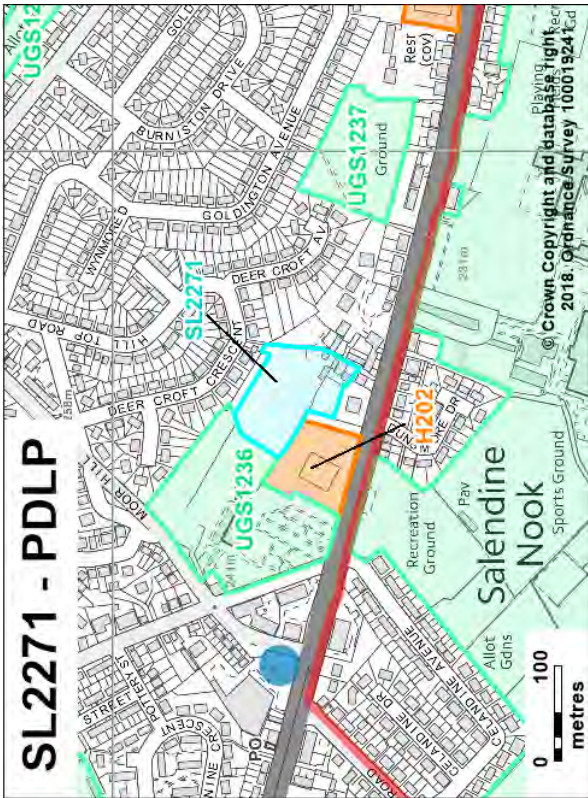
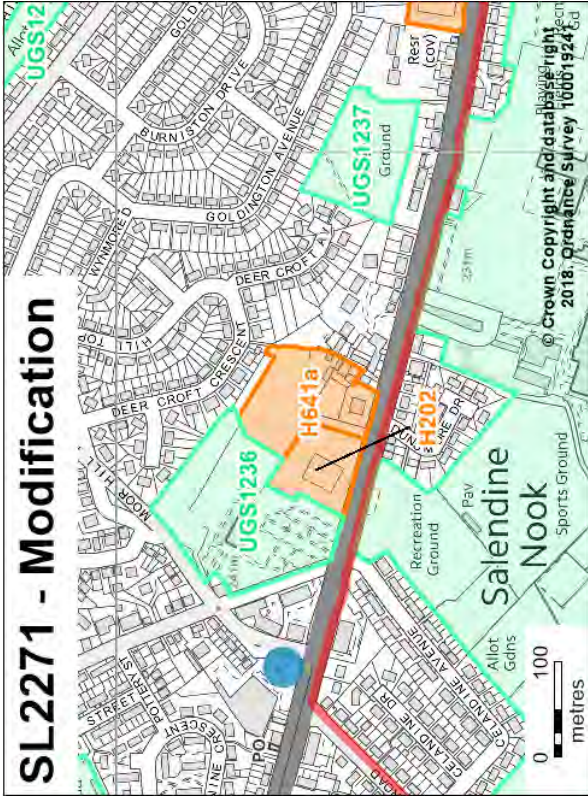
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM378	Page 262	SL2271	Site text box	Delete Safeguarded Land allocation SL2271 and allocate as housing H641a
				

Table Modification SD2 - MM379

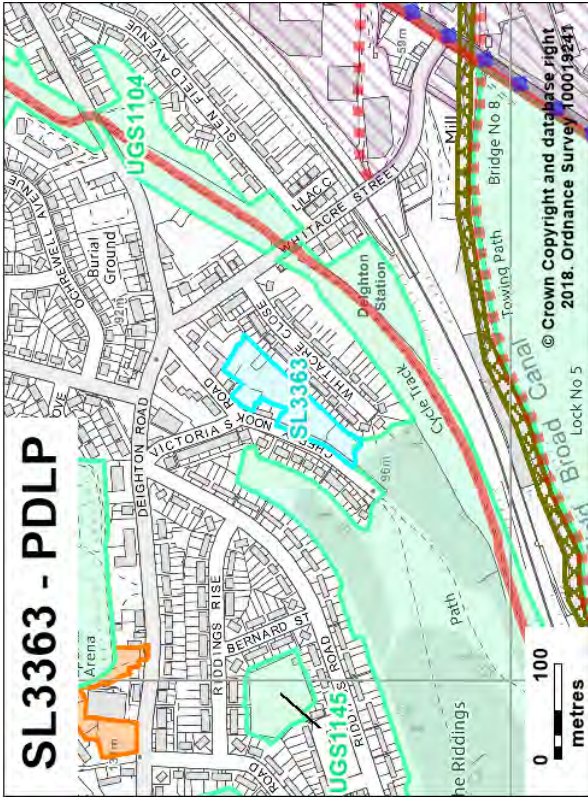
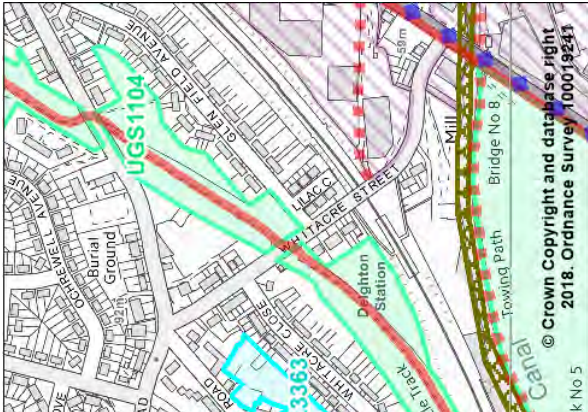
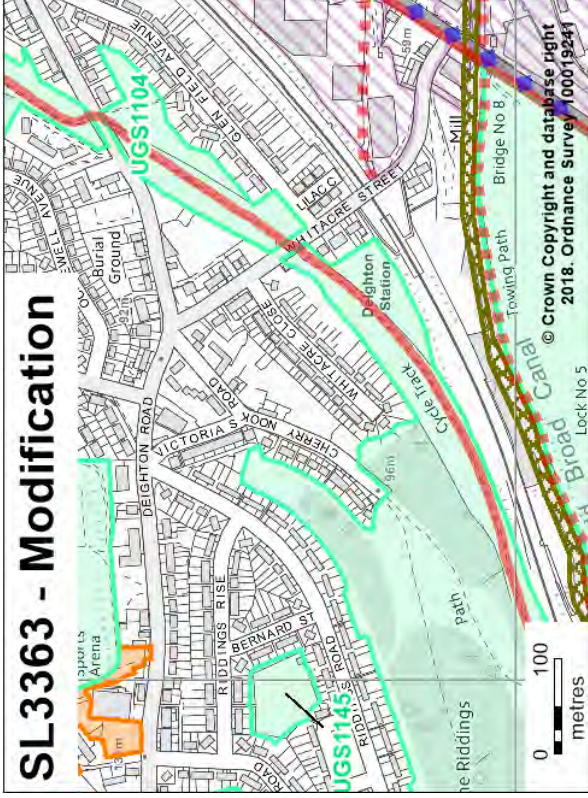
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM379	Page 262	SL3363	Site text box	Delete Safeguarded Land allocation SL3363 and show as unallocated
				

Table Modification SD2 - MM380

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM380	Page 263	SL2273	Site text box	Delete Safeguarded Land allocation SL2273 and show as unallocated
<div style="display: flex; justify-content: space-around;"> <div data-bbox="416 1357 1010 2152"> <p>SL2273 - PDLP</p> </div> <div data-bbox="416 365 1010 1158"> <p>SL2273 - Modification</p> </div> </div>				

Table Modification SD2 - MM381

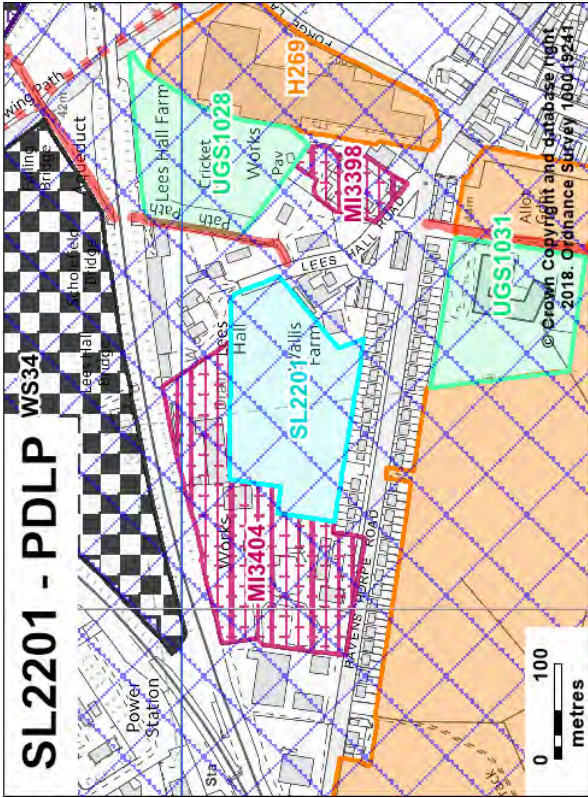
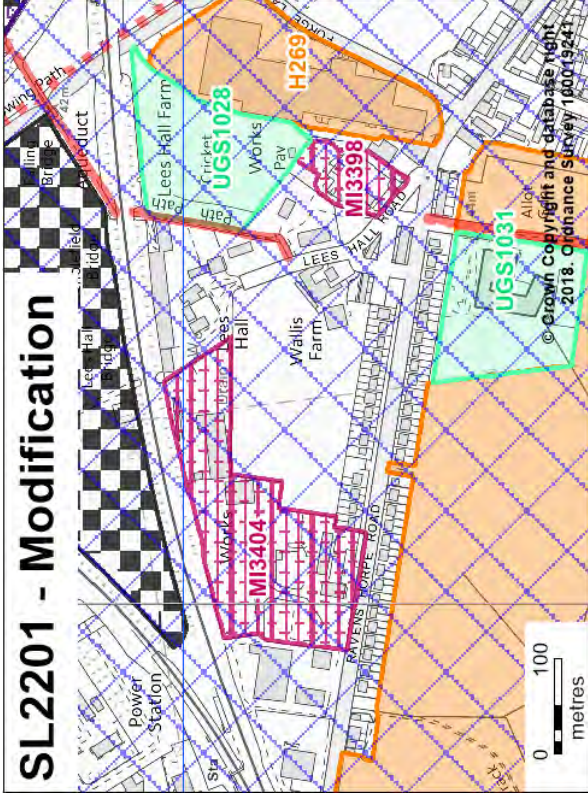
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM381	Page 263	SL2201	Site text box	Delete Safeguarded Land allocation SL2201 and show as unallocated
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;">  <p>SL2201 - PDLP</p> </div> <div style="width: 48%;">  <p>SL2201 - Modification</p> </div> </div>				

Table Modification SD2 - MM382

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM382	Page 263	SL2198	Site text box	Delete Safeguarded Land allocation SL2198 and show as unallocated

Table Modification SD2 - MM383

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM383	Page 263	SL2302	Site text box	Delete Safeguarded Land allocation SL2302 and show as unallocated
<div style="display: flex; justify-content: space-around;"> <div data-bbox="418 1357 1008 2152"> <p>SL2302 - PDLP</p> </div> <div data-bbox="418 362 1008 1158"> <p>SL2302 - Modification</p> </div> </div>				

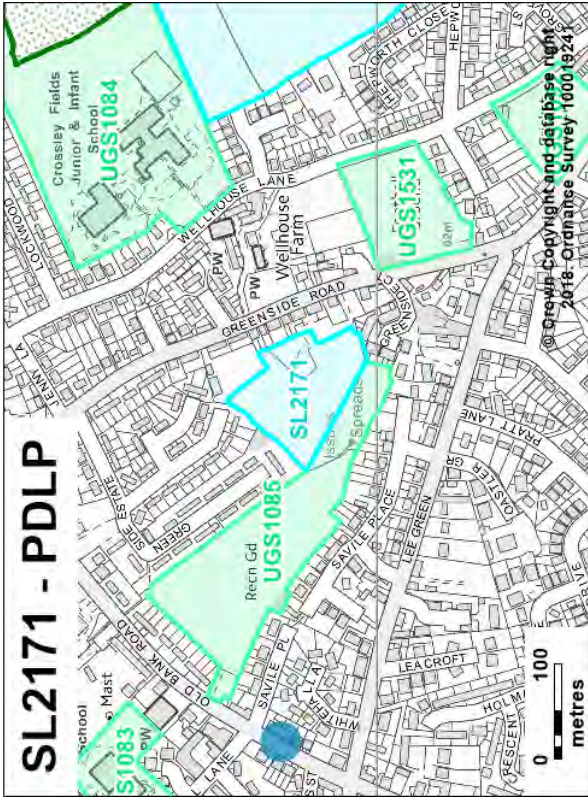
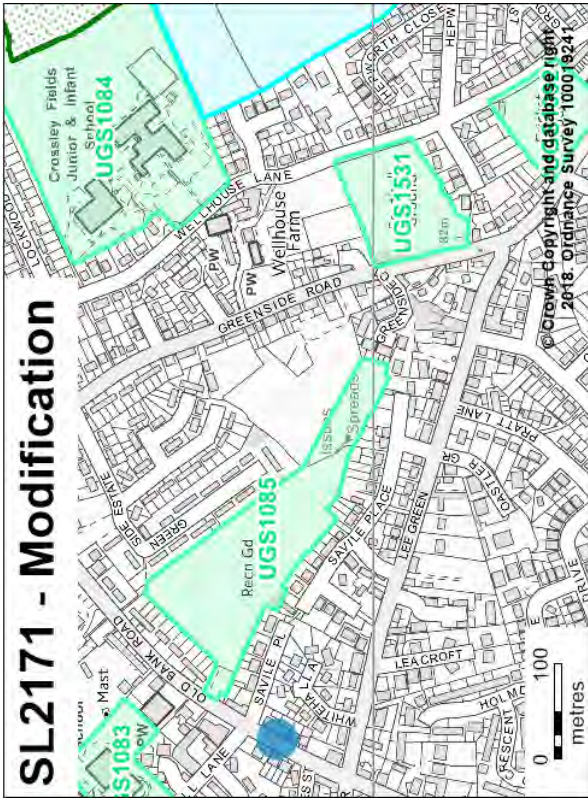
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM384	Page 264	SL2171	Site text box	Delete Safeguarded Land allocation SL2171 and show as unallocated
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>SL2171 - PDLP</p>  </div> <div style="width: 48%;"> <p>SL2171 - Modification</p>  </div> </div>				

Table Modification SD2 - MM385

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM385	Page 264	SL2202	Site text box	Delete Safeguarded Land allocation SL2202 and show as unallocated
<div style="display: flex; justify-content: space-around;"> <div data-bbox="416 1355 1007 2152"> <p>SL2202 - PDLP</p> </div> <div data-bbox="416 360 1007 1158"> <p>SL2202 - Modification</p> </div> </div>				

Table Modification SD2-MM386

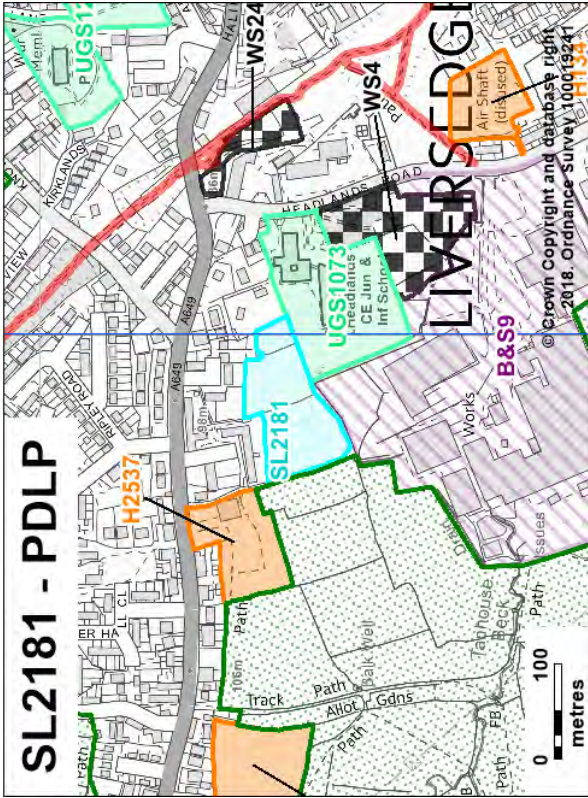
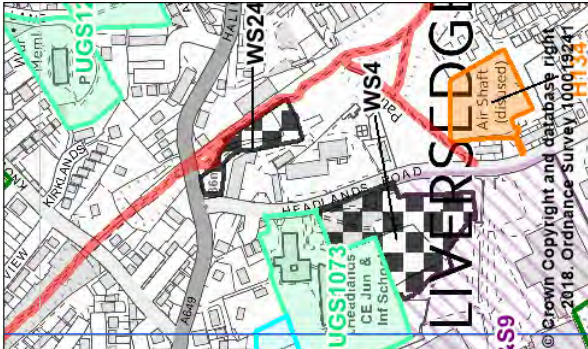
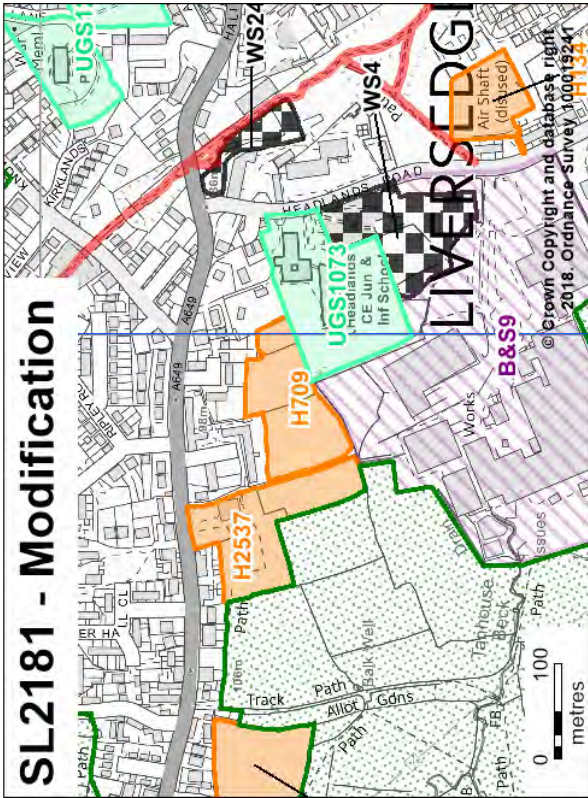
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM386	Page 265	SL2181	Site text box	Delete Safeguarded Land allocation SL2181 and allocate as housing H709
 <p>SL2181 - PDLP</p>				 <p>SL2181 - Modification</p>

Table Modification SD2-MM387

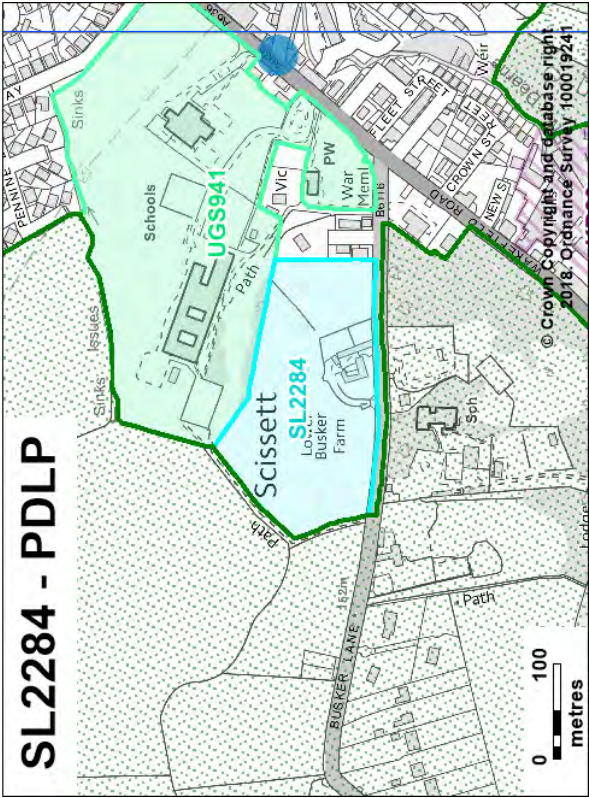
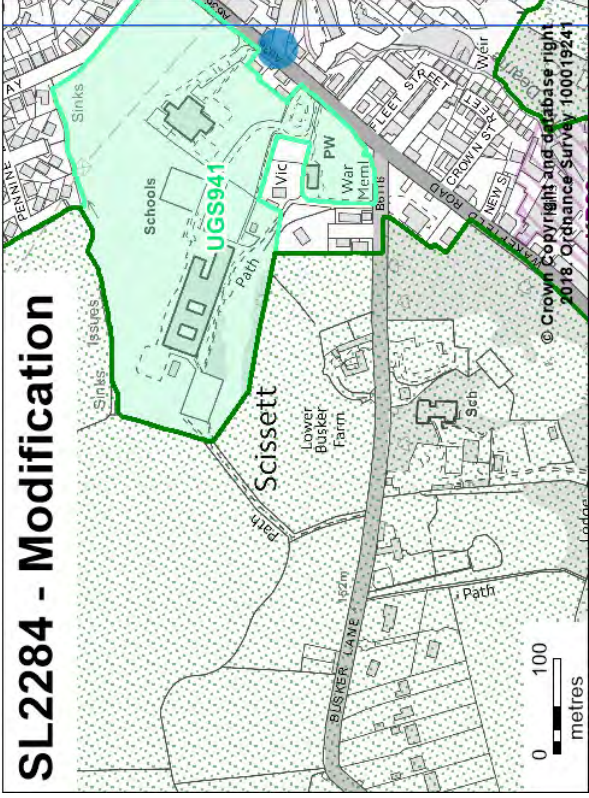
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM387	Page 267	SL2284	Site text box	Delete Safeguarded Land allocation SL2284 and show as Green Belt
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p data-bbox="432 1787 475 2130">SL2284 - PDLP</p>  </div> <div style="width: 48%;"> <p data-bbox="432 656 475 1149">SL2284 - Modification</p>  </div> </div>				

Table Modification SD2-MM388

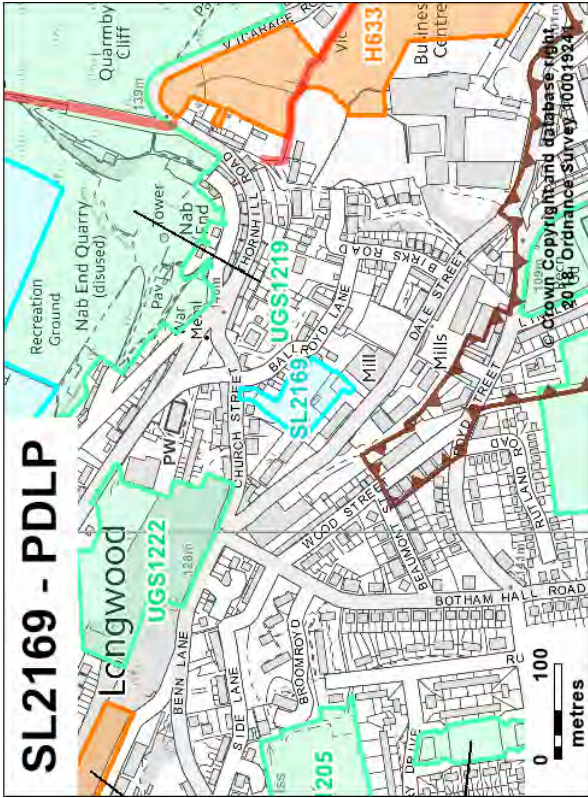
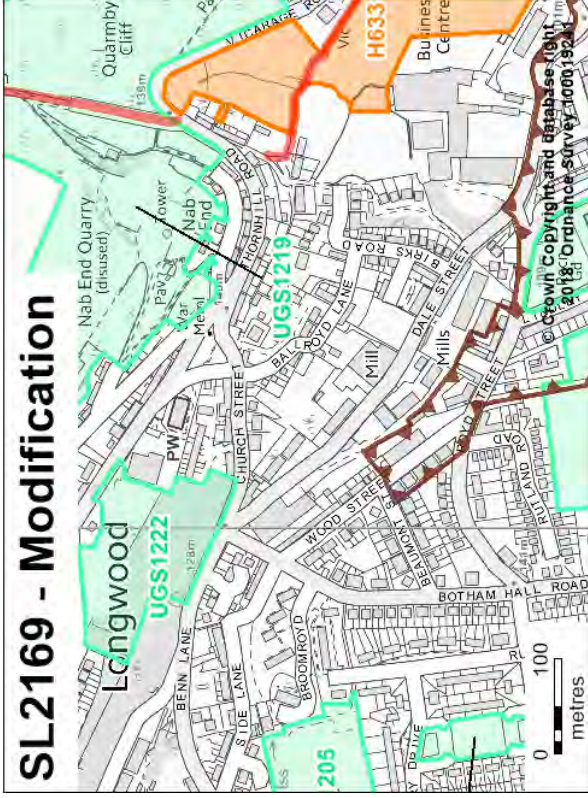
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM388	Page 267	SL2169	Site text box	Delete Safeguarded Land allocation SL2169 and show as unallocated
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;">  <p>SL2169 - PDLP</p> </div> <div style="width: 48%;">  <p>SL2169 - Modification</p> </div> </div>				

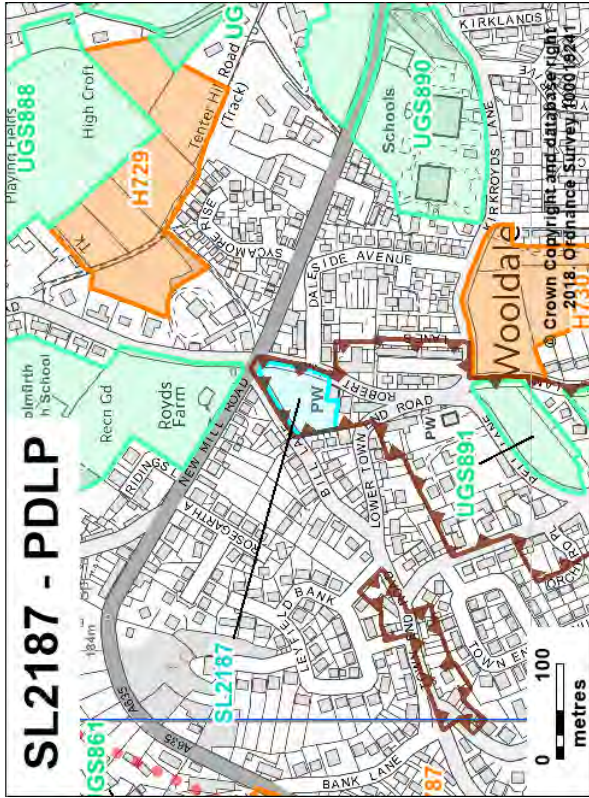
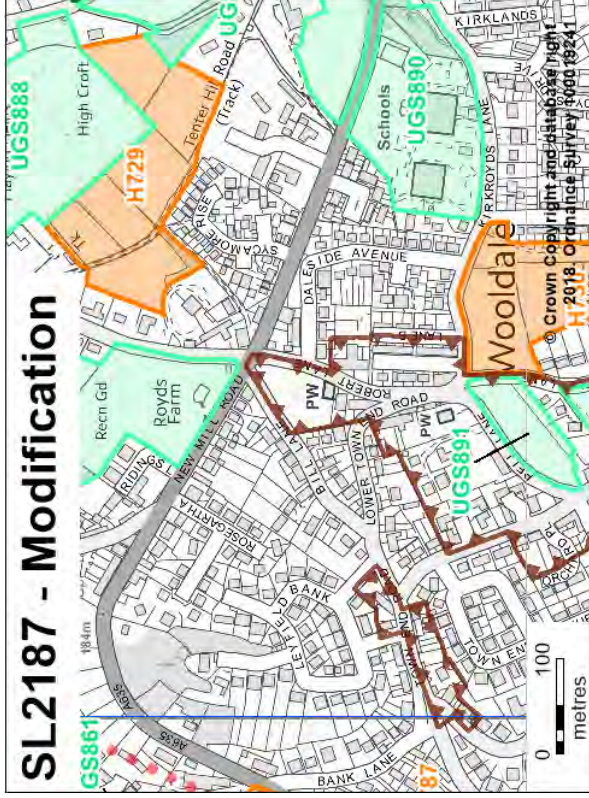
Table Modification SD2-MM389

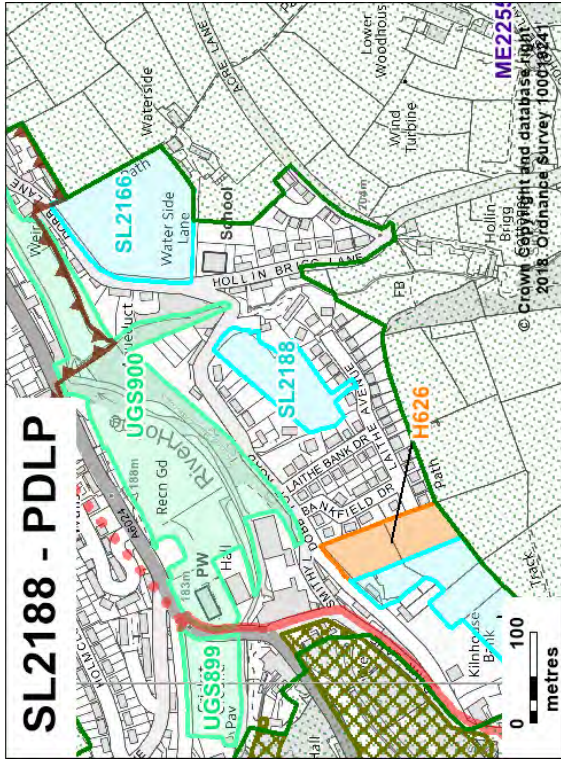
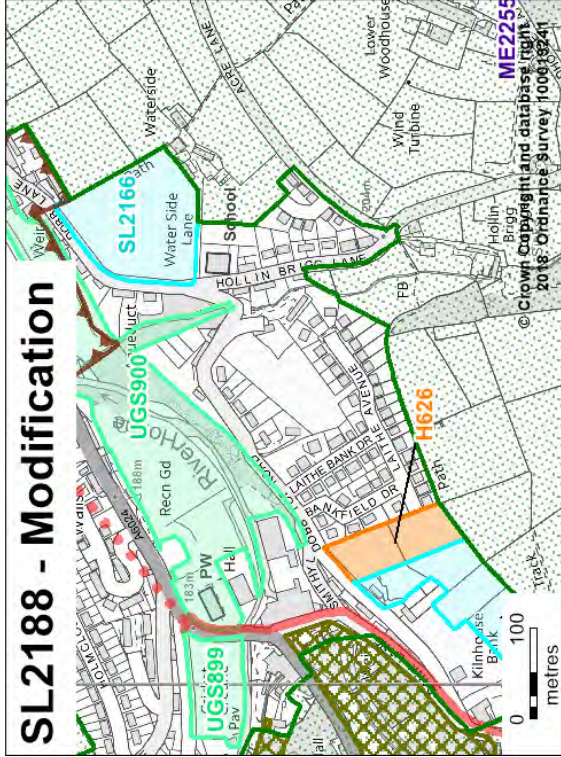
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM389	Page 267	SL3396	Site text box	Delete Safeguarded Land and allocation SL3396 and allocate as housing H119a
<div style="display: flex; justify-content: space-around;"> <div data-bbox="416 1355 1007 2152"> <p>SL3396 - PDLP</p> </div> <div data-bbox="416 362 1007 1158"> <p>SL3396 - Modification</p> </div> </div>				

Table Modification SD2-MM390

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM390	Page 267	SL2186	Site text box	Delete Safeguarded Land allocation SL2186 and allocate as housing H628
<div style="display: flex; justify-content: space-around;"> <div data-bbox="416 1357 1007 2152"> <p>SL2186 - PDLP</p> </div> <div data-bbox="416 365 1007 1158"> <p>SL2186 - Modification</p> </div> </div>				

Table Modification SD2-MM391

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM391	Page 268	SL2187	Site text box	Delete Safeguarded Land allocation SL2187 and show as unallocated
				

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM392	Page 269	SL2188	Site text box	Delete Safeguarded Land allocation SL2188 and show as unallocated
<p>SL2188 - PDLP</p> 		<p>SL2188 - Modification</p> 		

14 Urban Green Space

Table Modification SD2-MM393

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM393	Page 272		Paragraph 14.1	Insert text: "The following sites, as shown on the Policies Map, are designated as Urban Green Space <u>under Policy PLP61</u> . These are areas of green space within or adjoining towns and villages identified as being valuable for sport, recreation, amenity or wildlife. The Urban Green Space policy sets out the protection of these sites from development and local exceptions where development may be permitted."

Table Modification SD2-MM394

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM394	Page 275	UGS1068	Table Batley and Spen Urban Green Space - Size (Ha)	Delete and insert text: " <u>43.79</u> <u>42.19</u> "

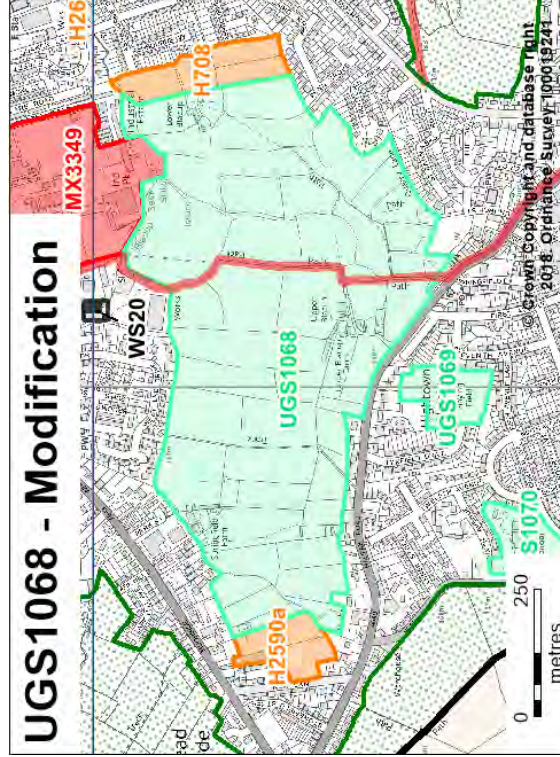
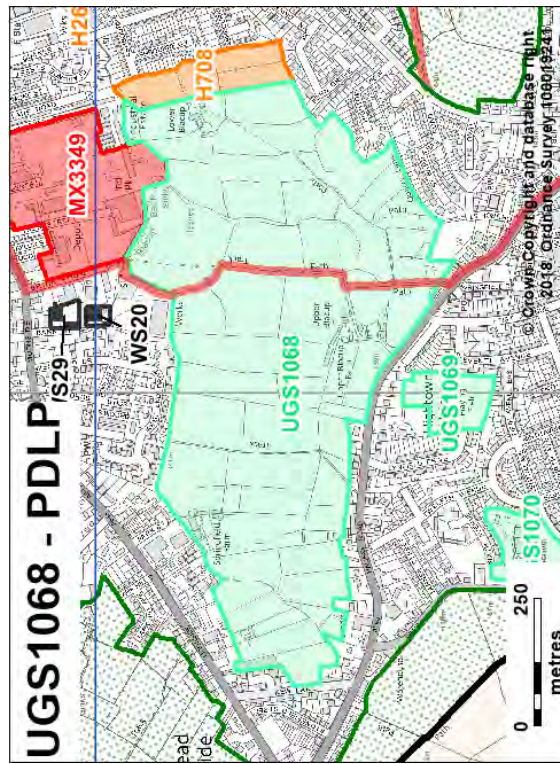


Table Modification SD2-MM395

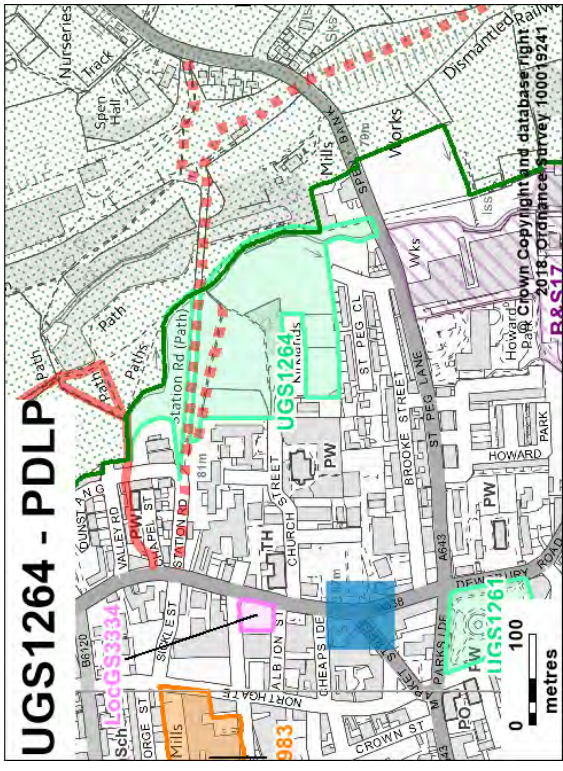
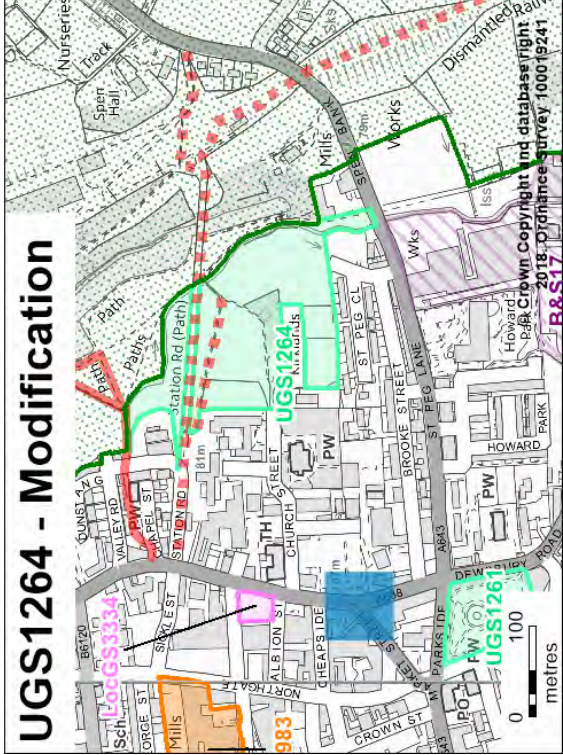
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM395	Page 276	UGS1264	Table Batley and Spen Urban Green Space - Size (Ha)	Delete and insert text: " <u>3.28</u> <u>3.20</u> "
				

Table Modification SD2-MM396

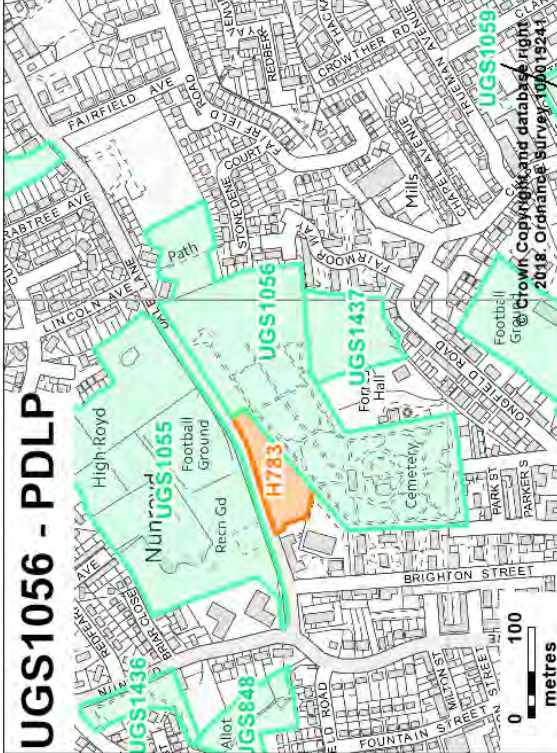
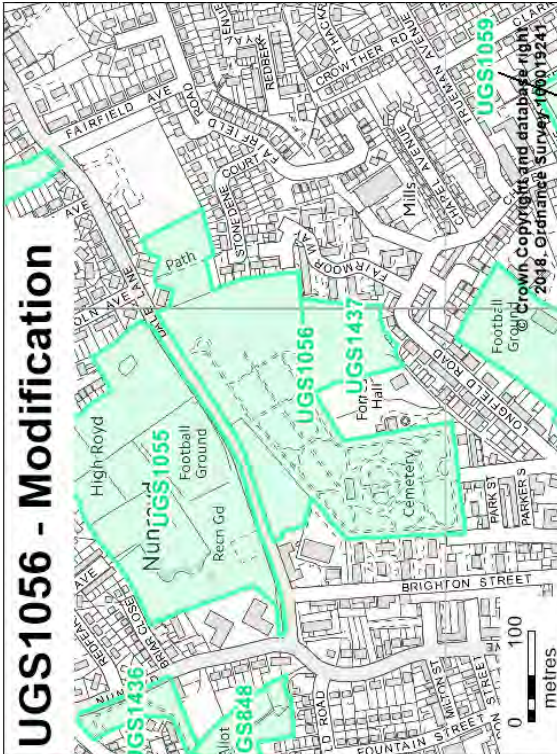
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM396	Page 276	UGS1056	Table Batley and Spen Urban Green Space - Size (Ha)	Delete and insert text: " <u>4.73</u> <u>5.22</u> "
 <p>UGS1056 - PDLP</p>		 <p>UGS1056 - Modification</p>		

Table Modification SD2-MM397

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM397	Page 279	UGS3333	Table Batley and Spen Urban Green Space	Delete Urban Greenspace allocation UGS3333 and show as Green Belt: UGS3333 Liversedge & Gomersal Liversedge Cricket Ground Robert Town Lane Robert Town Liversedge 1-92

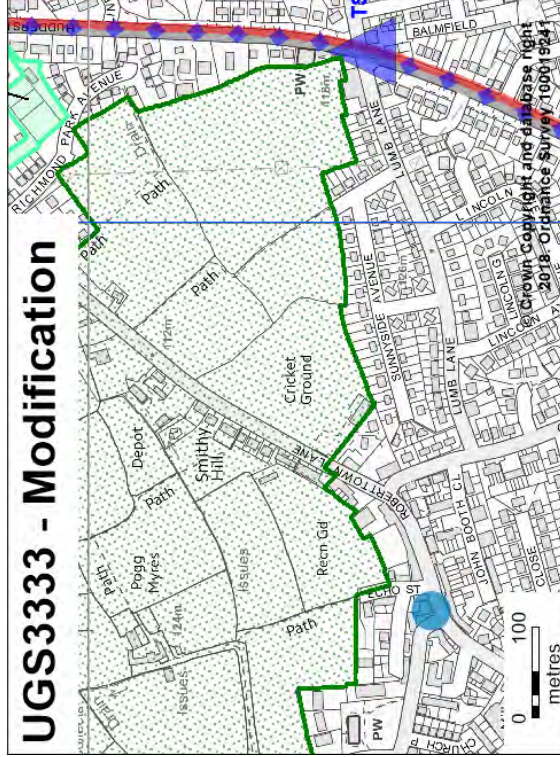
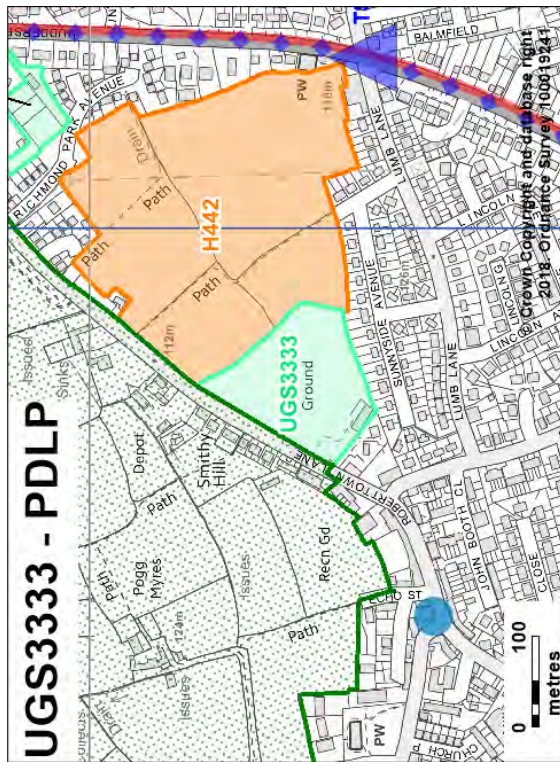


Table Modification SD2-MM398

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM398	Page 281	UGS2151	Table Dewsbury and Mirfield Urban Green Space	Delete Urban Greenspace allocation UGS2151 and allocate as housing H357: UGS2151 Dewsbury East Land off Rumble Road Dewsbury 4.52

Table Modification SD2-MM399

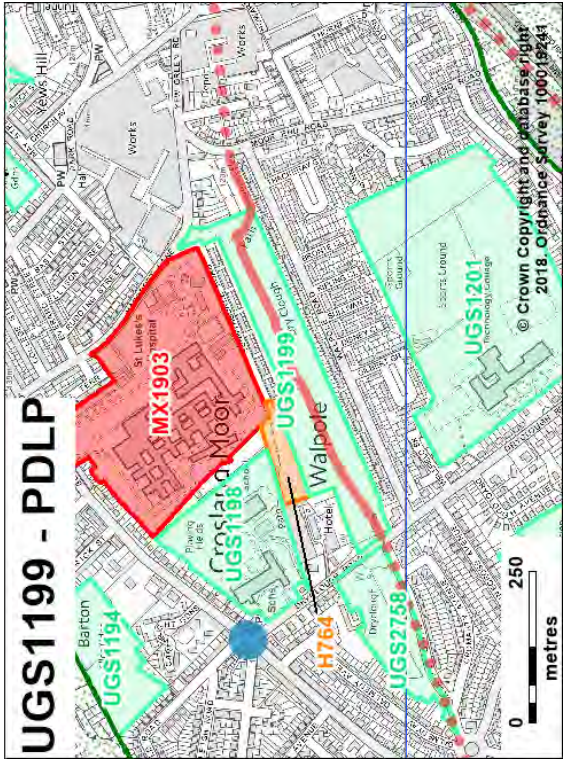
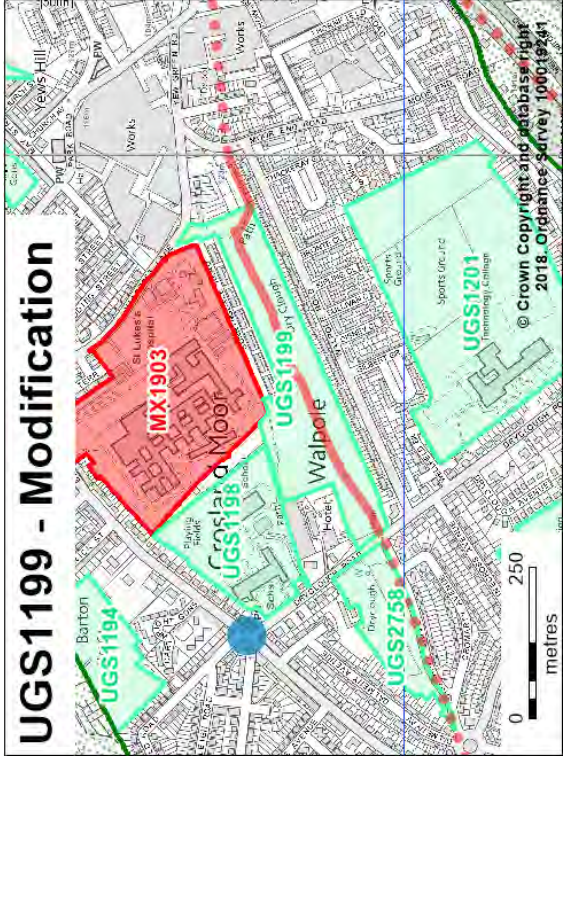
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM399	Page 289	UGS1199	Table Huddersfield Urban Green Space - Size (Ha)	Delete and insert text: " <u>4.77</u> <u>5.39</u> "
				

Table Modification SD2-MM400

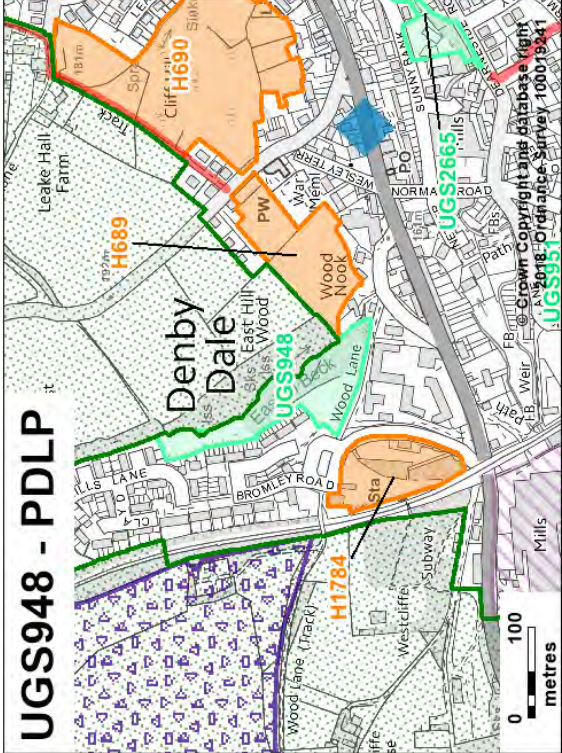
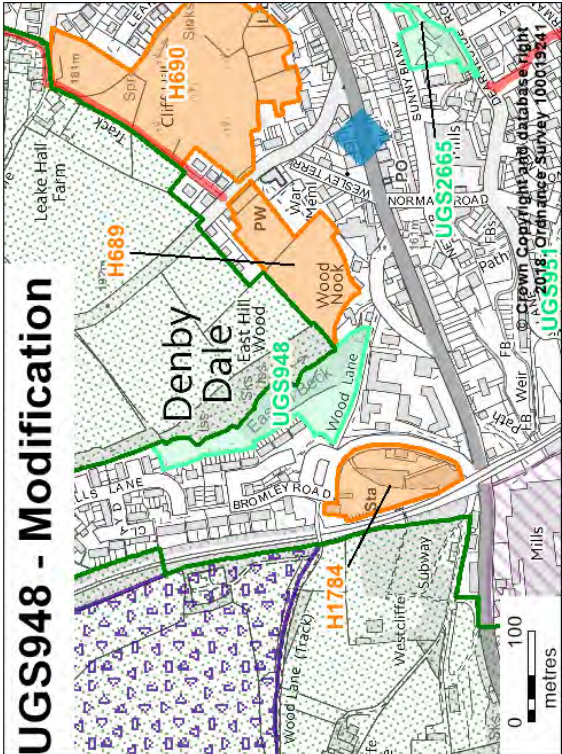
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM400	Page 299	UGS948	Table Kirklees Rural Urban Green Space - Size (Ha)	Delete and insert text: " <u>4.08 1.07</u> "
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;">  <p>UGS948 - PDLP</p> </div> <div style="width: 48%;">  <p>UGS948 - Modification</p> </div> </div>				

Table Modification SD2-MM401

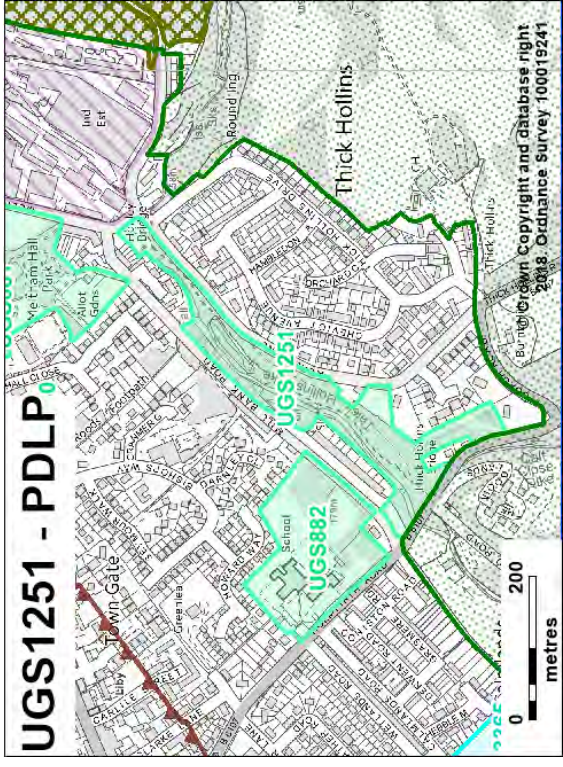
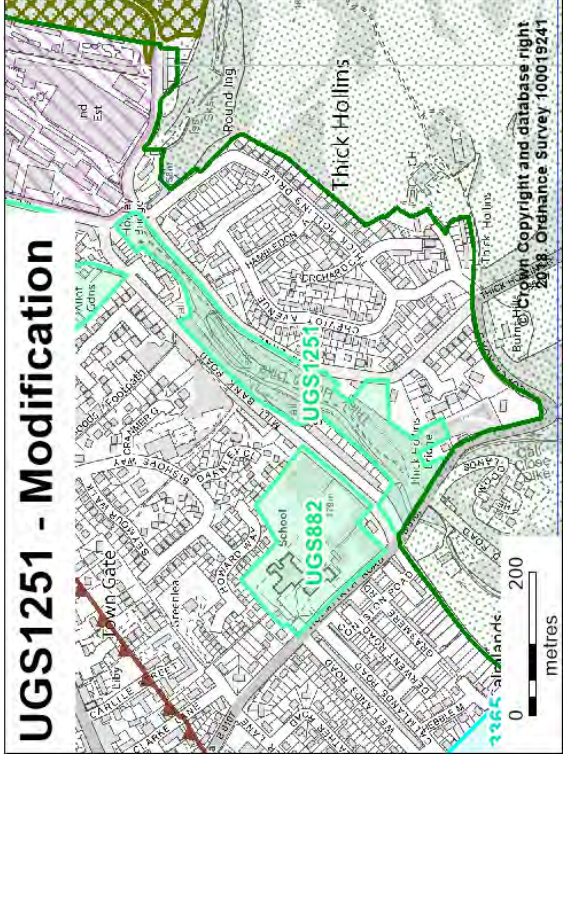
Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM401	Page 301	UGS1251	Table Kirklees Rural Urban Green Space - Size (Ha)	Delete and insert text: " 3.63 <u>3.35</u> "
				

Table Modification SD2-MM402

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM402	Page 302	UGS909	Table Kirklees Rural Urban Green Space	Delete Urban Greenspace allocation UGS909 and allocate as housing H331: UGS909 Holme Valley North Open Land (south site) Lancaster Lane Brockholes Holmfirth 0.47

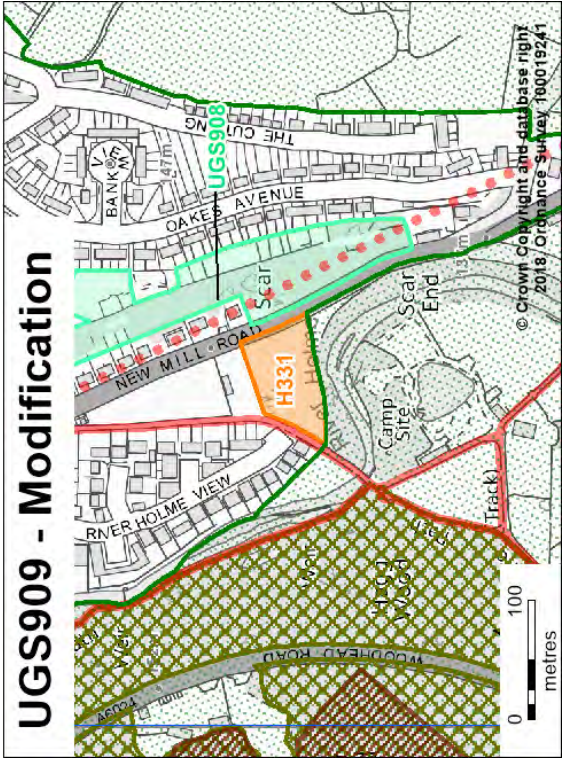
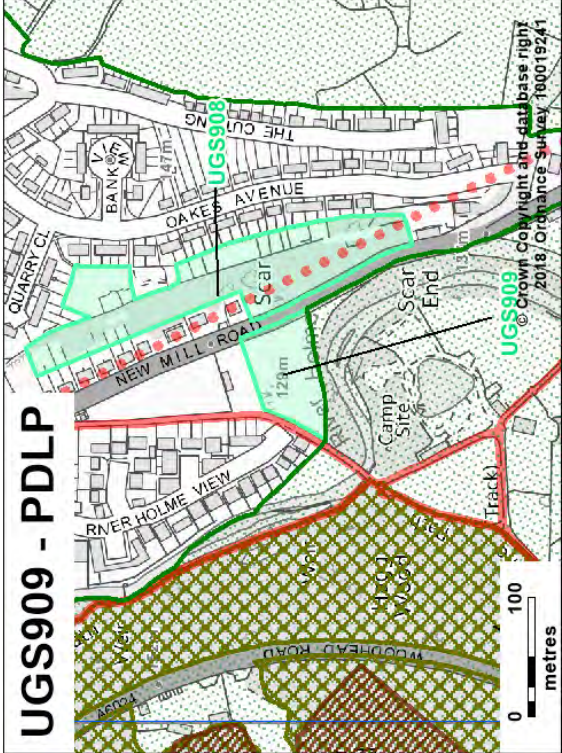
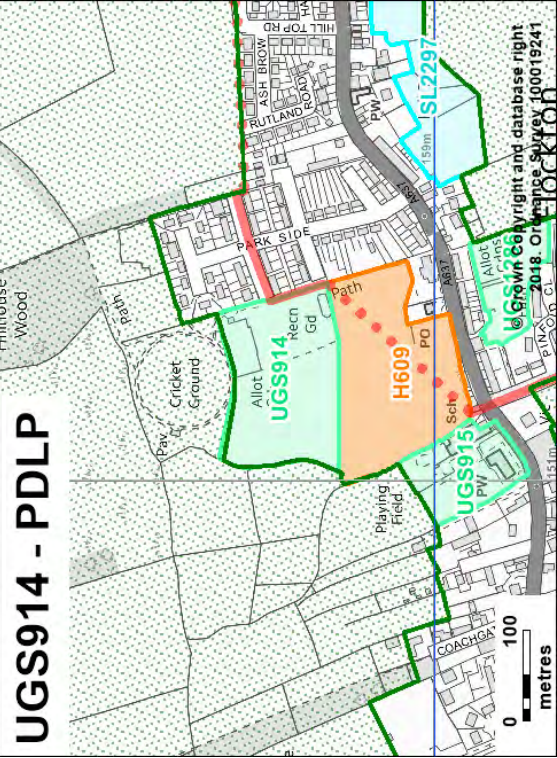
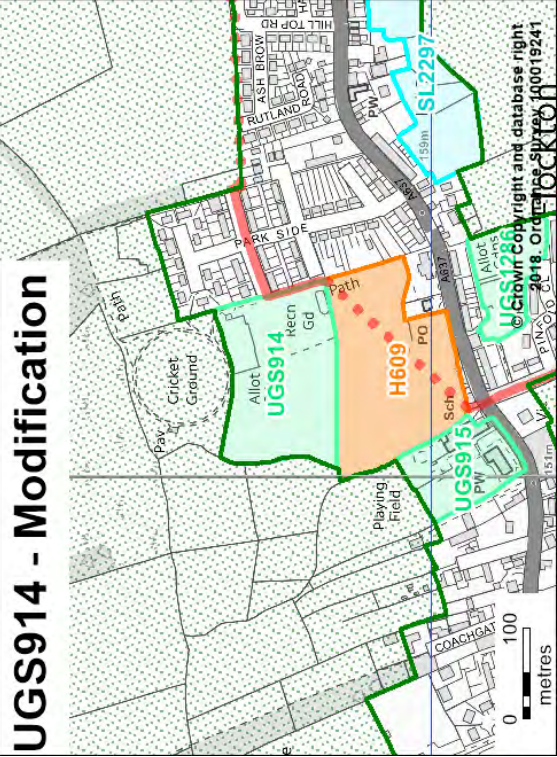


Table Modification SD2-MM403

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM403	Page 302	UGS884	Table Kirklees Rural Urban Green Space - Size (Ha)	Delete and insert text: " 4.13 <u>1.00</u> "

Table Modification SD2-MM404

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM404	Page 304	UGS914	Table Kirklees Rural Urban Green Space - Size (Ha)	Delete and insert text: "2.30- 2.26"
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>UGS914 - PDLP</p>  </div> <div style="width: 48%;"> <p>UGS914 - Modification</p>  </div> </div>				

15 Local Green Space

Table Modification SD2-MM405

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM405	Page 306		Paragraph 15.1	Insert text: "The following sites, as shown on the Policies Map, are designated as Local Green Space, <u>under Policy PLP62</u> . These are green areas that are of particular importance to local communities and which they wish to see have special protection against development."

16 Strategic Green Infrastructure

Table Modification SD2-MM406

Modification Ref	Page	Site	Para/table/box	Tracked change
SD2-MM406	Page 307		New policy box to be inserted after paragraph 16.1	<p>Insert new policy: <u>"Policy PLP 74 Strategic Green Infrastructure</u> <i>The site listed below is allocated as a strategic green infrastructure project. Planning permission will be expected to be granted if proposals accord with the development principles set out in the site box below, relevant development plan policies and as shown on the Policies Map."</i></p>

APPENDIX 2

Kirklees Local Plan

SD1 Kirklees Local Plan Strategy and Policies Additional Modifications



Document Introduction	1
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2 Achieving sustainable development	3
3 Issues facing kirklees	4
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Document Introduction

The council has published 'Additional Modifications' (minor changes) to provide clarification, corrections, minor updates to text and the correction of minor mapping errors to the Policies Map. These changes do not relate to the soundness of the plan.

Modifications are indicated as follows: deletions are shown as a ~~striketrough~~ and new text is shown *underlined* and in italics. Modifications to the Local Plan Policies Map are incorporated into SD2 Kirklees Local Plan Allocations and Designations Main Modifications.

1 Introduction

1 Introduction

No modifications proposed

2 Achieving sustainable development

No modifications proposed

3 Issues facing kirklees

3 Issues facing kirklees

Table Modification SD1-AM1

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM1	Page 17	Paragraph 3.14	Delete text: “Huddersfield and Kirklees Rural (Golne, Holme and Dearne Valleys) are more self-contained than north Kirklees – there is less out commuting and residents spend less in centres outside Kirklees. Huddersfield has a stronger asset base provided by Huddersfield University, several advanced manufacturing companies, growing creative industries and a relatively robust retail offer. In contrast.....”	Correction

4 Vision and Strategic Objectives

Table Modification SD1-AM2

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM2	Page 21	Section 4.2 Vision	<p>Insert text: "The local character and distinctiveness of Kirklees and its places will be retained. The natural, built and historic environment will be maintained and enhanced through high quality, inclusive design and safe environments, opportunities for play and sport, the protection and enhancement of green infrastructure, <i>safeguarding and ensuring a sufficient supply of minerals</i>, minimisation of waste, enhancement of distinctive and contrasting landscapes, tree and woodland protection, opportunities for local food growing, the enhancement of biodiversity and geodiversity and the protection and enhancement of heritage assets."</p>	Clarification

5 Place Shaping

Table Modification SD1-AM3

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM3	Page 33	Place shaping Kirklees Rural	Delete and replace text: “• Holmfirth town centre and District centres at Denby Dale, Kirkburton, Marsden, Meitham, Milnsbridge, Skelmanthorpe and Skelmanthorpe <u>Slaithwaite</u> provide for day-to-day shopping needs, with other local centres”	Correction

6 Delivering Growth and Sustainable Development

Table Modification SD1-AM4

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM4	Page 48	Paragraph 6.37	Delete and insert text: "The proportion of long term vacant dwellings in Kirklees is 1.4% <u>1.2%</u> (2,507 2,217 properties), which is above <u>comparable with</u> the national average (0.9%) and the West Yorkshire <u>Yorkshire and Humber</u> average (1.3% <u>1.1%</u>)."	Update

7 Economy

Table Modification SD1-AM5

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM5	Page 57	Table 4 Employment Land Supply from Priority Employment Areas (PEAs) - Kirklees Rural KR5 Gross Area	Delete and insert text: <u>2-25 2.22</u>	Correction

Table Modification SD1-AM6

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM6	Page 58	Table 4 Employment Land Supply from Priority Employment Areas (PEAs) - Kirklees Rural KR16 Gross Area	Delete and insert text: 6-24 <u>6.73</u>	Correction

8 Homes

Table Modification SD1-AM7

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM7	Page 68	Supporting evidence	Delete text: • Kirklees Strategic Housing Market Assessment (2015)	Clarification

Table Modification SD1-AM8

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM8	Page 70	Paragraph 8.36	Delete and insert text: "Mechanisms to deliver affordable homes include through negotiation with developers on planning applications for housing and provision from grant funding by Registered Providers and other delivery partners using private borrowing and eligible Homes England funding . The council has negotiated and secured affordable housing provision over several years through the planning applications process and the use of its land assets."	Clarification

9 Retailing and Town Centres

Table Modification SD1-AM9

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM9	Page 85	Paragraph 9.29	<p>Insert text: "... Such developments therefore require careful consideration, and the policy seeks to ensure that such uses are appropriate for their location. <u>Mitigation measures that could be used to make development acceptable through applying the appropriate conditions dependant on circumstances of the particular scheme include the following:</u></p> <ul style="list-style-type: none"> • <u>Changes to the design/layout to remove 'pinch points' e.g. narrow passageways and stairwells and ensuring no hiding places are created or are available</u> • <u>Changes to external layout such as gating off alleyways to prevent loitering and inappropriate behaviour</u> • <u>Security standards of doors and windows</u> • <u>Improvement or introduction of exterior lighting</u> • <u>CCTV coverage for inside and to the immediate exterior of the premises</u> • <u>Management of the premises such as opening hours and/or having supervisory staff"</u> 	Clarification

10 Transport

Table Modification SD1-AM10

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM10	Page 100	Paragraph 10.38	Delete and insert text: "The initial results of modelling undertaken as part of the Highways England West Yorkshire Infrastructure Study (WYIS) indicate that capacity improvement measures additional to the schemes included in the RIS will be needed to cater for demand generated by development in Kirklees and neighbouring districts during the period to 2030. The draft version of the WYIS was completed in November 2015 and has been considered by Highways England. <u>WYIS schemes and funding are currently not committed.</u> "	Clarification

Table Modification SD1-AM11

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change

SD1-AM11	Page 100	Paragraph 10.41	<p>Delete and insert text: "Needed by 2022:</p> <ul style="list-style-type: none"> • <u>M1 junction 39: Capacity enhancements including signalisation (within the boundary of Wakefield Metropolitan District).</u> • <u>M1 junction 40: Widen local road network approaches and small improvements to the junction-circulatory. Increased capacity on the local road network approaches (within the boundary of Wakefield Metropolitan District).</u> • <u>M62 junction 24: Three lanes approach from M62 westbound off-slip on A629 provides improved stacking capacity. Increased capacity to address issues on the westbound off-slip (within the boundary of Calderdale Metropolitan District).</u> • <u>M62 junction 25: Signalisation (in conjunction with the Kirklees-Cooper Bridge scheme) to maintain the level of circulatory operation in the context of increased traffic flows. Increased capacity and potential signalisation (within the boundary of Calderdale Metropolitan District).</u> • <u>M62 junction 27: Widen slip roads on west side of junction on approach to the junction to give benefits through improved stacking capacity. Increased capacity on the east and westbound off-slips along with capacity enhancements to the southern dumbbell (within the boundaries of Kirklees and Leeds Metropolitan Districts).</u> • <u>M62 junction 27: Scheme of capacity improvements to the northern dumbbell roundabout.</u> • <u>M62 junction 28: Increased capacity on the circulatory carriageway and potential ramp metering. (Within the boundary of Leeds Metropolitan District)"</u> 	Clarification
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Table Modification SD1-AM12

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
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SD1-AM12	Page 101	Paragraph 10.42	<p>Delete and insert text: "Needed by 2030:</p> <ul style="list-style-type: none"> • M62 junction 24: Provision of two lanes from the A629 around the northern circulatory carriageway to the M62 eastbound including closure of the southern circulatory: <u>Capacity enhancement of the gyratory (within the boundary of Kirklees Metropolitan District).</u> • M62 junction 26: Signalisation of the M606 approach to the roundabout, removal of the segregated free flow left turn and upgrade of the M62 westbound diverge to type D1 ghost island (or D2 parallel diverge) to give enhanced junction operating capacity. <u>Further capacity enhancements may be required to the westbound off slip and to control the flow from the M606 to M62 (this will be dependent on the eventual scope of the RIS1 scheme for Chain Bar) (within the boundary of Kirklees Metropolitan District).</u> • M62 junction 27: New link road from M624 to M62 south, new link road between M62 westbound and M624 westbound slip road and associated segregated left turning lane on A62 south: <u>Significant improvement needed, likely to require a major reconfiguration of the junction (within the boundaries of Kirklees and Leeds Metropolitan Districts).</u> • M62 junction 28: Widening of circulatory carriageway to accommodate two lanes dedicated to the movement from the M62 westbound exit slip to the A650. Ramp metering of eastbound merge. • <u>M62 Junction 30-32: Provision of additional mainline capacity (within the boundaries of Leeds and Wakefield Metropolitan Districts).</u> • M62 junction 29 (Loffhouse): Increase current two lanes eastbound and westbound on M62 through Loffhouse Interchange to three lanes in each direction. This is intended to provide capacity additional to the M1/M62 Loffhouse Interchange RIS scheme. • <u>Loffhouse: Additional capacity eastbound on M62 (within the boundary of Leeds Metropolitan District).</u>" 	Clarification
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Table Modification SD1-AM13

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
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SD1-AM13	Page 101	Paragraph 10.43	<p>Insert text: "In addition the WYIS tests the addition of a new junction at 24a to the network. <i>Junction 24a is a proposed West Yorkshire Plus Transport Fund scheme.</i> Initial modelling results indicate that this would provide strategic and local road network benefits through increased connectivity and network resilience. More detailed feasibility work involving Highways England, Kirklees and the West Yorkshire Combined Authority is ongoing. Modelling of the best performing option is underway with a view to providing a better understanding of the scheme benefits."</p>	Clarification
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Table Modification SD1-AM14

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM14	Page 105	Paragraph 10.67	<p>Insert text: "For larger developments a specific site travel plan will be required to be submitted with planning applications. These travel plans will need to accord with national guidance or that set out by the council in separately issued Supplementary Planning Documents. Travel plans addressing specific local transport issues may also be required for developments at particular locations such as railway stations and entertainment venues. <i>Measures may include providing real time rail/bus timetable information screens, flexible working hours, staff rail/bus discount cards, secure and sheltered cycle parking.</i> All types of travel plans will need to set out the development thresholds at which they become operative, targets to be met, the measures to be implemented, and processes for monitoring, plan revision and enforcement. Sustainable working options should be encouraged and included within travel plans."</p>	Clarification

11 Design

Table Modification SD1-AM15

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM15	Page 118	Supporting Evidence	Insert text: <u>West Yorkshire Low Emissions Strategy 2016 to 2021</u>	Update

12 Climate Change

Table Modification SD1-AM16

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM16	Page 124	Policy PLP27	Delete and insert text: a. no new highly vulnerable or more vulnerable uses will be permitted; b. less vulnerable uses may only be permitted provided that the sequential test has been passed and; e. <u>i.</u> where extensions are linked operationally to an existing business or, <u>ii.</u> where redevelopment of a site provides buildings with the same or a smaller footprint; <u>c</u> <u>d.</u> all proposals will be expected to include flood mitigation measures such as compensatory storage which should be identified and considered through a site specific Flood Risk Assessment; <u>d</u> <u>e:</u> development will not be permitted on any part of the site identified through a site specific Flood Risk Assessment as performing a functional floodplain role.	Correction

Table Modification SD1-AM17

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM17	Page 128	Paragraph 12.37	Delete text: “...Where run-off rates cannot meet or reduce pre-development run-off volumes, the run-off rate should be limited to 5 litres per second per hectare or less depending on local circumstances.”	Clarification

Table Modification SD1-AM18

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change

SD1-AM18	Page 128	Paragraph 12.38	<p>Insert text: "There will be a presumption against the water management solution relying on surface water pumping as mechanical failure could lead to surface water flooding within an area. SuDs should contribute to green infrastructure and provide biodiversity benefits wherever practicable. It is important that inappropriately or poorly managed SuDS do not lead to a reduction in water quality in surrounding areas and watercourses and where possible <i>(in accordance with PLP34)</i>, act to improve water quality in line with the Water Framework Directive and Humber River Basin Management Plan. Consideration should also be given to whether areas of open space within a development proposal can contribute to the sustainable drainage of the site."</p>	Clarification
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13 Natural Environment

Table Modification SD1-AM19

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM19	Page 132	Paragraph 13.1	Insert text: "The National Planning Policy Framework (NPPF) recognises that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils and minimise impacts on biodiversity, providing net gains in biodiversity where possible. Local authorities should also plan positively for networks of biodiversity and green infrastructure. <u>A key objective of the Local Plan is to protect and enhance the integrity of the natural environment in Kirklees and the locally distinctive qualities which contribute to its character, including the district's varied landscapes and natural assets.</u> "	Clarification

Table Modification SD1-AM20

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM20	Page 132	Paragraph 13.6	Insert text: "The policies in the Plan will ensure the protection of the special attributes of these areas <u>and seek to protect the areas of highest biodiversity and the best examples of local habitat types....</u> "	Clarification

Table Modification SD1-AM21

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change

SD1-AM21	Page 135	Paragraph 13.17	Delete and insert text: "...Exceptions may be made where the benefits of the development clearly outweigh the impacts on the features of <i>that support</i> the site's special conservation features value. habitats and prevention, mitigation and compensation (biodiversity offsetting) measures are provided. "	Clarification
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Table Modification SD1-AM22

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM22	Page 135	Paragraph 13.19	Delete and insert text: "All development in Kirklees, as set out in national policy and the policies described in this document, will be expected to avoid <i>not to result in</i> significant loss or harm to biodiversity through protection avoidance, mitigation and compensatory measures and seek opportunities to enhance biodiversity value and ecological links..."	Clarification

Table Modification SD1-AM23

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM23	Page 136	Policy PLP31 (iii)	Insert text: "(iii) the scheme integrates into existing and proposed cycling, <i>bridleway</i> and walking routes, particularly the Core Walking and Cycling Network, by providing new connecting links where opportunities exist;"	Clarification

Table Modification SD1-AM24

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change

SD1-AM24	Page 140	Paragraph 13.36	<p>Delete text: "Trees, woodlands and hedgerows are a valuable part of the environment. Increasing woodland cover and effectively managing existing woodlands would ensure a suitable habitat for woodland species. The total area of woodland within the Kirklees district is 8.2%. This is below the national figure of 10.5%. Kirklees Council owned woodlands (including Kirklees Council managed woods), total over 600ha, representing 18% of the woodlands in the district of 1.5%, which is a notable contribution to wellbeing. Priority will be given to the protection and enhancement of trees and woodland throughout the district. The Council will support the planting of new woodland in urban and rural areas where this is sympathetic to local topography, enhances ecology and contributes positively to landscape character."</p>	Clarification
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14 Historic Environment

No modifications proposed

15 Minerals

Table Modification SD1-AM25

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM25	Page 149	Paragraph 15.4	Insert text: "The council has produced a Minerals Needs Assessment as evidence to support the spatial strategy and policy framework. <u>It should also be noted that Kirklees Council works collaboratively at both the regional and sub-regional level to understand the minerals needs. These are reported and published through the Yorkshire and Humber Aggregate Working Party and the West Yorkshire Local Aggregates Assessment. Both have informed the minerals requirements for Kirklees.</u> "	Clarification

Table Modification SD1-AM26

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM26	Page 151	Policy PLP36	Insert text: " <u>Part 1</u> Proposals for mineral extraction will be considered having regard to:" " <u>Part 2</u> Proposals to explore for, or extract minerals, including from former waste deposits will be permitted provided that they will not:"	Correction

16 Waste

Table Modification SD1-AM27

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM27	Page 162	Paragraph 16.6	<p>Insert text:</p> <p>"In order to inform the council on the requirements of Kirklees with regard to the management of waste within the district over the plan period, a comprehensive Waste Needs Assessment (WNA) has been produced. This examines in detail the current quantities of waste generated and managed in the Kirklees district, the projected growth of waste to be managed over the plan period and the associated future capacity requirements. <u>It should also be noted that Kirklees Council works collaboratively at both the regional and sub-regional level to understand the relevant waste management needs. These are reported and published through the Yorkshire and Humber Waste Position Statement and the West Yorkshire Combined Authority Waste Needs Assessment.</u>"</p>	Clarification

17 Health and Supporting Communities

Table Modification SD1-AM28

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM28	Page 168	New paragraph after paragraph 17.9	Insert text: “ <u>The Localism Act 2011 and the Assets of Community Regulations 2012 provide the legislative framework to give community groups the right to prepare and bid to buy community facilities and buildings if made available for sale. Any applications affecting a community asset will need to have regard to relevant legislation requirements.</u> ”	Clarification

Table Modification SD1-AM29

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM29	Page 173	Policy PLP50 a	Insert text: "a. an assessment clearly shows that the site is no longer required to meet <u>an</u> identified need for open space, sport or recreation use; or "	Correction

18 Environmental Protection

Table Modification SD1-AM30

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM30	Page 177	Paragraph 18.4	Delete and insert text: “A variety of air pollutants can effect <u>affect</u> human health and the environment. In most areas of Europe, these pollutants are principally the products of combustion from space heating, power generation or from motor vehicle traffic. Generally if you are young and in a good state of health, moderate air pollution levels are unlikely to have any serious short term effects. However, elevated levels and/or long term exposure to air pollution can lead to more serious symptoms and conditions affecting human health. This mainly affects the respiratory systems, but can also lead to more serious conditions such as heart disease and cancer. It also causes damage to plants and animals, affecting biodiversity and crop yields.”	Correction

Table Modification SD1-AM31

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM31	Page 177	Paragraph 18.5	Delete and insert text: “ The Air Quality Strategy for England, Scotland, Wales and Northern Ireland sets out UK air quality standards and objectives for reducing levels of health-threatening pollutants, mainly in the form of gases such as carbon monoxide, lead, nitrogen dioxide, sulphur dioxide and fine dust particles. Pollution limits are set out in the form of National Air Quality Objectives (NAQOs). These objectives are written into law by the Environment Act 1995 and accompanying regulations as well as the Policy, Guidance and Strategy documents produced by the Department for Environment, Food and Rural Affairs (DEFRA) as part of the Local Air Quality Management (LAQM) system and National Governments compliance with the European Union Directives on Air Quality. These pollutants are mainly in the form of gases such as nitrogen	Clarification

18 Environmental Protection

				<i>dioxide, carbon monoxide, lead, sulphur dioxide and fine dust particles. These pollutants have the potential to cause ill health and should be managed where possible before they reach the Air Quality Objective limit.</i>	
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Table Modification SD1-AM32

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM32	Page 177	Paragraph 18.7	Insert text: “Part IV of the Environment Act 1995 requires local authorities to review and assess air quality in their area. If any standards are being exceeded or are unlikely to be met by the required date, then that area should be designated an Air Quality Management Area (AQMA) and the local authority must draw up and implement an action plan aimed at reducing levels of the pollutant. In many areas, traffic is likely to be the main contributor to excessive levels of pollution. <u>Action Planning is the crucial part of managing Air Quality in areas which are being affected by poor Air Quality. The WYLES and development control is critical to the measures set out within action plans.</u> ”	Update

Table Modification SD1-AM33

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change

SD1-AM33	Page 177	Paragraph 18.9	<p>Delete and insert text:</p> <p>“Kirklees has an Air Quality Strategy and <u>annually reviews local</u> has reviewed its air quality and <u>publishes a Local Air Quality Management Annual Status Report</u>. To date <u>Kirklees</u> has declared <u>two nine</u> AQMAs, where the levels of pollution are considered to be too high to allow new development unless improvements can be secured. <u>These are as follows:</u></p> <p><u>Bradley Road/Leeds Road, Huddersfield</u> <u>Birchcliffe, Huddersfield</u> <u>Outlane, Huddersfield</u> <u>Edgerton, Huddersfield</u> <u>Huddersfield Town Centre</u> <u>Birkenshaw, Bradford</u> <u>Eastborough, Dewsbury</u> <u>Heckmondwike</u> <u>Scout Hill, Dewsbury</u></p> <p>Action Plans have been implemented, for the two AQMAs in Bradley Road/Leeds Road, Huddersfield and Scout Hill, Dewsbury.”</p>	Update
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Table Modification SD1-AM34

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM34	Page 177	New Paragraph after 18.9	<p>Insert text:</p> <p><u>“The AQMAs within Kirklees are likely to change on an annual basis, as a result of the ongoing monitoring of local air quality. Kirklees Council currently have Action Plans in place, for the two AQMAs in Bradley Road/Leeds Road, Huddersfield and Scout Hill, Dewsbury. New action plans are being prepared for the remaining AQMAs and for the district. Action plans, will be made available on the Kirklees website: https://www.kirklees.gov.uk/beta/crime-and-safety/air-pollution.aspx”</u></p>	Update

Table Modification SD1-AM35

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM35	Page 177	Paragraph 18.10	Delete and insert text: “Eight <u>Two</u> further Areas of Concern have also been identified, where monitoring of levels on nitrogen dioxide appear to indicate that the annual average for nitrogen dioxide may be exceeded. These areas are: <u>as follows: Manchester Road, Thornton Lodge and Lindley Moor Road, Huddersfield, Huddersfield Town Centre Birchencliffe Birkenshaw Edgerton Liversedge Outlane Eastborough”</u>	Update

Table Modification SD1-AM36

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM36	Page 177	Paragraph 18.11	Delete and insert text: “All of these Areas of Concern appear to potentially have elevated levels of nitrogen dioxide from road traffic. Detailed assessments of these areas are <u>currently being carried out. Areas of Concern are monitored annually; the outcomes of this monitoring</u> These assessments could lead to the introduction of further AQMAs. <u>Up to date information on AQMAs can be found on the Kirklees website: https://www.kirklees.gov.uk/beta/crime-and-safety/air-pollution.aspx”</u>	Update

Table Modification SD1-AM37

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change

SD1-AM37	Page 178	Supporting Evidence	Insert text: <u>"Kirklees Air Quality Annual Status Report 2017</u> <u>West Yorkshire Low Emissions Strategy 2016 to 2021</u> <u>Air Quality (England) Regulations 2000</u> <u>Local Air Quality Management Policy Guidance for England (PG16), DEFRA 2016</u> <u>Local Air Quality Management Technical Guidance (TG16), DEFRA 2016"</u>	Update
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19 Green belt and open space

19 Green belt and open space

No modifications proposed

20 Monitoring and implementation

No modifications proposed

Glossary

Table Modification SD1-AM38

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM38	Page 205	Glossary - Development	Delete text: "Development This includes adopted Local Plans, neighbourhood plans and the London Plan; and is defined in section 38 of the Planning and Compulsory Purchase Act 2004. (Regional strategies remain part of the development plan until they are abolished by Order using powers taken in the Localism Act. It is the government's clear policy intention to revoke the regional strategies outside of London, subject to the outcome of the environmental assessments that are currently being undertaken.)"	Correction

Table Modification SD1-AM39

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM39	Page 205	Glossary - Economic Development	Delete text: "Economic development Development, including those within the B-use Classes, public and community uses and the main town centre uses (but excluding housing development)."	Correction

Appendix 1 Replaced Unitary Development Plan Policies

Table Modification SD1-AM40

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM40	Page 209	Appendix 1 Title	Insert text: "Replaced Unitary Development <u>Plan</u> Policies"	Correction

Table Modification SD1-AM41

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM41	Page 209	Appendix 1 Paragraph 1.2	Insert text: "The following table sets out the Kirklees Unitary Development Plan (UDP) saved policies proposed to be superseded by the Local Plan. <u>The most relevant local plan policies have been assigned to each UDP policy, where applicable, however this is not an exhaustive list of policies that would apply when determining a planning application.</u> "	Clarification

Appendix 2 Monitoring Framework

Table Modification SD1-AM42

Modification Ref	Page	Policy/Para /Table/Box	Tracked change	Reason for Change
SD1-AM42	Page 224	Appendix 2 Monitoring Framework Policy PLP46b - Indicator name	Delete and insert text: "Percentage of Local Authority collective <u>collected</u> waste (LACW) landfilled"	Correction

APPENDIX 3

Kirklees Local Plan

SD2 Kirklees Local Plan Allocations and Designations Additional Modifications



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Document Introduction

The council has published ‘Additional Modifications’ (minor changes) to provide clarification, corrections, minor updates to text and the correction of minor mapping errors to the Policies Map. These changes do not relate to the soundness of the plan.

Modifications are indicated as follows: deletions are shown as a ~~strike through~~ and new text is shown underlined and in italics. Modifications to the Local Plan Policies Map are incorporated into SD2 Kirklees Local Plan Allocations and Designations Main Modifications.

Map legend – The following legend has been provided to assist with the interpretation of the indicative policies maps included in the schedule for those modifications that resulted in a change to the policies map.

<p>Green Belt and Green Infrastructure</p> <ul style="list-style-type: none">  Peak District National Park  Green Belt  Strategic Green Infrastructure (SGI)  Urban Green Space (UGS)  Local Green Space (LocGS)  Add to Green Belt (AGB) <p>Housing, Employment & Other Significant Development</p> <ul style="list-style-type: none">  Employment (E)  Priority Employment Areas (B&S, D&M, HUD, KR)  Housing (H)  Mixed Use (MX)  Land at Storthes Hall (MDGB)  Gypsies And Travellers & Travelling Showpeople (GTTS)  Safeguarded Land (SL) <p>Heritage Assets</p> <ul style="list-style-type: none">  Archaeological Sites (Class 2) (AS)  Conservation Area  Registered Battlefield (RB)  Registered Parks and Gardens (RPG)  Scheduled Monuments (SM) <p>Minerals & Waste</p> <ul style="list-style-type: none">  Minerals Areas of Search (ME)  Minerals Extraction Sites (ME)  Minerals Preferred Areas (ME)  Minerals Infrastructure (MI)  Waste Site (W)  Waste Site (Safeguarded) (WS) 	<p>Natural Environment</p> <ul style="list-style-type: none">  Special Protection Area  Special Area of Conservation  Site of Special Scientific Interest  Local Wildlife Sites (LWS)  Local Geological Sites (LGS)  Dark Peak Nature Improvement Area <p>Shopping Centres</p> <ul style="list-style-type: none">  Principal Town Centre  Town Centre  District Centre  Local Centre <p>Transport</p> <ul style="list-style-type: none">  Highways England Transport Scheme <p>Core Walking, Cycling and Riding Network</p> <ul style="list-style-type: none">  Existing  Proposed  Indicative <p>Transport Scheme (TS)</p> <ul style="list-style-type: none">  Junction improvement  Committed transport improvement scheme  TSS - Mirfield to Dewsbury to Leeds & North Kirklees Growth Zone <p><small>Sites references relate to allocations and policies in: Publication Draft Local Plan - Allocations & Designations and Strategy & Policies</small></p>
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1 Introduction

1 Introduction

No modifications proposed

2 Employment Allocations

Table Modification SD2-AM1

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM1	Page 7	E1837	Ownership	Insert text: " <u>Part private and part Council</u> "	Correction

Table Modification SD2-AM2

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM2	Page 8	E1899	Ownership	Insert text: " <u>Part private and part Council</u> "	Correction

Table Modification SD2-AM3

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM3	Page 9	E1879	Ownership	Insert text: " <u>Part private and part council</u> "	Correction

Table Modification SD2-AM4

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM4	Page 10	E1831	Constraints	Insert text:"• Potential for noise impact on <u>adjacent cemetery</u> • Potential for odour impact on <u>adjacent cemetery</u> • Air quality issues - <u>Site is adjacent to the M62</u> "	Clarification

2 Employment Allocations

Table Modification SD2-AM5

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM5	Page 12	E1876	Ownership	Insert text: " <u>Part private and part Council</u> "	Correction

Table Modification SD2-AM6

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM6	Page 16	E1829	Constraints	Delete and insert text: " Part <u>All</u> of <u>the</u> site <u>is</u> within Flood Zone 3" " Part of s Site lies <u>adjacent to</u> within a UK BAP Priority habitat"	Correction

3 Priority Employment Areas

Table Modification SD2-AM7

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM7	Page 20		Paragraph 3.1	Insert text: "The following sites, as shown on the Policies Map, are designated as Priority Employment Areas (PEAs). <u>under Policy PLP8</u> . The following chapter provides details of land identified as being within PEAs. These areas have been set out to meet the requirements of the Safeguarding Employment Land and Premises policy."	Clarification

4.1 Huddersfield Sub-Area

Table Modification SD2-AM8

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM8	Page 25	H31	Constraints	Insert text: "• Noise source near site - <u>Noise from road traffic on Penistone Road</u> "	Clarification

Table Modification SD2-AM9

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM9	Page 26	H2684a	Constraints	Insert text: "• Noise source near site - <u>Noise from road traffic on Penistone Road</u> "	Clarification

Table Modification SD2-AM10

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM10	Page 28	H616	Constraints	Insert text: "• Noise source near site - <u>Noise from road traffic on Wakefield Road and activities at Morrison's Supermarket</u> "	Clarification

Table Modification SD2-AM11

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

4 Housing Allocations

SD2-AM11	Page 28	H684	Constraints	Insert text: "• Noise source near site - <u>Noise from road traffic on Wakefield Road</u> "	Clarification
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Table Modification SD2-AM12

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM12	Page 30	H1679	Constraints	Insert text: "• Noise source near site - <u>Noise from road traffic on Penistone Road, Southfield Road and Fenay Lane</u> "	Clarification

Table Modification SD2-AM13

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM13	Page 31	H87	Constraints	Insert text: "• Noise source near site - <u>Noise from road and rail traffic</u> "	Clarification

Table Modification SD2-AM14

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM14	Page 32	H519	Constraints	Insert text: "• Noise source near site - <u>Noise from road traffic on M62 and Clough Lane</u> "	Clarification

Table Modification SD2-AM15

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

SD2-AM15	Page 35	H1647	Constraints	Insert text: <ul style="list-style-type: none"> Noise source near site - <u>Noise from road traffic on Bradford Road and Alder Street and depots</u> Odour source near site - <u>Odour from restaurant/takeaways on Bradford Road</u> 	Clarification
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Table Modification SD2-AM16

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM16	Page 36	H1657	Constraints	Insert text: <ul style="list-style-type: none"> Noise source near site - <u>Noise from road traffic on Deighton Road and adjacent school and playing fields</u> Site affected by hazardous installations - <u>Located in Middle/Outer Zone for Syngenta</u> 	Clarification

Table Modification SD2-AM17

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM17	Page 39	H102	Constraints	Insert text: <ul style="list-style-type: none"> Noise source near site - <u>Road traffic noise and noise from Sunnyside Farm</u> Odour source close to the site - <u>Odour from Sunnyside Farm</u> 	Clarification

Table Modification SD2-AM18

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

4 Housing Allocations

SD2-AM18	Page 40	H481	Constraints	Insert text: "• Noise and dust source near site - <u>Noise and dust from Johnson Wellfield Quarry</u> "	Clarification
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Table Modification SD2-AM19

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM19	Page 41	H660	Constraints	Insert text: • Noise source near site - <u>Road traffic noise and noise from Sunnyside Farm</u> • Odour source near site - <u>Odour from Sunnyside Farm</u>	Clarification

Table Modification SD2-AM20

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM20	Page 43	H1783	Constraints	Insert text: "• Noise source near site - <u>Noise from Johnson Wellfield Quarry</u> "	Clarification

Table Modification SD2-AM21

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM21	Page 43	H216	Constraints	Insert text: "• Site affected by hazardous installations - <u>Syngenta Ltd</u> "	Clarification

Table Modification SD2-AM22

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

SD2-AM22	Page 44	H439	Constraints	Insert text: "• Site affected by hazardous installations - <u>Syngenta Ltd</u> "	Clarification
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Table Modification SD2-AM23

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM23	Page 46	H215	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise</u> "	Clarification

Table Modification SD2-AM24

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM24	Page 46	H121	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise from New Hey Road</u> "	Clarification

Table Modification SD2-AM25

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM25	Page 47	H201	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise</u> "	Clarification

Table Modification SD2-AM26

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM26	Page 48	H202	Constraints	Insert text: • Noise source near site - <u>Road traffic noise from New Hey Road</u>	Clarification

4 Housing Allocations

Table Modification SD2-AM27

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM27	Page 50	H706	Constraints	Insert text: • Noise source near site - <u>Road traffic noise</u>	Clarification

Table Modification SD2-AM28

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM28	Page 51	H790	Ownership	Insert text: " <u>Part private and part Council</u> "	Correction

Table Modification SD2-AM29

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM29	Page 52	H1694	Ownership	Insert text: " <u>Part private and part Council</u> "	Correction

Table Modification SD2-AM30

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM30	Page 54	H1935	Constraints	Insert text: ". Noise source near site - <u>Road traffic noise from Ring Road</u> "	Clarification

Table Modification SD2-AM31

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

SD2-AM31	Page 55	H3350	Constraints	Insert text: "• Site affected by hazardous installations - <u>Syngenta Ltd</u> "	Clarification
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Table Modification SD2-AM32

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM32	Page 56	H2594a	Constraints	Insert text: "• Noise source near site - <u>Industrial units</u> "	Clarification

4.2 Dewsbury and Mirfield Sub-Area

Table Modification SD2-AM33

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM33	Page 59	H367	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise and various industrial units</u> "	Clarification

Table Modification SD2-AM34

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM34	Page 60	H559	Constraints	Insert text: "• Noise source near site - <u>Noise from road traffic and adjacent rugby ground</u> "	Clarification

Table Modification SD2-AM35

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM35	Page 60	H813	Ownership	Delete and insert text: "Gounett <u>Private</u> "	Correction

Table Modification SD2-AM36

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM36	Page 61	H1937	Constraints	Insert text: "• Noise source near site - <u>Noise from road traffic and various industrial units</u> "	Clarification

Table Modification SD2-AM37

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM37	Page 62	H778	Constraints	Insert text: ". Noise source near site - <u>Noise from road traffic</u> "	Clarification

Table Modification SD2-AM38

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM38	Page 65	H192	Constraints	Insert text: ". Noise source near site - <u>Various industrial sources</u> "	Clarification

Table Modification SD2-AM39

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM39	Page 66	H269	Constraints	Insert text: ". Noise source near site - <u>Noise from road and rail traffic</u> "	Clarification

Table Modification SD2-AM40

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM40	Page 67	H661a	Constraints	Insert text: ". Noise source near site - <u>Noise from road traffic</u> "	Clarification

4 Housing Allocations

Table Modification SD2-AM41

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM41	Page 69	H2646	Constraints	Insert text: ". Noise source near site - <u>Noise from rail traffic</u> "	Clarification

Table Modification SD2-AM42

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM42	Page 70	H46	Constraints	Insert text: ". Noise source near site - <u>Noise from various industrial sources and rugby ground</u> "	Clarification

Table Modification SD2-AM43

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM43	Page 72	H2089	Constraints	Insert text: ". Noise source near site - <u>Noise from rail and road and various industrial sources</u> "	Clarification

Table Modification SD2-AM44

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM44	Page 74	H197	Constraints	Insert text: ". Noise source near site - <u>Noise from road traffic</u> "	Clarification

4.3 Batley and Spen Sub-Area

Table Modification SD2-AM45

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM45	Page 77	H758	Constraints	Insert text: • Noise sources near site - <u>Grange Road Industrial Estate and Soothill School</u> "	Clarification

Table Modification SD2-AM46

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM46	Page 77	H1938	Constraints	Insert text: "Noise sources near site - <u>George Street Mills, Valley Mills and New Street Mills Complex, Fox's Biscuit</u> "	Clarification

Table Modification SD2-AM47

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM47	Page 80	H760	Ownership	Delete and insert text: ". <u>Private Council</u> "	Correction

Table Modification SD2-AM48

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

4 Housing Allocations

SD2-AM48	Page 80	H760	Constraints	Insert text: "• Noise sources near site - <u>Industrial Estate close by off Reservoir Road, road traffic noise from Halifax Road</u> "	Clarification
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Table Modification SD2-AM49

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM49	Page 81	H1702	Constraints	Insert text: "• Noise sources near site - <u>road traffic noise from Mayman Lane, mill building nearby</u> "	Clarification

Table Modification SD2-AM50

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM50	Page 82	H11	Constraints	Insert text: "• Noise sources near site - <u>M62 motorway and adjacent garage</u> "	Clarification

Table Modification SD2-AM51

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM51	Page 83	H138	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise from Huddersfield Road, Park Mills, factory on Bradford Road, works on Smithies Moor Lane</u> • Odour source near site - <u>Industry nearby, Park Mills, factory on Bradford Road, works on Smithies Moor Lane</u> "	Clarification

Table Modification SD2-AM52

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM52	Page 84	H172	Constraints	Insert text: "• Noise sources near site" - <u>M62 motorway and road traffic noise from Bradford Road and Whitehall Road East</u> "	Clarification

Table Modification SD2-AM53

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM53	Page 85	H173	Constraints	Insert text: "• Noise source near site - <u>Industry noise</u> "	Clarification

Table Modification SD2-AM54

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM54	Page 85	H193	Constraints	Insert text: "• Noise sources near site - <u>M62 motorway and Oxford Road TPO's on site</u> "	Clarification

Table Modification SD2-AM55

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM55	Page 86	H224	Constraints	Insert text: "• Noise sources near site - <u>Road traffic noise from Huddersfield Road, Park Mills, factory on Bradford Road, works on Smithies Moor Lane</u> "	Clarification

4 Housing Allocations

Table Modification SD2-AM56

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM56	Page 87	H601	Constraints	Insert text: ". Noise sources near site - <u>M62 motorway and Oxford Road</u> , <u>adjacent industry</u> "	Clarification

Table Modification SD2-AM57

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM57	Page 88	H761	Ownership	Delete and insert text: " Private <u>Council</u> "	Correction

Table Modification SD2-AM58

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM58	Page 89	H796	Ownership	Delete and insert text: ". <u>Part private and part Council</u> "	Correction

Table Modification SD2-AM59

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM59	Page 89	H218	Constraints	Insert text: • Noise source near site - <u>M62 motorway</u> • Odour source near site - <u>farms along Whitehall Road</u>	Clarification

Table Modification SD2-AM60

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM60	Page 91	H69	Constraints	Insert text: • Noise sources near site - <u>industrial estates on Hunsworth Lane and Riverside Drive and M62 motorway</u>	Clarification

Table Modification SD2-AM61

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM61	Page 92	H508	Site address	Delete and insert text: Land to the west of Whitechapel Middle <u>Primary</u> School, Whitechapel Road, Cleckheaton	Correction

Table Modification SD2-AM62

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM62	Page 92	H508	Constraints	Insert text: "• Noise source near site - <u>M62 motorway</u> "	Clarification

Table Modification SD2-AM63

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM63	Page 94	H640	Constraints	Insert text: "• Noise sources near site - <u>Industrial and commercial premises on Westgate, Wood St, Stone St, Iron Street, Brick Street</u> "	Clarification

4 Housing Allocations

Table Modification SD2-AM64

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM64	Page 94	H708	Constraints	Insert text: "• Noise sources near site - <u>Industrial Estate, Quarry Road and Quaker Lane</u> • Odour sources near the site - <u>Industrial Estate, Quarry Road and Quaker Lane and local farm, Lower Blacup"</u>	Clarification

Table Modification SD2-AM65

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM65	Page 96	H1704	Constraints	Insert text: "• Noise sources near site - <u>M62 motorway"</u>	Clarification

Table Modification SD2-AM66

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM66	Page 97	H1983	Constraints	Insert text: "• Noise source near site - <u>Tesco Store/Carpark, Whitcliffe Road and Bradford Road."</u>	Clarification

Table Modification SD2-AM67

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM67	Page 97	H2066	Constraints	Insert text: "• Noise sources near site - <u>M62 motorway"</u>	Clarification

Table Modification SD2-AM68

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM68	Page 98	H2645	Constraints	Insert text: "• Noise source near site - <u>industry noise</u> "	Clarification

Table Modification SD2-AM69

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM69	Page 98	H145	Constraints	Insert text: "• Noise source near site - <u>industrial premises on Wormald Street and Union Street</u> "	Clarification

Table Modification SD2-AM70

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM70	Page 100	H1772	Constraints	Insert text: • Noise source near site - <u>Westgate and Flush Mills and industrial premises on Wormald Street and Union Street</u>	Clarification

Table Modification SD2-AM71

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM71	Page 101	H134	Constraints	Insert text: "• Noise source near site - <u>industrial premises on Headlands Road</u> " • Odour source near site - <u>industrial premises on Headlands Road</u> "	Clarification

4 Housing Allocations

Table Modification SD2-AM72

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM72	Page 101	H198	Ownership	Insert text: " <u>Part</u> private <u>and part Council</u> "	Correction

Table Modification SD2-AM73

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM73	Page 102	H242	Constraints	Insert text: ". Noise source near site - <u>adjacent school</u> "	Clarification

Table Modification SD2-AM74

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM74	Page 106	H2537	Site no	Delete and insert text: " <u>H2537 H2537a</u> "	Clarification

Table Modification SD2-AM75

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM75	Page 107	H2667	Constraints	Delete and insert text: ". Site is <u>within</u> <u>near</u> an Air Quality management Area • Site is <u>partly</u> within a conservation area"	Clarification

4.4 Kirklees Rural Sub-Area

Table Modification SD2-AM76

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM76	Page 109	H221	Constraints	Insert text: "• Noise source near site - <u>Commercial Mills/Upper Mill and railway noise</u> "	Clarification

Table Modification SD2-AM77

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM77	Page 113	H1776	Constraints	Insert text: "• Noise source near site - <u>Noise from sports facilities</u> "	Clarification

Table Modification SD2-AM78

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM78	Page 113	H2649	Constraints	Insert text: • Noise source near site - <u>Noise from sports facilities</u>	Clarification

Table Modification SD2-AM79

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM79	Page 114	H2652	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise and licensed premises</u> "	Clarification

4 Housing Allocations

Table Modification SD2-AM80

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM80	Page 115	H17	Constraints	Insert text: "• Noise source near site - <u>Noise from industrial units</u> "	Clarification

Table Modification SD2-AM81

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM81	Page 119	H454a	Constraints	Insert text: "• Noise source near site - <u>Road noise and noise from cricket ground</u> "	Clarification

Table Modification SD2-AM82

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM82	Page 124	H1784	Constraints	Insert text: "• Noise source near site - <u>Noise from railway and industrial estate</u> "	Clarification

Table Modification SD2-AM83

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM83	Page 126	H174	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise and noise from industrial estate</u> "	Clarification

Table Modification SD2-AM84

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM84	Page 126	H199	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise, and noise from recreation ground and licensed premises</u> "	Clarification

Table Modification SD2-AM85

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM85	Page 128	H633	Constraints	Insert text: "• Noise source near site - <u>Noise from adjacent business park</u> "	Clarification

Table Modification SD2-AM86

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM86	Page 130	H780	Site boundary	Minor amendment to northern boundary. No change to gross site area.	Correction

4 Housing Allocations

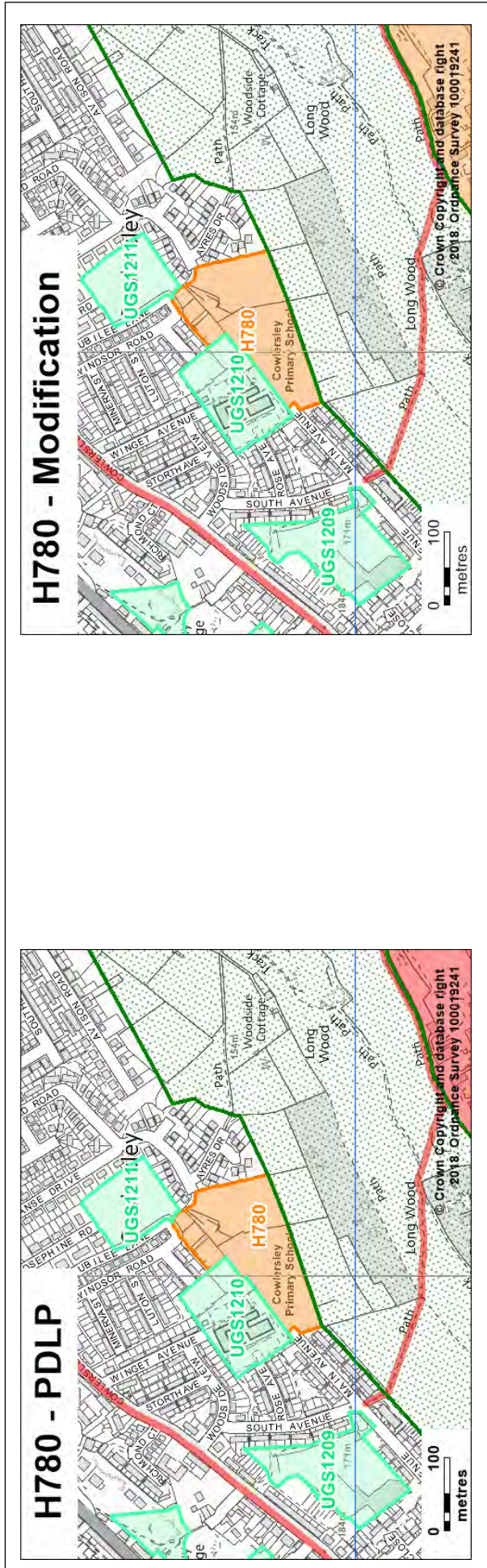


Table Modification SD2-AM87

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM87	Page 132	H48	Constraints	Insert text: "• Noise source near site - <u>Noise from adjacent railway</u> "	Clarification

Table Modification SD2-AM88

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM88	Page 133	H67	Constraints	Insert text: "• Noise source near site - <u>Noise from adjacent recreation ground, cricket ground, and industrial works</u> "	Clarification

Table Modification SD2-AM89

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM89	Page 133	H129	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise and noise from industrial uses</u> "	Clarification

Table Modification SD2-AM90

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM90	Page 137	H584	Net site area (Ha)	Delete and insert text: "2.41 - area of protected trees and <u>existing</u> dwelling (and curtilage) removed from the developable area"	Correction

Table Modification SD2-AM91

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM91	Page 138	H664	Constraints	Insert text: "• Noise source near site - <u>Noise from industrial uses</u> "	Clarification

Table Modification SD2-AM92

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM92	Page 142	H50	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise</u> "	Clarification

4 Housing Allocations

Table Modification SD2-AM93

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM93	Page 144	H288a	Constraints	Insert text: "• Odour source near site - <u>Odour from nearby farm</u> "	Clarification

Table Modification SD2-AM94

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM94	Page 145	H294	Constraints	Insert text: "• Noise source near site - <u>Noise from licensed premises</u> "	Clarification

Table Modification SD2-AM95

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM95	Page 146	H597	Constraints	Insert text: "• Odour source near site - <u>Odour from nearby farm</u> "	Clarification

Table Modification SD2-AM96

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM96	Page 152	H2587	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise and noise from local industry</u> "	Clarification

Table Modification SD2-AM97

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM97	Page 156	H339	Constraints	Insert text: "• Noise source near site - <u>Railway noise and noise from industrial use</u> "	Clarification

Table Modification SD2-AM98

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM98	Page 158	H583	Constraints	Insert text: "• Noise source near site - <u>Road traffic</u> "	Clarification

Table Modification SD2-AM99

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM99	Page 158	H609	Constraints	Insert text: "• Noise source near site - <u>Road traffic noise and noise from playing fields</u> "	Clarification

Table Modification SD2-AM100

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM100	Page 160	H652	Constraints	Insert text: "• Noise source near site - <u>Railway noise and noise from industrial uses</u> "	Clarification

4 Housing Allocations

Table Modification SD2-AM101

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM101	Page 161	H1774	Constraints	Insert text: <ul style="list-style-type: none"> • Odour source near site - <u>Noise from licensed premises and farm</u> • Noise source near site - <u>Odour from adjacent farm</u> 	Clarification

4.5 Accommodation for Travellers

Table Modification SD2-AM102

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM102	Page 162	GTTS1957	Constraints	Insert text: "• Noise source near site - <u>Industrial works, sewage treatment, active mill works</u> • Odour source near site - <u>Industrial works, sewage treatment, active mill works</u> "	Clarification

Table Modification SD2-AM103

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM103	Page 162	GTTS2487	Constraints	Insert text: "• Noise source near site - <u>Industrial estate, business park, motorway traffic noise</u> "	Clarification

5 Mixed Use Allocations


Table Modification SD2-AM104

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM104	Page 164	MX1903	Constraints	Insert text: " <u>• Adjacent to the Wildlife Habitat Network</u> "	Correction

6 Town Centre Proposals

Primary Shopping Area
Primary and Secondary Shopping Frontages

Key

 Primary Shopping Area

 Primary Shopping Frontage

 Secondary Shopping Frontage

6.1 Huddersfield Town Centre inset

Table Modification SD2-AM105

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM105	Page 179		Paragraph 6.8	Insert text: "The Huddersfield Town Centre boundary forms the defined extent of the town centre and includes the primary shopping areas, primary and secondary shopping frontages. <u>It is to be used to implement Policy PLP13.</u> The boundary includes two mixed use town centre site allocations MX1906 and MX2101. Proposals for main town centre uses outside this boundary would require a sequential test as set out in the Town Centre Uses policy."	Clarification

Table Modification SD2-AM106

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM106	Page 179		Paragraph 6.9	Insert text: The Huddersfield Primary Shopping Area forms the retail core of the town centre and includes all primary shopping frontages and the majority of the secondary shopping frontages. <u>It is to be used to implement Policy PLP14.</u> "	Clarification

Table Modification SD2-AM107

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

SD2-AM107	Page 179	Paragraph 6.10	Insert text: "The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Primary Shopping Frontages and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification
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Table Modification SD2-AM108

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM108	Page 180	Site HudPSF 2		Delete and insert text: <u>1 High Street, 66 99</u> New street to 120 New Street	Correction

Table Modification SD2-AM109

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM109	Page 181	Site HudPSF 9		Insert text: 1 The Shambles to <u>21</u> Princess Alexandra Walk	Correction

Table Modification SD2-AM110

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM110	Page 181	Site HudPSF 11		Insert text: <u>10</u> - 12 Victoria Lane to 30 Victoria Lane	Correction

6 Town Centre Proposals

Table Modification SD2-AM111

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM111	Page 182		Paragraph 6.11	Insert text: "The designations relate to Shopping Frontages Policy which sets out the level of protection afforded to Secondary Shopping Frontages and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification

Table Modification SD2-AM112

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM112	Page 182	Site HudSSF 2		Insert text: 5 Ramsden Street to 11 - 13 Ramsden Street	Correction

Table Modification SD2-AM113

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM113	Page 182	Site HudSSF 3		Delete and insert text: 4 6 High Street to 24 High Street	Correction

Table Modification SD2-AM114

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM114	Page 182	Site HudSSF 5		Delete and insert text: 1 3 Market Street to 17 Market Street	Correction

Table Modification SD2-AM115

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM115	Page 182	Site HudSSF 6		Insert text: 14a Market Street to 22-24 Market Street	Correction

Table Modification SD2-AM116

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM116	Page 183	Site HudSSF 13		Correction to Secondary Shopping Frontage on Policies Map	Correction

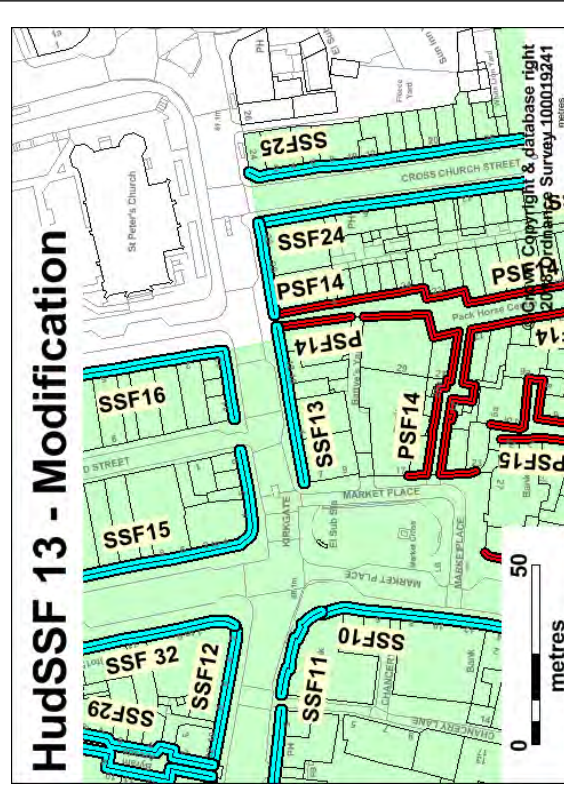
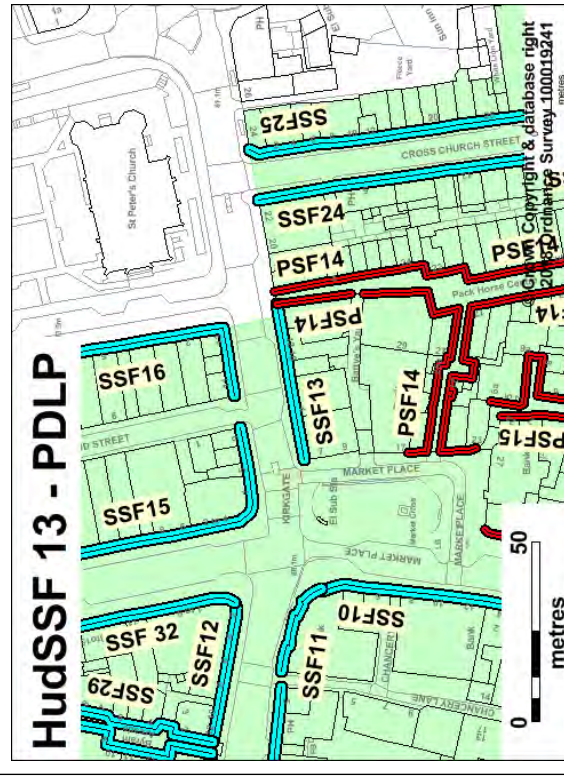


Table Modification SD2-AM117

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM117	Page 182	Site HudSSF 6			

6 Town Centre Proposals

SD2-AM117	Page 184	Site HudSSF 17	Delete and insert text: g 2 Church Street to g 2 St Peters Street	Correction
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Table Modification SD2-AM118

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM118	Page 184	Site HudSSF 18		Delete and insert text: 2 40 Church Street to 6A & St Peters Street	Correction

Table Modification SD2-AM119

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM119	Page 185	Site HudSSF 25		Insert text: 2 Cross Church Street to 34 - 36 Cross Church Street	Correction

Table Modification SD2-AM120

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM120	Page 185	Site HudSSF 26		Delete and insert text: 49 King Street to <u>Unit 27 Kingsgate Centre, 63 King Street</u> Correction to Secondary Shopping Frontage on Policies Map	Correction

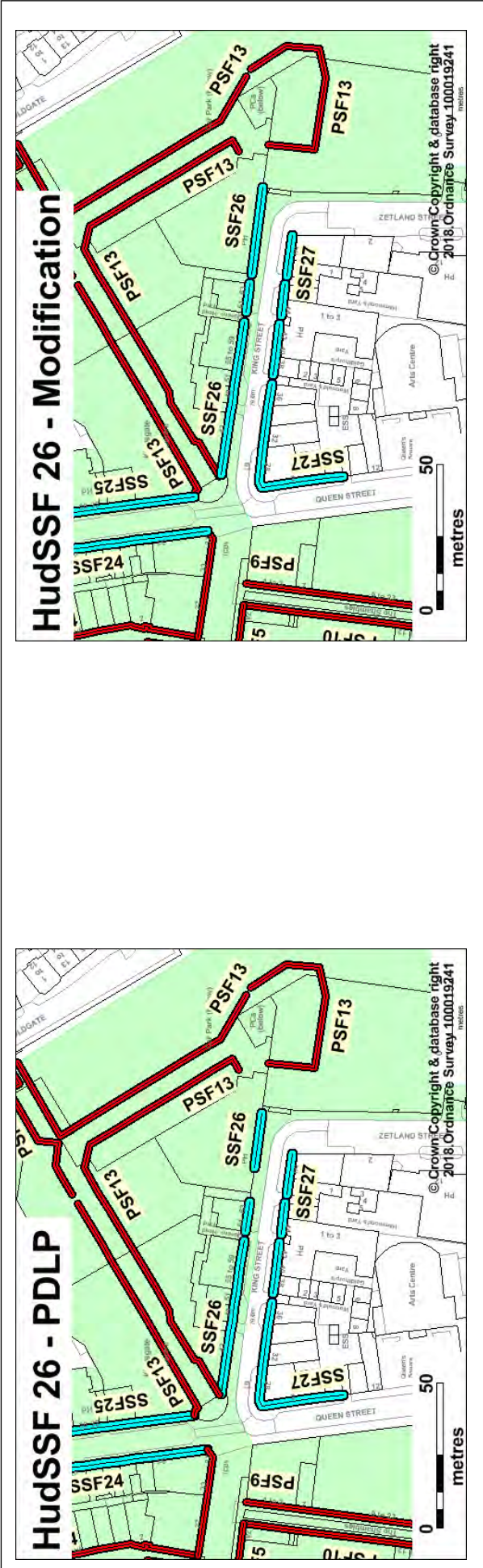


Table Modification SD2-AM121

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM121	Page 185	Site HudSSF 27		Delete and insert text: 6 & Queen Street to 50 King Street	Correction

6.2 Dewsbury Town Centre inset

Table Modification SD2-AM122

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM122	Page 186		Paragraph 6.15	Insert text: "The Dewsbury Town Centre boundary forms the defined extent of the town centre and includes the primary shopping area, primary and secondary shopping frontages. <u>It is to be used to implement Policy PLP13.</u> Proposals for main town centre uses outside this boundary would require a sequential test as set out in the Town Centre Uses policy."	Clarification

Table Modification SD2-AM123

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM123	Page 186		Paragraph 6.16	Insert text: "The Dewsbury Primary Shopping Area forms the retail core of the town centre and includes all primary shopping frontages and the majority of the secondary shopping frontages. <u>It is to be used to implement Policy PLP14.</u> "	Clarification

Table Modification SD2-AM124

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM124	Page 186		Paragraph 6.17	Insert text:	Clarification

							"The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Primary Shopping Frontages, and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "
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Table Modification SD2-AM125

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM125	Page 187	Site DewPSF 6		Delete and insert text: 1 Foundry Street to <u>15 - 17 49 Foundry Street</u>	Correction

Table Modification SD2-AM126

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM126	Page 188		Paragraph 6.18	Insert text: "The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Secondary Shopping Frontages, and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification

Table Modification SD2-AM127

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM127	Page 190	Site DewSSF 17		Delete and insert text: <u>11 - 12 24 Broadway House to 21 Crackenedge Lane</u>	Correction

Table Modification SD2-AM128

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM128	Page 190	Site DewSSF 20		Delete and insert text: <u>19</u> 24 Foundry Street to <u>37-39</u> Foundry Street	Correction

6.3 Batley

Table Modification SD2-AM129

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM129	Page 190		Paragraph 6.22	Insert text: "The Batley Town Centre boundary forms the defined extent of the town centre and includes the primary shopping area, primary and secondary shopping frontages. <u>It is to be used to implement Policy PLP13.</u> Proposals for main town centre uses outside this boundary would require a sequential test as set out in the Town Centre Uses policy."	Clarification

Table Modification SD2-AM130

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM130	Page 191		Paragraph 6.23	Insert text: "The Batley Primary Shopping Area forms the retail core of the town centre and includes all primary shopping frontages and the majority of the secondary shopping frontages. <u>It is to be used to implement Policy PLP14.</u> "	Clarification

Table Modification SD2-AM131

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

6 Town Centre Proposals

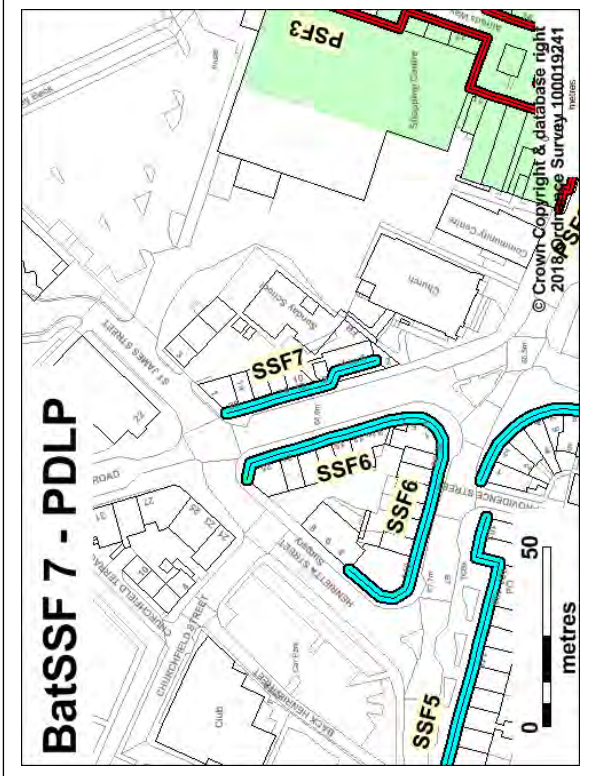
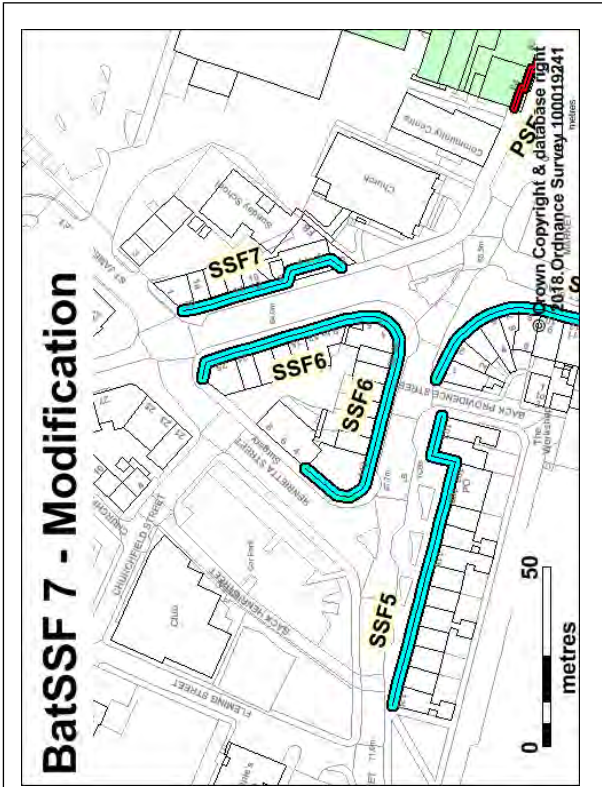
SD2-AM131	Page 191		Paragraph 6.24	Insert text: "The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Primary Shopping Frontages, and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification
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Table Modification SD2-AM132

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM132	Page 192		Paragraph 6.25	Insert text: "The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Secondary Shopping Frontages, and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification

Table Modification SD2-AM133

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM133	Page 193	Site BatSSF 7		Correction to Secondary Shopping Frontage on Policies Map	Correction



6.4 Cleckheaton Town Centre inset

Table Modification SD2-AM134

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM134	Page 194		Paragraph 6.29	Insert text: "The Cleckheaton Town Centre boundary forms the defined extent of the town centre and includes the primary shopping area, primary and secondary shopping frontages. <u>It is to be used to implement Policy PLP13.</u> Proposals for main town centre uses outside this boundary would require a sequential test as set out in the Town Centre Uses policy."	Clarification

Table Modification SD2-AM135

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM135	Page 194		Paragraph 6.30	Insert text: "The Cleckheaton Primary Shopping Area forms the retail core of the town centre and includes all primary shopping frontages and the majority of the secondary shopping frontages. <u>It is to be used to implement Policy PLP14.</u> "	Clarification

Table Modification SD2-AM136

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

SD2-AM136	Page 194	Paragraph 6.31	Insert text: "The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Primary Shopping Frontages, and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification
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Table Modification SD2-AM137

Modification Ref	Page	Para/Table/Box	Tracked change	Reason for Change
SD2-AM137	Page 195	Site CleckPSF 2	Insert text: 2 Cheapside <u>to</u> 5 Albion Street	Correction

Table Modification SD2-AM138

Modification Ref	Page	Para/Table/Box	Tracked change	Reason for Change
SD2-AM138	Page 195	Site CleckPSF 5	Delete and insert text: 16 Albion Street to <u>Old House at Home Inesons Provincial House,</u> Albion Street	Correction

Table Modification SD2-AM139

Modification Ref	Page	Para/Table/Box	Tracked change	Reason for Change

6 Town Centre Proposals

SD2-AM139	Page 195	Paragraph 6.32	Insert text: "The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Secondary Shopping Frontages, and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification
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Table Modification SD2-AM140

Modification Ref	Page	Site	Para/Table /Box	Tracked change	Reason for Change
SD2-AM140	Page 196	Site CleckSSF 6		Delete and insert text: Z 8 Railway Street to 8 Cross Crown Street Correction to Secondary Shopping Frontage on Policies Map	Correction

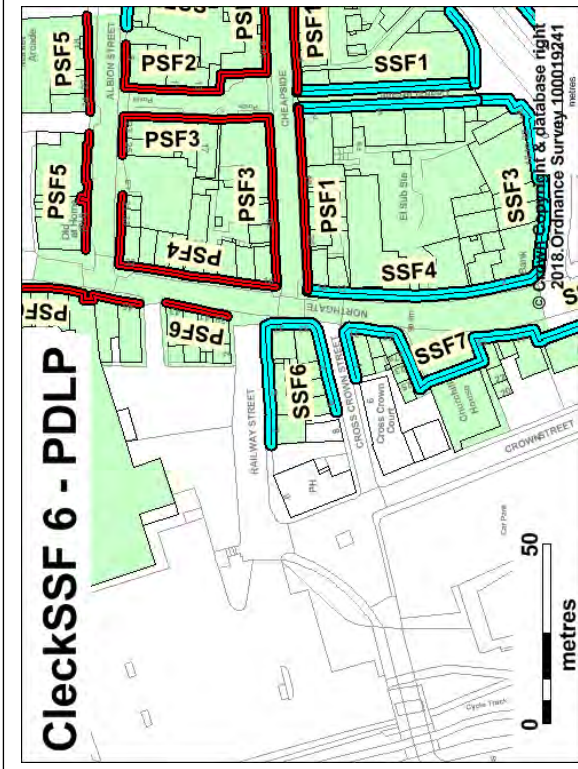
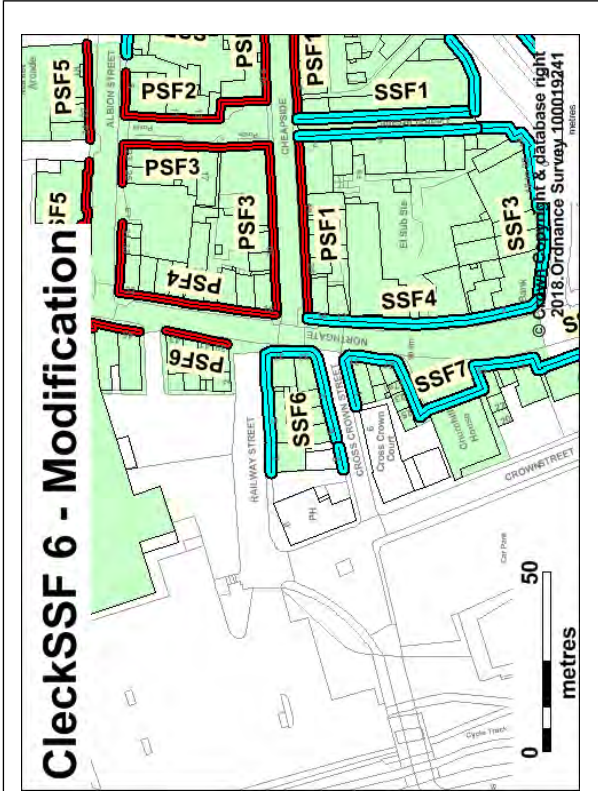


Table Modification SD2-AM141

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM141	Page 196	Site CleckSSF 7		Delete and insert text: 1 Crown <u>Crown</u> Street to 5 - 7 Northgate	Correction

6.5 Holmfirth Town Centre inset

Table Modification SD2-AM142

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM142	Page 197		Paragraph 6.36	<p>Insert text: "The Holmfirth Town Centre boundary forms the defined extent of the town centre and includes the primary shopping area, primary and secondary shopping frontages. <u>It is to be used to implement Policy PLP13.</u> Proposals for main town centre uses outside this boundary would require a sequential test as set out in the Town Centre Uses policy."</p>	Clarification

Table Modification SD2-AM143

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM143	Page 197		Paragraph 6.37	<p>Insert text: "The Holmfirth Primary Shopping Area forms the retail core of the town centre and includes all primary shopping frontages and the majority of the secondary shopping frontages. <u>It is to be used to implement Policy PLP14.</u>"</p>	Clarification

Table Modification SD2-AM144

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

SD2-AM144	Page 197		Paragraph 6.38	Insert text: "The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Primary Shopping Frontages, and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification
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Table Modification SD2-AM145

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM145	Page 198	Site HoIPSF 1		Insert text: 54 - <u>56</u> Huddersfield Road to <u>84</u> - 88 Huddersfield Road	Correction

Table Modification SD2-AM146

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM146	Page 198		Paragraph 6.39	Insert text: "The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Secondary Shopping Frontages, and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification

Table Modification SD2-AM147

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM147	Page 198	Site HoISSF 2		Delete and insert text: 3 <u>Norridge Bottom 54 Huddersfield Road to 9 15 Norridge Bottom</u>	Correction

6 Town Centre Proposals

Table Modification SD2-AM148

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM148	Page 199	Site HoISSF 5		Delete and insert text: 4 Market Walk to <u>Old Bridge Barbers</u> , 42 Market Walk	Correction

Table Modification SD2-AM149

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM149	Page 199	Site HoISSF 7		Delete and insert text: 46 <u>20</u> Dunford Road to 19 Rotcher Road	Correction

Table Modification SD2-AM150

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM150	Page 199	Site HoISSF 9		Insert text: 2 Hollowgate to <u>6</u> - 8 Hollowgate Correction to Secondary Shopping Frontage on Policies Map	Correction

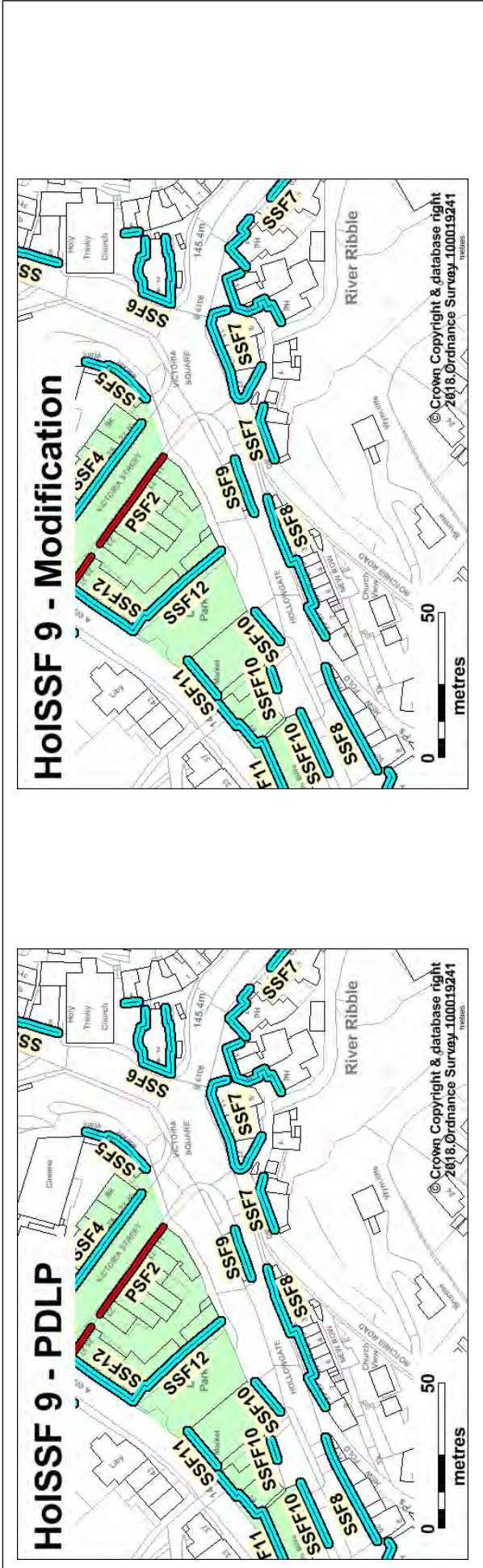


Table Modification SD2-AM151

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM151	Page 199	Site HoISSF 13		Delete and insert text: 40 <u>14</u> Huddersfield Road to 34 Huddersfield Road	Correction

6 Town Centre Proposals

6.6 Heckmondwike Town Centre inset

Table Modification SD2-AM152

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM152	Page 200		Paragraph 6.43	Insert text: "The Heckmondwike Town Centre boundary forms the defined extent of the town centre and includes the primary shopping area, primary and secondary shopping frontages. <u>It is to be used to implement Policy PLP13</u> . Proposals for main town centre uses outside this boundary would require a sequential test as set out in the Town Centre Uses policy."	Clarification

Table Modification SD2-AM153

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM153	Page 200		Paragraph 6.44	Insert text: "The Heckmondwike Primary Shopping Area forms the retail core of the town centre and includes all primary shopping frontages and the majority of the secondary shopping frontages. <u>It is to be used to implement Policy PLP14</u> ."	Clarification

Table Modification SD2-AM154

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change

SD2-AM154	Page 200		Paragraph 6.45	Insert text: "The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Primary Shopping Frontages, and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification
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Table Modification SD2-AM155

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM155	Page 201		Paragraph 6.46	Insert text: "The designations relate to the Shopping Frontages Policy which sets out the level of protection afforded to Secondary Shopping Frontages, and the considerations which would apply to change of use proposals within these frontages. <u>These frontages should be used to implement Policy PLP14.</u> "	Clarification

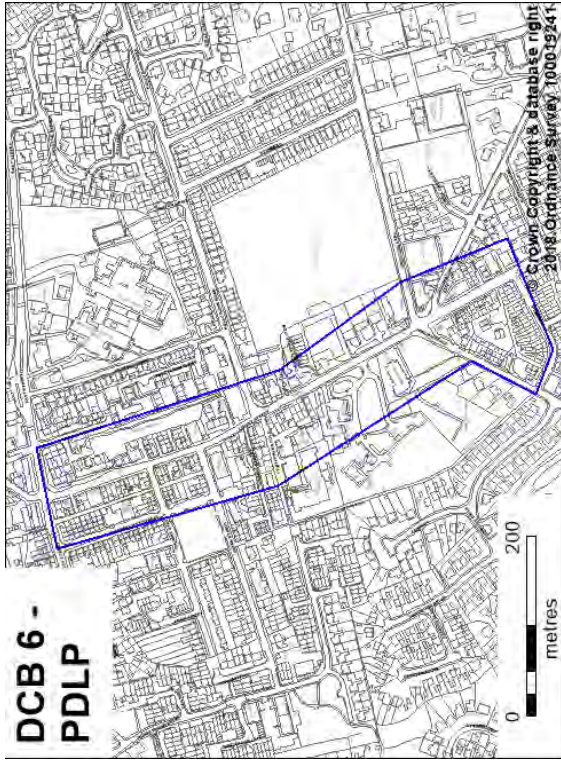
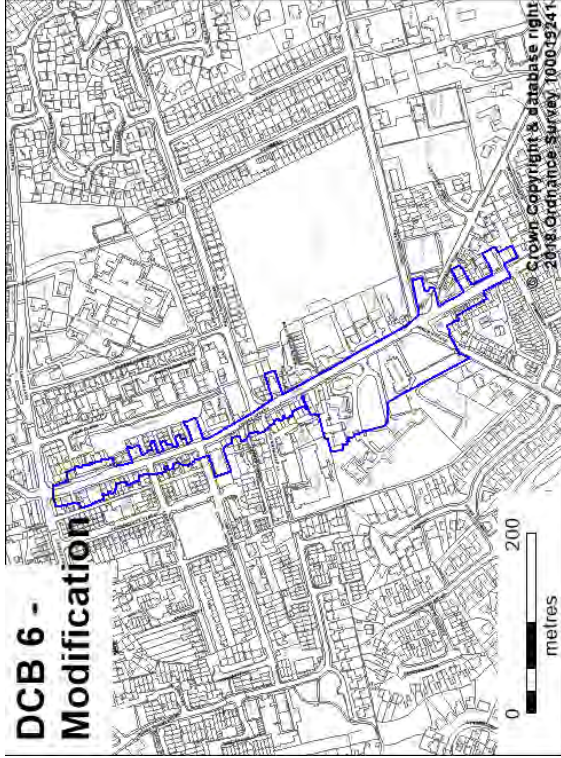
6.7 District Centres

Table Modification SD2-AM156

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM156	Page 202		Paragraph 6.47	Insert text: "Within Kirklees fifteen district centres have been identified which serve the local area, as well as local centres providing local provision of goods and services. <u>These should be used to implement Policy PLP13.</u> "	Clarification

Table Modification SD2-AM181

(Previous reference SD2-MM334)

Modification Ref	Page	Site	Para/table/box	Tracked change	Reason for Change
SD2-AM181	Page 203	DCB 6	Lindley District Centre Boundary	Correct district centre boundary	Correction
<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>DCB 6 - PDLP</p>  </div> <div style="text-align: center;"> <p>DCB 6 - Modification</p>  </div> </div>					

6 Town Centre Proposals

6.8 Local Centres

Table Modification SD2-AM157

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM157	Page 204		Paragraph 6.50	<p>Insert text:</p> <p>"The following 61 Local Centres have been identified for Kirklees. The centres vary in scale but have been classified in accordance with the Delivery of Services table set out in the Town Centre Uses Policy. <u>These should be used to implement Policy PLP13.</u>"</p>	Clarification

Table Modification SD2-AM158

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM158	Page 204		Paragraph 6.51	<p>Delete and insert text:</p> <p>Local Centres are The geographical central point of each Local Centre has been identified on the Policies Map, and each of the Local Centres also have a separate Local Centre Map (LCB 1 - LCB 61). <u>is shown as a blue circle. A list of the Local Centres can be seen below, along with a centre reference and location:</u></p> <p>NOTE: Maps showing each Local Centre boundary can be found in Appendix 1 of this document</p>	Clarification

Table Modification SD2-AM159

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM159	Page 204		Table - Kirklees Local Centres	Delete Easting and Northing columns	Clarification

				<p>Delete and insert text:</p> <p>LCB31: Manchester Road/Longroyd Lane <u>Bridge</u>, Huddersfield</p> <p>LCB34: Mount Street <u>Manchester Road</u>, Milnsbridge</p>	
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7 Transport

Table Modification SD2-AM160

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM160	Page 207		Paragraph 7.1	<p>Insert text:</p> <p>"The following section provides details of the transport schemes identified, <u>under Policy PLP19</u> within the Transport section of the Local Plan. The boxes identify strategic and local transport infrastructure to assist with the delivery of the spatial strategy and anticipated growth. Detailed transport schemes that require planning permission will have regard to the constraints and considerations as set out in Local Plan such as impact on designated heritage assets and any other environmental considerations."</p>	Clarification

8.1 International and National Designated Sites

Table Modification SD2-AM161

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM161	Page 213		Paragraph 8.2	Insert text: "The following sites, as shown on the Policies Map, are international and nationally designated sites, <u>under Policy PLP30.</u> "	Clarification

8.2 Local Geological Sites

Table Modification SD2-AM162

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM162	Page 213		Paragraph 8.3	Insert text: "The following sites, as shown on the Policies Map, are designated as Local Geological Sites <u>under Policy PLP30</u> . These are defined areas identified and selected locally for the geological value."	Clarification

8 Environmental designations

8.3 Local Wildlife Sites

Table Modification SD2-AM163

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM163	Page 215		Paragraph 8.4	Insert text: The following sites, as shown on the Policies Map, are designated as Local Wildlife Sites <u>under Policy PLP30</u> . These are defined areas identified and selected locally for their nature conservation value.	Clarification

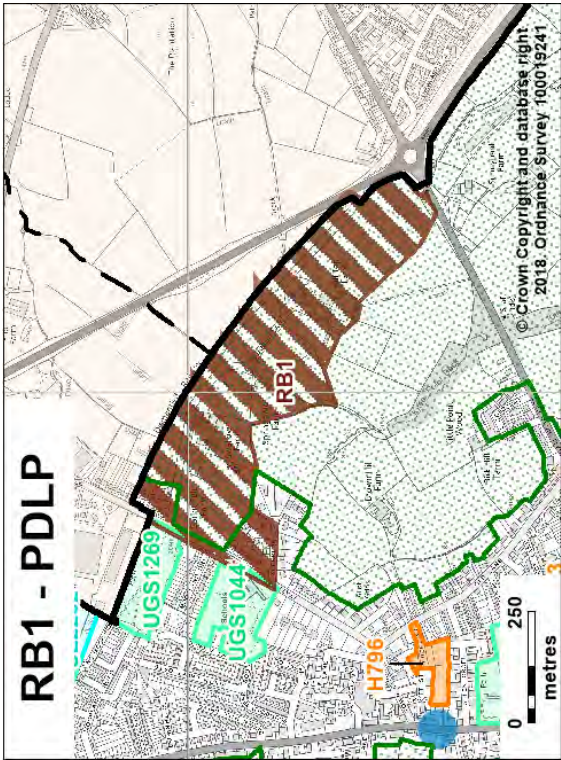
Table Modification SD2-AM164

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM164	Page 216	LWS117	Address	Delete and insert text: ' Park Hill <u>Park Hill</u> '	Correction

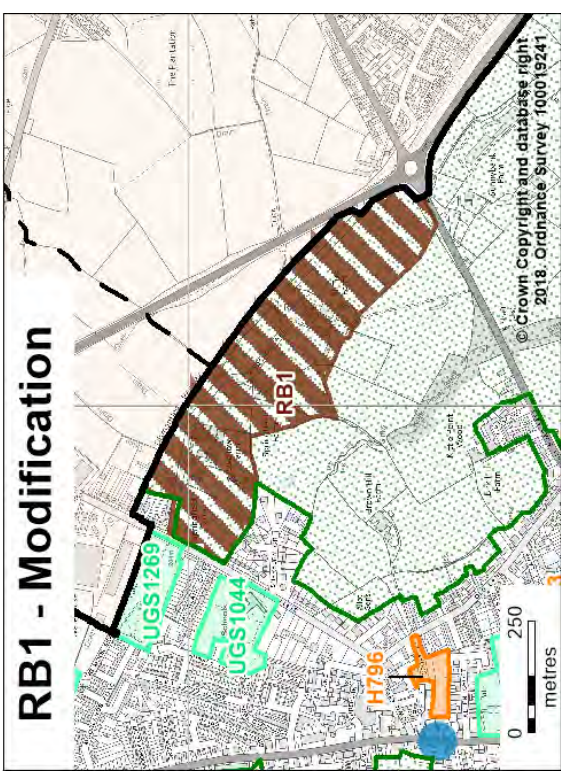
9 Historic Designations

Table Modification SD2-AM165

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM165	Page 224	RB1	Site boundary	Amend boundary	Update



RB1 - PDLP



RB1 - Modification

10.1 Minerals Areas of Search

No modifications proposed

10.2 Minerals Extraction Sites

Table Modification SD2-AM166

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM166	Page 246	ME2568	Site address	Delete and insert text: "Intake Road <i>Intake Lane"</i>	Correction

10.3 Minerals Preferred Areas

Table Modification SD2-AM167

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM167	Page 248	ME3324	Site address	Delete and insert text: "Intake Road <i>Intake Lane"</i>	Correction

11 Waste Allocations

11 Waste Allocations

No modifications proposed

12 Land at Storthes Hall

No modifications proposed

13 Safeguarded Land

13 Safeguarded Land

No modifications proposed

14 Urban Green Space

Table Modification SD2-AM168

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM168	Page 275	UGS963	Site boundary	Minor amendment to northern boundary to about the green belt boundary. No change to gross site area.	Correction

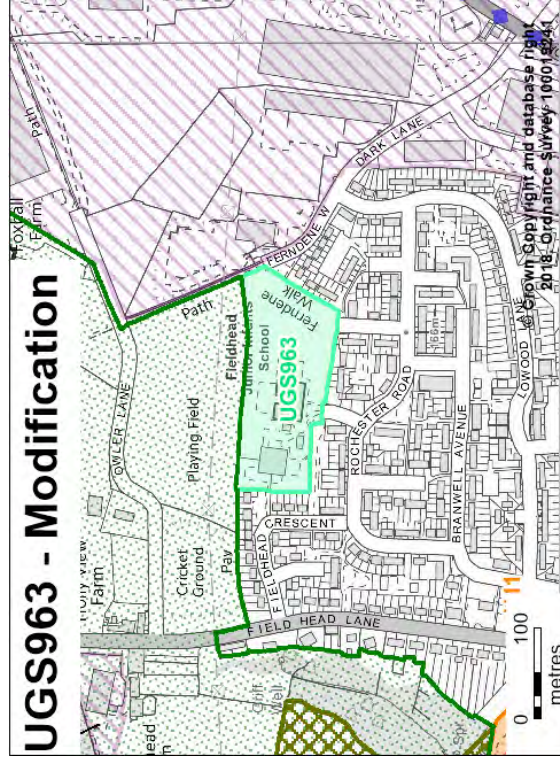
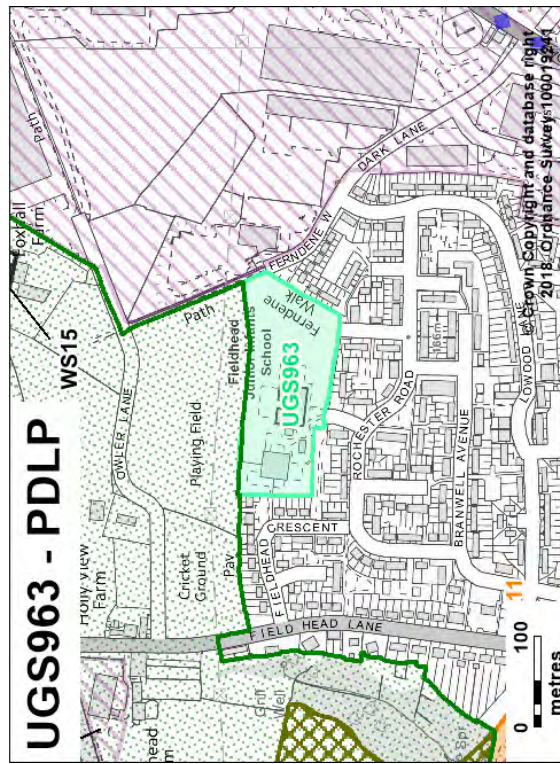
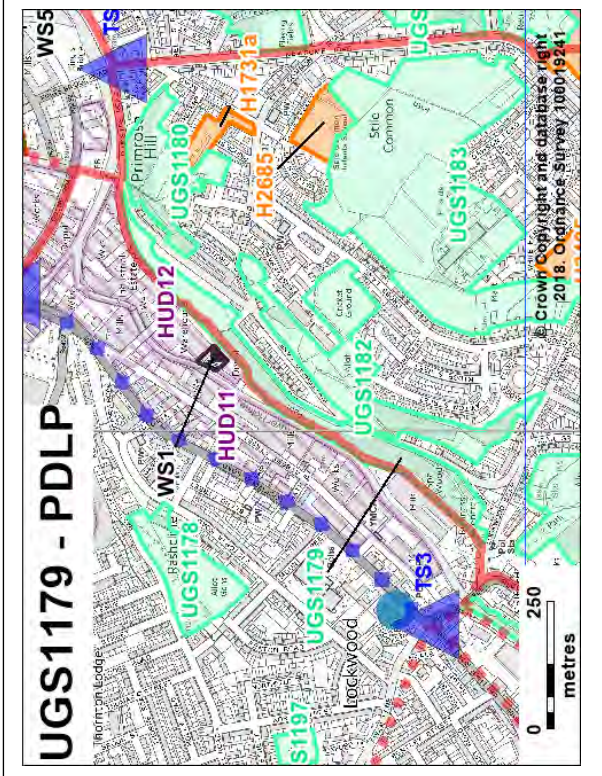
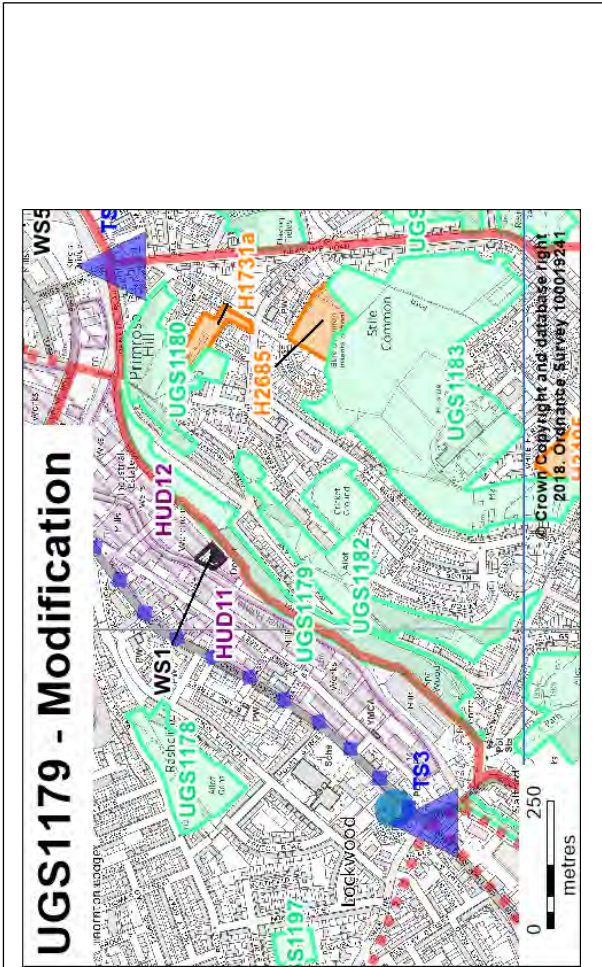


Table Modification SD2-AM169

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM169	Page 295	UGS1179	Table Huddersfield Urban Green Space - Size (Ha)	Delete and insert text: " <u>4.17</u> <u>3.95</u> "	Correction



15 Local Green Space

No modifications proposed

16 Strategic Green Infrastructure

16 Strategic Green Infrastructure

No modifications proposed

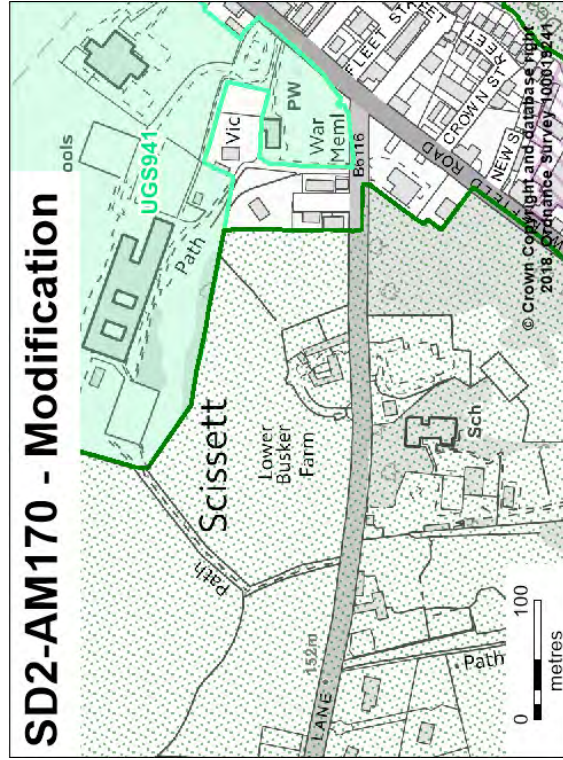
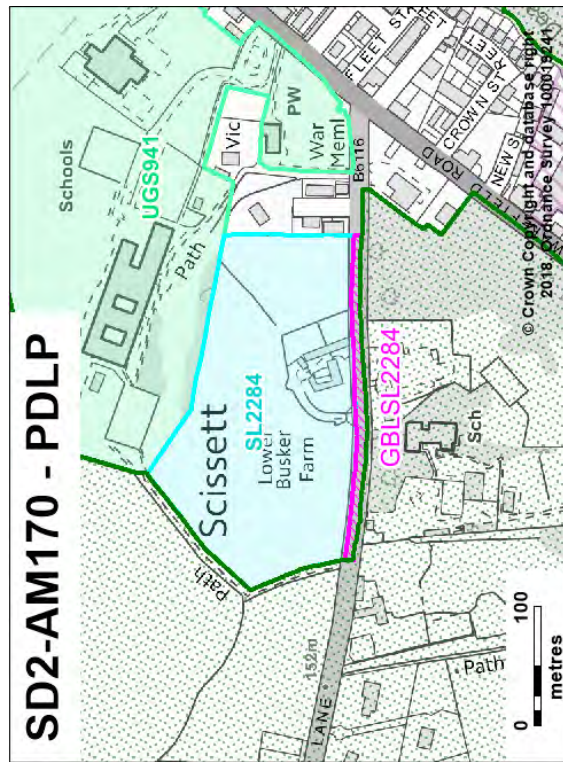
Policies Maps - Changes to the Green Belt

A number of changes to the Publication Draft Local Plan green belt boundary are required as a result of modifications to the plan, these modifications are listed below.

In addition, some minor changes are required to correct drafting errors but these are not required to make the plan sound. Most of these error corrections are extremely small alterations to the council's digital mapping and it is not possible to publish these in printed format. Further information can be obtained from the Planning Policy Group on request.

Table Modification SD2-AM170

Modification Ref	Site	Address	Mapping Change	Reason for Change
SD2-AM170	SL2284 and GBLSL2284 (in SD21)	Busker Lane, Scissett	SL2284 Safeguarded land to Green Belt and GBLSL2284 unallocated land to Green Belt	Consequence of deletion of SL2284



Policies Maps - Changes to the Green Belt

Table Modification SD2-AM171

Modification Ref	Site	Address	Mapping Change	Reason for Change
SD2-AM171	H2537	Halifax Road, Hightown	Create new Green Belt boundary around allocation H2537a and consequential change (CCH2537a) green belt to unallocated at Tanhouse Lane	Consequence of modification to H2537

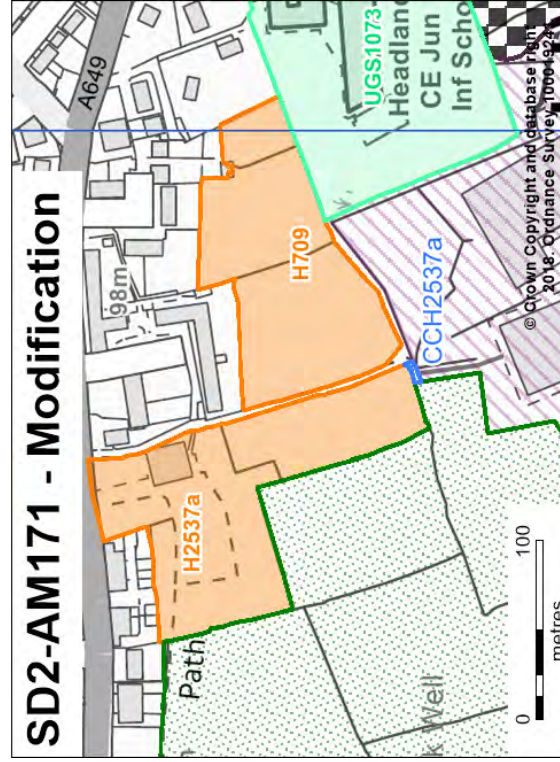
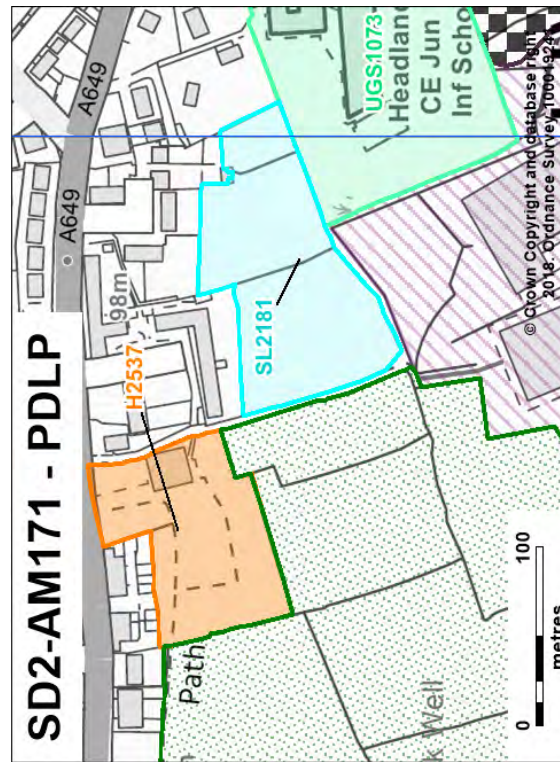


Table Modification SD2-AM172

Modification Ref	Site	Address	Mapping Change	Reason for Change
SD2-AM172	Netherthong Primary School, Netherthong	Netherthong Primary School, Netherthong	Correction to position of Green Belt boundary	Correction

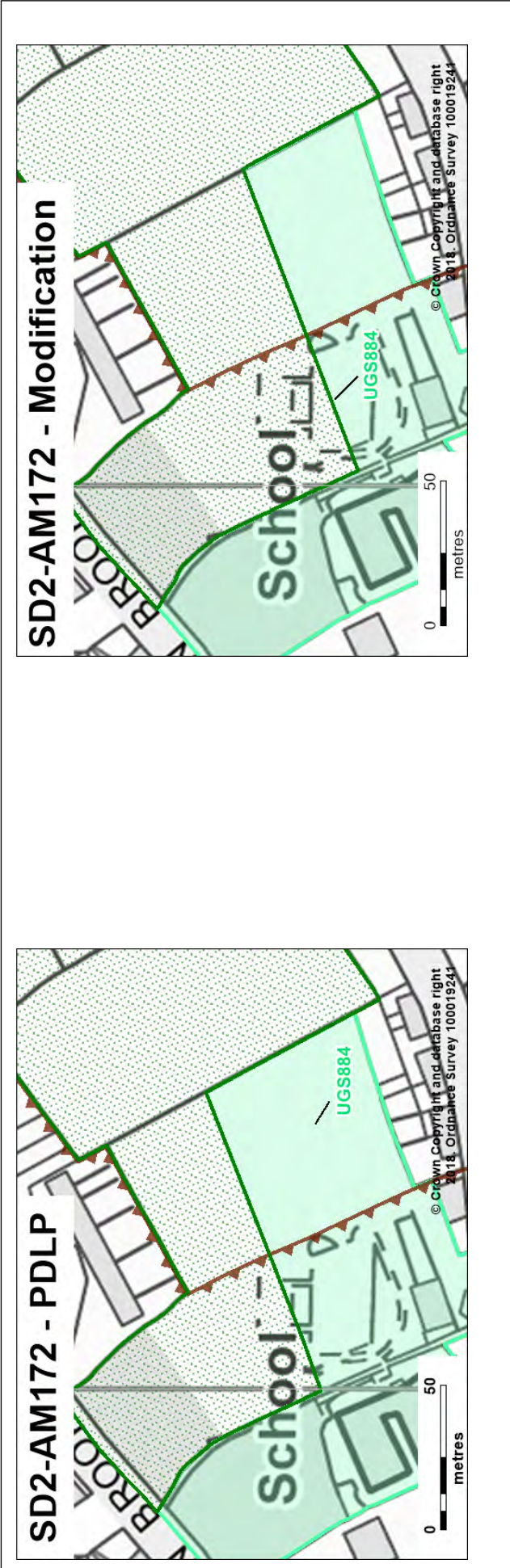


Table Modification SD2-AM173

Modification Ref	Site	Address	Mapping Change	Reason for Change
SD2-AM173	AGB2074	Jackroyd Lane, Newsome	Reduce area of AGB2074 and delete CCAGB2074	Correction to exclude sub-station

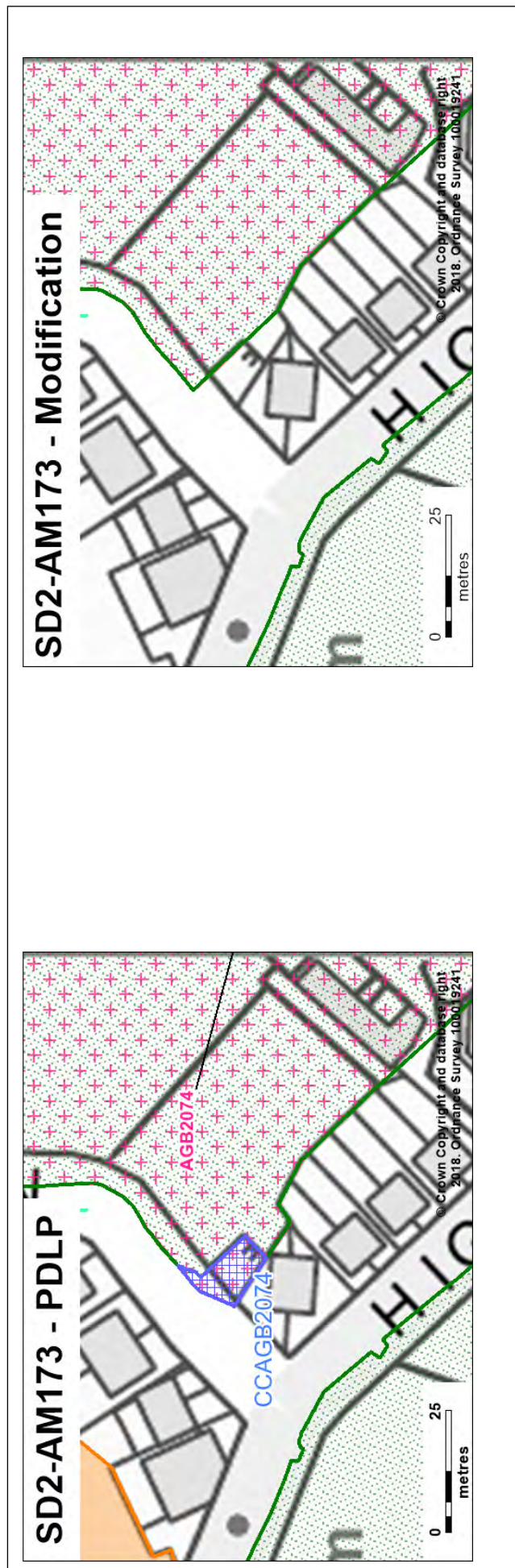


Table Modification SD2-AM174

Modification Ref	Site	Address	Mapping Change	Reason for Change
SD2-AM174	H442, UGS3333 (also CCH442ii), CCH442i (in SD21)	Roberttown Lane, Roberttown	H442 (housing), UGS3333 (Urban Greenspace) and consequential change CCH442ii (urban green space) and CCH442i (unallocated) to Green Belt	Consequence of deletion of H442

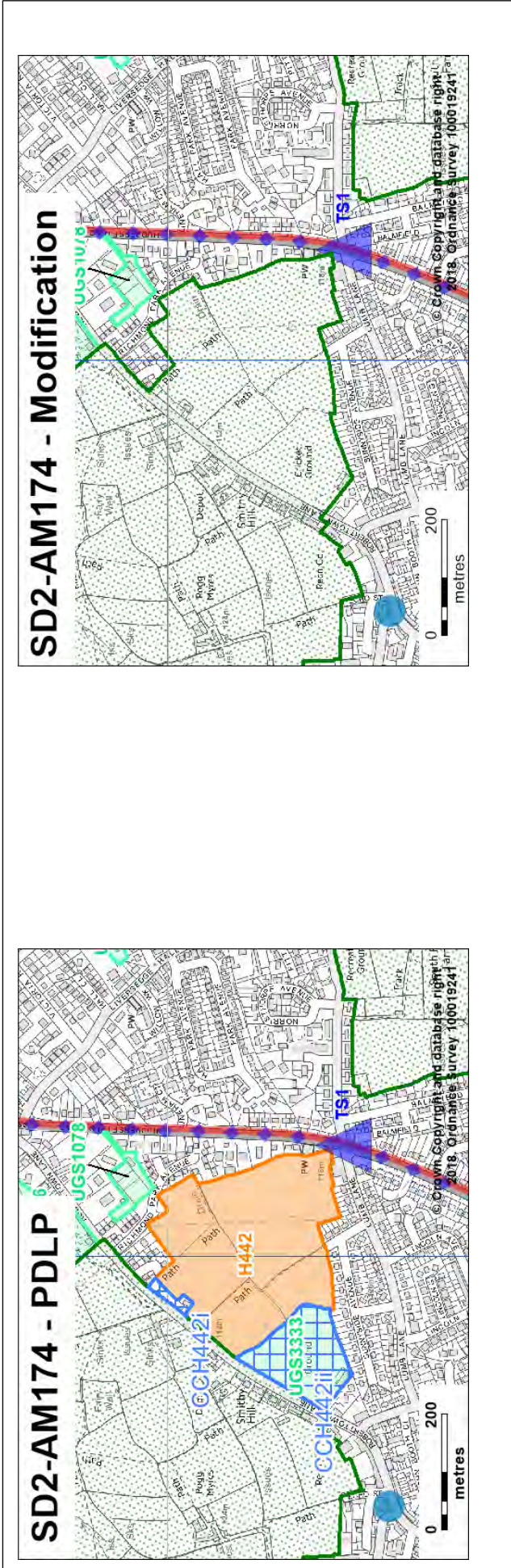


Table Modification SD2-AM175

Modification Ref	Site	Address	Mapping Change	Reason for Change
SD2-AM175	E1832c	Cooper Bridge, Leeds Road, Huddersfield	Part of employment allocation E1832c to Green Belt	Consequence of modification to E1831c

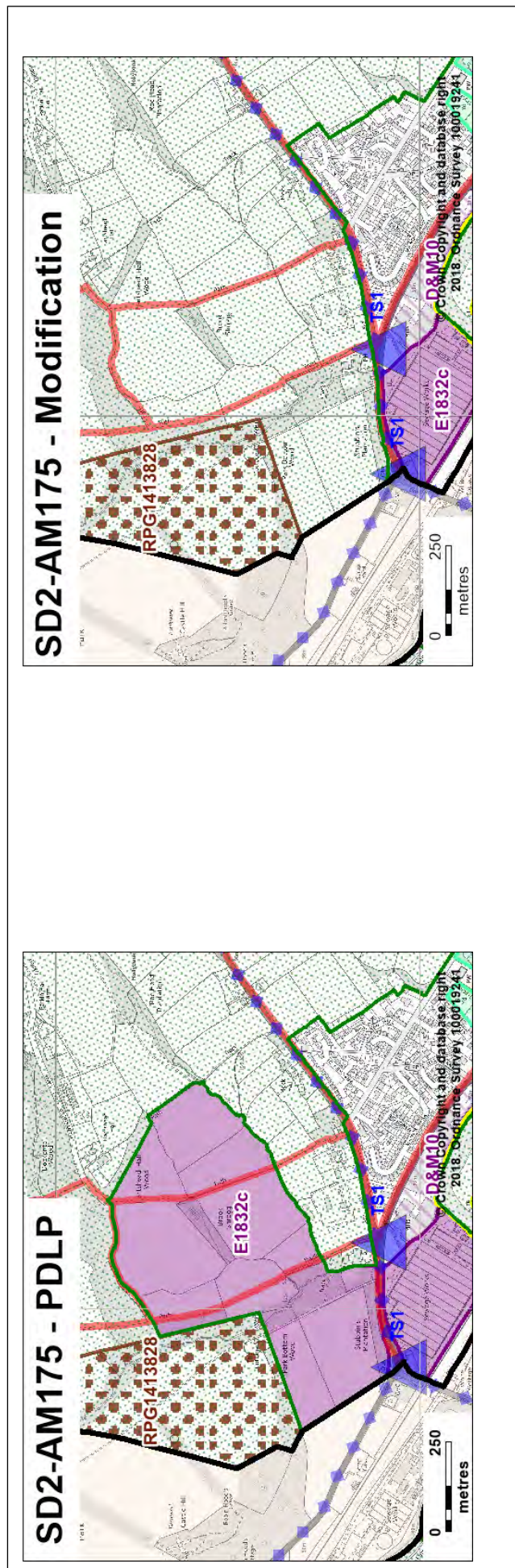


Table Modification SD2-AM176

Modification Ref	Site	Address	Mapping Change	Reason for Change
SD2-AM176	E2333a, H3325a, CCH3325a and GBLE2233a (in SD21)	Wakefield Road, Clayton West	E2333a (employment), part of H3325a (housing), consequential change CCH3325a (unallocated) and part of GBLE2333a to green belt. Create new green belt boundary around H17.	Consequence of deletion of E2333a and modification to H3325a

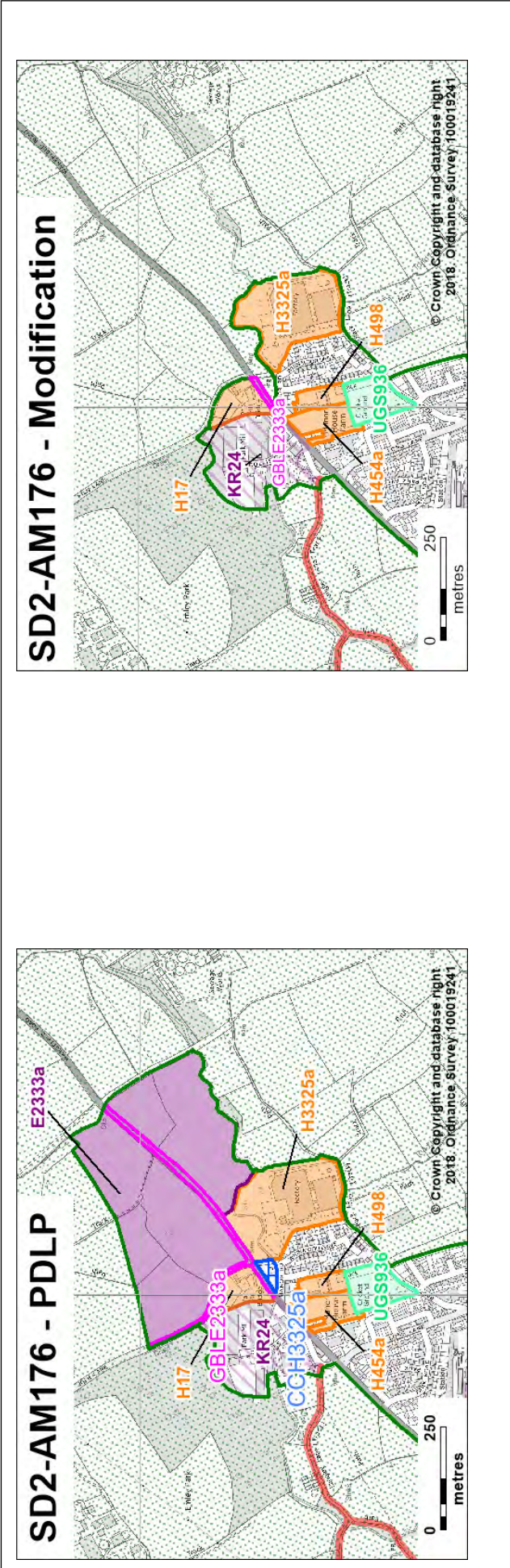


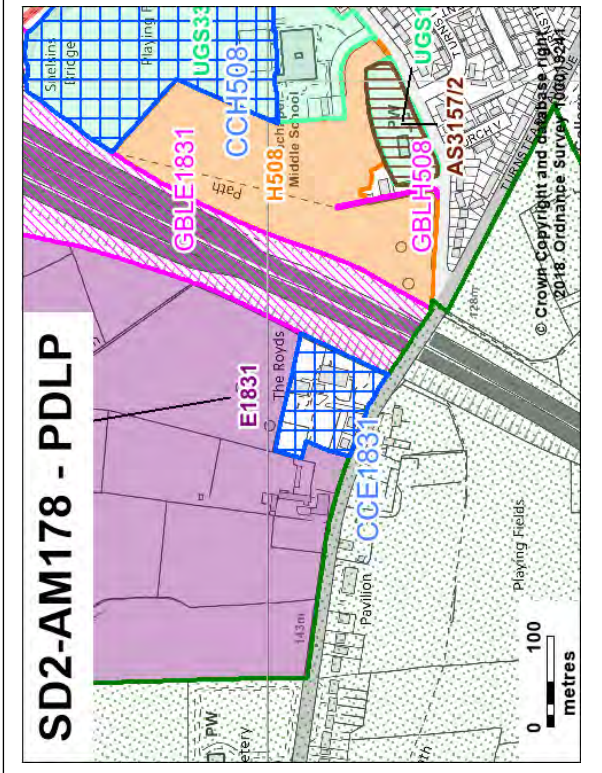
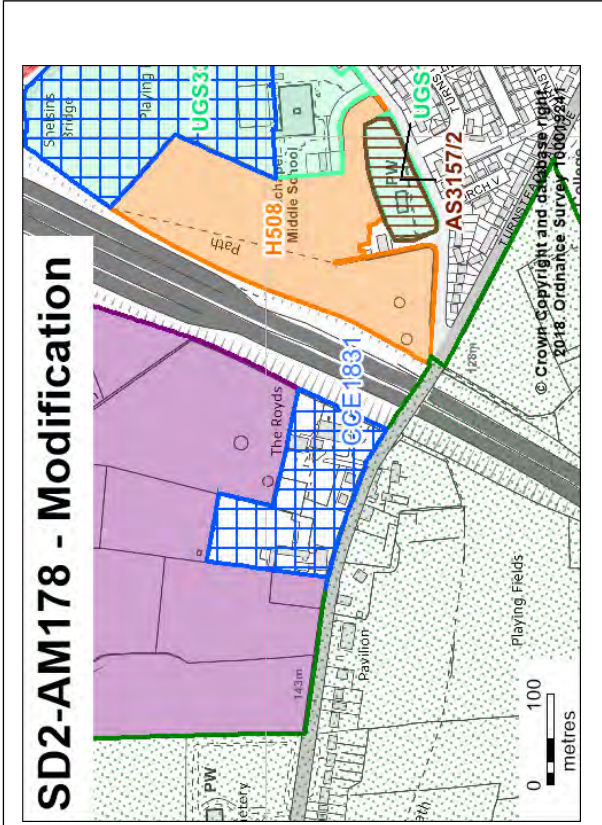
Table Modification SD2-AM177

Modification Ref	Site	Address	Mapping Change	Reason for Change
SD2-AM177	H1774	The Village, Thurstonland	Part of H1774 (housing) to green belt	Consequence of modification to H1774



Table Modification SD2-AM178

Modification Ref	Site	Address	Mapping Change	Reason for Change
SD2-AM178	CCE1831	Whitechapel Road, Scholes, Cleckheaton	Employment (E1831) to unallocated	Consequence of modification to E1831. No change to Green Belt boundary

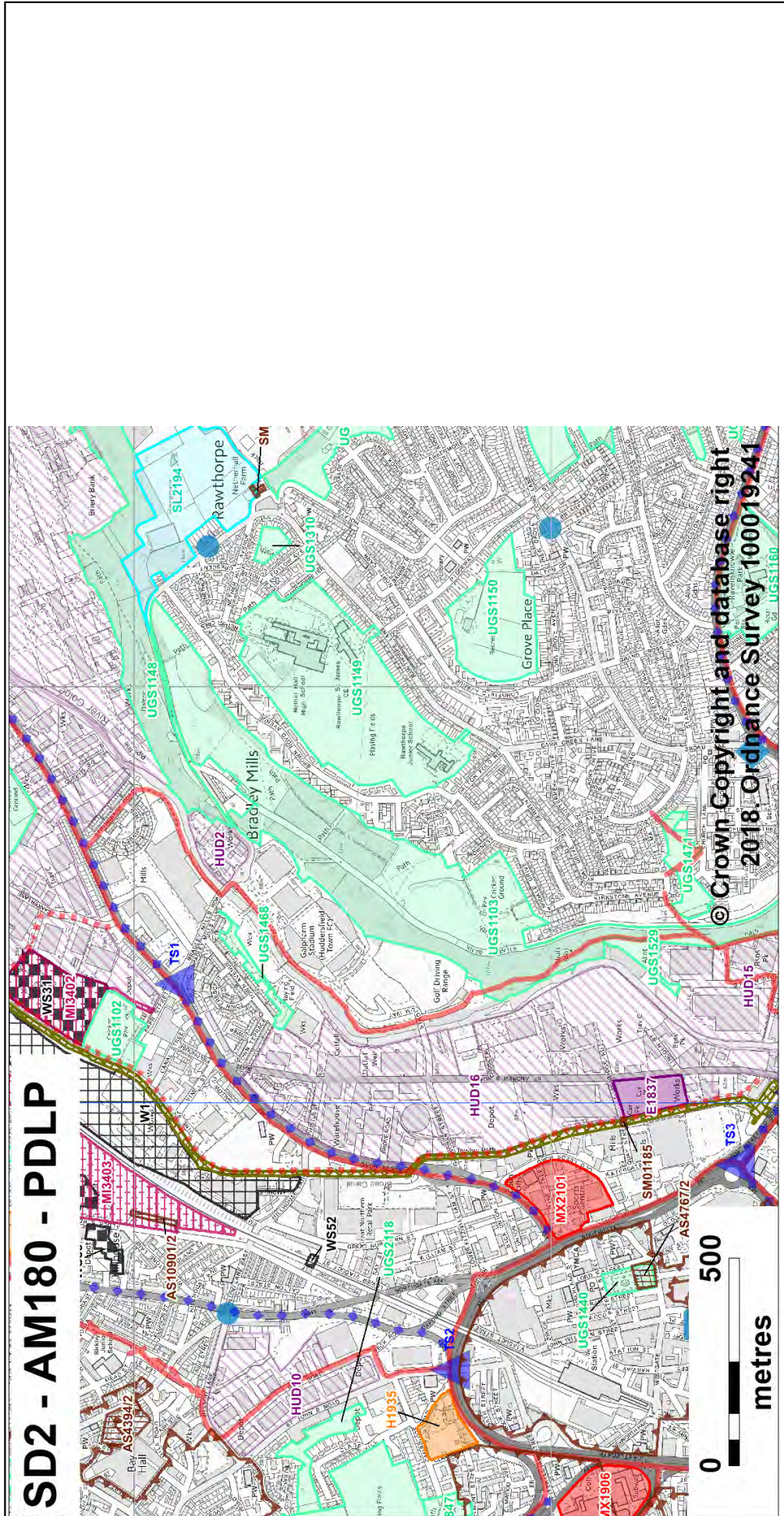


Policies Maps - Changes to the Core Walking & Cycling Network

Minor changes have been made to update and clarify the proposed route of Meltham Footpath and Huddersfield Footpath along the River Colne. These changes are not required to make the plan ‘sound’ but are needed to ensure that the final routes are correct and up-to-date.

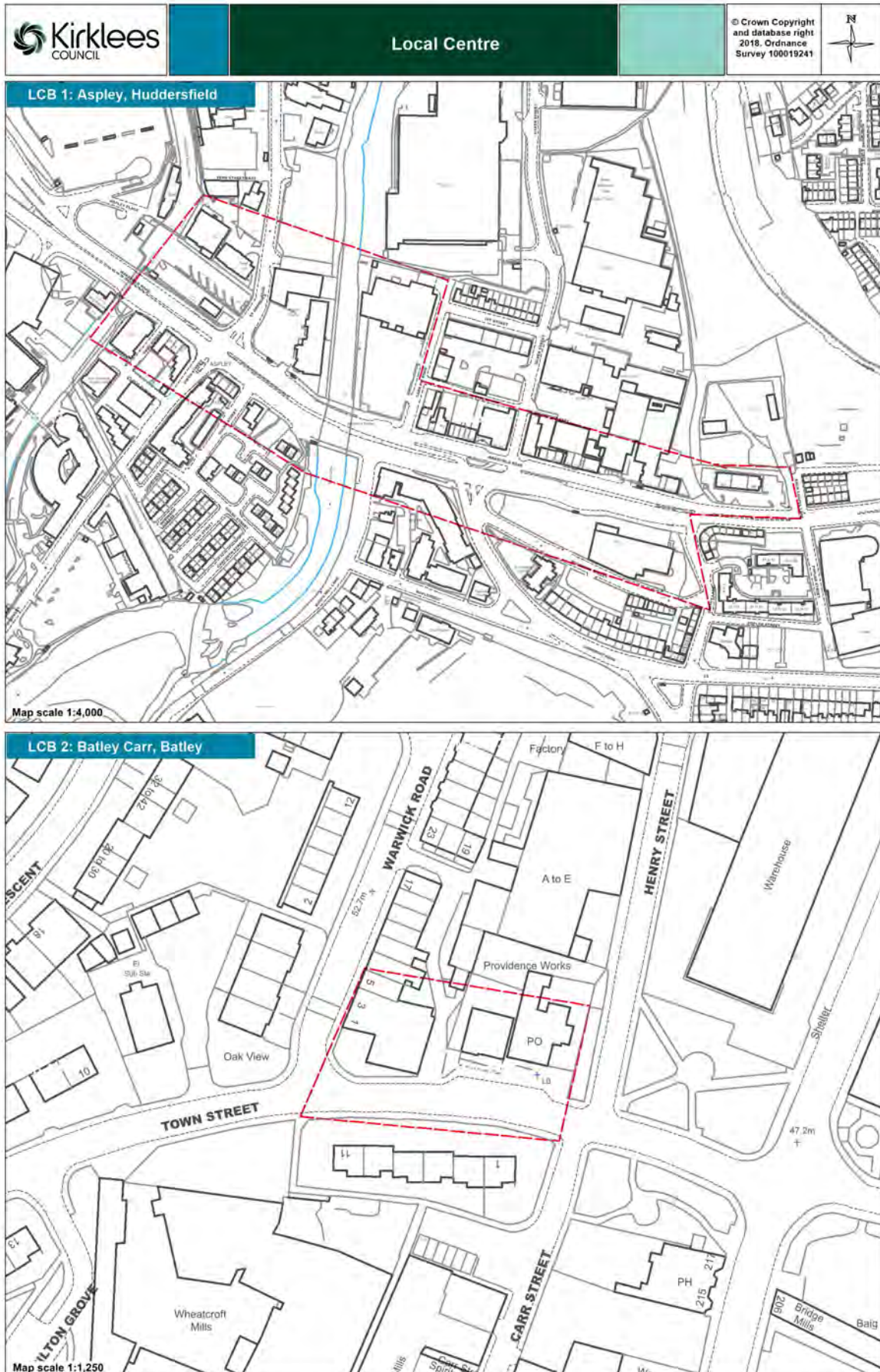
Table Modification SD2-AM179

Modification Ref	Page	Site	Para/Table/Box	Tracked change	Reason for Change
SD2-AM179	Core Walking & Cycling Network	Meltham Footpath	Policies Map	Existing and indicative route of Meltham Footpath to be included on the Policies Map.	Correction



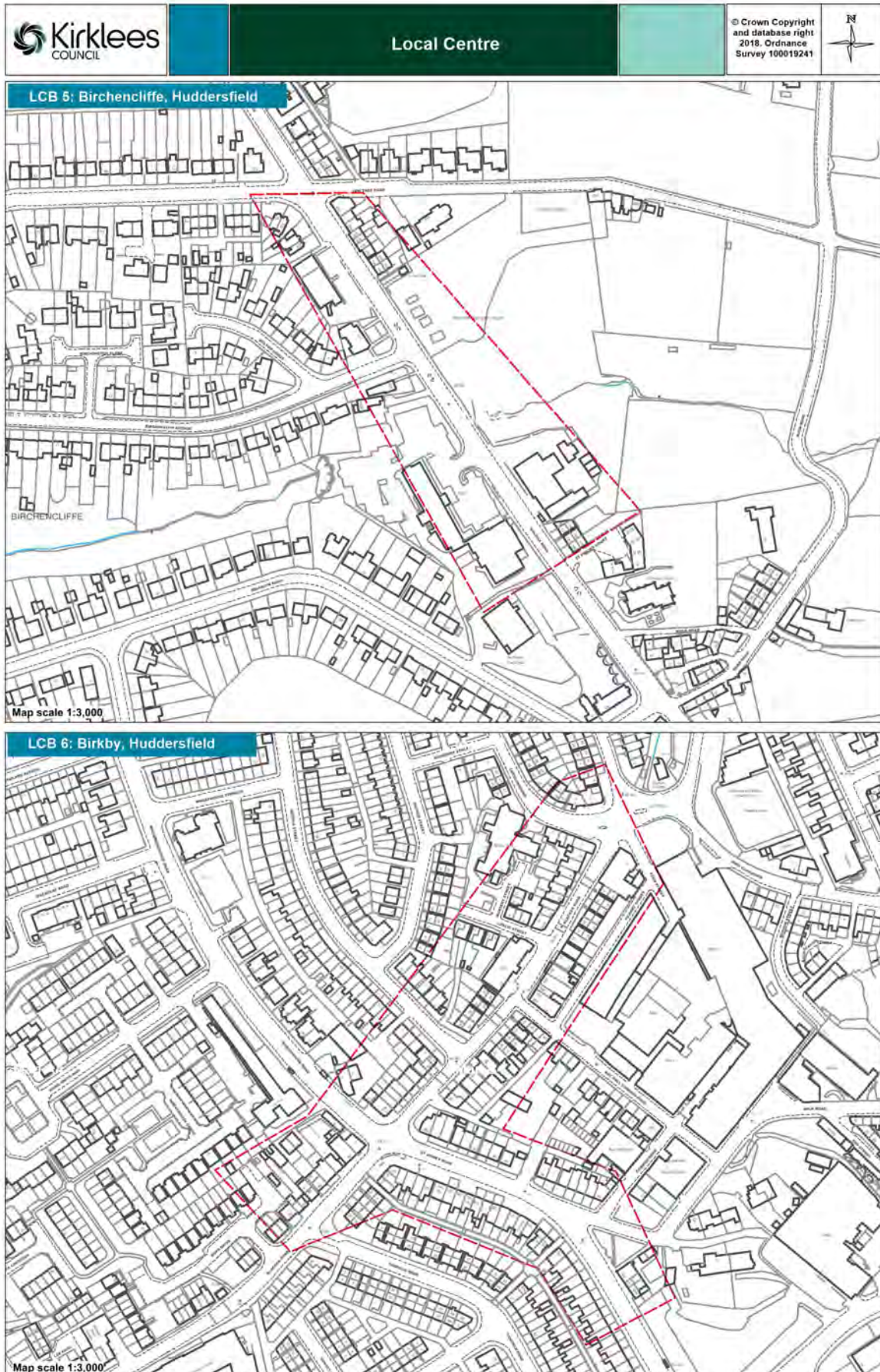
Appendix 1 Local Centre Boundaries

Appendix 1 Local Centre Boundaries

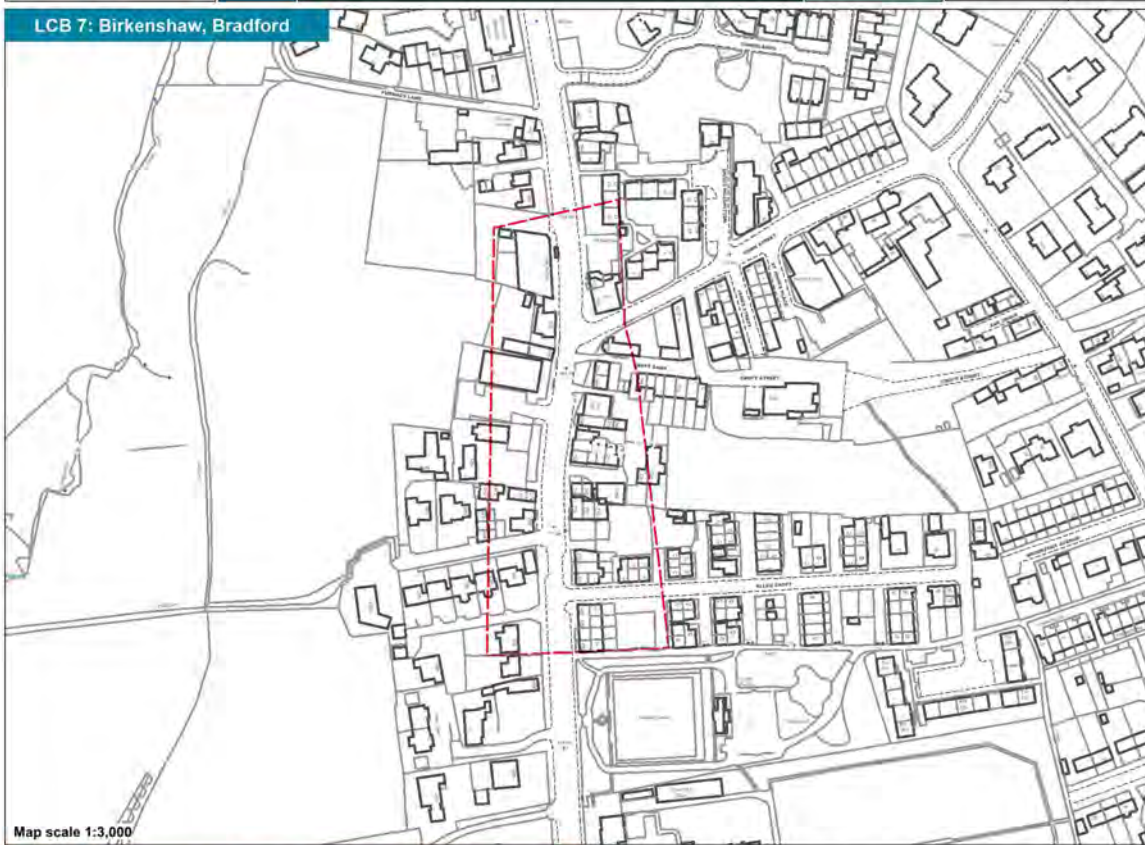




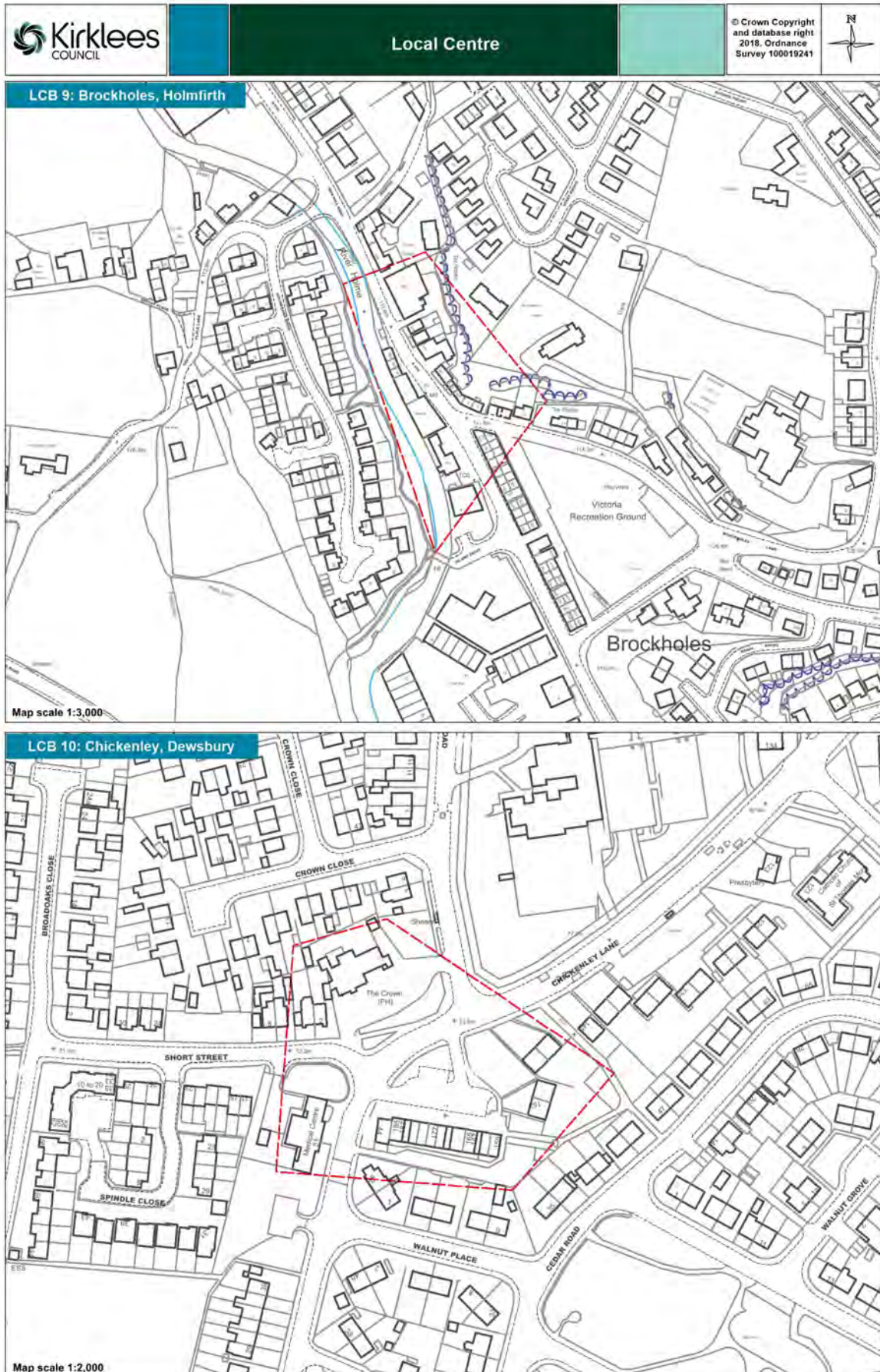
Appendix 1 Local Centre Boundaries



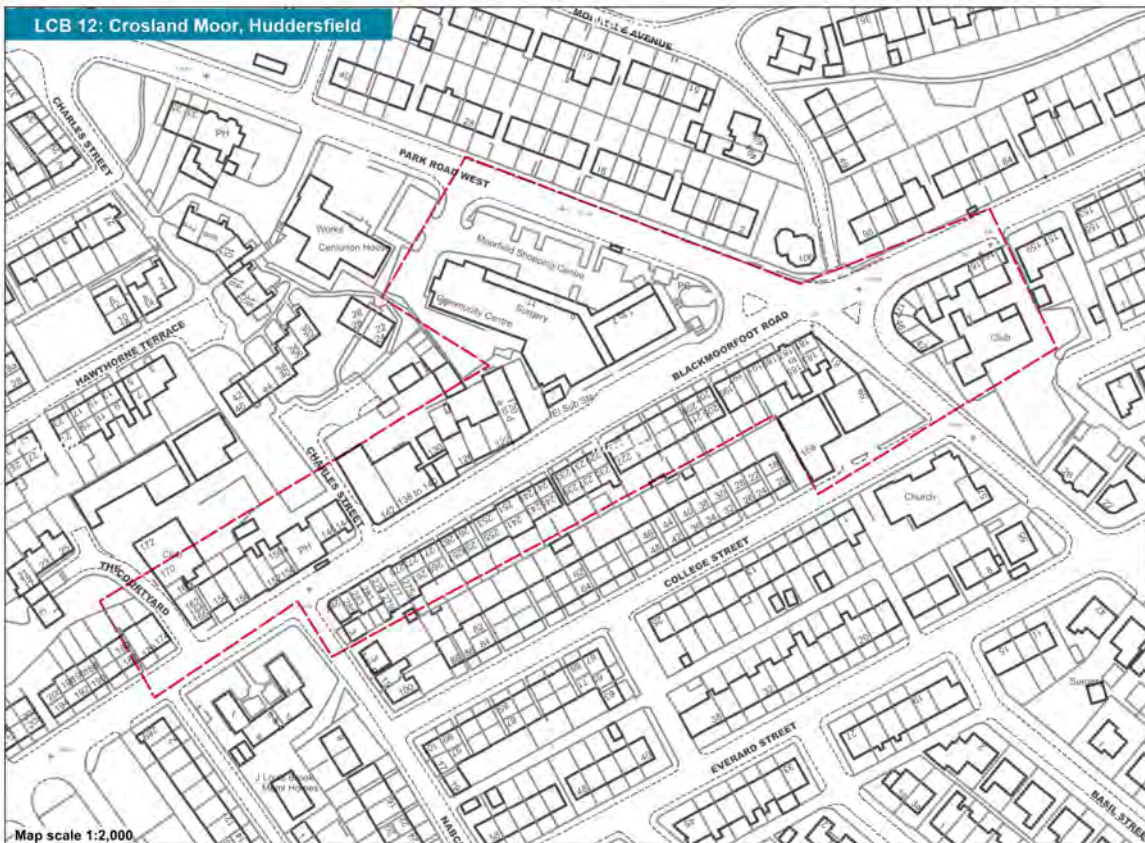
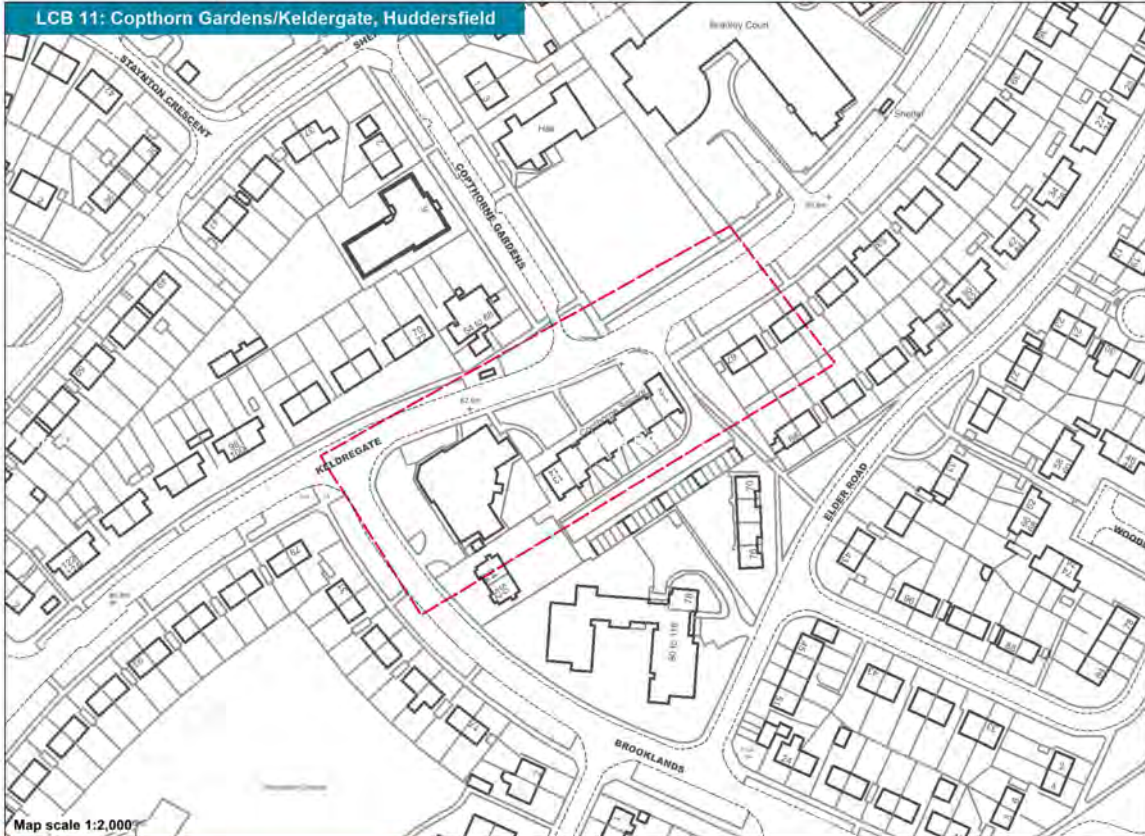
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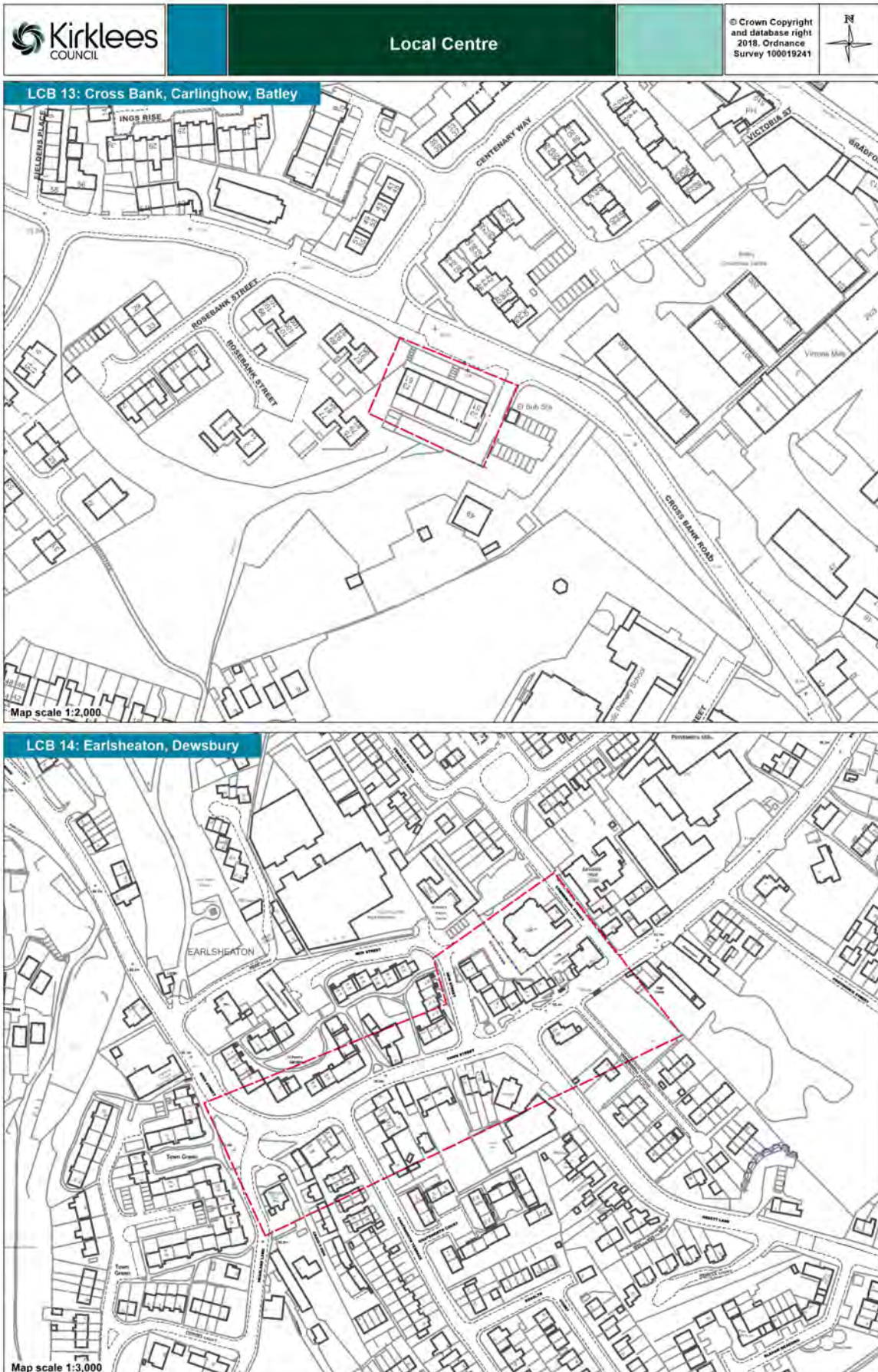
Appendix 1 Local Centre Boundaries

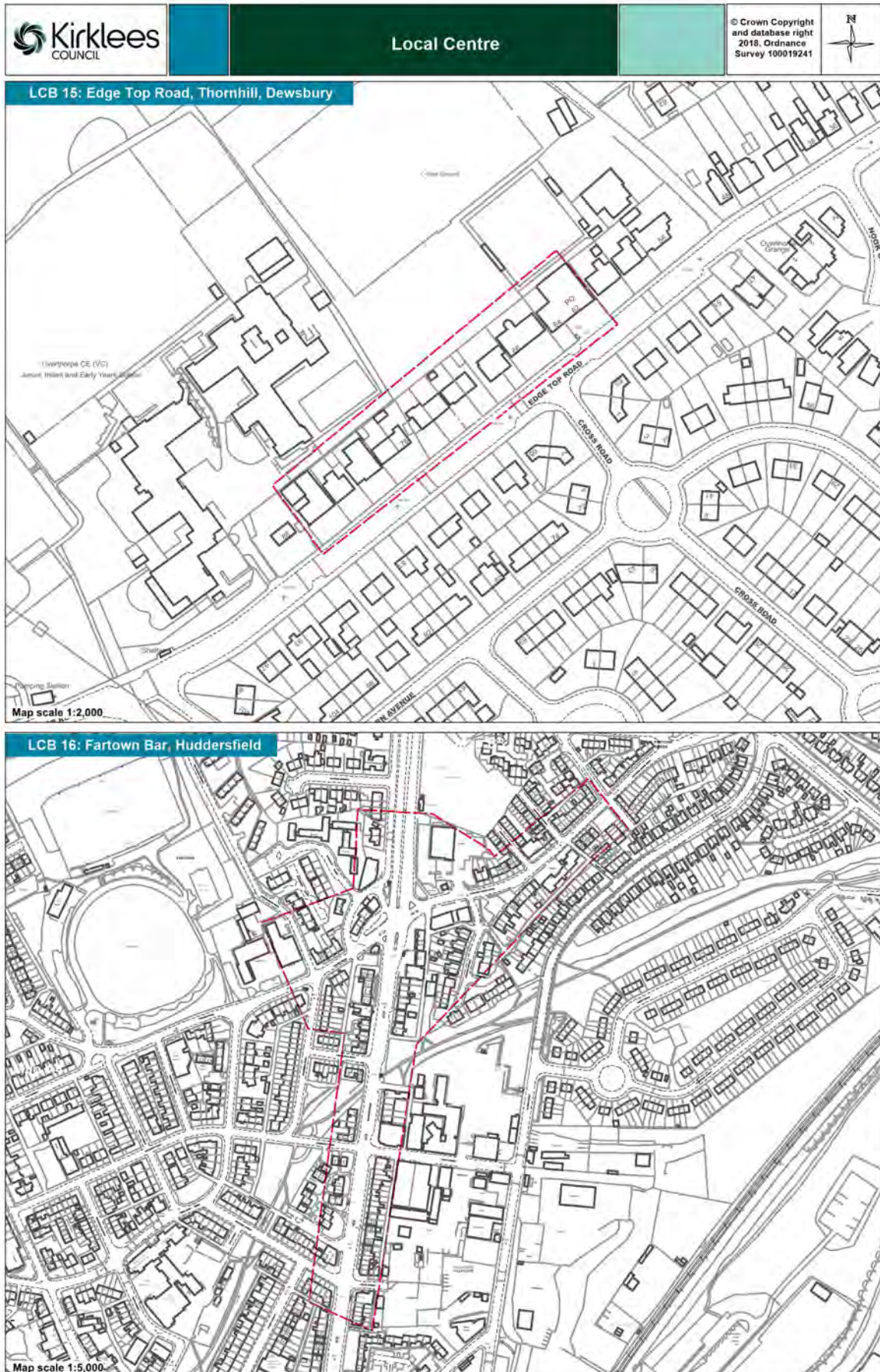


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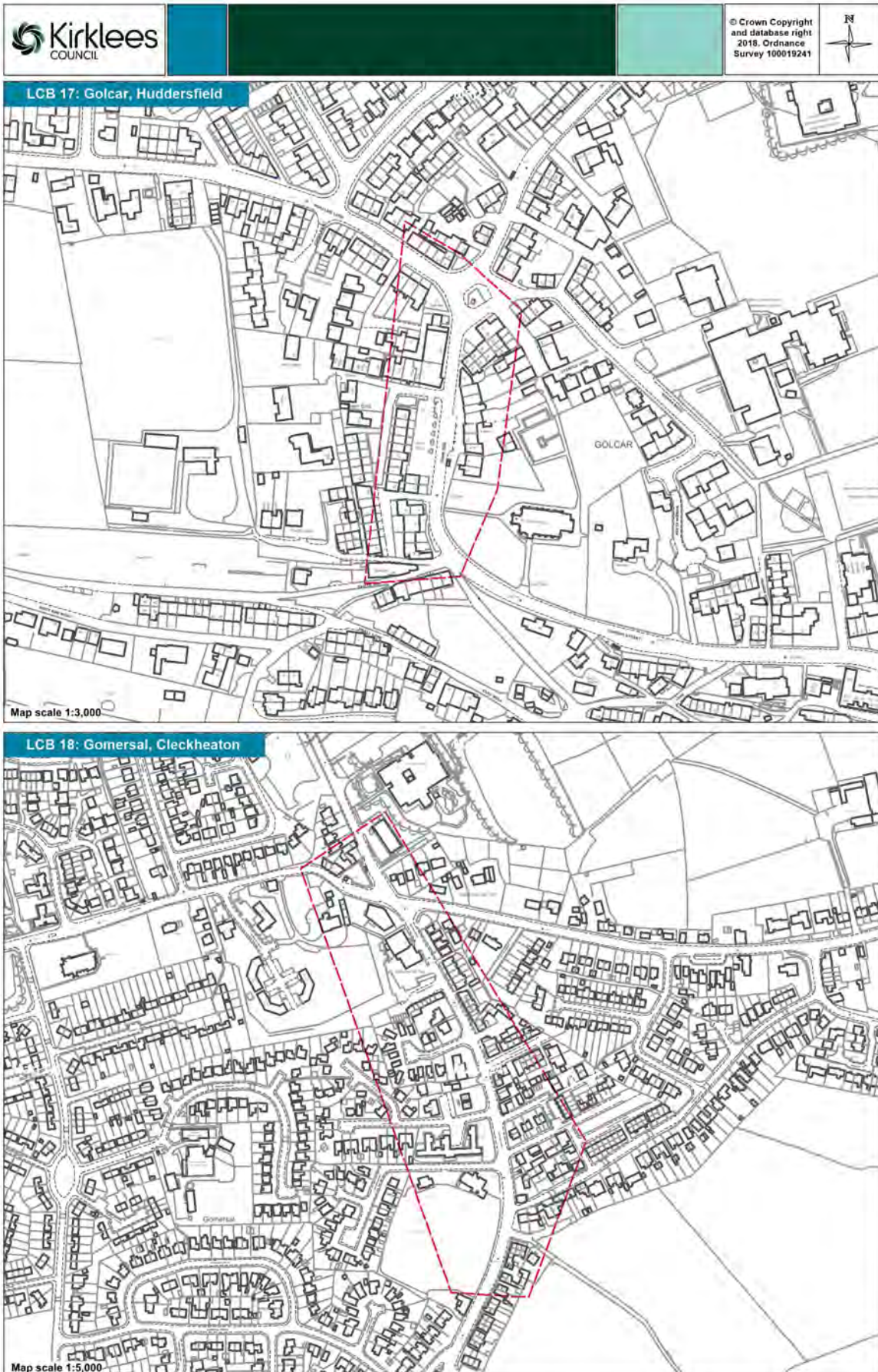


Appendix 1 Local Centre Boundaries

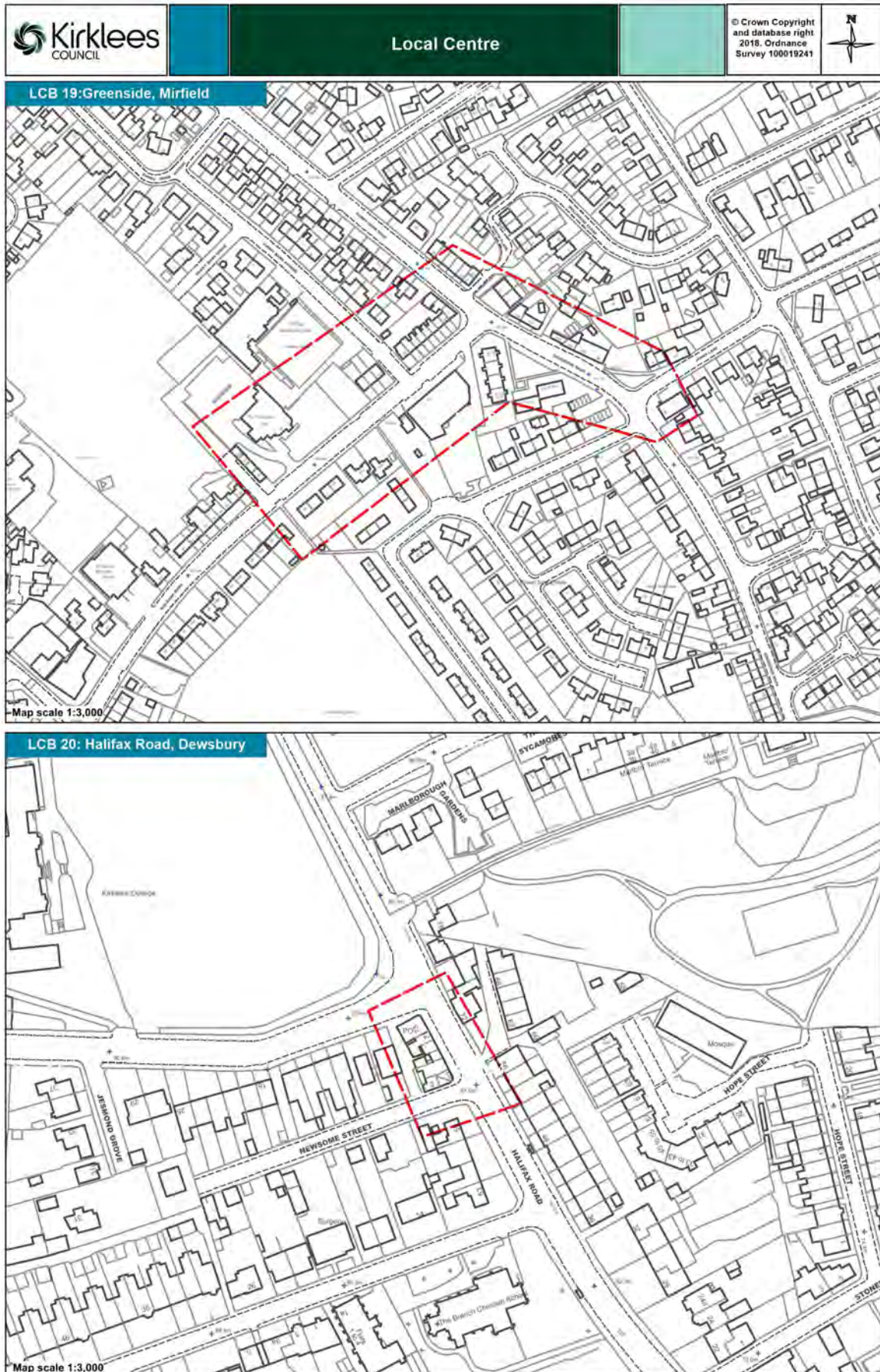




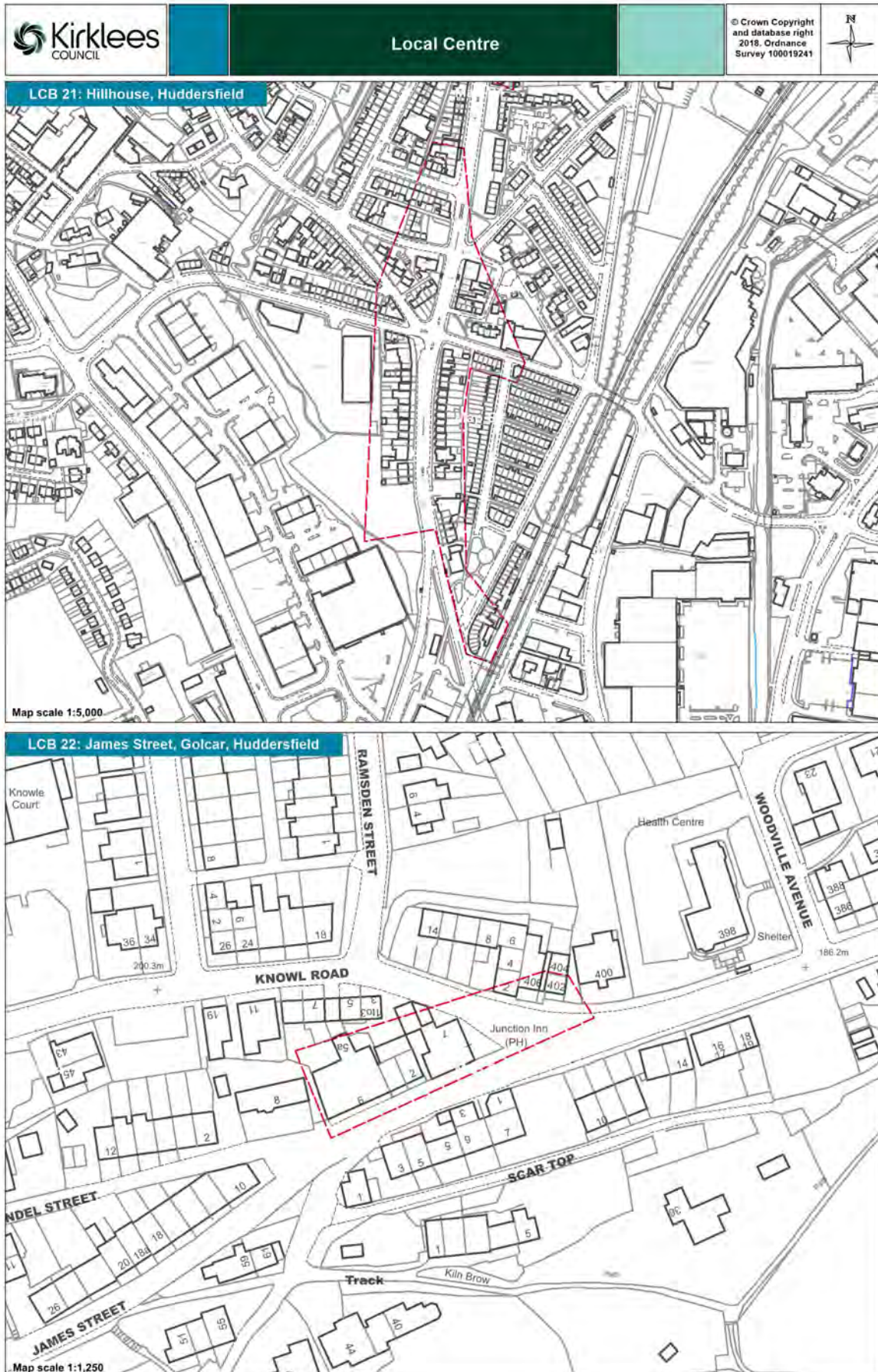
Appendix 1 Local Centre Boundaries



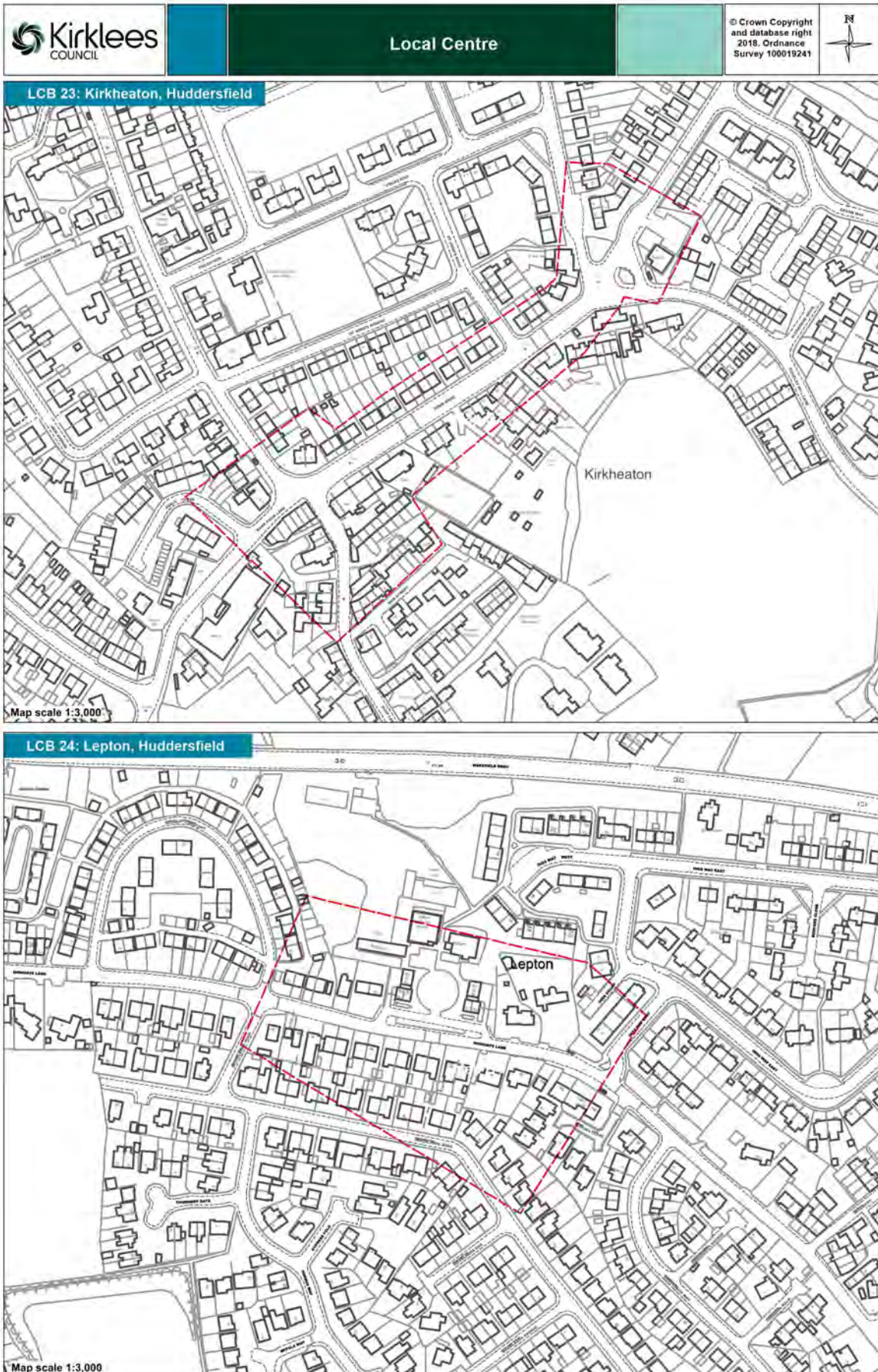
Appendix 1 Local Centre Boundaries



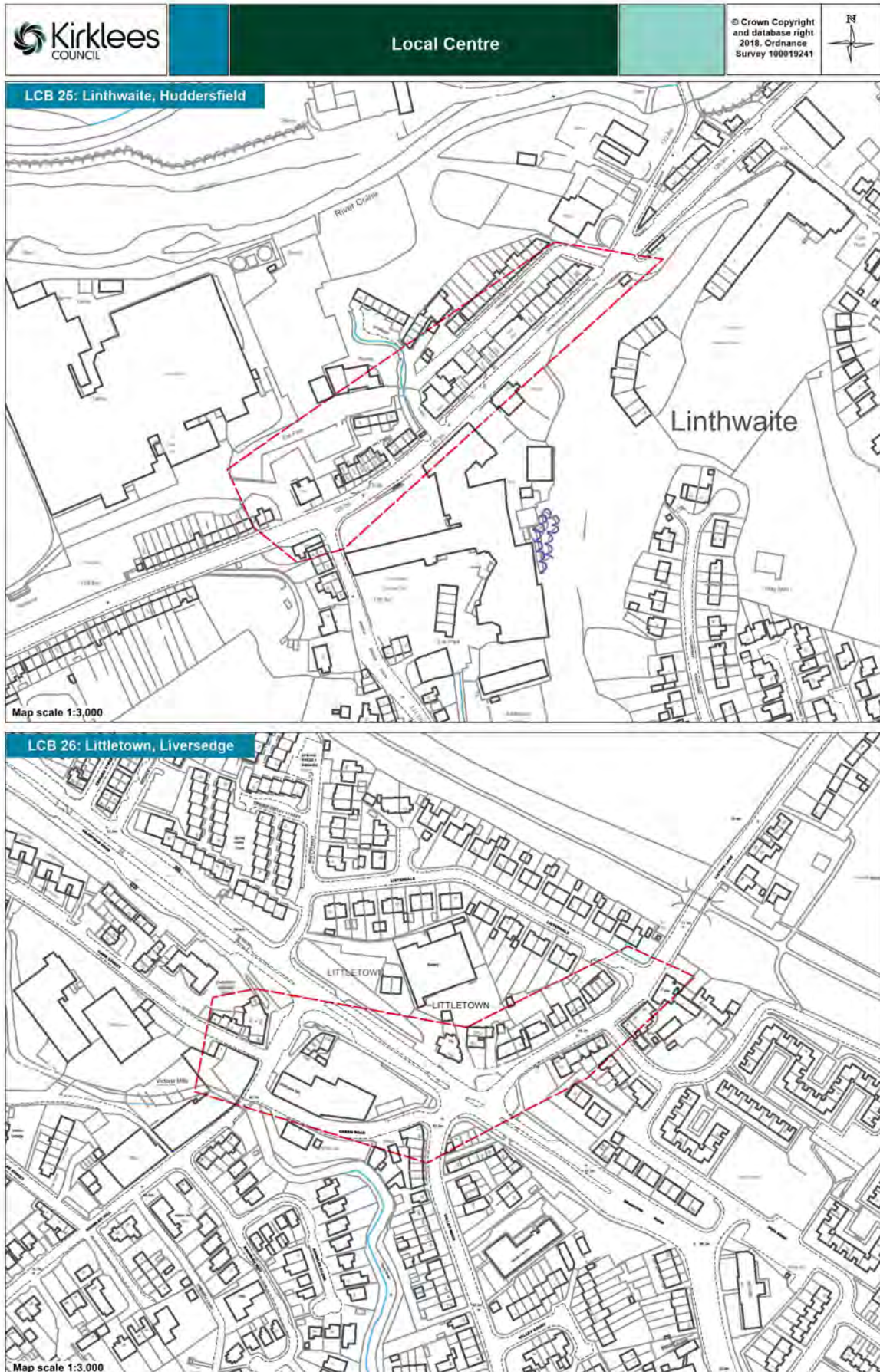
Appendix 1 Local Centre Boundaries



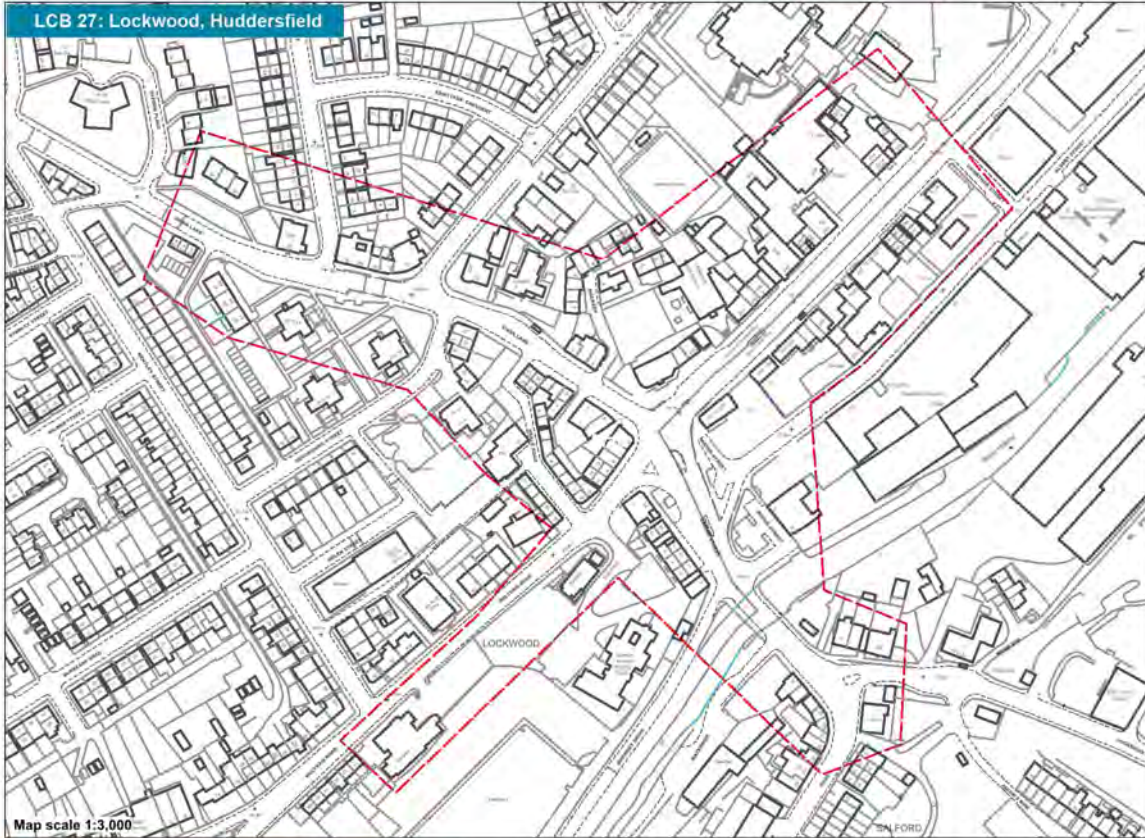
Appendix 1 Local Centre Boundaries



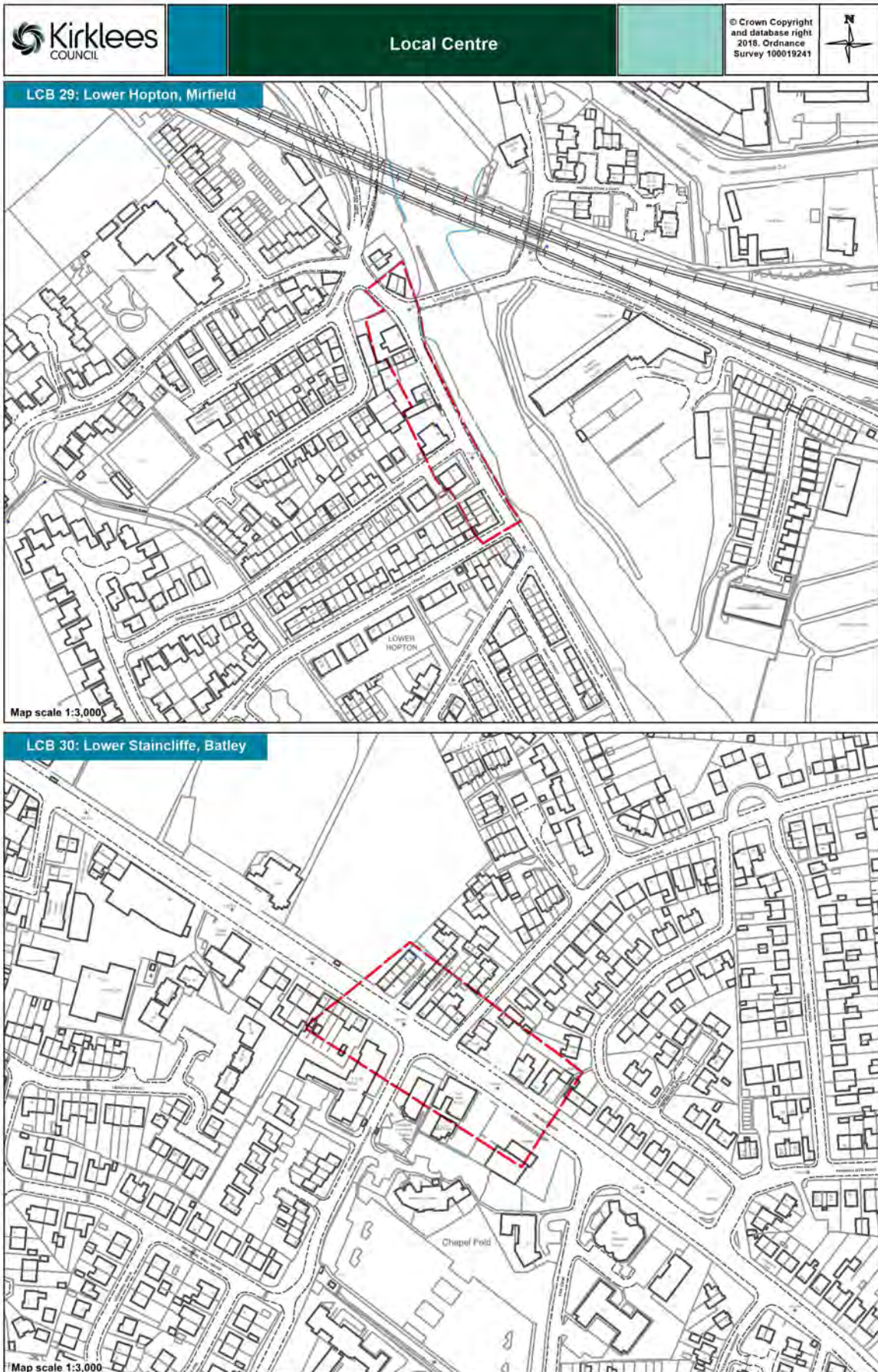
Appendix 1 Local Centre Boundaries

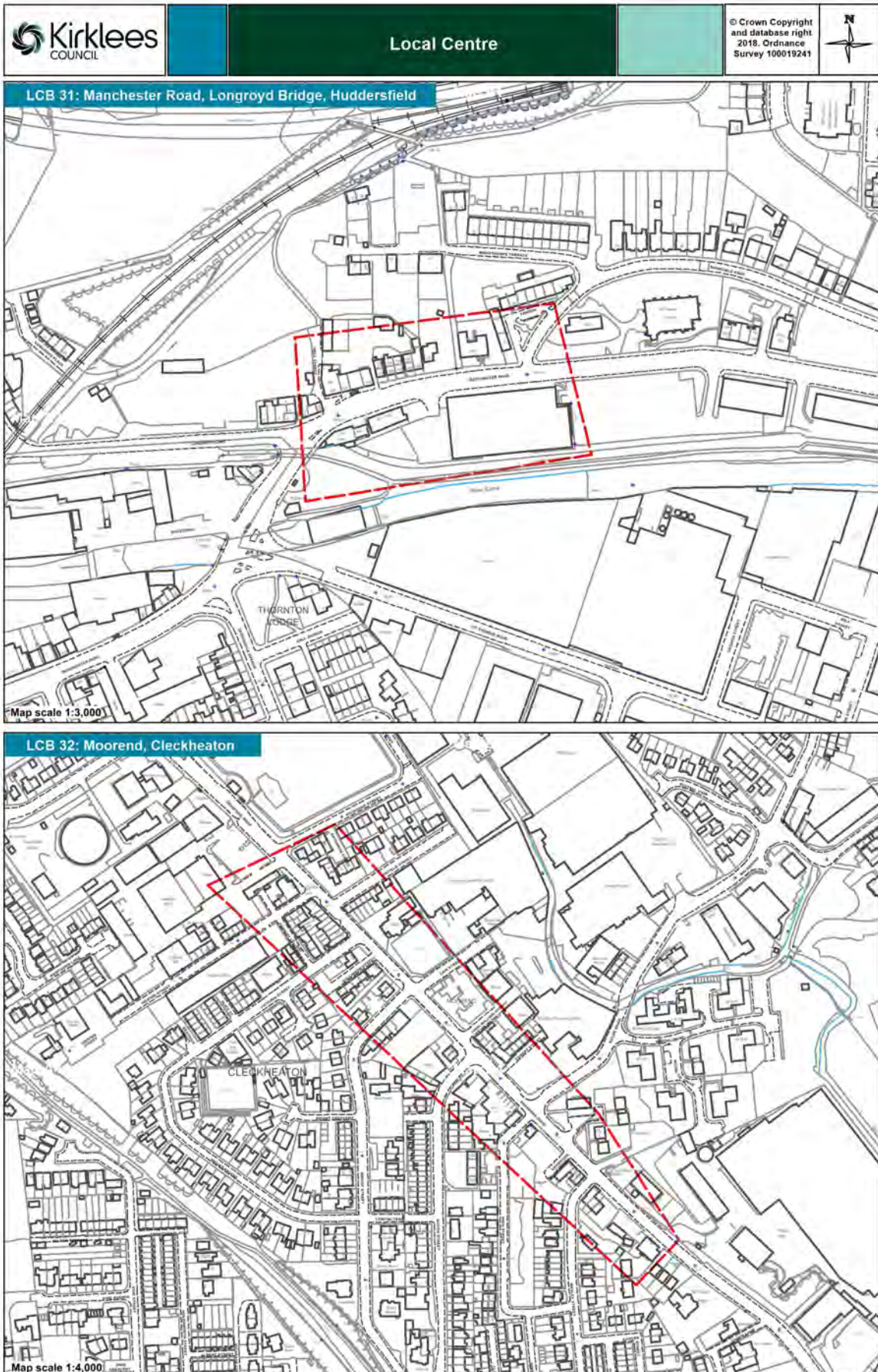


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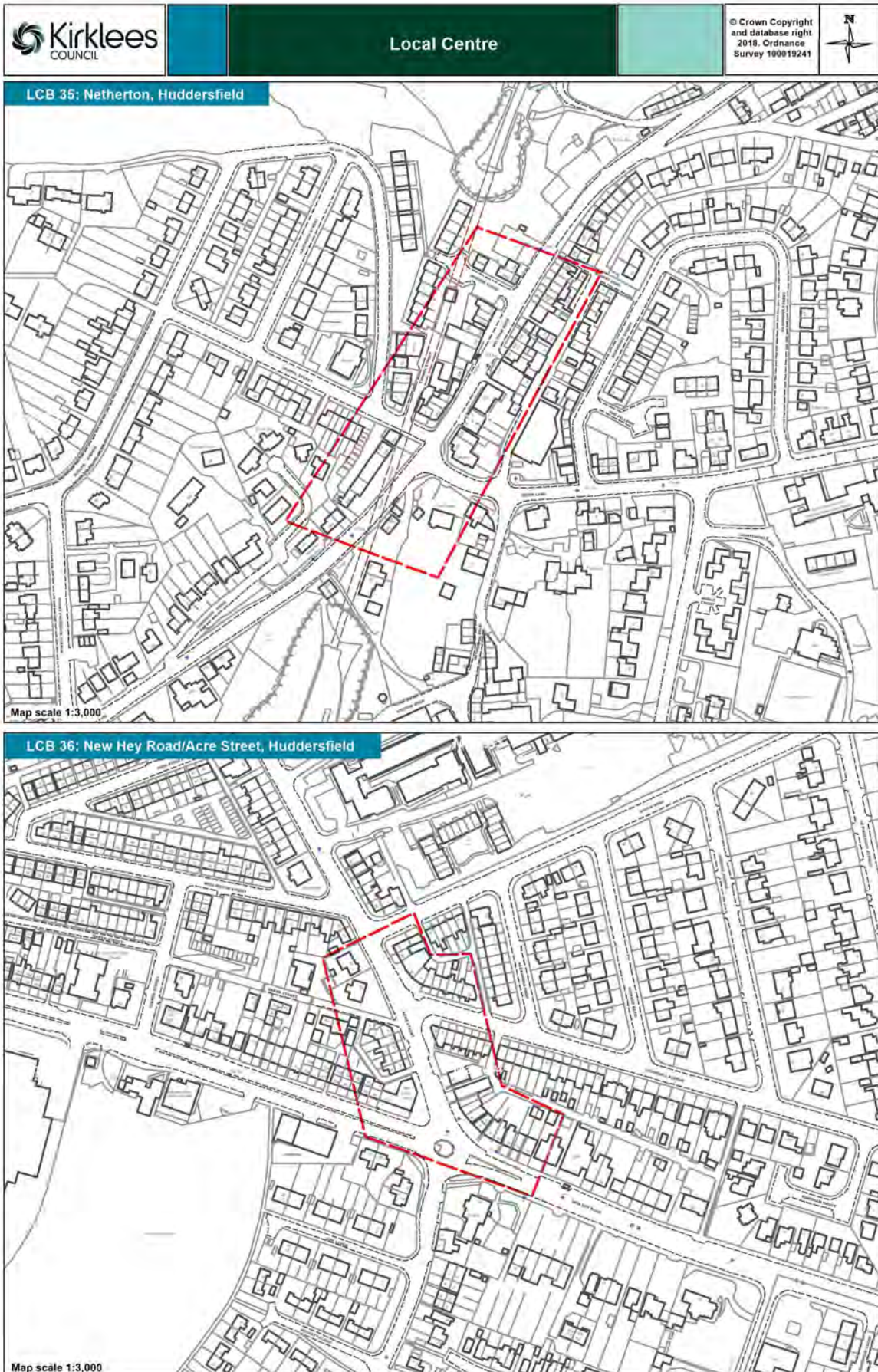
Appendix 1 Local Centre Boundaries



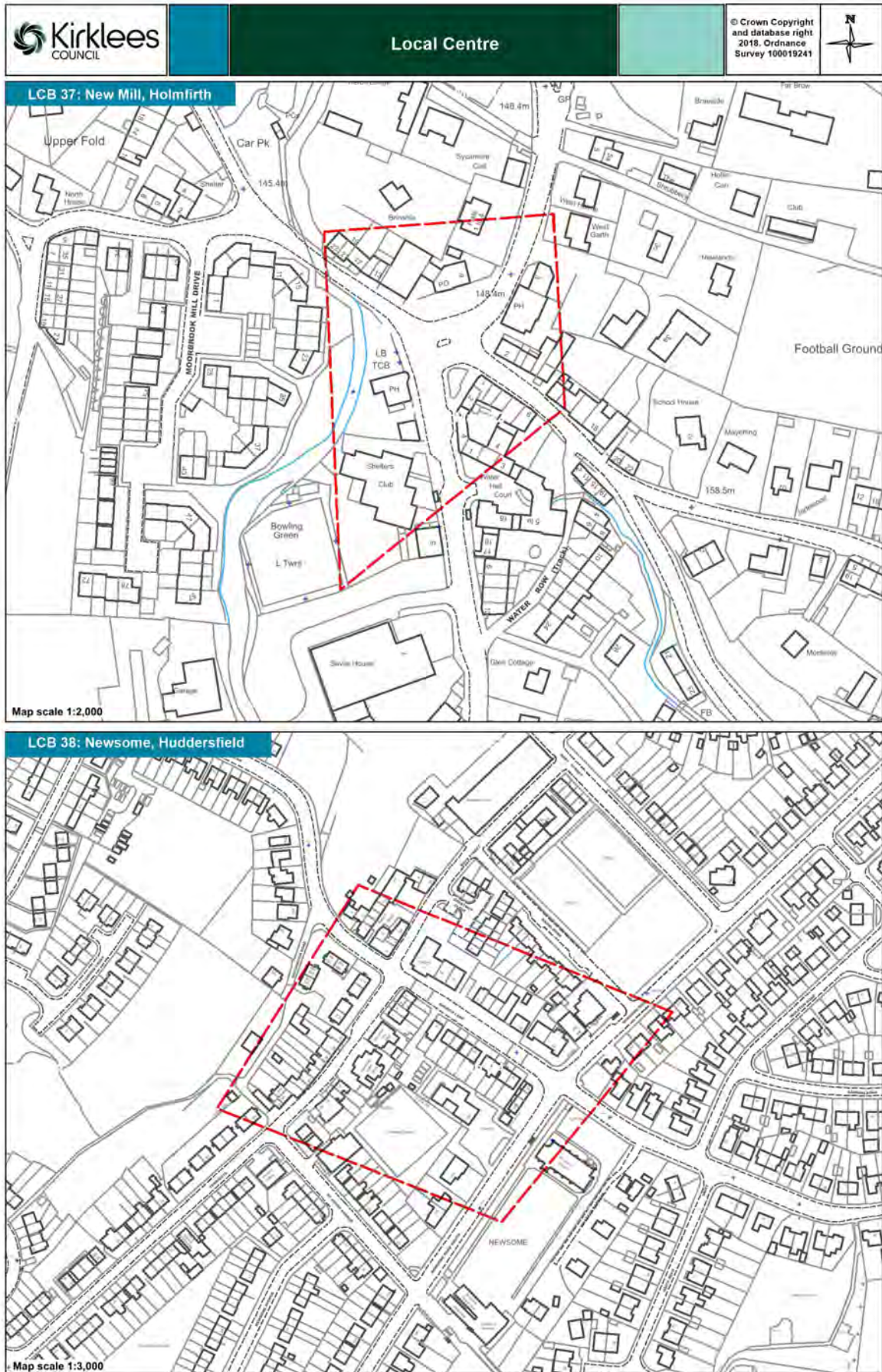


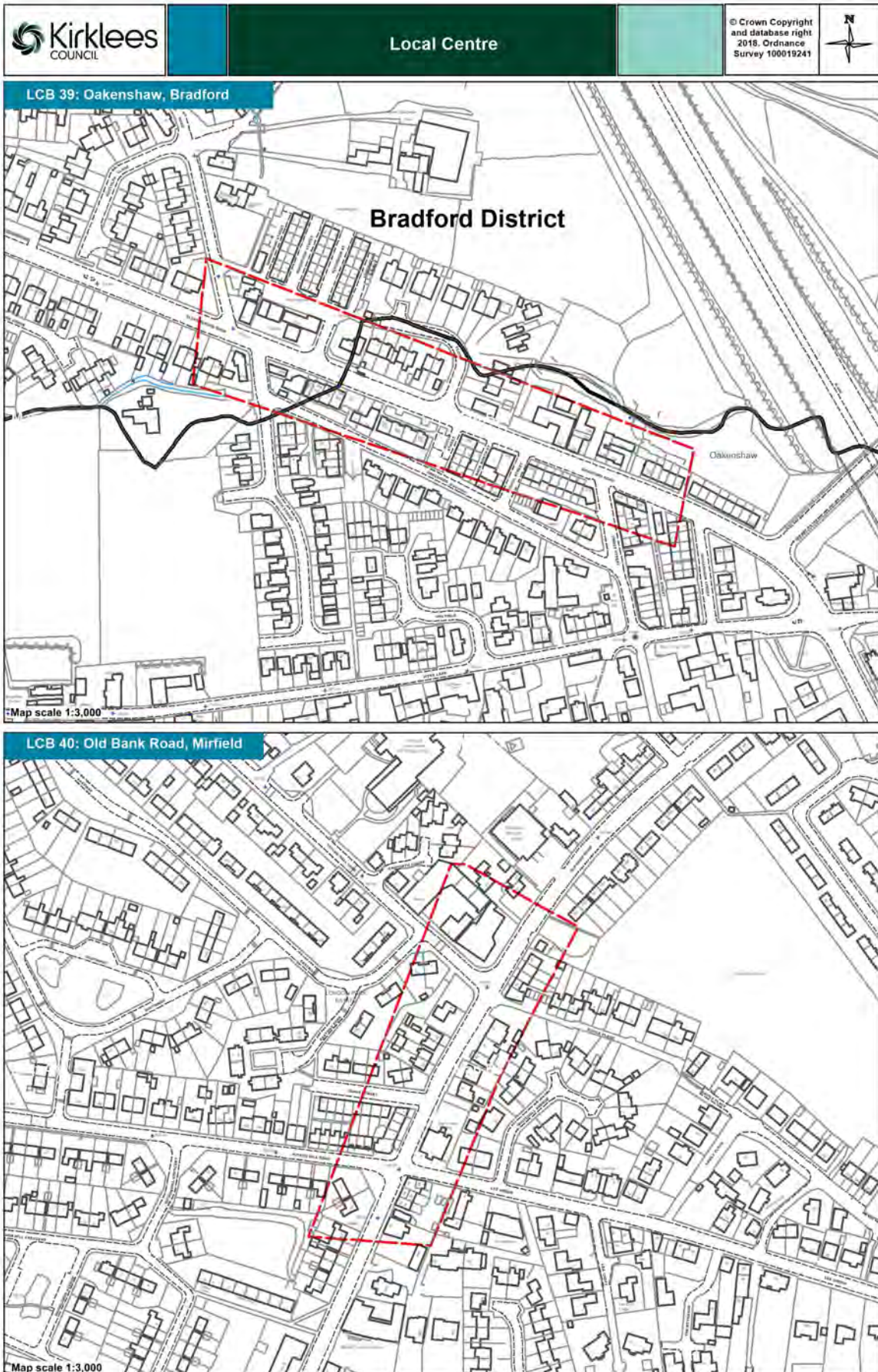
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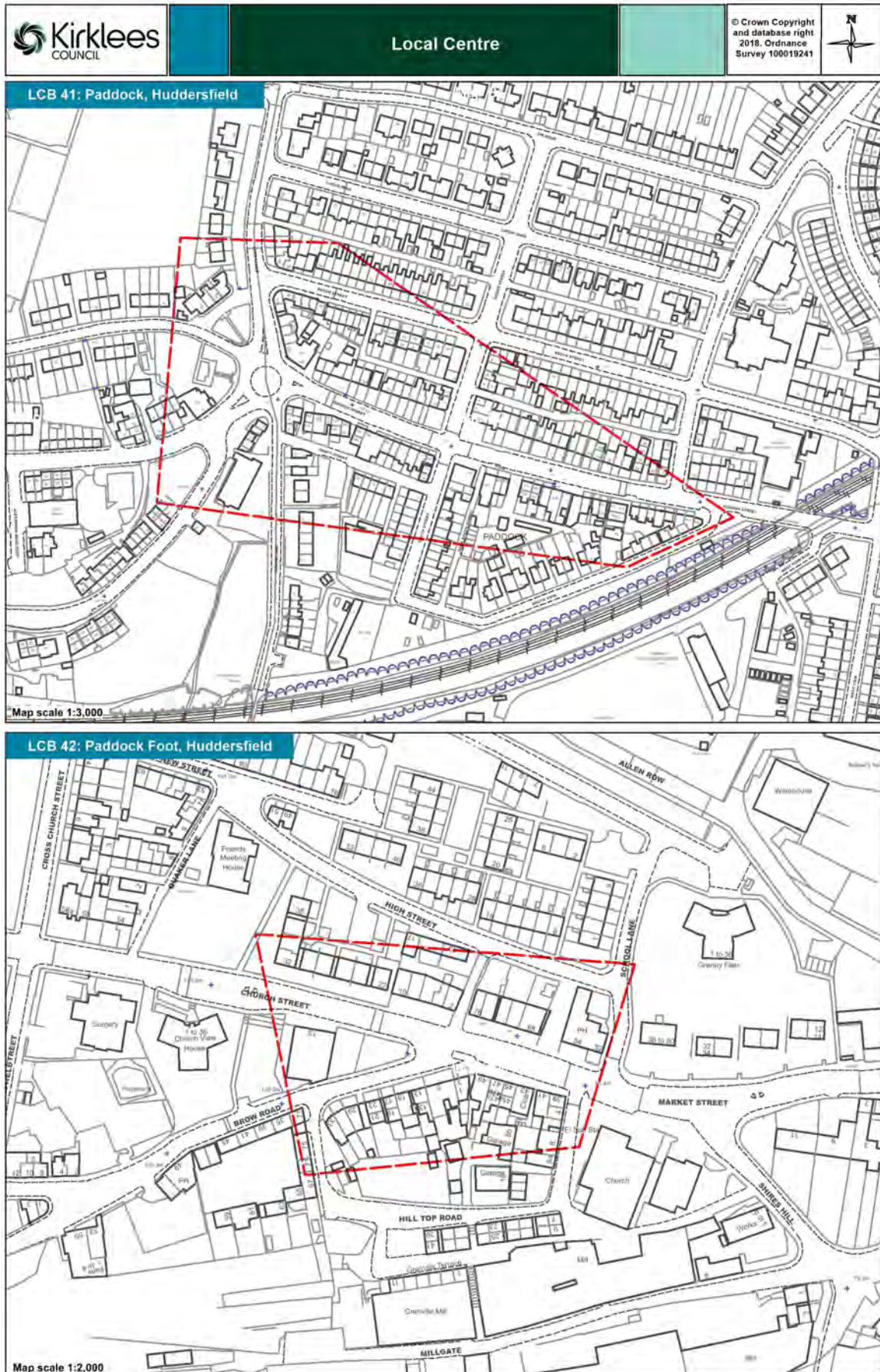


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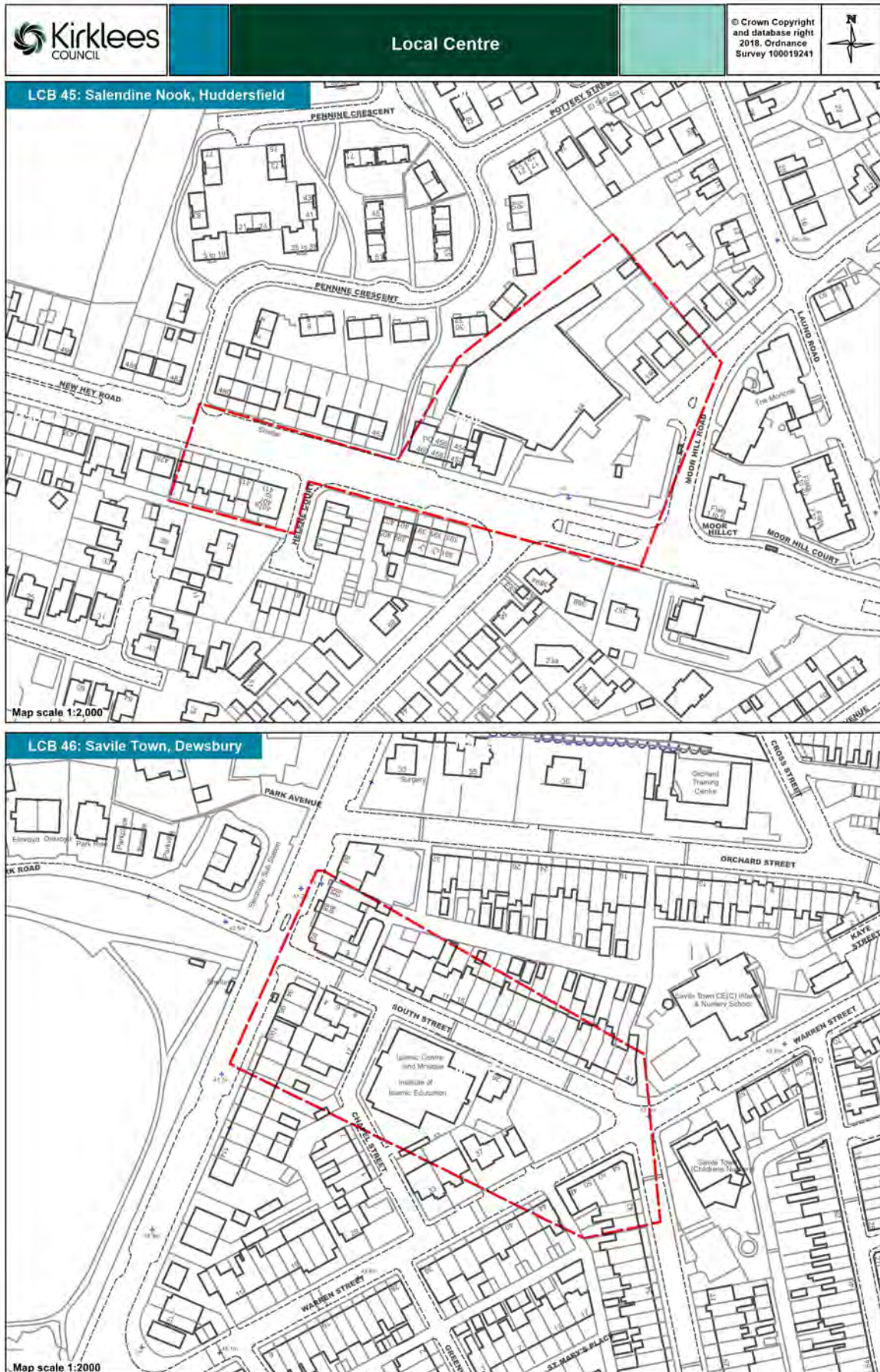
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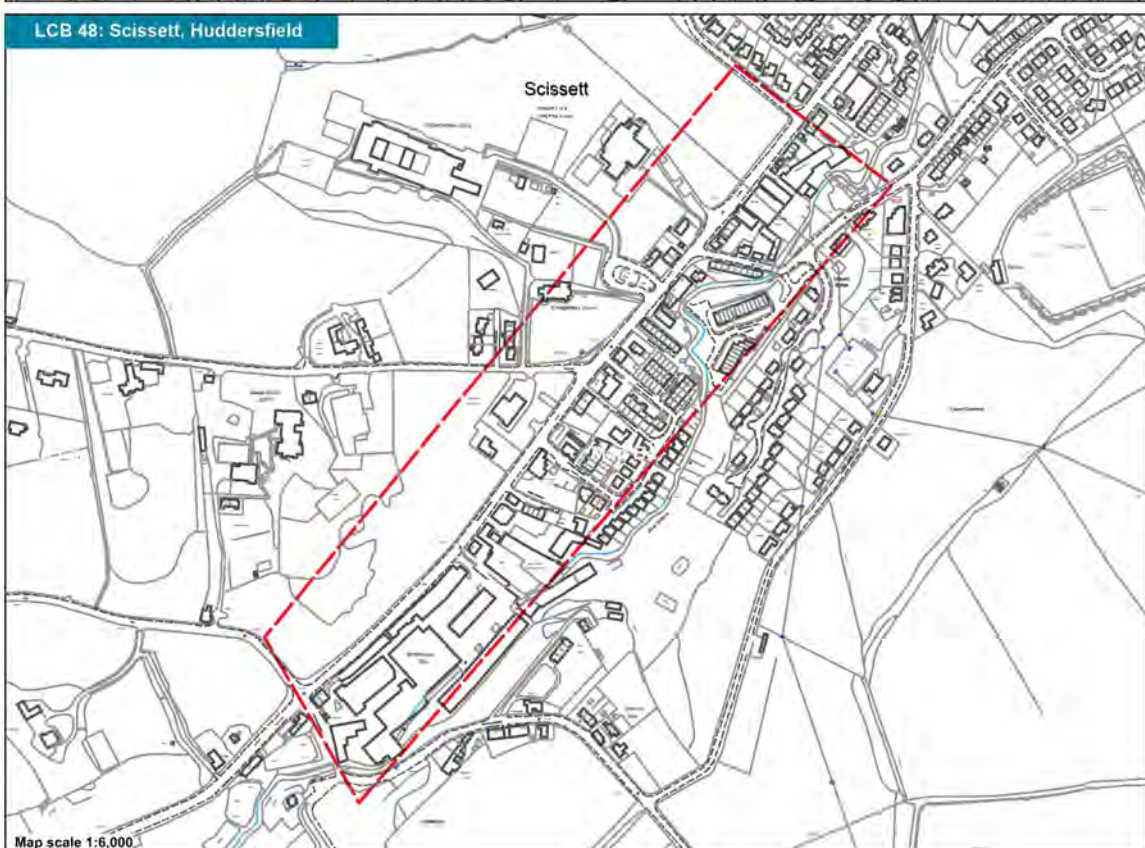
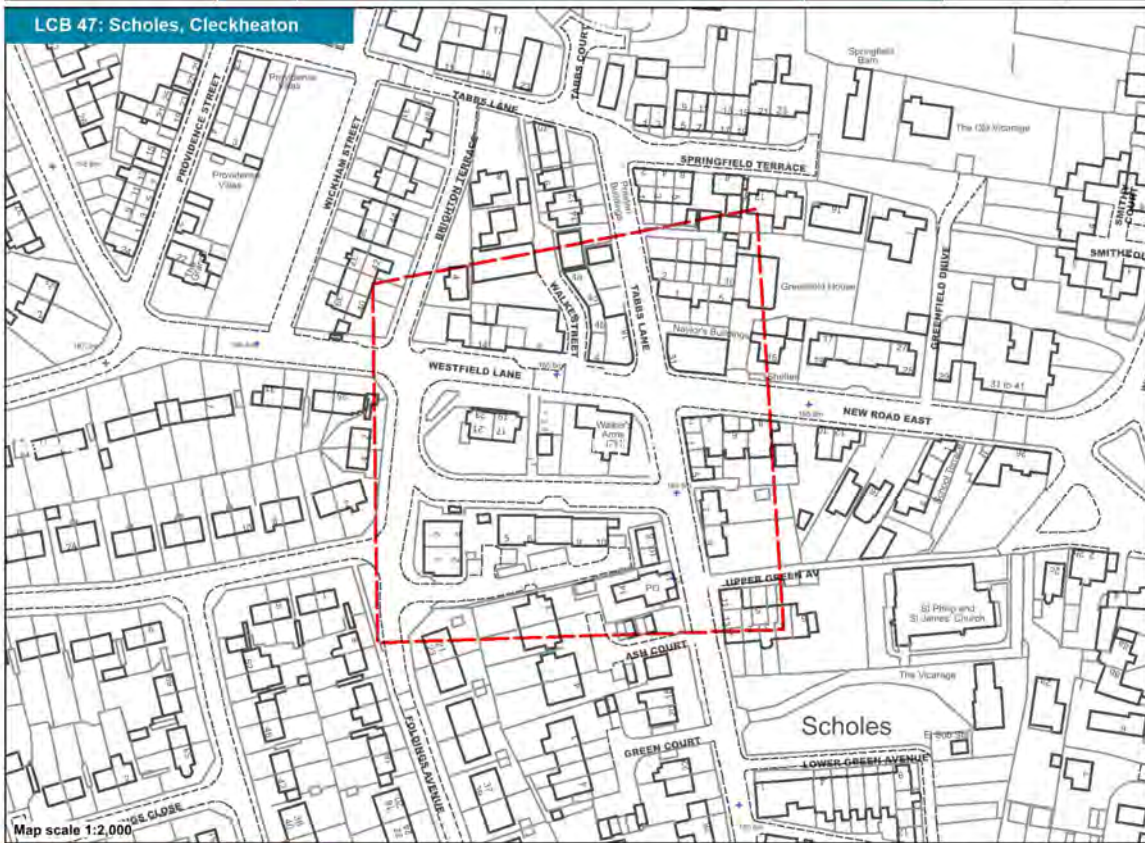
Appendix 1 Local Centre Boundaries



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	Local Centre	© Crown Copyright and database right 2018. Ordnance Survey 100019241 
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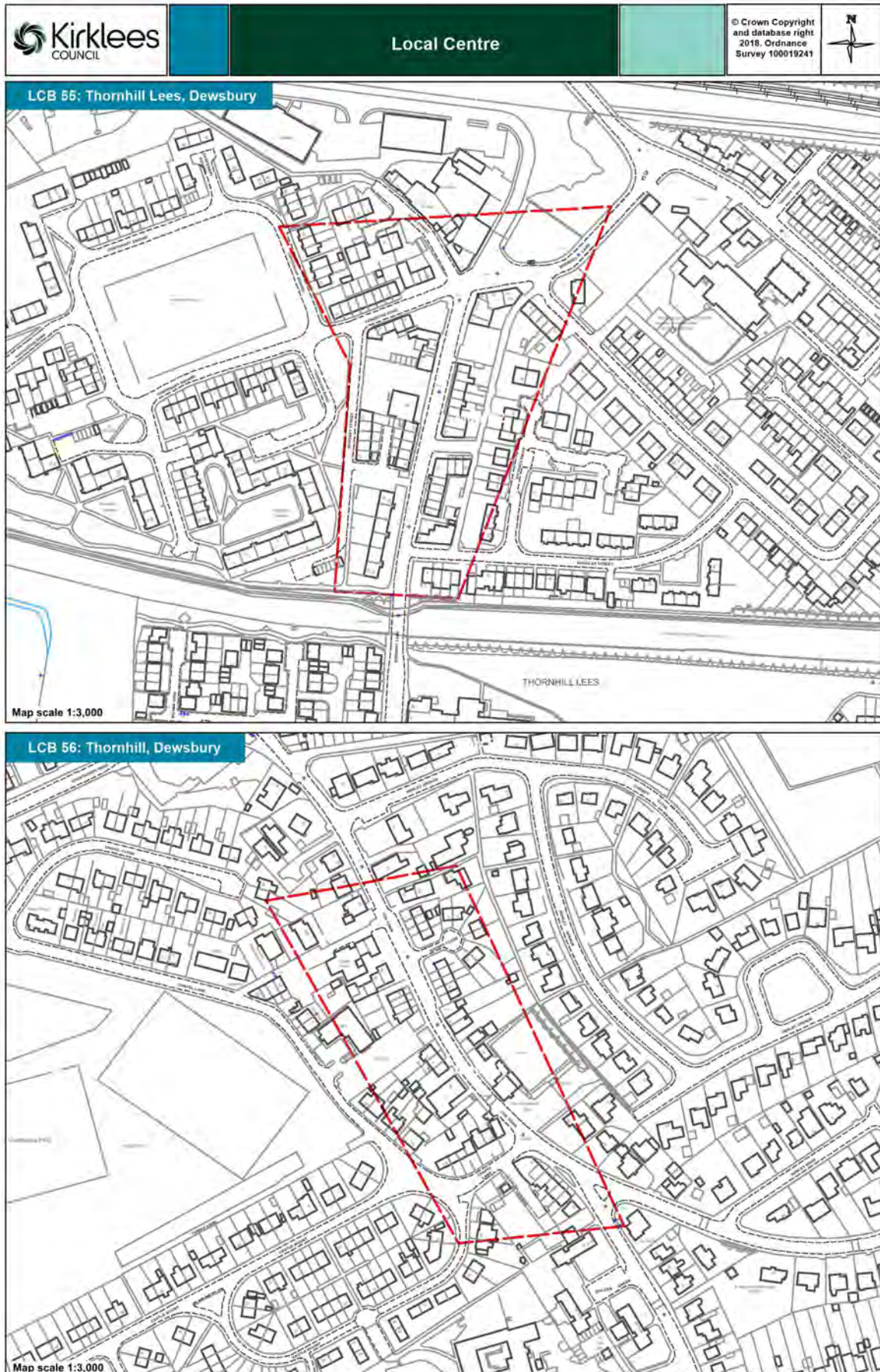




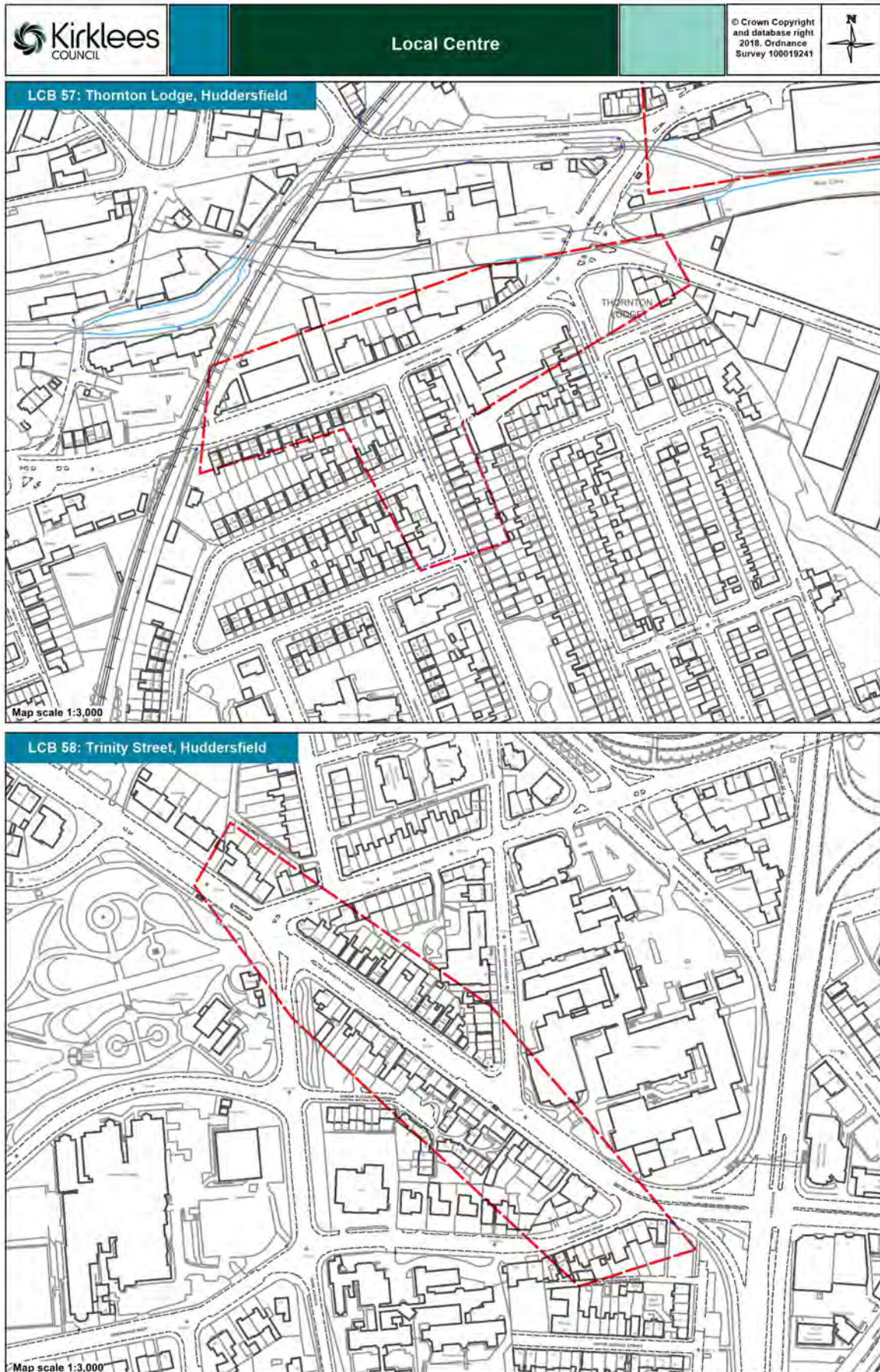
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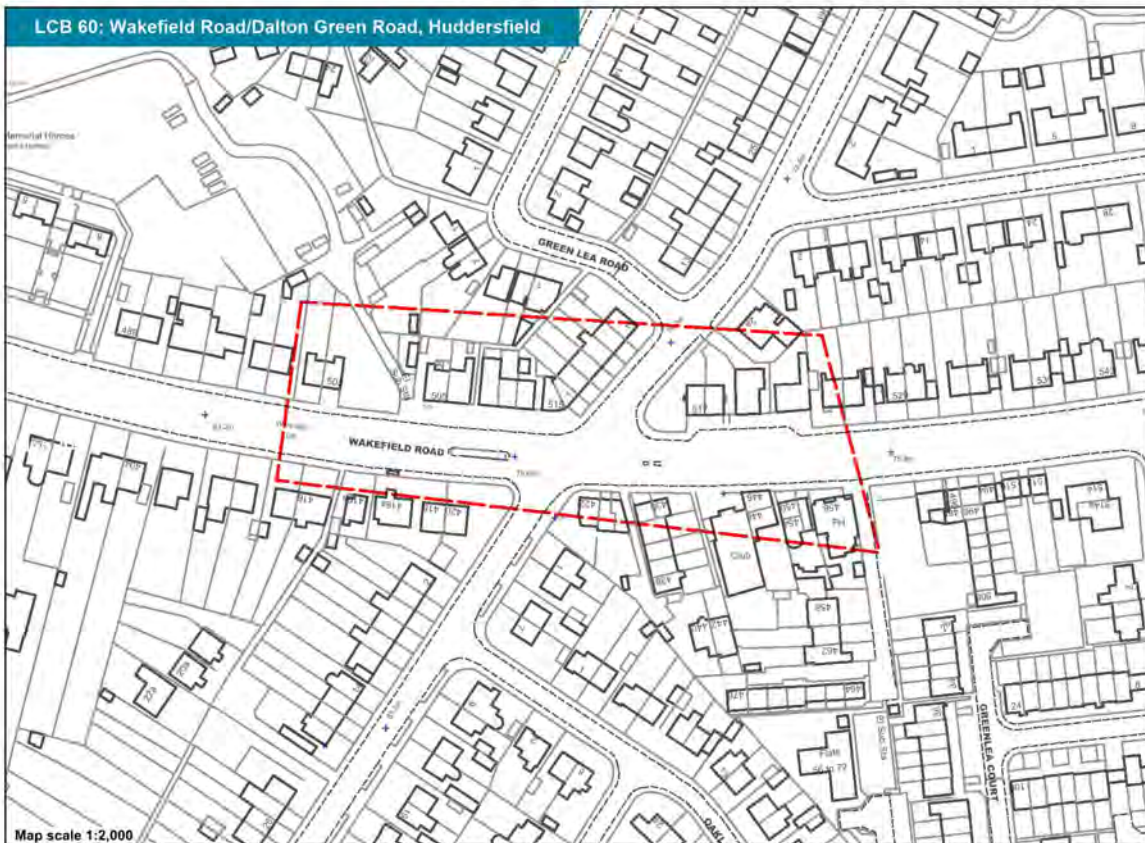
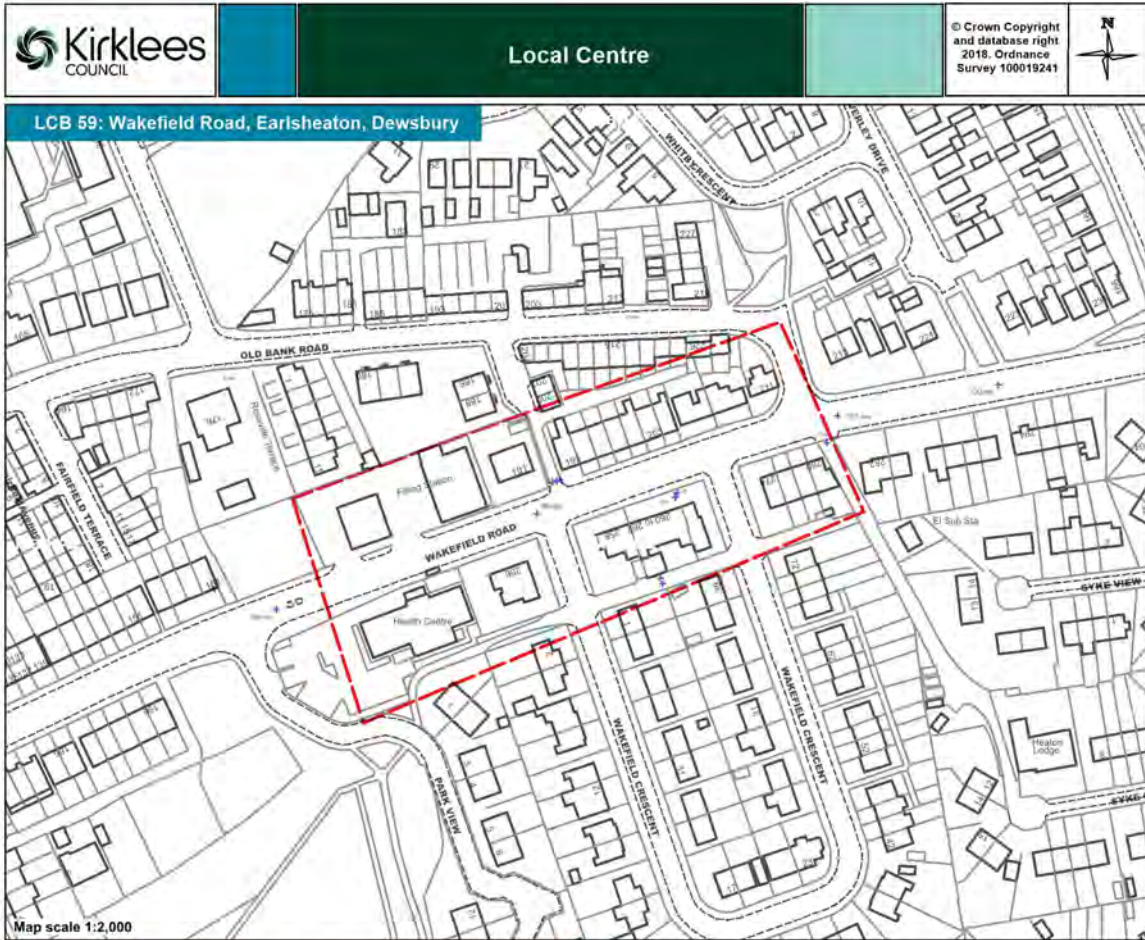


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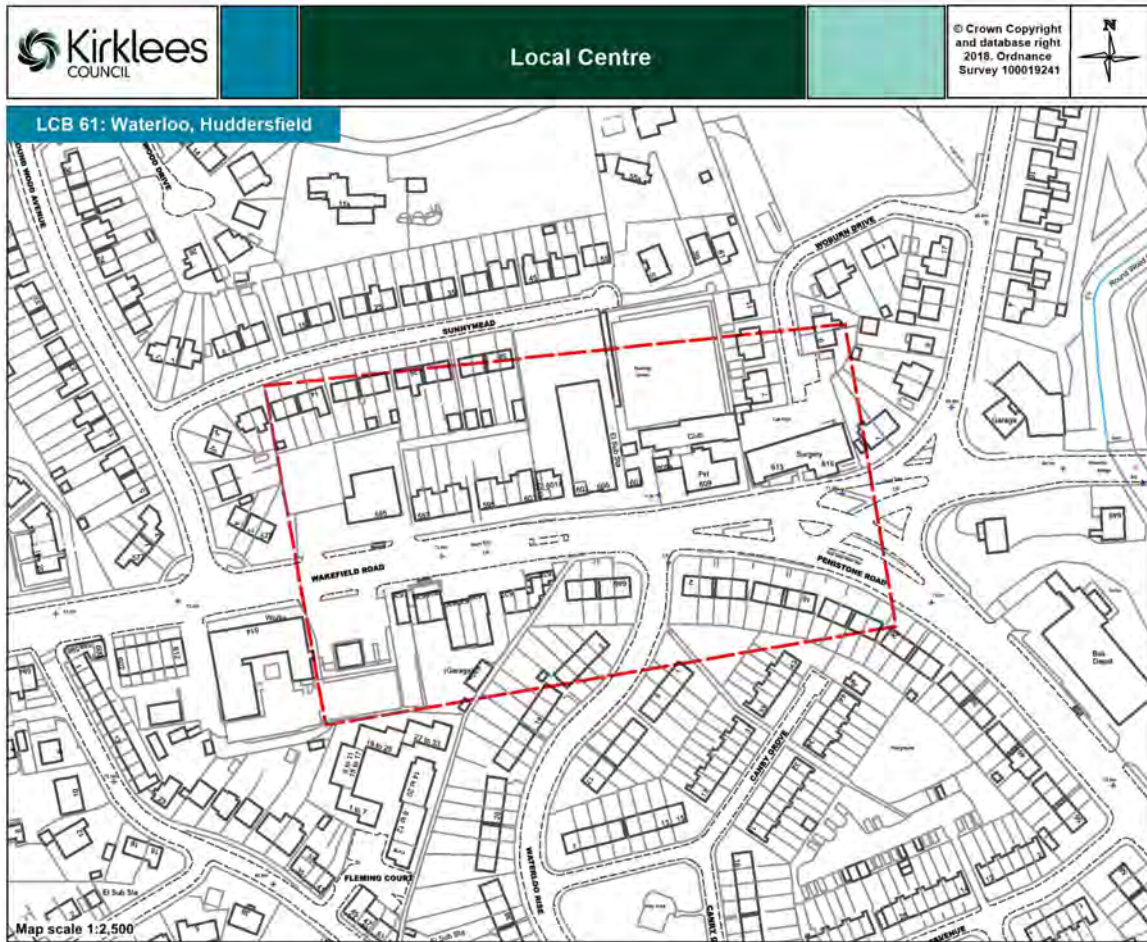


Appendix 1 Local Centre Boundaries





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APPENDIX 4

Comments received on the Kirklees Local Plan Main Modifications

Additional information can be found at: <http://kirklees.objective.co.uk/portal/pp/modifications/>

Mod ref	Rep ID	Outcome	Report text
Introduction	Mod_SP_M230	"No Comment"	Leeds City Council has no objection to any of the current modifications.
Introduction	Mod_SP_M254	"No Comment"	Thank you for notifying the Peak District National Park Authority of the latest event SD1 Kirklees Local Plan Strategy and Policies Main Modifications (Soundness) and SD2 Kirklees Local Plan Allocations and Designations Main Modifications (Soundness) and associated documents. I can confirm that the Peak District National Park Authority has no comment to make on any of the documents subject of this latest event.
Introduction	Mod_SP_M258	Object	Save Mirfield fully supports the submissions that have been made by KCAN in relation to MM1 - MM162. These submissions represent the views of save Mirfield.
Introduction	Mod_SP_M304	"No Comment"	I have reviewed the documents and can confirm that the Coal Authority has no objections to make to the Main Modifications proposed.
Introduction	Mod_SP_M31	Object	In agreement with BOLT
Introduction	Mod_SP_M375	Object	This objection is to all modifications proposed by the Council in response to recommendations from the Inspector. The Council has, contrary to law, given no reasoned justification for any of the modifications. And the Council cannot rely on the fact that the Inspector has recommended the Council to act, because the Inspector has herself not given any reasons for the modifications which she has proposed. Indeed, she has made it quite clear in her letter of 15 June, that the content of that letter does not necessarily represent her final views on the plan. It follows that the Council's proposed modifications must be rejected en bloc in their present form.
Introduction	Mod_SP_M4	Object	The modifications are unsound because the basic plan is fundamentally flawed. The original inspector threw out the first plan because it was flawed, this plan is still flawed. The housing projection was based back in 2002 based on a projected employment growth that was described by Councillor Khan (Leader) as "inspirational", we have moved on 16 years, we can now prove that the belief that the employment projection was flawed. All you have to do is look at Kirklees own Economic Fact Sheets to see there has been no job growth from 2003 to last year's sheet. The belief then that employment in Kirklees will grow over your time frame flies in the faith of the evidence Kirklees has. To use the Regional figures flies in the face of the evidence.
Introduction	Mod_SP_M487	"No Comment"	The Commission does not have the resources to respond to all consultations, but will respond to consultations where it considers they raise issues of strategic importance. Local, parish and town councils and other public authorities, as well as organisations exercising public functions, have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. The PSED is an on-going legal requirement and must be complied with as part of the planning process. The Commission is the regulator for the PSED and the Planning Inspectorate is also subject to it. In essence, you must consider the potential for planning proposals to have an impact on equality for different groups of people. To assist, you will find our technical guidance here.
Introduction	Mod_SP_M490	Object	Please find below my comments on the modifications and amendments proposed to the Kirklees Local Plan. I decline to use the on- line form as its complexity and reductionism in my view reduces accessibility and thus discourages people like me from commenting. Moreover, the focus on detail detracts from making comments about overarching and fundamental issues which remain of concern to me and others interested in securing sustainable and appropriate development for all the people in this area. The on-line system in my view is neither transparent nor accessible and presents itself as an organisationally focused and lazy way to engage in public consultation. This detracts from the process and means that many local people are unaware of these serious matters and have been denied the opportunity to comment. You may consider or ignore my comments made below as you will. I doubt if they will make much difference at this stage but at least I can be secure in knowing that the points have been raised. The opportunity to genuinely recognise and preserve the differences between places, despite the policy to do so, has been missed. The place making aspect of the plan is weak. There is little evidence of the appreciation of difference between the towns, villages and settlement and the effect of building, despite the commitment to prevent mergers. The net effect will be ribbon development and construction of largely similar estates. We have yet to see the design code and without strong guide lines, planners will have little to prevent developers using stock designs. This will reduce the richness and diversity of the area for the loss of future generations. The Local Plan in essence is backward looking, old fashioned and misses a host of

Mod ref	Rep ID	Outcome	Report text																								
			opportunities. God stopped making land a long time ago so did Slartibartfast! Missing the many opportunities to look forward does the people of Kirklees a disservice and it is difficult to see how the Plan can be considered sound. I realise it is too late to change the Plan now given the increasing pressure on the Council to build houses anywhere a developer wants. I can only hope the economic forces will prevent too much damage being done to our wonderfully beautiful area and that decent housing and jobs will be provided in the areas where real need exists. In my view sustainable and properly focused action is more likely to result from the LEP and Combined Authority than from this plan. I can only hope it will be subject to revision in the very near future.																								
Introduction	Mod_SP_M506	Object	To keep green belt land as green belt.																								
Introduction	Mod_SP_M54	Object	I am not a lawyer so cannot comment																								
Introduction	Mod_SP_M8	Object	This actual section has no modifications so we have chosen this section to make a general comment. None of us are lawyers so we are unable to comment upon whether the plan is legal or not. We were set up with the sole purpose of assisting our communities in opposing site ME1965a's inclusion in the local plan and whilst it remains in the plan we will consider the plan to be unsound. We are supportive of some modifications and not others. We will comment individually on the modifications that are of interest to us.																								
SD1-MM1	Mod_SP_M280	Object	<p>The local plan is based on an unsound economic role and does not embrace the main objectives set out in the NPPF. The outline for growth is based on the M62 corridor which is not an exceptional circumstance for development, removal from the greenbelt and creating urban sprawl rather than preventing urban sprawl, specifically in North Kirklees. This is addressed by evidence under SD1MM1 provided by KCAN and CPRE uploaded to this modification comment. For example, deliverability of key proposed strategic site MX1905 is some distance from the M62 and many issues as to its deliverability including, for example, highways, that are addressed specifically throughout the consultation documents are considered not justified, not effective nor consistent with National Policy. Quote: "Across the district, the council has aligned its strategies for the economy and for health and wellbeing, and is seeking inclusive growth that benefits quality of life and reduces inequalities." The health and wellbeing and quality of life for the residents of north Kirklees is completely ignored by overinflated housing figures, 35 hectares of industrial units offering manufacturing and engineering units. The health of residents in north Kirklees will suffer immensely with the prospect of poor air quality from the increase of traffic on the A653 the pollution from mechanical and engineering works. Poor air quality is an issue which affects child respiratory disease, dementia, cancer and a rise in infant mortality. Quote "Researcher Michael Ryan" Air pollution – rather than poverty – is the reason for high numbers of baby deaths in parts of Kirklees, it has been claimed. According to environmental researcher Michael Ryan, areas such as Dewsbury and Batley not only have the highest levels of deprivation in the borough, they also have the poorest air quality. And according to figures from the Office for National Statistics (ONS), wards such as Batley West and Dewsbury East have particularly high infant mortality rates. Conversely, wards with the least infant deaths have higher levels of affluence and lower levels of pollution. Five wards with highest infant mortality rate 2004 to 2014.</p> <table border="1"> <thead> <tr> <th>Ward</th> <th>Live births</th> <th>Infant deaths</th> <th>Infant mortality rate (per 1,000 live births)</th> </tr> </thead> <tbody> <tr> <td>Batley West</td> <td>3399</td> <td>34</td> <td>10</td> </tr> <tr> <td>Dewsbury East</td> <td>2769</td> <td>24</td> <td>8.67</td> </tr> <tr> <td>Batley East</td> <td>3608</td> <td>29</td> <td>8.04</td> </tr> <tr> <td>Dewsbury West</td> <td>4729</td> <td>37</td> <td>7.82</td> </tr> <tr> <td>Dewsbury South</td> <td>3313</td> <td>25</td> <td>7.55</td> </tr> </tbody> </table> <p>MX1905 acts as a "green lung" for the area. With regard to the wellbeing of North Kirklees the loss of this area for exercise and relaxation is contrary to the NPPF and support health, social and cultural wellbeing.</p>	Ward	Live births	Infant deaths	Infant mortality rate (per 1,000 live births)	Batley West	3399	34	10	Dewsbury East	2769	24	8.67	Batley East	3608	29	8.04	Dewsbury West	4729	37	7.82	Dewsbury South	3313	25	7.55
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SD1-MM1	Mod_SP_M317	Object	~ The original wording referred to specific sites, namely "Cooper Bridge, Chidswell, Lindley Moor and Mirfield". The new wording represents a huge undeclared policy shift and expansion in that it says "Strategic employment growth opportunities for Kirklees are promoted along the M62 corridor" – which could mean anywhere along the M62 corridor and it means the opportunities are now "unlimited" in number and scope. If there is to be development in the green spaces of the M62 corridor it needs to be carefully assessed for specific site sustainability, restricted in scope and very clearly defined. In particular the adverse impact on the already narrow green belt corridor adjacent to the M62 needs to be given very considerable weight. We do not accept that development along the M62 corridor should be a strategic objective in itself, because it is ultimately unsustainable. The M62 corridor is a very valuable Green belt corridor.It is not an economic development zone. Whilst Kirklees Council may consider development in the M62 corridor to be appropriate from a narrow economic perspective, it is wholly inappropriate when considered on a West Yorkshire regional																								

Mod ref	Rep ID	Outcome	Report text
			<p>scale or with regard to all three dimensions of sustainability – including environmental and social, as well as economic. Large scale development in this location is simply unsustainable and it therefore renders the Local Plan unsound. The relatively narrow green belt and green spaces that make up the M62 corridor are the last bastion of green space preventing complete merger of the towns and cities of West Yorkshire, notably Huddersfield, Halifax, Elland, Bradford, Brighouse, Cleckheaton, Mirfield, Leeds, Birstall, Dewsbury, Batley and Morley. All these settlements are currently separated from each other by relatively narrow areas of green belt and have their own sense of place and identity. If the modification is accepted and the M62 corridor greenspace continues to be regarded as THE place to promote “strategic employment growth opportunities”, West Yorkshire will very quickly become a single, sprawling, urban metropolis defined by and “hanging off” a highly congested and often grid-locked urban motorway that runs through the middle. We find that completely unacceptable.~ It is ludicrously unsustainable to promote “strategic employment opportunities” alongside the M62 motorway on the northern boundary of Kirklees, whilst placing a significant proportion of the “housing opportunities” in the South and West of Kirklees. It effectively promotes even more commuting through the centres of Huddersfield and Dewsbury and makes it more likely that the created jobs will be taken by people commuting from other Council areas. In our view the Council needs to take a more pragmatic and forward thinking view of the nature of future employment, economic development, business strategy and spatial distribution of housing and industry in Kirklees. It is important that this proposed modification is seen in the context of similar plans by all other authorities in West Yorkshire. All are planning large developments in the green belt and green space of the M62 corridor, seemingly without regard for the plans of neighbouring authorities. The current green belt separation between the cities, towns and urban areas of West Yorkshire is therefore under attack from all sides, with rapid and total destruction ~ over the lifetime of the plan(s). The area close to junction 25 is a classic example where both Calderdale and Kirklees are seeking to develop right up to the M62 motorway, leaving virtually no green space at all. Similarly between Bradford and Kirklees close to junction 26 and between Leeds and Kirklees near junction 28.~ We have always tried to take a measured approach to the emphasis on strategic sites across West Yorkshire, acknowledging that the approach - including coalescence of some settlements - might theoretically offer a more sustainable way to meet future growth needs than other scenarios. However, the problem of coalescence remains, in this plan and is not addressed at all in these modifications. It is evident that the scale and distribution of growth in this plan is not driven by the need to make sustainable, high quality places or communities. It is driven by numerical targets for housing generated by:- a) statistical modelling which is not sensitive to different types of needs AND b) the inflated requirements for five-year supply which make such unrealistic demands on the flow of new sites, that brownfield sites have inevitably become discounted from the supply calculation. We find this totally unacceptable.</p>
SD1-MM2	Mod_SP_M282	Object	<p>The area action plan should support the regeneration of Dewsbury Centre rather than support development of disproportionate size in North Kirklees. Please see uploaded evidence provided by KCAN and CPRE attached to this modification comment. The Planning Inspector has recommended a reduction in the amount of greenbelt release in other areas of Kirklees but not in North Kirklees. Quote: "Central Dewsbury will be produced which will set out a framework for promoting regeneration, place shaping and managing development within and around the edge of these town centres so that they fill their role in providing shopping, leisure, residential and employment opportunities. ". The action plan includes shopping but is not central nor on the periphery of the town centre. Major shopping attractions are in place at Leeds, Wakefield and White Rose Centre. Dewsbury Centre does not offer a quality retail experience and regeneration should be focused here. Site MX1905 for example continues to support an out of Dewsbury experience contributing to a "doughnut effect" and does not support the aims of SD1MM2. Outdoor leisure opportunities will be lost due to loss of Greenbelt. Residential properties overinflated and employment opportunities are unsustainable and unrealistic.</p>
SD1-MM2	Mod_SP_M318	Object	<p>Paragraph 1.42 and MM2 refer to future retail growth within town centres. We feel this is unrealistic given the massive changes that are taking place in shopping habits across the country. Research from the Big Data project indicates that town centre retail has been in decline since the 1950's and that the decline is set to continue. Current research from the Centre for Cities also indicates that thriving town centres have a mixture of retail, commerce and housing whilst the evening and night economy is also of growing importance as people shift from acquiring “things” to seeking experience. The future purpose of town centres is emerging as having four elements: 1. A focal point which gives the place its identity; 2. A meeting place; 3. A place to access shops & services and 4. A place to spend time and be with other people. The changes made to para 1.42 are a step in the right direction but the thinking behind it is still backward looking.</p>
SD1-MM3	Mod_SP_M319	Object	<p>~ We object to the wording “There is need and demand for new homes in all parts of Kirklees” as it is completely unnecessary and wrongly suggests equal need and demand in all parts of Kirklees. As such it is inconsistent with market reality and the spatial distribution of housing in the Local Plan allocations. However, our greatest concern is that it is likely to be quoted by developers in support of speculative planning applications for development in highly inappropriate places, especially in settlements where there is no housing allocation in the plan (see MM7 & MM8).</p>

Mod ref	Rep ID	Outcome	Report text
			We support other aspects of this modification.
SD1-MM3	Mod_SP_M514	Object	The modification documents were not made available to me until 27th September and this failure to notify is a fundamental flaw in the entire process of public consultation. I notified the Programme officer at the start of the process that I cannot use electronic communication and she agreed to ensure all papers were provided in printed form. It is impossible to deal with Modification SD1-MM3 on its own given that the totality of planning advocates a Place Shaping approach. In SD1-MM3 it is proposed that an active stock management approach to housing should be adopted but this is not carried through due to the absence of any comment on the need to apply place shaping to all settlements. Rather than operating at a level of good planning practice, the modification SD1-MM8 produces a table of identified housing need which ignores the characteristics of each settlement and the established planning practice requirements to ensure a worthwhile Local Plan and produces an infantile approach to settlement planning at odds with SD1 MM3. SD1_MM3 is helpful in reinforcing place shaping but SD1-MM8. The victims of the failure to deal with the question of place shaping is the communities. The required changes are:1 Produce a spatial strategy for each settlement2 Pay attention to representations made by the local community3 Consider forming an independent expert panel to progress issues.
SD1-MM4	Mod_SP_M284	Object	The reliance of greenbelt land for employment growth is unrealistic when the M62 and M1 corridor are all ready littered with industrial units and with the close proximity of Leeds and Wakefield providing employment areas the vision of Kirklees is unrealistic, unsustainable and undeliverable. Please see uploaded supporting evidence from KCAN CPRE
SD1-MM4	Mod_SP_M312	Object	The Council is making significant modifications to its approach to meeting housing and employment needs. These involve the deletion of a host of strategic development sites, all of which the Council previously concluded were necessary in order to achieve its Vision. However, the Council is proposing very limited modifications to its Vision. As a result, the stated aims of the Local Plan still include (inter alia):• an integrated approach to housing and employment;• responding to local needs;• provision of new prime employment land; and• reduce out-commuting. As set out further below, in preparing the Main Modifications the Council has failed to properly reconcile its Vision with the rest of the Plan (as amended). The Local Plan is therefore unlikely to be effective and is therefore unsound (NPPF Paragraph 182).
SD1-MM4	Mod_SP_M320	Object	~ We are disappointed to see that Whitehall Road, Cleckheaton has now seemingly replaced Cooper Bridge in the Council's strategic industrial thinking. Whitehall Road is part of a strategic green space buffer between Cleckheaton and the outlying parts of Bradford. See comments against MM1 We are also disappointed that the Council remains wedded to a narrow focus on "manufacturing and engineering". In our view the Council's economic development strategy is "rooted in the past" and is not consistent with the "Leeds City Region Economic Plan (2016 to 2036)". The LEP Plan is much more forward looking and recognises that job growth will occur in Innovative Manufacture, Finance, Professional Services, Health & Life Sciences, Low Carbon & Environmental, Digital, Creative, Food & Drink industries. The Council's economic development strategy also still fails to recognise the major contribution that will be made to the economy by tourism, small & micro businesses, rural businesses and self-employment, particularly in South and West Kirklees. These industries do not need large land allocations and do not, in many cases, need to be sited immediately adjacent to the M62 or M1.
SD1-MM5	Mod_SP_M285	Object	The approximate amount of employment land is 95 hectares. The larger sites of Cleckheaton (33 to 4) and Cooper Bridge (25 to 11) have been considerably reduced yet Chidswell has remained at 35 hectares. The council has not suggested any alternative sites for the reduction in employment land. MX1905 is disproportionate to all other employment sites. See attached document from CPRE KCAN.
SD1-MM5	Mod_SP_M296	Object	SD1-MM5 P36 States that the net additional employment land has been reduced from 25 hectares to 11 hectares. This does not seem to be reflected in any of the area maps.
SD1-MM5	Mod_SP_M313	Object	The Council is making significant modifications to its approach to meeting housing and employment needs. These involve the deletion of a host of strategic development sites, all of which the Council previously concluded were necessary in order to achieve its Vision. However, the Council is proposing very limited modifications to its Vision. As a result, the stated aims of the Local Plan still include (inter alia):• an integrated approach to housing and employment;• responding to local needs;• provision of new prime employment land; and• reduce out-commuting. As set out further below, in preparing the Main Modifications the Council has failed to properly reconcile its Vision with the rest of the Plan (as amended). The Local Plan is therefore unlikely to be effective and is therefore unsound (NPPF Paragraph 182).

Mod ref	Rep ID	Outcome	Report text
SD1-MM5	Mod_SP_M321	Object	<p>~ We are not convinced that the Kirklees industrial allocations (175Ha) focussed on the M62 corridor are consistent with the LEP industrial projections of 100Ha in the entire M62 corridor (including Leeds, Wakefield, Bradford and Calderdale). See comments against MM1.</p> <p>We are disappointed that the Council is “hanging on” to a target 75% employment rate, which we have consistently argued is unachievable. The latest national figure is 75.5% with unemployment at 4%. In March 2018, in Kirklees, the employment rate was 69.3% and the unemployment rate was 5.2%. We cannot see how the Council will be able to raise this to 75% by focussing on declining industries with vulnerable jobs and ignoring the natural strengths, constraints and opportunities of the differing parts of the whole area in the 21st century.</p>
SD1-MM5	Mod_SP_M489	Object	<p>Spatial strategy – this continues to be fundamentally flawed. It is evident from the numbers now provided that the bulk of house building will take place in the south of the district while employment growth will occur in the north, particularly around the M62 corridor. It is known that many people already commute by car from the rural to the urban areas. The spatial strategy therefore conflicts with the policy on climate change and will serve to increase car journeys rather than reduce them. Population growth is more likely in the north, the housing stock there poorer and the economic need greater. The type of housing development the land allocation strategy has encouraged the building of larger more expensive properties. The need in the villages is for smaller, lower-cost housing to act as starter homes and to enable down-sizing. This need is not being met. Rather it is encouraging people to move into the area. Thus housing need anywhere in the area is not being properly met. The land allocation strategy is encouraging development on green fields and green belt rather than encouraging the re-use of land in contradiction to the Council’s claimed policy in PLP3 and is leading to building in rural and semi-rural areas rather than in urban locations. The growth of housing in the rural towns will not contribute to protecting town centres – recent research shows that thriving town centres need a mix of residential and commercial activity as well as retain. Therefore there is another conflict between policies. Economic growth – this continues to promote a 75% employment rate. Currently the national rate is 75.5% and locally this is 69.2%. There is no indication as to how this growth in local employment will occur. The focus continues to be on manufacturing and engineering despite these sectors being in decline, prone to robotization and being promoted by city regions with a far better track record than West Yorkshire. The LEP’s most recent economic strategy highlights a number of sectors for growth including the digital and green economics. Kirklees’ plan only refers to the former in relation to connectivity and glosses over the latter. There is scant attention to the creative and media sectors where there is local strength. Growth in tourism and the use of the outdoor would have massive health benefits: these receive a nod, despite the policy on growing the rural economy. The needs of micro businesses and the self-employed are not properly considered. Realising the potential for growth in these sectors would reduce the demand for land. As it is the Local Plan focuses on land-hungry industries and condemns these areas to planning blight rather than releasing them for housing. Doing so would provide land closer to the areas where population growth is predicted and current housing need exists.</p>
SD1-MM6	Mod_SP_M297	Support	<p>The HBF considers that the proposed modifications are sound, and they are an improvement on the previous text, particularly in relation to the minimum number of new dwellings.</p>
SD1-MM6	Mod_SP_M308	Support	<p>Gladman welcome the changes made to Policy SD1 and associated modifications throughout the KLP, particularly in relation to the reference to the delivery of a minimum 31,140 dwellings to be achieved over the plan period. This is considered to be an improvement over the wording previously used and will ensure that the Plan does not unnecessarily prevent the delivery of sustainable growth opportunities once this figure is met.</p>
SD1-MM6	Mod_SP_M322	Object	<p>~ We have consistently objected to the target figure of 31,140 dwellings, especially as a minimum figure.~ If a minimum figure is set, it effectively sets the Local Plan up to fail, when actual housing delivery is outside the direct control of the Council and there are likely to be very significant changes in government policy, economic circumstances, population, employment and housing need over the plan period. This point is a simple matter of professional programme management and not a challenge to the OAN calculations per se. However..... Whilst we support the principle of a standardised method of OAN calculation, we believe that the existing method can produce anomalies and has done so in Kirklees. We believe that the figure of 31,140 is far too high, undeliverable, out of step with local market demand in Kirklees and is now out of step with the OAN for all other Council areas in West Yorkshire (NB: the standardised method of calculation has allowed ALL other Councils in West Yorkshire to significantly reduce their OAN – but not Kirklees). The total annual requirement of 1,730 (expressed as a minimum) is now only slightly less than the revised OAN figure for Leeds (on the 2018 DCHLG figures), which means that if Kirklees pursues the current figure it is effectively taking a hugely disproportionate share of the housing requirement for the Leeds City Region. The likelihood of Kirklees failing the New Housing Delivery Tests within a short time is extremely strong, and it is impossible to draw any other conclusion than the Plan will be obsolete before it is adopted.</p>
SD1-MM6	Mod_SP_M323	Object	<p>~ We are pleased that the Council have now produced a breakdown of the proposed housing allocations by settlement. However, the real question is</p>

Mod ref	Rep ID	Outcome	Report text
			<p>why the Council have not produced this breakdown before this very late stage! We regret to say that we find it disingenuous.</p> <p>~ We remain concerned that the total housing allocation for the Kirklees Rural area (5530 dwellings including Storthes Hall) is not consistent with the original stated intention to site most of the new housing within the existing urban areas of Huddersfield and Dewsbury. In fact the total allocation for Kirklees Rural is greater than the allocation for Dewsbury (5530 versus 4650) and 2130 of the Dewsbury allocation will only be delivered after the plan period! Huddersfield and Dewsbury together only make up 53% of the total allocation and 45% of the housing allocation to be delivered within the plan period! Again we find the Council's actions disingenuous.</p> <p>~ Most of the new housing in Dewsbury is concentrated on the strategic sites at Chidswell and Dewsbury Riverside. As we have consistently pointed out, the Plan contains no urban strategy for Dewsbury, whose town centre is terribly run-down. Locating extensive new housing on the periphery of Dewsbury, with no urban regeneration strategy, will not help, do nothing to create sustainable places and will hugely increase out-commuting. It is deeply unsustainable. It is also significantly at odds with the revised NPPF, which gives a renewed emphasis on maximising the re-use of brownfield land.</p> <p>~ It is clear from the spatial breakdown that allocations in individual settlements have been determined by perceived land availability and pressure from landowners & developers: not by local need. The Batley, Birstall and Mirfield figures also effectively compound the aforementioned regeneration problems in Dewsbury, as they are contiguous settlements. Similarly, the Cleckheaton apportionment contributes to the impending merger of Huddersfield, Brighouse, Bradford and Cleckheaton. At the same time the Skelmanthorpe and Clayton West/Scissett apportionments amounts to a hugely disproportionate scale of growth for a rural area with negligible public transport opportunities. In effect there is no spatial strategy.</p> <p>See our comments against MM1</p>
SD1-MM8	Mod_SP_M324	Object	<p>~ We are pleased that the Council have now produced a breakdown of the proposed housing allocations by settlement. However, the real question is why the Council have not produced this breakdown before this very late stage! We regret to say that we find it disingenuous.~ We remain concerned that the total housing allocation for the Kirklees Rural area (5530 dwellings including Storthes Hall) is not consistent with the original stated intention to site most of the new housing within the existing urban areas of Huddersfield and Dewsbury. In fact the total allocation for Kirklees Rural is greater than the allocation for Dewsbury (5530 versus 4650) and 2130 of the Dewsbury allocation will only be delivered after the plan period! Huddersfield and Dewsbury together only make up 53% of the total allocation and 45% of the housing allocation to be delivered within the plan period! Again we find the Council's actions disingenuous.~ Most of the new housing in Dewsbury is concentrated on the strategic sites at Chidswell and Dewsbury Riverside. As we have consistently pointed out, the Plan contains no urban strategy for Dewsbury, whose town centre is terribly run-down. Locating extensive new housing on the periphery of Dewsbury, with no urban regeneration strategy, will not help, do nothing to create sustainable places and will hugely increase out-commuting. It is deeply unsustainable. It is also significantly at odds with the revised NPPF, which gives a renewed emphasis on maximising the re-use of brownfield land.~ It is clear from the spatial breakdown that allocations in individual settlements have been determined by perceived land availability and pressure from landowners & developers: not by local need. The Batley, Birstall and Mirfield figures also effectively compound the aforementioned regeneration problems in Dewsbury, as they are contiguous settlements. Similarly, the Cleckheaton apportionment contributes to the impending merger of Huddersfield, Brighouse, Bradford and Cleckheaton. At the same time the Skelmanthorpe and Clayton West/Scissett apportionments amounts to a hugely disproportionate scale of growth for a rural area with negligible public transport opportunities. In effect there is no spatial strategy. See our comments against MM1</p>
SD1-MM8	Mod_SP_M515	Object	<p>The modification documents were not made available to me until 27th September and this failure to notify is a fundamental flaw in the entire process of public consultation. I notified the Programme officer at the start of the process that I cannot use electronic communication and she agreed to ensure all papers were provided in printed form. It is impossible to deal with Modification SD1-MM3 on its own given that the totality of planning advocates a Place Shaping approach. In SD1-MM3 it is proposed that an active stock management approach to housing should be adopted but this is not carried through due to the absence of any comment on the need to apply place shaping to all settlements. Rather than operating at a level of good planning practice, the modification SD1-MM8 produces a table of identified housing need which ignores the characteristics of each settlement and the established planning practice requirements to ensure a worthwhile Local Plan and produces an infantile approach to settlement planning at odds with SD1 MM3. SD1_MM3 is helpful in reinforcing place shaping but SD1-MM8. The victims of the failure to deal with the question of place shaping is the communities.</p>

Mod ref	Rep ID	Outcome	Report text
			<p>The required changes are:</p> <ol style="list-style-type: none"> 1 Produce a spatial strategy for each settlement 2 Pay attention to representations made by the local community 3 Consider forming an independent expert panel to progress issues.
SD1-MM8	Mod_SP_M6	Object	<p>The volume of houses planned for Gomersal and Cleckheaton is over double the amount of dwellings proposed for villages and towns of a similar size. There is now no local sixth form facility - children are having to rely on buses to get them to Huddersfield, which means one bus an hour that stops running at 6pm. Door to door it's a two hour journey and many are unable to become involved with extracurricular activities because of this. The two primary and one middle school have been merged into one school so there will be very few local school places available. Cleckheaton library is currently threatened with closure, the local Gomersal (Red House) museum has been closed, and the Gomersal Public Hall looks set to be closed and sold off along with every other heritage and community asset in the area. There is no infrastructure in place to support this influx of people, and Kirklees Councillors have admitted at several public meetings that they do not intend to make any improvements to the infrastructure in North Kirklees. In addition to this the M1 corridor is increasingly becoming congested. The M62 is regularly blocked at rush hours, coming into and out of Leeds. Adding more transport to this motorway and then onto residential roads to reach the M1 will only exacerbate the poor air quality in these areas.</p>
SD1-MM9	Mod_SP_M286	Object	<p>Economic plan is based on the M62 and M1 corridors which is not justified or sustainable. See attached document from KCAN CPRE</p>
SD1-MM9	Mod_SP_M325	Object	<p>~ The original wording referred to specific sites, namely "Cooper Bridge, Chidswell, Lindley Moor and Mirfield". The new wording represents a huge undeclared policy shift and expansion in that it says "Strategic employment growth opportunities for Kirklees are promoted along the M62 corridor" – which could mean anywhere along the M62 corridor and it means the opportunities are now "unlimited" in number and scope. If there is to be development in the green spaces of the M62 corridor it needs to be carefully assessed for specific site sustainability, restricted in scope and very clearly defined. In particular the adverse impact on the already narrow green belt corridor adjacent to the M62 needs to be given very considerable weight. We do not accept that development along the M62 corridor should be a strategic objective in itself, because it is ultimately unsustainable. The M62 corridor is a very valuable GREEN BELT CORRIDOR.IT IS NOT AN ECONOMIC DEVELOPMENT ZONE.~ Whilst Kirklees Council may consider development in the M62 corridor to be appropriate from a narrow economic perspective, it is wholly inappropriate when considered on a West Yorkshire regional scale or with regard to all three dimensions of sustainability – including environmental and social, as well as economic. Large scale development in this location is simply unsustainable and it therefore renders the Local Plan unsound. The relatively narrow green belt and green spaces that make up the M62 corridor are the last bastion of green space preventing complete merger of the towns and cities of West Yorkshire, notably Huddersfield, Halifax, Elland, Bradford, Brighouse, Cleckheaton, Mirfield, Leeds, Birstall, Dewsbury, Batley and Morley. All these settlements are currently separated from each other by relatively narrow areas of green belt and have their own sense of place and identity. If the modification is accepted and the M62 corridor greenspace continues to be regarded as THE place to promote "strategic employment growth opportunities", West Yorkshire will very quickly become a single, sprawling, urban metropolis defined by and "hanging off" a highly congested and often grid-locked urban motorway that runs through the middle. We find that completely unacceptable.~ It is ludicrously unsustainable to promote "strategic employment opportunities" alongside the M62 motorway on the northern boundary of Kirklees, whilst placing a significant proportion of the "housing opportunities" in the South and West of Kirklees. It effectively promotes even more commuting through the centres of Huddersfield and Dewsbury and makes it more likely that the created jobs will be taken by people commuting from other Council areas. In our view the Council needs to take a more pragmatic and forward thinking view of the nature of future employment, economic development, business strategy and spatial distribution of housing and industry in Kirklees. It is important that this proposed modification is seen in the context of similar plans by all other authorities in West Yorkshire. All are planning large developments in the green belt and green space of the M62 corridor, seemingly without regard for the plans of neighbouring authorities. The current green belt separation between the cities, towns and urban areas of West Yorkshire is therefore under attack from all sides, with rapid and total destruction ~ over the lifetime of the plan(s). The area close to junction 25 is a classic example where both Calderdale and Kirklees are seeking to develop right up to the M62 motorway, leaving virtually no green space at all. Similarly between Bradford and Kirklees close to junction 26 and between Leeds and Kirklees near junction 28.~ We have always tried to take a measured approach to the emphasis on strategic sites across West Yorkshire, acknowledging that the approach - including coalescence of some settlements - might theoretically offer a more sustainable way to meet future growth needs than other scenarios. However, the problem of coalescence remains, in this plan and is not addressed at all in these modifications. It is evident that the scale and distribution of growth in this plan is not driven by the need to make sustainable,</p>

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			high quality places or communities. It is driven by numerical targets for housing generated by:- a) statistical modelling which is not sensitive to different types of needs AND b) the inflated requirements for five-year supply which make such unrealistic demands on the flow of new sites, that brownfield sites have inevitably become discounted from the supply calculation. We find this totally unacceptable.
SD1-MM10	Mod_SP_M231	Object	GAIL is concerned that the proposed distinction between essential and desirable infrastructure will actually result in under-investment in communities: 'deliver place making benefits' is linked to desirable infrastructure, what is the definition of 'place making benefits' and how would they be measured, 'desirable' is no different to 'optional' if infrastructure is needed, surely the commitment has to be in place to deliver it as opposed to putting it in a 'desirable' category which can conveniently be ignored, These concerns are increased given the lack of detail as to the approach to be taken where multiple developments are proposed for the same area: the greater the number of 'desirable infrastructure' improvements, the more likely the chance of non-delivery which, on a cumulative basis, could have a significant negative effect. The potential problem is put into context given that proposed modification SD1-MM11 states that 'Masterplans would only be sought where feasible and appropriate' (see below).
SD1-MM10	Mod_SP_M278	Object	<p>As currently drafted Wakefield does not consider this policy to be sound. The policy is not justified in terms of dealing with potential impacts on the local highway network outside of Kirklees. Wakefield acknowledges that the policy refers to working with 'partners' on this issue. However, 'partners' is not defined and the potential impact on Wakefield local network is so significant the Council considers that a specific reference to adjacent local authorities should be included in the policy and site specific policies for allocations H559, H2089 and MX1905.</p> <p>The Council is particularly concerned about the potential for significant impacts on the A638/ Owl Lane/ Leeds Road/ Chancery Road roundabout. A major highway improvement scheme has been submitted to the West Yorkshire Combined Authority Corridor Improvement Programme for the roundabout. This has been approved at pipeline eligibility stage and an outline business case is currently being prepared. As part of preparing the outline business case consultants were commissioned to undertake detailed modelling. Kirklees Council officers were consulted as part of this process and it was agreed with Kirklees that the growth rates currently factored into Kirklees's own strategic level model would be used as an alternative by Wakefield's consultants when modelling the future year scenarios for Owl Lane Roundabout. This research demonstrates that no options were viable when modelled for 2020/1 with growth in the Kirklees Local Plan included. Therefore no subsequent years were modelled. Wakefield is currently in the process of having alternative options, with further capacity, modelled but at this stage it is not clear whether this exercise will reveal a viable option.</p> <p>This research emphasizes the likelihood of significant impacts on the Wakefield local highway network from developments in Kirklees. The requirement for both authorities to work together to mitigate these should be recognised explicitly in planning policy</p>
SD1-MM10	Mod_SP_M287	Object	The Local Plan is unrealistic for improvement of infrastructure particularly in North Kirklees. Specifically the A653 which according to Kirklees has 20,000 to 40,000 cars per day travelling along its entirety. Morley Town Council has raised its concerns of traffic congestion and pollution. The improvement of the A653 has not been examined thoroughly by the council or planning inspector. Please see attached Objection report from Morley Town Council
SD1-MM10	Mod_SP_M326	Object	We object to this modification as it implies that place making may be desirable but is not a requirement in planning terms. That is fundamentally and worryingly wrong. Place making is a central tenet of planning.
SD1-MM10	Mod_SP_M495	Object	Comment transcribed by KC from attached letter: I am concerned in so far as I note that although the council will work with partners to bring forward the requisite and proportionate essential and desirable infrastructure, the distinction between the definition of essential infrastructure and desirable infrastructure and how that is applied will result in under-investment in infrastructure to the detriment of local communities. Where infrastructure is needed, the onus must be on the Council with its partners to put that infrastructure in place, whatever it is. If that infrastructure is deemed to improve capacity and deliver place making benefits, thus falling into the desirable definition, it could be cast to one side, thereby having a negative impact on local area.
SD1-MM11	Mod_SP_M232	Object	GAIL is concerned that whilst the proposed modification refers to 'Masterplans must involve all the relevant stakeholders', the final sentence weakens any sense of community engagement by saying 'Masterplans would only be sought where feasible and appropriate': what are the criteria for deciding that masterplans are feasible and appropriate, at what stage will the local community become involved in the development of a masterplan/consultation involvement should be at a formative

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			stage before key decisions are taken and before it is too late to genuinely influence a development. To do otherwise strikes at the core of the principle of community involvement and engagement, who decides and what redress would stakeholders have if they feel that the decision not to develop a Masterplan is inappropriate, what happens if the Inspector approves Sites for inclusion in the Local Plan subject to Masterplans being prepared but the developer(s) fail to implement the Inspector's conclusion.
SD1-MM11	Mod_SP_M288	Object	MX1905 is one of the most fiercely contested sites in the area the residents opinions have not been included and there is no confidence that they will be taken into consideration at later stages.
SD1-MM11	Mod_SP_M327	Object	~ We are very concerned at the inclusion of the phrase "Masterplans would only be sought where feasible and appropriate" as it is open to vastly different interpretations, heavy manipulation and is inconsistent with the specific requirements proposed under MM12. The main modifications to the Barnsley Local Plan make provision for Masterplan Frameworks on all strategic sites and major allocations, and we suggest the same approach for Kirklees. In our view, masterplans prepared in full consultation with affected and neighbouring communities are essential, because without them there is no way to give the community confidence that the right mix of uses, good design and environmental quality will be secured. If a masterplan for a development is deemed to be not feasible, it is difficult to see how the development itself can be deemed feasible. See comments under MM12
SD1-MM11	Mod_SP_M496	Object	Comment transcribed by KC from letter: "Masterplans must involve all the relevant stakeholders, including the Council, landowners, developers, the local community, service providers and other interested parties" I believe it is important to involve all stakeholders in the development of Masterplans at the first opportunity, which will help engagement and community involvement. Key decisions may need to be taken early on, which may have a huge influence on any Masterplan, leaving other stakeholders out of the early stages may have a negative detrimental impact. Additionally: Who decides if a masterplan will only be sought where feasible and appropriate and what conditions constitute feasible and appropriate? - What influence do stakeholders have on this decision?
SD1-MM11	Mod_SP_M508	Support	MM-11 relates to the requirement for the preparation of masterplans in relation to development proposals. The NPPF (2018) sets out when and where design guidance, including master planning is required. Paragraph 124 states that: "being clear about design expectations, and how these will be tested, is essential in achieving this." Paragraph 126 of the NPPF continues by stating that in developing design guides and codes: "their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified." NPPG also sets out which planning processes and tools can be used to help achieve good design. In terms of development plan content NPPG states: "The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: - careful plan and policy formulation - the use of proper consultative and participatory techniques - where appropriate the preparation of masterplans, briefs and site-specific policies". The main modifications to paragraph 6.23 provides clear guidance as to the circumstances in which a masterplan will be required (i.e. not all circumstances). This approach is compliant with policy in the NPPF and NPPG and is therefore considered to be legally compliant and sound.
SD1-MM12	Mod_SP_M233	Object	GAIL is concerned that the proposed text 'the council will 'normally' require a masterplan to be submitted' will result in developments which have not been subjected to a rigorous assessment: what are the criteria and definition of 'normally', who decides that a masterplan is not required, would stakeholders have any opportunity to challenge a decision that a masterplan is not necessary, and through what process, as with SD1-MM11, what happens if the council decides that a masterplan/joint masterplan is not needed even if the Inspector has made the inclusion of a site(s) in the Local Plan conditional on the development of a masterplan/joint masterplan would the council have the power/authority to ignore the Inspector's recommendations. The reference in the proposed modification to multi-plot developments lacks clarity: does it mean sites which adjoin/are adjacent to each other

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			<p>and/or does it mean a number of sites in a larger area (for example, sites within the boundary of a Neighbourhood Plan)?</p> <p>In the case of developments involving multiple landowners, GAIL believes it essential that joint masterplans clearly detail the respective legal responsibilities of the landowners/developers for site development (including phasing and the effective co-ordination of site activities) and, in particular, their respective responsibilities for the provision of all associated infrastructure.</p> <p>The proposed modification should also state what measures should be in place and which stakeholders should be involved in monitoring the implementation of any (joint) masterplan.</p>
SD1-MM12	Mod_SP_M328	Object	<p>~ MM12 provides some clarification of when masterplans will be required but is inconsistent with the “where feasible and appropriate” escape clauses set out under MM11. See comments under MM11</p> <p>We are also concerned that the specific requirements set out under MM12 are too narrow, in that they (e.g.) refer to land in multiple ownerships but not to multiple developers (who may not be landowners) working to develop a single large site, multiple nearby sites or to distributed developments with a significant impact on existing “as built” communities. MM12 also deletes the requirements for masterplans in more general situations “where proposals warrant such an approach owing to the site location, scale, relationship with surrounding uses, mix of uses or where the scale of change is significant”. We feel that this is a significantly retrograde step, which will undermine the often sensible requirement for masterplans in many situations. A masterplan is not just how a complex development might be phased but about how it fits in to and affects the local environment. That is not reflected in this new clause.</p>
SD1-MM12	Mod_SP_M497	Object	<p>Comment transcribed by KC from letter: Delete and insert text "The Council will normally require a masterplan to be submitted where; developments are to be developed in separate phases over a number of years multi-plot developments where there may be multiple landowners and for mixed use development to ensure that the different land uses to be developed on a site are capable of being delivered... How does the council define the word 'normally' and what criteria does it apply? What would be the scenario where the council decided a Masterplan - Joint masterplan wasn't required Where the Inspector has included a site in the Local Plan which is subject to the development of a Masterplan/Joint masterplan, would the Inspector's direction be binding upon the Council?"</p>
SD1-MM12	Mod_SP_M509	Support	<p>MM-11 relates to the requirement for the preparation of masterplans in relation to development proposals. The NPPF (2018) sets out when and where design guidance, including master planning is required. Paragraph 124 states that:</p> <p>"being clear about design expectations, and how these will be tested, is essential in achieving this."</p> <p>Paragraph 126 of the NPPF continues by stating that in developing design guides and codes:</p> <p>"their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified."</p> <p>NPPG also sets out which planning processes and tools can be used to help achieve good design. In terms of development plan content NPPG states:</p> <p>"The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through:</p> <ul style="list-style-type: none"> - careful plan and policy formulation - the use of proper consultative and participatory techniques - where appropriate the preparation of masterplans, briefs and site-specific policies". <p>The main modifications to paragraph 6.23 provides clear guidance as to the circumstances in which a masterplan will be required (i.e. not all circumstances).</p> <p>This approach is compliant with policy in the NPPF and NPPG and is therefore considered to be legally compliant and sound.</p>
SD1-MM13	Mod_SP_M234	Object	<p>The clause refers to masterplans being often submitted as part of the pre-application process and continues ‘Where appropriate, the council will take a lead role on preparing masterplans’.</p> <p>what is the definition of ‘where appropriate’, also</p> <p>the text fails to spell out any requirement for all stakeholders (particularly the local community) who may be affected by the masterplan to be involved in the process.</p>
SD1-MM13	Mod_SP_M329	Object	<p>~ This section lacks clarity, assigned responsibilities and clear requirements. For example what is meant by the rather ambiguous phrase “Where appropriate, the council will take a lead role on preparing masterplans”? Does this mean the Council will pay for it or do it for the developer?</p>

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			If it were true, or if it were an inalienable requirement placed on the Council or developers, we would welcome the phrase “The documents are frequently prepared in consultation with local communities and other organisations”. However we are not aware of ANY situation where developers or Council planners have worked with local communities and other organisations to produce masterplans, or even taken public comment in to account on specific planning applications. The phrase is untrue, grossly misleading and does not place any requirements on planners and developers.
SD1-MM14	Mod_SP_M255	Support	The identification of a site as Safeguarded Land is, in effect, establishing that the site is likely to be suitable to meet the long-term needs of the District. However, although the development of several of the sites identified as Safeguarded Land could have impacted upon the significance of one or more of the District’s heritage assets, there had been no assessment of this potential impact. The proposed Modification now makes it clear that, in any review of the appropriateness of these safeguarded areas as possible allocations, account must be taken of the likelihood of them achieving sustainable development and their compatibility with other planning objectives. We particularly welcome using the historic environment as an example of the type of area which might need to be evaluated.
SD1-MM14	Mod_SP_M330	Support	KCAN and CPRE accept the changes to this policy and have no comments to make.
SD1-MM15	Mod_SP_M331	Object	~ The Council have not proven the exceptional circumstances needed to remove any land from the green belt for allocation as safeguarded land and the figures set out in this section can only be described as wildly arbitrary. For example there is absolutely no justification or evidence base for allocating an amount of land equivalent to 17% of the current OAN as safeguarded land, as that will presumably not be sufficient to maintain green belt boundaries in the next plan period as intended by the NPPF (although no-one can actually say what will be needed so far ahead). In our view it is impossible and quite wrong, perhaps even ludicrous, to allocate ANY amount of safeguarded land NOW on the premise that it will safeguard green belt boundaries in 15 years’ time. Calderdale Council have taken a very pragmatic decision not to allocate ANY safeguarded land in their Local Plan. Why do Kirklees need to do so? See our comments under MM372 to MM392
SD1-MM15	Mod_SP_M483	Object	Our clients have been promoting their land known in the Local Plan as safeguarded Land designation Site SL2297 - Mill Lane, Flockton. We have identified that the promoters have supported the Local Plan including the identification of the site in their ownership. They have provided additional details of the site in terms of identifying how the site may be accessed through land in our clients’ ownership. The site was retained as safeguarded land rather than allocated for residential uses. Should allocation not be required at the present time then support is given to the Safeguarded land notation. However, the site in our view should be considered for allocation in this Plan to meet the needs of Kirklees and Flockton itself. There have been a range of modifications identified, but a review of linked Modifications SD1-MM15 – Paragraph 6.30; SD1-MM39 – Table 5; SD2-MM40 – Paragraph 8.17 and SD2-MM41 – Figure 7, the position taken is clear that the Local Plan fails to identify sufficient sites to meet the housing supply requirements for the Plan period. Whether the Council think they can address this shortfall as part of an early review is not really of relevance as this plan should provide for the entire requirement as a minimum figure not a ceiling. To knowingly underprovide sufficient housing sites in the Local Plan would in our view be in conflict with National Planning Policy and Guidance and therefore calls into question the soundness of the Local Plan in this regard.
SD1-MM15	Mod_SP_M491	Object	Comment transcribed/summarised by KC from attached letter: Taylor Wimpey consider that similar to previous representations and appearances at the Examination in Public, insufficient flexibility and safeguarded land is made in the Plan. The Main Modification shows that less safeguarded land is proposed through the Plan and less long term development land is proposed. The level of safeguarded land has significantly reduced. Furthermore, the Main Modification does not highlight that some of the retained safeguarded land is not deliverable and there are no reasonable prospects for its delivery. Taylor Wimpey is concerned that safeguarded sites are being allocated in the Local Plan are with significant constraints to delivery and without any evidence or prospects that these constraints could be overcome. Taylor Wimpey still have significant concerns with Site SL2173 East of Far Bank and SL3356 Land to the East of Far Bank. Both of these sites have no access and are not deliverable. Both SL2173 and SL3356 are not developable or deliverable and should not be identified in the Plan, which will reduce the level of safeguarded land and flexibility in the Plan further. Further safeguarded land opportunities in Shelley should therefore be identified to replace such sites, including Taylor Wimpey’s site at Penistone

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			Road, Shelley.
SD1-MM16	Mod_SP_M332	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM16	Mod_SP_M480	Support	Miller Homes supports the clarification regarding the delivery of Dewsbury Riverside (H2089) and level of housing beyond Plan period. This provides greater certainty to the scheme and allows for the comprehensive delivery of the scheme and associated infrastructure.
SD1-MM17	Mod_SP_M333	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM18	Mod_SP_M334	Object	~ We deplore the deletion of the council's commitment to a brownfield first approach, just as we deplore their failure to incorporate brownfield first strategies, policies and allocations in the Local Plan. It is appalling but does confirm what we have observed and feared throughout the Local Plan process. Many would consider it deceitful that the Council should hide their true intention, by saying one thing and doing another, throughout the plan process and only admitting the truth of their intention, by this modification, at a very late stage – when it may be too late to affect the outcome. Our view is that the Council has simply not done enough to encourage the re-use of brownfield land, encourage much needed urban regeneration or even make sufficient allowance for brownfield windfalls, consistent with historical performance data. Instead it has pursued a green field first policy which is to the advantage of developers but to the detriment of the environment, communities and the people of Kirklees. This is also contrary to the “brownfield first” requirements in NPPF 2018.
SD1-MM19	Mod_SP_M314	Object	The Modification relates to Paragraph 7.8 of the Plan, but fails to consider the wider context in which this particular paragraph of the Plan is presented. Paragraphs 7.1-7.3 set out the requirements of national policy, including addressing potential barriers to investment, delivering a strategy which is responsive to economic signals and positively responding to identified business needs. As set out above, as modified the Plan will do nothing to address barriers to investment in this part of the Borough and it is not responsive to evidenced economic signals or business needs. The Plan is therefore not positively prepared, and is unsound (NPPF Paragraph 35). Additionally, the Modification removes the allowance for flexibility in the Council's employment land supply. This is contrary to the provisions of the NPPF (Paragraph 20), which states that “policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances”. This requirement is particularly relevant in the case of Policy E2333a. The allocation would have the effect of removing land from the Green Belt to meet evidenced employment needs. Failing to allocate sufficient land to meet evidence needs and/or react to needs not anticipated would mean that there may be a need for Green Belt boundaries to be revisited during the Plan Period. This fails to recognise the intended permanence of Green Belt boundaries and is contrary to the NPPF (Paragraphs 83 and 85). For the above stated reasons, the Plan is also inconsistent with national policy, and therefore unsound.
SD1-MM19	Mod_SP_M335	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM20	Mod_SP_M336	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM21	Mod_SP_M337	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM22	Mod_SP_M338	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM23	Mod_SP_M315	Object	The stated “oversupply” amounts to 18ha of non-prime employment land. This non-prime land will only be capable of catering for a distinctly different market need to that of prime employment sites, the provision for which have been reduced by some 48ha. The plan will be ineffective in this regard, and therefore unsound (NPPF Paragraph 182).
SD1-MM23	Mod_SP_M339	Object	We do not agree with the principle that the Council needs to allocate land over and above the objectively assessed need in order to “ensure a degree of flexibility is accounted for and allow for a range of sites for the market and to account for the non-delivery of prime sites”. The public sector simply loves to include Factors of safety in plans but in reality “factors of safety” are profligate with scarce resources (in this case undeveloped land) and represent an outdated approach to Local Plan (programme) management. We are adamant that the industrial land allocation should be restricted to the Objectively Assessed Need of 175 Hectares. We have to stop piling factors of safety, on factors of safety, on very arguable and unreliable assessments of basic need.
SD1-MM24	Mod_SP_M340	Support	We do not agree with the principle that the Council needs to allocate land over and above the objectively assessed need in order to “ensure a degree of flexibility is accounted for and allow for a range of sites for the market and to account for the non-delivery of prime sites”. The public sector simply loves to include Factors of safety in plans but in reality “factors of safety” are profligate with scarce resources (in this case undeveloped land) and represent an outdated approach to Local Plan (programme) management. We are adamant that the industrial land allocation should be restricted to the Objectively Assessed Need of 175 Hectares. We have to stop piling factors of safety, on factors of safety, on very arguable and unreliable assessments of basic need.

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SD1-MM25	Mod_SP_M341	Support	We do not agree with the principle that the Council needs to allocate land over and above the objectively assessed need in order to “ensure a degree of flexibility is accounted for and allow for a range of sites for the market and to account for the non-delivery of prime sites”. The public sector simply loves to include Factors of safety in plans but in reality “factors of safety” are profligate with scarce resources (in this case undeveloped land) and represent an outdated approach to Local Plan (programme) management. We are adamant that the industrial land allocation should be restricted to the Objectively Assessed Need of 175 Hectares. We have to stop piling factors of safety, on factors of safety, on very arguable and unreliable assessments of basic need.
SD1-MM26	Mod_SP_M259	Object	<p>When taken together with the modification proposed in SD1-MM27, the resultant approach to Priority Employment Areas is not considered to be sound. The policy is not effective and does not accord with Paragraph 81 of the NPPF, which states that planning policies should:</p> <p>c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and</p> <p>d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.</p> <p>As set out within DLP’s Local Plan representation (Dec, 2016), the PEA policy is considered to be unduly restrictive in respect of the potential future needs of businesses to adapt to changing economic circumstances, in accordance with the Framework.</p> <p>This is most pertinently illustrated in the case of the proposed allocation site HUD23. The Technical Paper: Priority Employment Areas assesses sites against a range of criteria. Site HUD23 scored an Amber classification in the assessment and was not identified as being strategically important. The assessment also confirmed that site HUD23 is over 10 minutes’ drive time from a motorway junction, with no opportunity for expansion and with a significant potential for conflict with the existing residential area to the south of the site and the proposed housing allocation to the north and east. Nevertheless, the site is identified as a PEA, based on incorrect assumptions of modern office stock and good internal site layout.</p> <p>The buildings within the site are, in part, 50+ years old and whilst they have been adapted as far as possible over time, they will prove difficult or costly to adapt for an alternative occupier. The site is not well connected to the motorway network, offers no room for expansion and has significant potential for conflict with existing and proposed residential allocations. In addition the nature of the existing buildings may restrict the future reuse of the site for employment purposes.</p> <p>Should the growth of the business currently located within site HUD23 necessitate relocation from the site in the future, the HEA designation will constrain alternative future uses of the site, which may be more suitable within the context of surrounding land uses, and may provide the required financial return to support the relocation of the business within the District.</p>
SD1-MM26	Mod_SP_M305	Support	Please refer to the enclosed letter of representations prepared by Quod.In summary, this confirms support for the main modifications reference SD1-MM-26 and SD1-MM-140. These main modifications are considered necessary to ensure the soundness of the Local Plan.
SD1-MM26	Mod_SP_M342	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM27	Mod_SP_M260	Object	<p>Within the comments provided under SD1-MM26, the intentions of the additional proposed supporting text are understood, in order to provide clarity in respect of policy PLP8, however the proposed modification is not considered to be sound.</p> <p>The inference within the supporting text that all sites allocated as PEA’s are currently viable is unjustified and is not supported by information within the PEA Technical Paper regarding the needs and economic circumstances of individual businesses within these areas.</p> <p>The text does not explain how the existing site assessment within Appendix 3 of the Technical Paper will support an assessment of the acceptability of non-employment uses.</p>
SD1-MM27	Mod_SP_M343	Conditional Support	Should the first line of inserted text read “For the purposes of the plan all sites allocated as Priority Employment Areas are PRESUMED viable”? Stating that they definitely ARE VIABLE at this moment in time may be an over statement that will come to rebound on the Council. Otherwise the text is good.
SD1-MM28	Mod_SP_M344	Conditional Support	Whilst we support the principle of encouraging companies to employ apprentices, we are not convinced that including clauses in the Local Plan is the right way to do it or even if it is legal to do so. There is certainly nothing in the NPPF or planning law to support it. Critically we do not believe that it can be demanded, enforced or policed at any stage in the planning process. It is therefore a pointless political statement.
SD1-MM29	Mod_SP_M289	Object	NPPF 133. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence and these should be wholly held to. NPPF 134. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging

Mod ref	Rep ID	Outcome	Report text
			into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It would not be possible for sites such as MX1905 to meet the requirements of this policy in its current designation as greenbelt. There is no exceptional circumstance for release of Greenbelt at Chidswell (MX1905) and does not embrace the purpose of the Greenbelt therefore should be removed from the local plan.
SD1-MM29	Mod_SP_M345	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM30	Mod_SP_M261	Object	<p>The proposed modifications to the above Green belt policies set out within SD1-MM30, SD1-MM121 and SD1-MM126 demonstrate the conflict associated with allocating site HUD23 as a Priority Employment Area where economic growth is encouraged, whilst retaining the Green Belt designation of the site. This approach cannot be considered sound, as set out in our previous representations. It does not result in a positively prepared plan, is not justified or effective, nor is it in line with national guidance.</p> <p>Whilst seeking to appear to offer flexibility, the supporting text as set out in the current modifications, continues to restrict the ability of employment uses associated with site HUD23 to expand or redevelopment of the site to proceed in a manner that supports the efficient future operations of the business.</p> <p>Site HUD23 has no overriding physical or environmental constraints that prevent it from being removed from the Green Belt, its release would not result in neighbouring towns merging or in urban sprawl and the new boundary would follow the same discernible physical boundary features proposed to demarcate the new settlement boundary to the neighbouring proposed housing allocations.</p>
SD1-MM30	Mod_SP_M290	Object	Whilst appreciating the need for appropriate commercial opportunity within the greenbelt care must be taken that SD1MM 30 does not override or contradict SD1MM29. Wording must emphasise the value of the role of the greenbelt. In its current designation as greenbelt the proposed site at Chidswell MX1905 would not be allowed and it is vital that protection continues to be given to the greenbelt and value places on the role it plays to prevent irreplaceable and irreversible loss.
SD1-MM30	Mod_SP_M346	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM31	Mod_SP_M347	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM32	Mod_SP_M348	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM33	Mod_SP_M264	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the</p>

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			<p>existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool' method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.</p>
SD1-MM33	Mod_SP_M349	Object	<p>~ We maintain our previous strong objection to the target figure of 31,140 dwellings being regarded as a MINIMUM. See comments against MM6 ~ Our reasons for saying this are that, if a minimum figure is set, it effectively sets the Local Plan up to fail, when actual housing delivery is outside the direct control of the Council and there are likely to be very significant changes in government policy, economic circumstances, population, employment and housing need over the plan period. In our professional experience of programme management it is bad professional practice to set "fixed minimum" targets and there is a very high risk of the Local Plan failing against the new Housing Delivery Tests, simply as a result of aiming for a target that cannot be delivered in practice.</p> <p>Whilst we support principle of a standardised method of OAN calculation, we believe that it can produce anomalies, as it has done in Kirklees. We believe that the figure of 31,140 is far too high, undeliverable, out of step with local market demand in Kirklees and out of step with the OAN for all other Council areas in West Yorkshire. The total annual requirement of 1,730 (expressed as a minimum) is now only slightly less than the revised housing need figure for Leeds (on the 2018 DCHLG figures), which means that if Kirklees pursues the current figure it is effectively taking a hugely disproportionate share of the housing requirement for the Leeds City Region. The likelihood of Kirklees failing the New Housing Delivery Tests within a short time is extremely strong, and it is impossible to draw any other conclusion than the Plan will be obsolete before it is adopted.</p>
SD1-MM34	Mod_SP_M268	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any</p>

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			undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool' method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.
SD1-MM34	Mod_SP_M350	Object	We do not agree with the principle that the Council needs to provide a 10% contingency on homes which have not been assessed through the local plan methodology, The public sector simply loves to include Factors of safety in plans but in reality they are profligate with scarce resources (in this case valuable undeveloped land) and represent an outdated approach to Programme and Plan management. We have to stop piling factors of safety, on factors of safety, on very arguable and unreliable assessments of base data. See comments against MM25
SD1-MM35	Mod_SP_M269	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool' method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.</p>
SD1-MM35	Mod_SP_M352	Object	<p>~ We agree with the text changes but note that the Council is effectively admitting that "brownfield first" policies and restrictions in the availability of greenfield land since 1999 were successful, leading to the high proportion of new housing on brownfield sites and protection of valuable green field and green belt sites. If they accept this past success, we fail to see why the "brownfield first" policy has now been abandoned and why the Council has effectively pursued a "greenfield first and large scale green belt release" policy in this Local Plan.</p> <p>The proposed per annum windfall allowance is significantly less than half the long term windfall level achieved over the past 18 years. We fail to see why this is so, when older urban areas are in dire need of regeneration anyway. In our view the total windfall allowance over the lifetime of the plan should be NO LESS THAN 11,000</p>

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SD1-MM36	Mod_SP_M270	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool' method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.</p>
SD1-MM36	Mod_SP_M351	Object	<p>~ We agree with the text changes but note that the Council is effectively admitting that "brownfield first" policies and restrictions in the availability of greenfield land since 1999 were successful, leading to the high proportion of new housing on brownfield sites and protection of valuable green field and green belt sites. If they accept this past success, we fail to see why the "brownfield first" policy has now been abandoned and why the Council has effectively pursued a "greenfield first and large scale green belt release" policy in this Local Plan.</p> <p>The proposed per annum windfall allowance is significantly less than half the long term windfall level achieved over the past 18 years. We fail to see why this is so, when older urban areas are in dire need of regeneration anyway. In our view the total windfall allowance over the lifetime of the plan should be NO LESS THAN 11,000</p>
SD1-MM37	Mod_SP_M271	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available</p>

Mod ref	Rep ID	Outcome	Report text
			<p>throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool' method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.</p>
SD1-MM37	Mod_SP_M353	Support	<p>KCAN & CPRE accept the changes made and have no comments to make.</p>
SD1-MM38	Mod_SP_M272	Object	<p>Comment transcribed/summarised by KC from attached letter: Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability</p>

Mod ref	Rep ID	Outcome	Report text
			Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool' method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.
SD1-MM38	Mod_SP_M354	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM39	Mod_SP_M273	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool' method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.</p>
SD1-MM39	Mod_SP_M355	Object	We do not agree with the principle that the Council needs to allow a 10% lapse rate on planning permissions already granted or make an allowance for house demolitions and conversions. In our view the ONS housing base data already takes account of a wide range of variables, to arrive at an overall housing demand figure. We have to stop piling factors of safety, on factors of safety, on very arguable and unreliable assessments of base data. See comments against MM25
SD1-MM39	Mod_SP_M482	Object	Modification SD1-MM39 is not sound as it will result in a Plan which is not positively prepared. Paragraph 35 of the NPPF states that, in order to be considered 'positively prepared', Plans should provide: '...a strategy which, as a minimum, seeks to meet the area's objectively assessed needs 'The revised Table 5 at modification SD1-MM39 demonstrates that the Plan does not have the capacity required to meet the minimum objectively assessed needs. The gross capacity required is 32,867 dwellings, whereas the Plan is only able to demonstrate a capacity of 32,739. This is a shortfall of 128 dwellings. Whilst a 128 dwelling shortfall may seem minor in the context of the overall need, it must be stressed that the need is a minimum, and a

Mod ref	Rep ID	Outcome	Report text
			<p>failure to deliver any less than the minimum requirement will mean that the Plan will not provide the amount of homes the communities conclusively need, as derived from the SHMA. Furthermore, the housing capacity in the Local Plan (final row of Table 5) assumes that every proposed allocation will deliver its full plan period yield in accordance with the very ambitious timescales set out in the Housing Trajectory. No flexibility allowance is included on the site allocations as it was in an earlier draft of the Plan. Any slippage or failure to deliver on any single one of the hundreds of draft allocations will therefore worsen this shortfall, and exacerbate the failure of the Plan. Paragraph 11 of the NPPF states that: ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change ‘The Plan’s failure to include a flexibility allowance means that it is inconsistent with national policy, and, on that basis, unsound. A 10% lapse rate is included for extant planning permissions, should they fail to come forward as expected. This approach is considered to be sound and is supported. We would however question why a similar lapse rate/flexibility allowance is not included on site allocations, which in many cases have no developer interest and have less certainty regarding their delivery than sites with planning permission. The need for a flexibility allowance in the Local Plan is made even more important by the inclusion of a number of complex strategic housing allocations (i.e. H1747/H351, H2089 and MX1905) which need to deliver at very ambitious rates, and above national averages, in order to meet the minimum housing requirement (or, in the case of this Plan as currently drafted, get close to the minimum requirement).To make the Plan sound it is considered that enough sites should be allocated to meet the minimum housing requirements, and an additional 10% flexibility allowance be identified to provide market choice and act as a buffer should identified sites fail to deliver as expected. This would require the identification of sufficient land to accommodate 2,115 dwellings (to make up for the existing shortfall and provide the 10% flexibility buffer).KeyLand Developments has promoted rejected site H596 at Windy Bank Lane, Liversedge for residential development throughout the various stages of the Local Plan consultation process. The representations submitted in relation to this site have been supported by a masterplan which shows how the site could accommodate around 140 dwellings, and how it could be delivered alongside allocation H198 to the north as part of a wider housing allocation, thereby contributing up to 270 new homes to the local housing requirement. A range of technical reports have been submitted to the Council and Local Plan Examination for site H596, including a Landscape and Visual Assessment, Preliminary Highways Assessment, Ecological Impact Assessment and Bat Surveys, Heritage Impact Assessment, and overarching Vision Document. These technical assessments have shown that there are no technical or environmental constraints which would restrict the development of housing at the site, as was largely found in the Council’s own assessments, and there are no technical reasons not to allocate the site for housing. The Council’s own Green Belt Review concludes that it is Windy Bank Lane and Hare Park Lane that prevent urban sprawl (and not the current designated edge). It further concludes that as the current Green Belt ‘edge’ does not follow a feature on the ground, it does not presently safeguard the countryside from encroachment. Site H596 could therefore be developed without significant harm to the existing Green Belt, and could indeed provide a more robust and enduring Green Belt boundary.</p>
SD1-MM39	Mod_SP_M484	Object	<p>Our clients have been promoting their land known in the Local Plan as safeguarded Land designation Site SL2297 - Mill Lane, Flockton. The site has been promoted by Spawforths on behalf of the site owners Mr P and Mr N Crowther.</p> <p>We have identified that the promoters have supported the Local Plan including the identification of the site in their ownership. They have provided additional details of the site in terms of identifying how the site may be accessed through land in our clients’ ownership. The site was retained as safeguarded land rather than allocated for residential uses. Should allocation not be required at the present time then support is given to the Safeguarded land notation. However, the site in our view should be considered for allocation in this Plan to meet the needs of Kirklees and Flockton itself.</p> <p>Our client is concerned about the proposed level housing provision in the plan.</p> <p>There have been a range of modifications identified, but a review of linked Modifications SD1-MM15 – Paragraph 6.30; SD1-MM39 – Table 5; SD2-MM40 – Paragraph 8.17 and SD2-MM41 – Figure 7, the position taken is clear that the Local Plan fails to identify sufficient sites to meet the housing supply requirements for the Plan period.</p> <p>Whether the Council think they can address this shortfall as part of an early review is not really of relevance as this plan should provide for the entire requirement as a minimum figure not a ceiling. To knowingly underprovide sufficient housing sites in the Local Plan would in our view be in conflict with National Planning Policy and Guidance and therefore calls into question the soundness of the Local Plan in this regard.</p> <p>It is considered that the Modifications render the Plan unsound as follows: Which test of soundness are comments about?</p>

Mod ref	Rep ID	Outcome	Report text
			Positively Prepared X Effective X Justified X Consistency with National Policy X
SD1-MM39	Mod_SP_M492	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Taylor Wimpey objects to the Main Modification, which provides insufficient land for housing to meet the Objectively Assessed Need over the Plan period. The Main Modification removes circa 1,500 homes from the Plan, which removes any level of flexibility in the Plan plus the opportunity for the Plan to meet its housing need. The Local Plan therefore does not accord with the Framework and this Main Modification needed to be amended by identifying sufficient sites to meet the housing requirement plus a level of flexibility.</p> <p>The Framework states that Local Plans must meet the full, objectively assessed needs for market and affordable housing. The Main Modification shows the Plan cannot fulfil this requirement. The Plan will now have a shortfall of 128 dwellings.</p> <p>SD1-MM40 states that this is justified as the Plan has a five year housing land supply, however the Framework is clear in stating that upon adoption Local Plans must meet the objectively assessed needs in full and have a five year supply of housing land. SD1-MM40 suggests that the remedy for this situation is to monitor and prepare an action plan or consider a plan review. These are some potential remedies but none replaces the clear need for further housing land to be allocated immediately and which can be appropriately accommodated within the emerging Plan.</p> <p>Taylor Wimpey is concerned that the Main Modification is allocating insufficient housing land and that if sites are removed from the Plan, appropriate sites in an area should be replaced as a minimum.</p> <p>In the Kirklees Rural Sub-Area circa 135 dwellings have been removed from the Plan from 5 sites. This should be replaced within the Kirklees Rural Sub-Area. If the housing is not replaced the need for housing would not be addressed in this Sub-Area and there could be an adverse impact on the economic growth aspirations for Kirklees.</p> <p>The Plan therefore has no buffer and a shortfall in housing. Taylor Wimpey questions whether this is sufficient given the potential for non-delivery and under delivery of sites, particularly from the large pool of SHLAA sites. Therefore, there is potential for an even greater shortfall in housing delivery. The principle of a buffer is supported by the Local Plan Expert Group report which recommends a 20 per cent buffer of reserve sites be provided to ensure that the plan can maintain a five year supply and respond flexibly and rapidly to change. Taylor Wimpey therefore suggests that further housing to replace those sites removed plus a buffer be considered.</p> <p>Within this context the council need to recognise the importance of housing for economic growth. The development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity in Sunderland and Washington.</p> <p>Importantly the HBF released in July 2018 its report on “the economic footprint of house building in England and Wales”, which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land.</p> <p>An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth</p> <p>Taylor Wimpey consider that their rejected site at Penistone Road, Shelley (H169 and H2731) which is in the Kirklees Rural Sub-Area is a suitable site to replace those sites which have been removed from the Plan. The potential of the site is summarised in the following section.</p>
SD1-MM40	Mod_SP_M274	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-</p>

Mod ref	Rep ID	Outcome	Report text
			<p>MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool' method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.</p>
SD1-MM40	Mod_SP_M309	Conditional Support	<p>The above modification identifies that there is a slight shortfall in the overall housing supply to meet the full OAN for housing over the plan period. Gladman would therefore question why the identified safeguarded sites have not been released or why the Council has not sought to identify additional housing land in order to meet housing needs in full over the plan period. Gladman consider that further sites are necessary to ensure the soundness of the plan and meet development needs in full.</p> <p>The modification also details that to ensure the effectiveness of the KLP, the Council will either prepare delivery action plans or consider a plan review. Whilst the notion of a local plan review is supported, there does not appear to be any policy mechanism linked to monitoring which would trigger such a review clause. Gladman believe that it would be prudent if this modification was expanded so that the KLP includes a review mechanism which is clear, easily understandable, and effective by setting achievable targets for the completion of the review. Specifically, the triggers for the review need to be meaningful, have teeth and contain an end date that is in the control of the Council. The policy should also include consequences for failing to undertake a review should a shortfall in housing supply become apparent. Gladman refer to the North-West Leicestershire Local Plan (adopted November 2017) as an example of an effective and implementable review policy. Policy S1 states: "The Council will continue to work collaboratively with the Leicester and Leicestershire Housing Market Area (HMA) authorities to establish the scale and distribution of any additional provision that may be necessary in North West Leicestershire and elsewhere in the HMA as a result of the inability of one or more authority to accommodate its own needs as identified in the Leicester and Leicestershire Housing and Economic Development Needs Assessment. The District Council will commence a review of this Local Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of the Town and Country Planning(Local Planning) (England) Regulations 2012) by the end of January 2018 or within 3 months of the adoption of this Local Plan (whichever is the later). The Plan Review will be submitted for examination within two years from the commencement of the review. In the event that the reviewed plan is not submitted within two years then this Local Plan will be deemed out of date. "The need for an effective review mechanism to be included in the KLP is considered vital to ensure the soundness of the Local Plan given the fact that the Council is not seeking to</p>

Mod ref	Rep ID	Outcome	Report text
			meet its full identified housing needs at this time over the plan period.
SD1-MM40	Mod_SP_M356	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM40	Mod_SP_M485	Object	<p>Our clients have been promoting their land known in the Local Plan as safeguarded Land designation Site SL2297 - Mill Lane, Flockton.</p> <p>We have identified that the promoters have supported the Local Plan including the identification of the site in their ownership. They have provided additional details of the site in terms of identifying how the site may be accessed through land in our clients' ownership. The site was retained as safeguarded land rather than allocated for residential uses. Should allocation not be required at the present time then support is given to the Safeguarded land notation. However, the site in our view should be considered for allocation in this Plan to meet the needs of Kirklees and Flockton itself.</p> <p>Our client is concerned about the proposed level housing provision in the plan.</p> <p>There have been a range of modifications identified, but a review of linked Modifications SD1-MM15 – Paragraph 6.30; SD1-MM39 – Table 5; SD2-MM40 – Paragraph 8.17 and SD2-MM41 – Figure 7, the position taken is clear that the Local Plan fails to identify sufficient sites to meet the housing supply requirements for the Plan period. This is stated</p> <p>Whether the Council think they can address this shortfall as part of an early review is not really of relevance as this plan should provide for the entire requirement as a minimum figure not a ceiling. To knowingly underprovide sufficient housing sites in the Local Plan would in our view be in conflict with National Planning Policy and Guidance and therefore calls into question the soundness of the Local Plan in this regard.</p>
SD1-MM40	Mod_SP_M493	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Taylor Wimpey objects to the Main Modification, which provides insufficient land for housing to meet the Objectively Assessed Need over the Plan period. The Main Modification removes circa 1,500 homes from the Plan, which removes any level of flexibility in the Plan plus the opportunity for the Plan to meet its housing need. The Local Plan therefore does not accord with the Framework and this Main Modification needed to be amended by identifying sufficient sites to meet the housing requirement plus a level of flexibility.</p> <p>The Framework states that Local Plans must meet the full, objectively assessed needs for market and affordable housing. The Main Modification shows the Plan cannot fulfil this requirement. The Plan will now have a shortfall of 128 dwellings.</p> <p>SD1-MM40 states that this is justified as the Plan has a five year housing land supply, however the Framework is clear in stating that upon adoption Local Plans must meet the objectively assessed needs in full and have a five year supply of housing land. SD1-MM40 suggests that the remedy for this situation is to monitor and prepare an action plan or consider a plan review. These are some potential remedies but none replaces the clear need for further housing land to be allocated immediately and which can be appropriately accommodated within the emerging Plan.</p> <p>Taylor Wimpey is concerned that the Main Modification is allocating insufficient housing land and that if sites are removed from the Plan, appropriate sites in an area should be replaced as a minimum.</p> <p>In the Kirklees Rural Sub-Area circa 135 dwellings have been removed from the Plan from 5 sites. This should be replaced within the Kirklees Rural Sub-Area. If the housing is not replaced the need for housing would not be addressed in this Sub-Area and there could be an adverse impact on the economic growth aspirations for Kirklees.</p> <p>The Plan therefore has no buffer and a shortfall in housing. Taylor Wimpey questions whether this is sufficient given the potential for non-delivery and under delivery of sites, particularly from the large pool of SHLAA sites. Therefore, there is potential for an even greater shortfall in housing delivery. The principle of a buffer is supported by the Local Plan Expert Group report which recommends a 20 per cent buffer of reserve sites be provided to ensure that the plan can maintain a five year supply and respond flexibly and rapidly to change. Taylor Wimpey therefore suggests that further housing to replace those sites removed plus a buffer be considered.</p> <p>Within this context the council need to recognise the importance of housing for economic growth. The development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity in Sunderland and Washington.</p> <p>Importantly the HBF released in July 2018 its report on “the economic footprint of house building in England and Wales”, which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in</p>

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			<p>different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land.</p> <p>An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth</p> <p>Taylor Wimpey consider that their rejected site at Penistone Road, Shelley (H169 and H2731) which is in the Kirklees Rural Sub-Area is a suitable site to replace those sites which have been removed from the Plan. The potential of the site is summarised in the following section.</p>
SD1-MM41	Mod_SP_M275	Object	<p>Comment transcribed/summarised by KC from attached letter: Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool' method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.</p>
SD1-MM41	Mod_SP_M357	Object	<p>~ It is difficult to compare housing trajectories when only one is provided as part of the consultation. However we presume that the trajectory shown in the consultation documents is the new revised trajectory (there are no titles or labels to indicate this). If this is not the case how can members of the public comment on a revised trajectory that they haven't seen?</p> <p>We have repeatedly pressed the point that the "housing" trajectory needs to show the projected rate of house completions, as housing delivery is the benchmark against which performance of the plan must be measured – NOT consented site availability. If the performance of the Plan were to be judged against the planned trajectory of "consented site availability", it would be bound to fail, as it represents a huge 250% increase in consented land supply between 2017 and 2020. Adoption of the Plan might facilitate that huge increase in supply of sites, but a comparable increase in actual delivery of homes is pure fantasy.</p>

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SD1-MM41	Mod_SP_M486	Object	<p>Our clients have been promoting their land known in the Local Plan as safeguarded Land designation Site SL2297 - Mill Lane, Flockton. We have identified that the promoters have supported the Local Plan including the identification of the site in their ownership. They have provided additional details of the site in terms of identifying how the site may be accessed through land in our clients' ownership. The site was retained as safeguarded land rather than allocated for residential uses. Should allocation not be required at the present time then support is given to the Safeguarded land notation. However, the site in our view should be considered for allocation in this Plan to meet the needs of Kirklees and Flockton itself.</p> <p>There have been a range of modifications identified, but a review of linked Modifications SD1-MM15 – Paragraph 6.30; SD1-MM39 – Table 5; SD2-MM40 – Paragraph 8.17 and SD2-MM41 – Figure 7, the position taken is clear that the Local Plan fails to identify sufficient sites to meet the housing supply requirements for the Plan period.</p> <p>Whether the Council think they can address this shortfall as part of an early review is not really of relevance as this plan should provide for the entire requirement as a minimum figure not a ceiling. To knowingly underprovide sufficient housing sites in the Local Plan would in our view be in conflict with National Planning Policy and Guidance and therefore calls into question the soundness of the Local Plan in this regard.</p>
SD1-MM41	Mod_SP_M494	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Taylor Wimpey object to the proposed changes to the housing trajectory. The trajectory shows that the Council will not achieve the objectively assessed housing need and that the Council will not achieve the annual housing requirement from 2026 onwards, following a spike in delivery in 2020 and 2021. The approach to housing delivery is unsustainable with a short term peak followed by years of under delivery. This needs to be reviewed and other housing opportunities need to be considered to maintain the rate of delivery consistently over the plan period otherwise a full review of the plan will be required in the short term to address housing delivery matters.</p>
SD1-MM42	Mod_SP_M276	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool'</p>

Mod ref	Rep ID	Outcome	Report text
			method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.
SD1-MM42	Mod_SP_M310	Object	Gladman raise concerns in relation to the above modification which suggests the use of the Liverpool approach for the purposes of calculating housing land supply. Gladman would highlight that this approach does not appear to be consistent with the requirements of national policy. Whilst neither the Liverpool or Sedgfield approach is specifically mentioned, it is clear that the emphasis on meeting the housing need in full on an annual basis as a minimum. The approach proposed through modifications therefore seems at odds with the approach to significantly boost the supply of housing to spread past housing delivery failure over a longer period into the future when it should have already been delivered. This is further concerning when the Local Plan does not seek to meet full housing needs over the plan period but instead allows for safeguarded land to potential meet housing need over the next plan period. It must be borne in mind that any further delay in meeting unmet housing needs is failing to meet those households who need both market and affordable homes since the start of the plan period. This is not simply a theoretical mathematical exercise as there are households who need homes now and it is unreasonable to expect them to wait until later in the plan period when the housing should have already been delivered. Accordingly, the reference to the Liverpool method in the Plan made via modification is not considered to be justified given the previous shortfall in housing delivery that has already accumulated. Instead, the Plan should make clear that the Sedgfield method be used for the purposes of calculating housing land supply to ensure housing shortfall is addressed as soon as possible. If it cannot be addressed in a timely manner then this reinforces the need for an effective review mechanism to be included in the Local Plan.
SD1-MM42	Mod_SP_M358	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM43	Mod_SP_M277	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Housing supply figures were subject to considerable scrutiny during the examination period. As part of this process the Council have now updated this housing land supply figures to 31 March 2017 and reassess the various assumptions and estimates underlying the figures. Revised Table 5 within SD1-MM39 provides the updated housing requirement and sources of housing land supply and the Local Plan confirms that the gross housing capacity required taking into account an allowance for losses and lapsed rate on planning permission is 32,867 dwellings. However, having regard to the housing supply capacity identified in the Local Plan (taking account existing supply and capacity from allocations) only amounts to 32,739 dwellings so there is a clear deficit. Both the Inspector in her letter dated 15 June 2018 and modification reference SD1-MM40 recognise that there is a short fall in overall housing supply for the full plan period (2013-2031). We consider there is a need to ensure that a ready supply of housing land is available throughout the Plan Period and as demonstrated through the Hearing Sessions, there is considerable uncertainty of predicting delivery. We therefore consider that assumptions of delivery have been over estimated and anticipate developing on certain sites will be liable to change as a result of more detailed work carried out. Experience indicates that it is unlikely that all commitments and allocations will be delivered which could further widen the shortfall between the required housing provision and the overall housing supply forecast within the Plan Period. In addition, the number of changes recommended by the Inspector to reducing and deleting allocated sites such as Site H442 will have significant implications for the housing supply figure and will prevent the Local Plan meeting its overall requirement. Paragraph 182 of the original NPPF identifies the criteria to assess whether a Local Plan can be judged 'sound'. A key objective is that the Plan should be positively prepared based on a strategy that seeks to meet objectively assessed development. Given both the Inspector and the Council readily accept that there is a shortfall in overall housing supply, we consider that the Main Modifications proposed fail this test of soundness as it is not consistent with National Policy. Given the unpredictability of the delivery of certain sites and the housing requirement is now drafted as a 'minimum', therefore not as a ceiling figure, it is clear that no flexibility has been built into the Local Plan. To assist in resolving this issue, we are of the opinion that Site H442 should be reinstated as a housing allocation as it was one of the most suitable and appropriate when considered against alternative sites and is deliverable in the short term. Modification Ref SD1 – MM43 deals with the Five Year Housing Land Supply calculation and guided by the Inspector's initial findings the assessment is based on the 'Liverpool' approach where the existing backlog is distributed over the Plan Period. Again the Inspector does not elaborate on the justification behind this decision but instead she confirms that her reasons will be set out within the final report. The Planning Practice Guidance notes that deal with Housing Land Availability Assessment, advises Local Authorities as to how they should deal with under supply. It confirms that Local Authorities should aim to deal with any undersupply within the first five years of the Plan Period where possible. This approach is consistent with Paragraph 47 of the original framework which aims to 'boost significantly the supply of housing'. We would therefore maintain that the Inspector's approach of favouring the 'Liverpool' method is inconsistent with National Policy. On this basis, the five year housing land supply calculation will not deliver a sufficient supply of housing sites and as such render the Local Plan immediately out of date.</p>

Mod ref	Rep ID	Outcome	Report text
SD1-MM43	Mod_SP_M311	Object	Gladman raise concerns in relation to the above modification which suggests the use of the Liverpool approach for the purposes of calculating housing land supply. Gladman would highlight that this approach does not appear to be consistent with the requirements of national policy. Whilst neither the Liverpool or Sedgfield approach is specifically mentioned, it is clear that the emphasis on meeting the housing need in full on an annual basis as a minimum. The approach proposed through modifications therefore seems at odds with the approach to significantly boost the supply of housing to spread past housing delivery failure over a longer period into the future when it should have already been delivered. This is further concerning when the Local Plan does not seek to meet full housing needs over the plan period but instead allows for safeguarded land to potential meet housing need over the next plan period. It must be borne in mind that any further delay in meeting unmet housing needs is failing to meet those households who need both market and affordable homes since the start of the plan period. This is not simply a theoretical mathematical exercise as there are households who need homes now and it is unreasonable to expect them to wait until later in the plan period when the housing should have already been delivered. Accordingly, the reference to the Liverpool method in the Plan made via modification is not considered to be justified given the previous shortfall in housing delivery that has already accumulated. Instead, the Plan should make clear that the Sedgfield method be used for the purposes of calculating housing land supply to ensure housing shortfall is addressed as soon as possible. If it cannot be addressed in a timely manner then this reinforces the need for an effective review mechanism to be included in the Local Plan.
SD1-MM43	Mod_SP_M359	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM44	Mod_SP_M298	Support	The HBF considers that the proposed modifications are sound, and they are an improvement on the previous text, particularly in relation to the minimum number of new dwellings.
SD1-MM44	Mod_SP_M360	Object	Once again we have a situation where policies are being watered down, with apparently slight changes in wording, to the point where they are completely useless and do not require developers to do anything.
SD1-MM45	Mod_SP_M361	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM45	Mod_SP_M498	Object	Comment transcribed by KC from attached letter: SD2 MM45 Extend the clause, to include all the existing PROW's and TPO's on the site.
SD1-MM46	Mod_SP_M362	Object	We are unsure why this change is necessary and have some concerns that deletion of the word "type" will lead to the Council losing any semblance of control over whether a development should consist of flats, bungalows, detached houses, semi-detached houses or terraced houses.
SD1-MM47	Mod_SP_M363	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM47	Mod_SP_M499	Object	Comment transcribed by KC from attached letter: or evidence of local need submitted through the planning applications process. -where a developer is not constrained by evidence contained in the latest SHMA - surely they will avoid building in the the areas where there is need for affordable homes and prefer to develop other areas, where they may decide to only build cheaper housing ie affordable housing after building other houses at market price
SD1-MM48	Mod_SP_M364	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM49	Mod_SP_M365	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM50	Mod_SP_M366	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM51	Mod_SP_M367	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM52	Mod_SP_M368	Object	Whilst we support an increase in the provision of affordable housing, we do not see how the trajectory set out in the revised table can possibly be achieved – especially with current limits on public sector funding and the number of "policy escape clauses" included within this plan. In our view it would be more practical and honest to anticipate a less "peaky" but more sustainable trajectory. The plan is once again being set up to fail.
SD1-MM52	Mod_SP_M500	Object	Comment transcribed by KC from attached letter: Affordable Housing Trajectory The Strategic Housing Market Assessment report 2016 shows an affordable housing deficit in Kirklees of 1049 per annum, with a backlog of 6513 in 2016 The trajectory shows a year on year decline in the number of affordable homes having been built from 320 homes in 2013/2014 to just 121 in 2016/2017. While the Local Plan Allocations shows a rise in the number of affordable homes to be built from 204 in 2019/2020, 586 in 2020/2021, 511 in 2021/2022, 372 2022/2023 over the next five years, this will not be enough to meet the year on year need and the backlog of affordable homes required will increase.
SD1-MM53	Mod_SP_M369	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM54	Mod_SP_M370	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM55	Mod_SP_M371	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM56	Mod_SP_M372	Support	KCAN & CPRE accept the changes made and have no comments to make.

Mod ref	Rep ID	Outcome	Report text
SD1-MM57	Mod_SP_M373	"No Comment"	We support the principle but feel that the 280 square metre limit might be over-generous. 280 square metres is not a small convenience store. We would prefer to see a lower threshold.
SD1-MM58	Mod_SP_M374	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM59	Mod_SP_M376	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM59	Mod_SP_M481	Conditional Support	Miller Homes supports the insertion of a new paragraph into the supporting text to Policy PLP13, which recognises that a new local centre can be created on Dewsbury Riverside (H2089) commensurate to the scale of growth of the proposed scheme. This provides greater certainty for the delivery of the scheme. However, Miller Homes are still concerned that a sequential test and impact assessment may still be requested when an application is submitted, which is unnecessary given the collaborative working towards the formulation of the Masterplan Framework and the preceding text of the supporting new paragraph. Miller Homes suggests that the following text be deleted "subject to the sequential test and impact assessment".
SD1-MM60	Mod_SP_M1	Support	The local centres should be constructed before the houses.
SD1-MM60	Mod_SP_M377	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM61	Mod_SP_M378	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM62	Mod_SP_M379	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM63	Mod_SP_M380	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM64	Mod_SP_M381	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM65	Mod_SP_M382	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM66	Mod_SP_M383	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM67	Mod_SP_M384	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM68	Mod_SP_M385	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM69	Mod_SP_M386	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM70	Mod_SP_M387	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM71	Mod_SP_M388	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM72	Mod_SP_M235	Conditional Support	GAIL supports the modification which states that the requirement of a Travel Plan will be considered on a case by case basis where the proposed development falls below the major application category where it has the potential to generate significant transport movements. However, more clarity is needed in defining what is 'significant' and how the local community could challenge a decision which says that the projected increase in traffic isn't significant. GAIL also believes that the modification should go further and explicitly require Travel Plans where the cumulative impact of developments in close proximity to each other are likely to result in significantly higher volumes of traffic. (As an example, H31 has an indicative capacity of 68 dwellings. However, it lies half way (less than half a mile in either direction) between H26840a and H1679 which have indicative capacities of 286 and 274 dwellings respectively taken together, the three Sites have an indicative capacity of 600+ dwellings. Indeed, with H2730a (proposed dwellings of 300+) being directly adjacent to H2684a and the Council's intention that H2684a is the primary means of access for traffic from H2730a onto Penistone Road, the likely cumulative volume of traffic which needs to be considered is significantly greater than the 'small scale major proposal' implied by the 68 dwellings proposed for H31).
SD1-MM72	Mod_SP_M389	Object	Why is it necessary to include the word "normally". This is once again an example of policies being watered down to the point where it gives an unnecessary and counterproductive "escape clause"
SD1-MM72	Mod_SP_M501	Object	Comment transcribed by KC from attached letter: I believe the modification does not go far enough as it does not address the cumulative impact of developments in very close proximity to each other. For example plot H31 with an indicative capacity of 68 dwellings, lies within half a mile of plot H2684a with an indicative capacity for 286 dwellings, and lies within half a mile of plot H1679 with an indicative capacity of 351 dwellings. This gives a total of 705 dwellings. In addition to this if H2730a is included with primary access off Penistone Rd, then the cumulative increase in volume of traffic is significant and clearly much greater than the small scale proposal implied by 68 dwellings in plot H31.
SD1-MM73	Mod_SP_M236	Object	The first proposed modification (deletion and introduction of amended text) ends with the words ' ... where the residual cumulative impacts of development are not severe':

Mod ref	Rep ID	Outcome	Report text
			'severe' is open to interpretation and needs clarification.
SD1-MM73	Mod_SP_M291	Object	Quote: "New development will normally be permitted where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of development are not severe. " No master plan or infrastructure document can facilitate a safe and suitable access to MX1905 it is not possible based on previously provided information that this site for example could meet this policy's requirements. Quote: "Proposals shall demonstrate adequate information and mitigation measures to avoid a detrimental impact on highway safety and the local highway network. Proposals shall also consider any impacts on the Strategic Road Network. The Local Plan has no in depth approach to the impact of highway safety on the A653.
SD1-MM73	Mod_SP_M390	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM73	Mod_SP_M511	Object	Comment transcribed by KC from attached letter: I refer to the proposed development for housing around the Thornhill Lees, Forge Lane, Ouzlewell area up to and beyond the railway and river bridges that span Calder Road. In your documentation regarding this particular development I have not been able to locate a temporary traffic management plan that will be put-in place both before, during and after completion of the Contract building works. In addition, there does not appear to be notifications as to who will be responsible for the maintenance, cleaning and upkeep of the main and temporary highways and site access roads in what can only be described as a very heavily congested location. Under general circumstances a temporary transport plan indicating the times when special plant and heavy equipment, substantial increases in site delivery vehicles and other types on construction transport can and cannot use public highways, especially during the early phases of development when groundworks and civil engineering operations are taking place. It should be noted from the onset that Calder Road is extremely restrictive due to parked vehicles at the Ravensthorpe end junction with Huddersfield Road, whilst there is a special school close to the junction at Forge Lane. As outlined above, a temporary and safe transport plan needs to be put in place and it is essential that the plan makes recognition of the fact that the public will be moving into dwellings as soon as possible whilst other sections of the development remain under development by the chosen building /development contractor. This in turn could lead to a problem whereby Kirklees owned property falls within the boundaries and temporary works of the contractor. The foregoing are only a few small elements associated with a development of this nature in the location outlined, and accordingly it is of paramount importance that the Kirklees department who will become ultimately responsible for the upkeep and safety of all roads and access points to the site, whether of a permanent or temporary nature, are fully in control of the acts and omissions of the Contractor and his suppliers at all times,
SD1-MM74	Mod_SP_M2	Support	The existing residents have a right to safe passage on the roads as well as the new residents. It is imperative that sound infrastructure is in place before commencement of large developments.
SD1-MM74	Mod_SP_M391	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM75	Mod_SP_M392	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM76	Mod_SP_M299	Support	The HBF considers that the modification is sound, and the addition of 'to a degree proportionate to the proposal' is an improvement on the previous text.
SD1-MM76	Mod_SP_M393	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM77	Mod_SP_M300	Support	The HBF considers that the modification to Policy PLP24 is sound, and it is an improvement on the previous text.
SD1-MM77	Mod_SP_M394	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM78	Mod_SP_M301	Support	The HBF considers that the modification to Policy PLP24 is sound, and it is an improvement on the previous text.
SD1-MM78	Mod_SP_M395	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM79	Mod_SP_M302	Support	The HBF does not consider that this proposed modification is sound. This modification changes the emphasis of the policy and does not add to the clarity of the policy. The HBF consider that the original text was more appropriate.
SD1-MM79	Mod_SP_M396	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM80	Mod_SP_M292	Object	Where national policy states that local planning authorities should plan positively to retain and enhance landscapes, visual amenity and biodiversity this should be followed completely. Based on information received it would not, for example, be possible for proposed sites such as MX1905 to meet these criteria which would destroy the landscape, visual amenity and biodiversity of MX1905. Please see attached earlier representation of Professor Ian Rotherham's (Sheffield Hallam University)
SD1-MM80	Mod_SP_M397	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM80	Mod_SP_M507	Support	To use materials and designs in-keeping with the areas as necessary.

Mod ref	Rep ID	Outcome	Report text
SD1-MM81	Mod_SP_M293	Object	Absence of evidence Quote: “traffic in our urban centres and on busy roads result in levels of air pollution which have a significant impact on the health of the population, with those having underlying health conditions being most at risk. There are two pollutants of greatest concern: nitrogen dioxide (NO2) and particulate matter (PMn.) There is increasing evidence that fine (PM2.5) and ultrafine particulate matter (nano-scale), plays a more significant role than previously thought, although as yet the precise toxicological mechanisms are not clearly understood. There is also evidence to suggest that particle numbers are of greater significance than mass concentration in the determination of certain health effects. Particulates have an adverse impact on health and are mainly caused by emissions from traffic, particularly exhaust emissions from older diesel vehicles”. The introduction of electric and hydrogen cars is in the distant future what about the impact of emissions now. The introduction of green vehicles totally solving pollution is myth as particle matter will still be present from tyres and brake pads.
SD1-MM81	Mod_SP_M398	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM82	Mod_SP_M104	Support	I support the modification
SD1-MM82	Mod_SP_M120	Support	I support the modification
SD1-MM82	Mod_SP_M141	Support	I support the proposed modification
SD1-MM82	Mod_SP_M22	Support	We are not in a position to comment upon the legality of this proposal.
SD1-MM82	Mod_SP_M248	Support	I support the proposed modification.
SD1-MM82	Mod_SP_M399	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM82	Mod_SP_M53	Support	Modification is supported
SD1-MM82	Mod_SP_M72	Support	I support the modification
SD1-MM82	Mod_SP_M93	Support	I support the proposed modification
SD1-MM83	Mod_SP_M105	Object	I am opposed to the modification. I support the comments made by BOLT(ED)
SD1-MM83	Mod_SP_M121	Object	I do not support this modification. I felt having the reports etc provided more safeguards and guidance.
SD1-MM83	Mod_SP_M142	Object	I oppose this modification. I am disappointed that the inspector has removed reference to these local reports as I felt they provided additional safeguards and guidance.
SD1-MM83	Mod_SP_M229	Object	I have insufficient knowledge to be sure that this is illegal but cannot see how it could be justified for Kirklees to abandon their own wind turbine landscape sensitivity maps? Surely, when more areas are identified as being appropriate for wind turbines (as recommended by the Inspector) it is imperative that those areas that have been identified as being unsuitable for large wind turbines should remain as fully protected as they currently are?
SD1-MM83	Mod_SP_M23	Object	We are not in a position to comment upon the legality of this modification.
SD1-MM83	Mod_SP_M249	Object	Kirklees should take into account the Julie Martin report and the sensitivity maps. The reportsd and maps provide complementary safeguards to the proposed SD1-MM87 modification
SD1-MM83	Mod_SP_M267	Object	why get rid of the local knowledge in the plan? This is a very sensitive area for nature and landscape. Those are precious hills separating us from the sprawl of greater Manchester. Turbines in the wrong place could ruin the special nature of the south pennines and industrialise the natural beauty of a very slim belt of land. The previous document had been carefully thought out. Please restore it.
SD1-MM83	Mod_SP_M400	Object	~ We are strongly opposed to this modification. The South Pennines Wind Energy Landscape Study (2014) is an excellent highly professional study which has been produced in collaboration with Calderdale, Barnsley, Rossendale and Burnley Councils. Together with its predecessor report dated 2010, written by the same consultants and involving an even wider range of Council sponsors, it demonstrates an 8 year history of cross border cooperation on wind turbine developments. Having demonstrated lengthy and substantial cooperation with these other authorities on wind turbine issues, we question whether it is appropriate or even legal for Kirklees Council to now unilaterally delete all references to the report from its Local Plan. We have to point out that in order to satisfy the duty to cooperate Councils must not only consult each other but also cooperate in plan making and plan implementation. They cannot withdraw from, depart from or decline to implement cooperatively determined plans without contravening the legal duty to cooperate. Notwithstanding the cross border cooperation that has gone in to preparation of the Landscape Study it is a highly professional and appropriate report which provides excellent guidance to wind energy developers and local communities about where and which type of wind energy

Mod ref	Rep ID	Outcome	Report text
			developments are likely to be acceptable.
SD1-MM83	Mod_SP_M488	Object	We welcome the changes the planning inspector has made in some respects but not in others and our comments as submitted for The Publication Draft Local Plan consultation still hold. In particular we remain concerned about some of the housing and mineral site allocations (including safeguarded allocations), loss of employment land to housing, impact on infrastructure, sustainability and loosening of the policy controlling the siting of turbines.
SD1-MM83	Mod_SP_M52	Object	My house is 5 metres from the proposed quarry and whilst I fully support BOLT(E)D KMC cannot leave my concerns out to save them time - this is a life changing decision you will be making for all the residents around the site especially the three families at Dearne Grange. I must add that this process of responding to the modifications is so complex it is almost unusable to people who are able to confidently use WEB based sites. Our community is of an older generation and this makes objecting impossible for them, surely it could have been done in such a way that everyone could voice their concerns rather than be obstructive in them being able to do so.
SD1-MM83	Mod_SP_M73	Object	I am opposed to the modification and support the comments made by BOLT(ED)
SD1-MM83	Mod_SP_M94	Object	I feel that this modification removes safeguards that protect areas in Kirklees from unnecessary wind turbine development. I am opposed to this modification.
SD1-MM84	Mod_SP_M106	Object	I am opposed to the modification and agree with the comments made by BOLT(ED)
SD1-MM84	Mod_SP_M122	Object	I do not support this modification. I felt having the reports etc provided more safeguards and guidance.
SD1-MM84	Mod_SP_M143	Object	I oppose this modification. I am disappointed that the inspector has removed reference to these local reports as I felt they provided additional safeguards and guidance.
SD1-MM84	Mod_SP_M228	Object	I am not in a position to assess the legality of these modifications, but it seems obvious that it can't be right to make it far more likely that yet more turbines will clutter our horizons and that they will move into areas that have formally been assessed as being in need of protection? The Julie Martin report, in particular, has hugely supported past rejections of turbine applications. If this proposed deletion were to remain, it would support widely held views that Kirklees's planners are simply giving up on the onerous task of protecting the visual amenity of this fragile area from increasing numbers of ever greedier developers. If we allow the urbanisation of our precious few "wild" areas, our growing tourism industry will suffer, as will all of those who are not directly benefitting financially from the turbines. Public money was spent on commissioning and updating the reports so as to protect the environment for the public good. Are these areas less vulnerable than they were when the reports were commissioned? Certainly not. They are far more vulnerable now. It is dishonest to jettison these reports. They were made by experts in order to make it easier for planners to resist the pressures put on them by developers. They are necessary to ensure that "Green" energy can be generated without harm to the general public.
SD1-MM84	Mod_SP_M24	Object	We are not in a position to comment upon the legality of this modification.
SD1-MM84	Mod_SP_M250	Object	I do NOT support this modification. Kirklees should take into account of the Julie Martin Report and sensitivity maps in order to maintain the character of the landscape
SD1-MM84	Mod_SP_M401	Object	~ We are strongly opposed to this modification. The South Pennines Wind Energy Landscape Study (2014) is an excellent highly professional study which has been produced in collaboration with Calderdale, Barnsley, Rossendale and Burnley Councils. Together with its predecessor report dated 2010, written by the same consultants and involving an even wider range of Council sponsors, it demonstrates an 8 year history of cross border cooperation on wind turbine developments. Having demonstrated lengthy and substantial cooperation with these other authorities on wind turbine issues, we question whether it is appropriate or even legal for Kirklees Council to now unilaterally delete all references to the report from its Local Plan. We have to point out that in order to satisfy the duty to cooperate Councils must not only consult each other but also cooperate in plan making and plan implementation. They cannot withdraw from, depart from or decline to implement cooperatively determined plans without contravening the legal duty to cooperate. Notwithstanding the cross border cooperation that has gone in to preparation of the Landscape Study it is a highly professional and appropriate report which provides excellent guidance to wind energy developers and local communities about where and which type of wind energy developments are likely to be acceptable.
SD1-MM84	Mod_SP_M51	Object	My house is 5 metres from the proposed quarry and whilst I fully support BOLT(E)D KMC cannot leave my concerns out to save them time - this is a life changing decision you will be making for all the residents around the site especially the three families at Dearne Grange. I must add that this process of responding to the modifications is so complex it is almost unusable to people who are able to confidently use WEB based sites. Our community is of an older generation and this makes objecting impossible for them, surely it could have been done in such a way that everyone could voice their concerns rather than be obstructive in them being able to

Mod ref	Rep ID	Outcome	Report text
			do so.
SD1-MM84	Mod_SP_M74	Object	I am opposed to the modification and support the comments of BOLT(ED)
SD1-MM84	Mod_SP_M95	Object	I feel that this modification removes safeguards that protect areas in Kirklees from unnecessary wind turbine development. I am opposed to this modification.
SD1-MM85	Mod_SP_M107	Object	I am opposed to the modification and agree with the comments made by BOLT(ED)
SD1-MM85	Mod_SP_M123	Object	I do not support this modification. I felt having the reports etc. provided more safeguards and guidance.
SD1-MM85	Mod_SP_M144	Object	I oppose this modification. I am disappointed that the inspector has removed reference to these local reports as I felt they provided additional safeguards and guidance.
SD1-MM85	Mod_SP_M227	Object	As for SD1-MM84, it is shocking that the need to adhere to recommendation in local reports and sensitivity maps has been removed. How can sound decisions be reached without the back-up of independent, expert detailed local knowledge and advice?
SD1-MM85	Mod_SP_M25	Object	We are not in a position to comment upon the legality of this modification.
SD1-MM85	Mod_SP_M253	Object	I do not support this proposal. All environmental reports and sensitivity maps should be taken into account
SD1-MM85	Mod_SP_M402	Object	~ We are strongly opposed to this modification. The South Pennines Wind Energy Landscape Study (2014) is an excellent highly professional study which has been produced in collaboration with Calderdale, Barnsley, Rossendale and Burnley Councils. Together with its predecessor report dated 2010, written by the same consultants and involving an even wider range of Council sponsors, it demonstrates an 8 year history of cross border cooperation on wind turbine developments. Having demonstrated lengthy and substantial cooperation with these other authorities on wind turbine issues, we question whether it is appropriate or even legal for Kirklees Council to now unilaterally delete all references to the report from its Local Plan. We have to point out that in order to satisfy the duty to cooperate Councils must not only consult each other but also cooperate in plan making and plan implementation. They cannot withdraw from, depart from or decline to implement cooperatively determined plans without contravening the legal duty to cooperate. Notwithstanding the cross border cooperation that has gone in to preparation of the Landscape Study it is a highly professional and appropriate report which provides excellent guidance to wind energy developers and local communities about where and which type of wind energy developments are likely to be acceptable.
SD1-MM85	Mod_SP_M50	Object	Why remove this other than to facilitate the inclusion of ME1965A local reports and sensitivity compliment MM87 modification and this text should remain.
SD1-MM85	Mod_SP_M75	Object	I am opposed to modification and support the comments made by BOLT(ED)
SD1-MM85	Mod_SP_M96	Object	I feel that this modification removes safeguards that protect areas in Kirklees from unnecessary wind turbine development. I am opposed to this modification.
SD1-MM86	Mod_SP_M108	Object	I am opposed to the modification and agree with the comments made by BOLT(ED)
SD1-MM86	Mod_SP_M124	Object	I do not support this modification. I felt having the reports etc. provided more safeguards and guidance.
SD1-MM86	Mod_SP_M226	Object	Obviously cumulative impacts matter.....would you rather be hit once or a hundred times! You only have to enter Holmfirth from the west to see how turbines on Barnsley's border have increased the impression of clutter on the eastern horizon above Holmfirth. Examples of this type of abuse can be particularly gross when the borders are between countries, ie Belgium and France. I am quite unable to understand why para 12.10 has been deleted
SD1-MM86	Mod_SP_M251	Object	I do NOT support this modification. Kirklees should keep the passage in its entirety.
SD1-MM86	Mod_SP_M26	Object	We are not in a position to comment upon the legality of this modification
SD1-MM86	Mod_SP_M33	Object	I oppose this modification. I am disappointed that the inspector has removed reference to these local reports as I felt they provided additional safeguards and guidance.
SD1-MM86	Mod_SP_M403	Object	~ We are strongly opposed to this modification. The South Pennines Wind Energy Landscape Study (2014) is an excellent highly professional study which has been produced in collaboration with Calderdale, Barnsley, Rossendale and Burnley Councils. Together with its predecessor report dated 2010, written by the same consultants and involving an even wider range of Council sponsors, it demonstrates an 8 year history of cross border cooperation on wind turbine developments. Having demonstrated lengthy and substantial cooperation with these other authorities on wind turbine issues, we question whether it is appropriate or even legal for Kirklees Council to now unilaterally delete all references to the report from its Local Plan. We have to point out that in order to satisfy the duty to cooperate Councils must not only consult each other but also cooperate in plan making

Mod ref	Rep ID	Outcome	Report text
			and plan implementation. They cannot withdraw from, depart from or decline to implement cooperatively determined plans without contravening the legal duty to cooperate. Notwithstanding the cross border cooperation that has gone in to preparation of the Landscape Study it is a highly professional and appropriate report which provides excellent guidance to wind energy developers and local communities about where and which type of wind energy developments are likely to be acceptable.
SD1-MM86	Mod_SP_M76	Object	I am opposed to modification and support the comments made by BOLT(ED)
SD1-MM86	Mod_SP_M97	Object	I feel that this modification removes safeguards that protect areas in Kirklees from unnecessary wind turbine development. I am opposed to this modification.
SD1-MM87	Mod_SP_M109	Support	I support the modification
SD1-MM87	Mod_SP_M125	Support	I support the modification
SD1-MM87	Mod_SP_M145	Conditional Support	I support the modification. It strengthens the need for public involvement and agreement,
SD1-MM87	Mod_SP_M252	Support	I support this modification.
SD1-MM87	Mod_SP_M27	Support	We are not in a position to comment upon the legality of this modification.
SD1-MM87	Mod_SP_M404	Conditional Support	The new wording is acceptable but of little value on its own. It only becomes meaningful, if proposed modifications MM82 to MM86 are NOT carried through to the final adopted version of the Local Plan.
SD1-MM87	Mod_SP_M77	Support	I am supportive of the modification and support the comments made by BOLT(ED)
SD1-MM87	Mod_SP_M98	Support	I support the proposed modification
SD1-MM88	Mod_SP_M405	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM89	Mod_SP_M265	Object	The proposed modification does not make the plan "sound" and in fact the proposed modification makes the plan even less "sound". The Council have identified that Site MX1905 falls outside of flood zones 2 & 3. However, the east of the Site is located in close proximity to Flood Zone 3. The Site is therefore in extreme close proximity to an active floodplain. Many watercourses also cross the Site. The Council and the Inspector have failed to fully consider the impact of development of site MX1905 on the nearby floodplain and these watercourses. We were previously comforted in that further consideration would be given to flooding as part of any planning application process. However, now this is not to be the case as per the proposed modification it is imperative that the Council fully investigate flooding and drainage issues for all proposed allocations, but in particular for site MX1905 before moving forward within any proposed allocation. Please see our previous representations on flooding and drainage.
SD1-MM89	Mod_SP_M279	Object	With any major development there will be extensive drainage and other modifications to the water environment. In this context there are EU Water Framework Directive (WFD) aims and objectives which have to be met. Therefore the use of Sustainable Urban Drainage Systems becomes very important in meeting WFD requirements and NPPF guidance. NPPF is clear where flood tests are not met, national planning policy is clear that new development should not be allowed. This is also very important when bearing in mind technical guidance requirement for developers for sites of 1 ha or more to undertake a site-specific flood risk assessment to accompany applications for planning permission (or prior approval for certain types of permitted development.) Reference representation of Prof Ian Rotherham, pp3-4 uploaded below. Taking site MX1905 modification SD2MM317 as an example the following has been removed "flood risk vulnerability of proposed uses will be considered and an exception test may still be required as part of a planning application as set out in national planning policy". Taking MX1905 as an example, whilst the site is on floodzone 1 it is in very close proximity to and draining into an active floodplain and floodzone flowing into the City of Wakefield at Alverthorpe with a history of flooding. With the sequential test at Local Plan stage focusing on the site being in floodzone 1 this policy would not appear to provide the necessary safeguards for flood protection and flood management for this strategic life and death issue. With unclear guidance in policy SD1 MM89 this creates a vulnerability and a gap in assurance of flood management. It is vague when the applicant has "responsibility to provide evidence".
SD1-MM89	Mod_SP_M406	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM90	Mod_SP_M126	Support	I support the modification and comments made by BOLT(ED)
SD1-MM90	Mod_SP_M146	Conditional	I support the modification - it strengthens the reasons why Site ME1965a should be removed from the plan

Mod ref	Rep ID	Outcome	Report text
		Support	
SD1-MM90	Mod_SP_M224	Support	Natural England welcomes modification reference SD1-MM92 which reflects the approach agreed between Natural England and Kirklees Council and as reflected in the 2017 draft of the Habitats Regulations Assessment accompanying this consultation. We consider that this helps address previous our concerns regarding impacts from the plan on European designated sites. We also welcome the updated text in policy PLP30 put forward in modifications SD1-MM90 and SD1-MM91 which we consider to add clarity to the policy.
SD1-MM90	Mod_SP_M237	Object	<p>GAIL is particularly concerned at the proposed modification to PLP30 which must be seen as a furthering weakening/dilution of what was an already flawed Policy.</p> <p>In looking to move away from a clause which talked about ‘an overriding public interest’ – which the Council had itself failed to adequately define – the Council has replaced it with ‘the benefits of development can be clearly shown to outweigh the need to safeguard the local conservation value of the site or feature’.</p> <p>The proposed modification raises more questions than answers: what’s the definition of ‘the benefits of development’, how are they to be measured and by whom, how is ‘the local conservation value of the site or feature’ to be measured and by whom, would local stakeholders have a right to challenge the Council’s decisions and how would this be done, and dependent on the Council’s response to how it intends to assess the local conservation value of a site or feature, how does it intend to define the ‘full compensatory measures’ which would be required.</p>
SD1-MM90	Mod_SP_M266	Object	<p>As per the comments we have previously submitted development of Site MX1905 would have a significant detrimental impact on the ancient woodland at Dum Wood a and Dogloitch Wood and could result in its total loss. This is wholly unacceptable. Ancient woodland should be protected. Mitigation is not possible when dealing with ancient woodland.</p> <p>The development of site MX1905 (if allocated) would instantly be contrary to Policy PLP30 as drafted. Therefore, why is it being promoted as an allocation? There is no point in having an allocation which cannot comply with the Policies contained within the Plan.</p> <p>In relation to the Ancient Woodland we do not believe that the Council nor the Inspector have fully understood the position around protecting ancient woodland. Ancient woodland covers less than 2% of the UK and therefore all remaining ancient woodland must be protected.</p> <p>The loss of natural water sources through development would result in the death of these woodlands.</p> <p>Professor Ian Rotherham of Sheffield Hallam university has undertaken considerable research in to the effect of development on woodland. Professor Rotherham has found numerous examples of woodlands slowly being killed by "drying" caused by developments of nearby land.</p> <p>Woodland cannot be protected simply by not building on it. The impacts on the ancient woodland and their hydrology depend on local topography and geology.</p> <p>The development of sites such as MX1905 would be devastating on the ancient woodland and once lost they can never be replaced.</p> <p>We refer the Council and the Inspector to the report produced by Professor Ian Rotherham and the Woodlands Trust document "Planners Manual for Ancient Woodlands and Veteran Trees" October 2017.</p>
SD1-MM90	Mod_SP_M281	Object	<p>The policy is not consistent with Biodiversity 2020: A strategy for England’s Wildlife and Ecosystem Services (2011). This sets out the government’s ambition to halt overall loss of England’s biodiversity by 2020, support healthy, well-functioning ecosystems and establish coherent ecological networks for the benefit of wildlife and people. The Natural Capital committee’s First Report notes that ancient woodland cannot be replaced and states “When thinking about natural capital, wild species and habitats require special treatment that reflects their irreplaceability”</p> <p>As ancient woodland and aged or veteran trees are irreplaceable, discussions over possible compensation should not form part of the assessment to determine whether the benefits of the development proposed outweigh the loss. See pp 8-9 Planner’s manual for Ancient Woodland and Veteran Trees, the Woodland Trust, uploaded below.</p> <p>Compensation for loss of ancient woodland Replacement planting Natural England states that ancient woodland, the product of centuries of habitat continuity and undisturbed soils, is an irreplaceable resource. As such, its loss cannot be compensated for by creating a new woodland – an irreplaceable habitat cannot, by definition, be replaced. Consequently, where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat.</p>

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			<p>Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost. In commenting on the proposals for the new HS2 rail link, Natural England has supported a 30:1 ratio²⁸, stating: "... a commitment to such a ratio would be a clear statement by HS2 Ltd that it recognises the critical importance of ancient woodland and the scale of newly created woodland provided would leave a positive legacy for the natural environment and for the communities along its route. It would also make a significant contribution to the [sic] delivering the recommendations of the Lawton report and set the standard for future projects (Lawton et al., 2010)". Habitat and soil translocation Compensation proposals for the loss of ancient woodland often include suggestions to move or 'translocate' the soil, or even individual trees (as coppice stools), from the ancient woodland to a new receptor site where woodland creation is proposed. However, translocation should be viewed only as a measure of last resort, and:</p> <ul style="list-style-type: none"> • should only be used as a form of partial compensation for damaging development when all other alternatives to protect the habitat have been exhausted; • should not be viewed as a benefit and will not make a proposed development on ancient woodland more palatable. <p>The Standing Advice states emphatically that: "An ancient woodland ecosystem cannot be moved." and "It is not possible to replicate the same conditions at another site; it will no longer be ancient woodland." The reason an ancient woodland ecosystem cannot be moved is because it has developed at this site over 400 years Lonsdale, D. (2013). Ancient and other veteran trees: further guidance on management. Available from: ancienttreeforum.co.uk/wp-content/uploads/2015/02/ATF_book.pdf 27 The Woodland Trust. (2005). Ancient tree guide 1: Trees and farming. Available at: www.woodlandtrust.org.uk/publications/2005/01/ancient-tree-guide-1/</p> <p>Please refer to Professor Ian Rotherham (Sheffield Hallam) representation using MX1905 as an example where the proposed Local Plan does not address the protection of ancient woodland, the drying out of the woodland, the loss of biodiversity.</p> <p>This policy does not form protection for rare and highly valuable ancient woodlands which are at risk from MX1905: these two ancient woodland Dum Wood and Dogloitch Wood both Local Wildlife Sites, both carpeted by the protected English Bluebell. The National Planning Policy Framework (NPPF) (paragraph 1181) states: When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity" and to do this "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss". Due to their historic significance, under Section 12 of the NPPF², LPAs may also consider veteran trees, and wood pasture and parkland, as heritage assets. The NPPF (Section 12) makes clear that developers need to "record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact", and to make this evidence publicly accessible.</p> <p>Ancient woodland is irreplaceable. It is our richest wildlife habitat, having developed over centuries, and contains a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. For this reason, ancient woods are reservoirs of biodiversity, and because the resource is limited and highly fragmented, they and their associated wildlife are particularly vulnerable to development-induced changes.</p>
SD1-MM90	Mod_SP_M34	Conditional Support	Support the modification, however the concerns about site ME1965a still remain and this site should be deleted from the Local Plan. Additionally, the opportunity to comment is very difficult particularly for those who do not have access to the internet.
SD1-MM90	Mod_SP_M407	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM90	Mod_SP_M502	Object	Comment transcribed by KC from attached letter: I am concerned about the text meaning of the wording to be inserted. "unless the benefits of the development can be clearly shown to outweigh the need to safeguard the local conservation value of the site or feature. What does the term the benefits of the development mean? How are benefits measured and by whom? How is the local conservation element measured? Is a holistic approach taken including the views of all stakeholder including the local community? Where is it claimed "there is no alternative means to deliver the proposal", will evidence to show this, be available in the public domain?
SD1-MM90	Mod_SP_M57	Support	I support the modification
SD1-MM90	Mod_SP_M79	Support	Proposed modification is supported.
SD1-MM90	Mod_SP_M9	Conditional Support	We are not in a position to comment upon the legality of this proposal.
SD1-MM91	Mod_SP_M10	Conditional Support	We are not in a position to comment upon the legality of the proposal.

Mod ref	Rep ID	Outcome	Report text
SD1-MM91	Mod_SP_M127	Support	Modification supported
SD1-MM91	Mod_SP_M147	Support	I support the modification
SD1-MM91	Mod_SP_M225	Support	Natural England welcomes modification reference SD1-MM92 which reflects the approach agreed between Natural England and Kirklees Council and as reflected in the 2017 draft of the Habitats Regulations Assessment accompanying this consultation. We consider that this helps address previous our concerns regarding impacts from the plan on European designated sites. We also welcome the updated text in policy PLP30 put forward in modifications SD1-MM90 and SD1-MM91 which we consider to add clarity to the policy.
SD1-MM91	Mod_SP_M238	Object	Given the NPPF core planning principle that planning should contribute to conserving and enhancing the natural environment by minimising the impact on biodiversity, the proposed modification of deleting 'protection' can only be described as perverse and must be seen to be unsound Protection has to be seen as the overriding principle of biodiversity conservation, not avoidance, mitigation or compensatory measures. The Council has also failed to outline what it means by 'compensatory measures'.
SD1-MM91	Mod_SP_M283	Object	Policy PLP30 – Biodiversity and Development Developments which do not lead to a net gain in biodiversity risk not being compliant with Paragraphs 8(c), 170(a and d) and 174(b) of the NPPF. Paragraph 8:8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): c) an environmental objective– to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. Paragraph 170:170. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; Paragraph 174:174. To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
SD1-MM91	Mod_SP_M35	Conditional Support	Support the modification and the protection of biodiversity as this enhances the reasons why ME1965a should not be in the Local Plan. Additionally, the modifications consultation was difficult to access particularly if you did not have access to the internet.
SD1-MM91	Mod_SP_M408	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM91	Mod_SP_M503	Object	Comment transcribed by KC from attached letter: I cannot accept that the proposed modification in this case will protect, conserve and enhance the natural environment, by minimising the impact on biodiversity. The overriding principle of biodiversity is protection and the proposed modification weakens that protection considerably. IT IS NOT CONSISTENT WITH THE NPPF
SD1-MM91	Mod_SP_M60	Support	I support the modification
SD1-MM91	Mod_SP_M80	Support	I support the modification
SD1-MM91	Mod_SP_M99	Support	I support the modification
SD1-MM92	Mod_SP_M223	Support	Natural England welcomes modification reference SD1-MM92 which reflects the approach agreed between Natural England and Kirklees Council and as reflected in the 2017 draft of the Habitats Regulations Assessment accompanying this consultation. We consider that this helps address previous our concerns regarding impacts from the plan on European designated sites. We also welcome the updated text in policy PLP30 put forward in modifications SD1-MM90 and SD1-MM91 which we consider to add clarity to the policy.
SD1-MM92	Mod_SP_M409	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM93	Mod_SP_M100	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM93	Mod_SP_M11	Conditional Support	We are not in a position to comment upon the legality of the proposal.
SD1-MM93	Mod_SP_M128	Support	I support the modification and the comments made by BOLT(ED)

Mod ref	Rep ID	Outcome	Report text
SD1-MM93	Mod_SP_M148	Conditional Support	I support this modification and the comments made by BOLT(ED). This modification strengthens the reasons why Site ME1965a should be removed from the plan.
SD1-MM93	Mod_SP_M162	Support	I support the proposed modification
SD1-MM93	Mod_SP_M168	Support	I support the proposed modification
SD1-MM93	Mod_SP_M175	Conditional Support	I support the proposed modification and comments made by BOLT(ED)
SD1-MM93	Mod_SP_M181	Support	I support the proposed modification
SD1-MM93	Mod_SP_M187	Support	I support the proposed modification
SD1-MM93	Mod_SP_M193	Conditional Support	I support the proposed modifications. We have water that runs into our farm - Park Dyke that could be contaminated if site ME1965a is developed. This site - ME1965a - should be removed from the plan.
SD1-MM93	Mod_SP_M199	Conditional Support	I support the proposed modification. We need to protect natural water sources our farm livestock are watered from Park Dyke - a natural water source that is under threat from proposed development ME 1965a. This water source needs protecting and the best way to do that is to remove Site ME1965a from the plan.
SD1-MM93	Mod_SP_M205	Conditional Support	I support the proposed modification. Our farm livestock are watered by Park Dike - a watercourse that is under threat from a possible new quarry Site ME1965a. This proposal should men that finally site ME1965a should be removed from the plan - as site ME1965a threatens Park Dike.
SD1-MM93	Mod_SP_M211	Conditional Support	I agree with the comment made by BOLT(ED)
SD1-MM93	Mod_SP_M217	Conditional Support	I support the proposed modification. In Site ME1965a there are two waterways that require protection - the River Dearne and Park Dyke. There is a need for a buffer zone to protect these waterways from pollution and I would like to see a reflection of this in the Plan with the actual potential site for development included as opposed to the full 24 hectares. This modification strengthens the reason why M1965a should not be an allocated site in the Plan and whilst it is included, the Plan remains unsound.
SD1-MM93	Mod_SP_M242	Conditional Support	I support the proposed modification. The rivers are important to our local environment. I support the comments made by BOLT(ED)
SD1-MM93	Mod_SP_M36	Conditional Support	Most other councils have buffer zones around their rivers and wildlife sites and the council did originally have a buffer zone of 250 metres for the waterways in ME1965A but strangely removed them in the last draft - why ? These two rivers are critical for employment as they feed a local mill and also support the biodiversity for many miles downstream.
SD1-MM93	Mod_SP_M410	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM93	Mod_SP_M58	Conditional Support	I support the modification - the site I am opposed to ME1965a has two waterways that need to be protected.
SD1-MM93	Mod_SP_M81	Support	I support the modifications and the comments made by BOLT(ED).
SD1-MM93	Mod_SP_M87	Support	I support this modification and the comments made by BOLT(ED)
SD1-MM94	Mod_SP_M101	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM94	Mod_SP_M12	Conditional Support	We are not in a position to comment upon the legality of the modification.
SD1-MM94	Mod_SP_M129	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM94	Mod_SP_M149	Conditional Support	I support this modification and the comments made by BOLT(ED). This modification strengthens the reasons why site ME1965a should be removed from the plan.
SD1-MM94	Mod_SP_M163	Support	I support the proposed modification
SD1-MM94	Mod_SP_M169	Support	I support the proposed modification
SD1-MM94	Mod_SP_M170	Support	I support the proposed modification
SD1-MM94	Mod_SP_M176	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM94	Mod_SP_M182	Support	I support the proposed modification

Mod ref	Rep ID	Outcome	Report text
SD1-MM94	Mod_SP_M188	Support	I support the proposed modification
SD1-MM94	Mod_SP_M194	Conditional Support	I support the proposed modification. Park Dyke which runs through our farm and is used by our livestock is fed by ground and underwater sources. The best way to protect these is not to develop site ME1965a. This site should be removed from the plan.
SD1-MM94	Mod_SP_M200	Conditional Support	I support this proposed modification. A natural water course - Park Dyke runs through our farm and is used by our livestock. This water needs protecting - it is under threat from proposed development ME1965a. The best way to protect the water is not to develop site ME1965a and the best way to achieve this is to remove Site ME1965a from the Plan.
SD1-MM94	Mod_SP_M206	Conditional Support	I support this proposed modification. Our farm relies on Park Dyke - a water course - for our livestock. This modification should protect Park Dyke from being affected by the proposed quarry ME1965a. The best way to ensure this protection is for Site ME1965a to be removed from the plan.
SD1-MM94	Mod_SP_M212	Conditional Support	I support the views of BOLT(ED)
SD1-MM94	Mod_SP_M218	Conditional Support	The proposed modification is supported. Site M1965a includes two waterways - the River Dearne and Park Dyke, and these need to be protected. It is my view that the buffer zones required to protect these waterways should be reflected in the modifications and whilst the original Site is included in the Plan it remains unsound.
SD1-MM94	Mod_SP_M243	Conditional Support	I support the proposed modification and all comments made by BOLT(ED)
SD1-MM94	Mod_SP_M37	Conditional Support	Support the Modification but ME1965a should be deleted from the Local Plan. Additionally, the process of commenting on the Modifications is difficult particularly for those who do not have access to the Internet.
SD1-MM94	Mod_SP_M411	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM94	Mod_SP_M59	Conditional Support	I support the modification - the site I am opposed to has two waterways that require protection.
SD1-MM94	Mod_SP_M7	Object	<p>We are concerned that the addition of the word 'natural' to the policy text means that policy PLP34 would not be applicable to canals, which would notably be classified as 'artificial' watercourses.</p> <p>We believe this would make the plan ineffective in meeting National Policy aims to improve water quality.</p> <p>Our canals in Kirklees include the Huddersfield Broad Canal, Huddersfield Narrow Canal and the canalised sections of the Calder & Hebble navigation. These inter-link with natural watercourses, and provide important ecological habitats in the borough (for example, the Huddersfield Broad Canal in Huddersfield is a designated Local Wildlife Site).</p> <p>The re-wording of this paragraph infers that canals would not be covered by this policy, which would reduce the effectiveness of the Local Plan in promoting improvements to water quality or seeking to ensure that watercourses meet a good status under the Water Framework Directive. Due to the relationships between the canal network and rivers, it is important that proposals are supported that do not result in the deterioration of water quality in our network in addition to that of natural rivers to which our network interacts. Harm to the water quality of our network could reduce the effectiveness of the local plan in contributing towards efforts to improve water quality as encouraged by paragraph 170 of the National Planning Policy Framework, which does not make a distinction between natural and canalised watercourses.</p>
SD1-MM94	Mod_SP_M82	Support	I support the modification and the comments made by BOLT(ED).
SD1-MM94	Mod_SP_M88	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM95	Mod_SP_M102	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM95	Mod_SP_M13	Conditional Support	We are not in a position to comment upon the legality of the modification.
SD1-MM95	Mod_SP_M150	Conditional Support	i support this modification and the comments made by BOLT(ED). This modification strengthens the reasons why Site ME1965a should be removed from the plan.
SD1-MM95	Mod_SP_M164	Support	I support the proposed modification
SD1-MM95	Mod_SP_M171	Support	I support the proposed modification
SD1-MM95	Mod_SP_M177	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)

Mod ref	Rep ID	Outcome	Report text
SD1-MM95	Mod_SP_M183	Support	I support the proposed modification
SD1-MM95	Mod_SP_M189	Support	I support the proposed modification
SD1-MM95	Mod_SP_M195	Conditional Support	I support the modification. The waterway that runs through our farm - Park Dyke- is used for watering our livestock. It is fed from ground and underground water sources. The best way to protect them is not to develop Site ME1965a - this site should be removed from the plan.
SD1-MM95	Mod_SP_M201	Conditional Support	I support this proposed modification. As I have said elsewhere Park Dyke runs through our farm and is used by our livestock. Park Dyke is fed by ground water and underground water sources - these need to be protected. The best way to ensure that is to remove Site ME1965a from the local plan.
SD1-MM95	Mod_SP_M207	Conditional Support	I support this proposed modification. Park Dike which crosses our farm and is used by our livestock is fed by groundwater and underground water sources. These need to be protected. For Park Dike the best way to protect this water course and the ground and underwater sources is for site ME1965a to be removed from the plan.
SD1-MM95	Mod_SP_M213	Conditional Support	I agree with the views of BOLT(ED) on this issue.
SD1-MM95	Mod_SP_M219	Conditional Support	The proposed modification is supported. It is essential to protect the two waterways included within the proposed site - the River Dearne and Park Dyke. The need to include buffer zones to protect these sites should be included within the revision so that the Plan reflect the area that can be developed as opposed to the full 24 hectares. Whilst the full site is included in the Plan, the Plan remains unsound.
SD1-MM95	Mod_SP_M244	Conditional Support	I support the proposed modification and all comments made by BOLT(ED)
SD1-MM95	Mod_SP_M32	Conditional Support	I support the modification and the comments made by BOLT(ED)
SD1-MM95	Mod_SP_M38	Conditional Support	Support modification but still consider ME1965a should be deleted from the Local Plan. There are Aquifers, two rivers and an underground reservoir supplying drinking water to 50,000 local people on or alongside this site. So this modification is welcomed and hopefully at worst the previous version of the plan which had 250m buffer zones would be implemented should this site end up in the plan. My house is 5 metres from the proposed quarry and whilst I fully support BOLT(E)D KMC cannot leave my concerns out to save them time - this is a life changing decision you will be making for all the residents around the site especially the three families at Dearne Grange. I must add that this process of responding to the modifications is so complex it is almost unusable to people who are able to confidently use WEB based sites. Our community is of an older generation and this makes objecting impossible for them, surely it could have been done in such a way that everyone could voice their concerns rather than be obstructive in them being able to do so.
SD1-MM95	Mod_SP_M412	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM95	Mod_SP_M61	Support	I support the modification
SD1-MM95	Mod_SP_M83	Support	I support the modification and the comments made by BOLT(ED).
SD1-MM95	Mod_SP_M89	Support	I support the modification and the comments made by BOLT(ED).
SD1-MM96	Mod_SP_M103	Support	I support the modification
SD1-MM96	Mod_SP_M130	Support	I support the modification
SD1-MM96	Mod_SP_M14	Conditional Support	We are not in a position to comment upon the legality of this proposal.
SD1-MM96	Mod_SP_M151	Conditional Support	I support this modification. It strengthens the reasons why site ME1965a should be removed from the plan.
SD1-MM96	Mod_SP_M239	Object	Clause 1 is contradictory: whilst the proposed modification states that development proposals should 'preserve or enhance the significance of the asset', the text goes on to say 'In cases likely to result in substantial harm or loss, development will only be permitted where it can be demonstrated that the proposals would bring substantial public benefits that clearly outweigh the harm'. The word 'only' is used again in the same context in the first proposed text amendment in clause 2 (see line four). GAIL contends that the word 'only' is mis-leading and is superfluous to the full understanding of the intention of clause: re-reading the two sentences but omitting 'only' shows that the fundamental presumption is one of development being allowed and not that heritage assets are to be preserved or

Mod ref	Rep ID	Outcome	Report text
			<p>enhanced.</p> <p>The issue with the proposed clauses is how would the council intend to define and objectively assess how a development proposal would bring 'substantial public benefits that clearly outweigh the harm' (clause 1) and '... where benefits of the development outweigh the harm having regard to the scale of the harm and the significance of the heritage asset (clause 2).</p> <p>To date, the council does not appear to have been able to define what is in the 'public interest' and, whilst 'public interest' has now basically been superseded by 'substantial public benefits, the same difficulty remains: the proposed modifications rely on subjective views and appear to be driven by a refusal to accept that certain categories of heritage asset should, by definition be secured and protected from development.</p> <p>Additionally, looking at clause 3, sub-clauses a) - e), it appears at first reading that the council is committed to protecting Kirklees' heritage assets and distinct identity. In the first sentence of the clause, however, the text refers to retaining elements of the historic environment and ensuring that they are 'appropriately' conserved, whilst at sub clause f), the council reverts to the caveat of preserving the setting of Castle Hill 'where appropriate'. 'Appropriately' and 'where appropriate' are a means of allowing the council a greater degree of subjectivity in deciding whether or not proposed developments do or do not detrimentally harm the historic environment and the setting of Castle Hill.</p>
SD1-MM96	Mod_SP_M256	Support	The proposed Modification improves the clarity of the Policy and makes it more consistent with national policy guidance.
SD1-MM96	Mod_SP_M39	Conditional Support	Support the modification but consider that ME1965a should still be deleted from the Local Plan. Burnt Cumberworth an historical site within ME1965A and this is welcome as it strengthens our arguments that ME1965A should not be in the plan. Additionally, the process of responding to the modifications was very complex particularly if you did not have access to the Internet.
SD1-MM96	Mod_SP_M413	Object	We object to the threshold of "substantial harm or loss" in paragraph 1 as it is a very high threshold and can mean different things to different people. We would prefer to see the word "substantial" deleted from the threshold such that the text reads "In cases likely to result in harm or loss". This would also then be consistent with paragraphs 2 and 3 in this modification AND allow planning discretion to apply to situations where the harm may be significant but perhaps not "substantial". We do not want to end up arguing with developers whether the harm is significant or substantial.
SD1-MM96	Mod_SP_M5	Support	Support
SD1-MM96	Mod_SP_M504	Object	Comment transcribed by KC from attached letter: Development proposals affecting a designated heritage asset. (or an archaeological site of national importance) should. Clause 1 I believe the wording that has been deleted in clause 1 should be reinstated, as the proposed modification does not protect the asset, by conserving the elements which contribute to its significance. To the contrary they are subjecting those elements to a potential loss of them, or harming them in some way. How therefore does the council define and objectively assess how a development proposal would bring substantial public benefits that would clearly outweigh the loss of some of the elements that contribute to the significance of a heritage asset, thereby damaging the heritage asset? Clause 2 Again "will only by permitted where benefits of the development outweigh the harm... How does the council define benefits? Who should decide? Clause 3 (f) while ensuring the setting of Castle Hill is conserved, and the council have more autonomy in decisions affecting that setting - 'where appropriate' it is the only setting in which the council have greater autonomy! No mention is made of any other local heritage site! THIS IS NOT CONSISTENT WITH THE NPPF
SD1-MM96	Mod_SP_M505	Object	Comment transcribed by KC from attached letter: Development proposals affecting a designated heritage asset. (or an archaeological site of national importance) should. Clause 1 I believe the wording that has been deleted in clause 1 should be reinstated, as the proposed modification does not protect the asset, by conserving the elements which contribute to its significance. To the contrary they are subjecting those elements to a potential loss of them, or harming them in some way. How therefore does the council define and objectively assess how a development proposal would bring substantial public benefits that would clearly outweigh the loss of some of the elements that contribute to the significance of a heritage asset, thereby damaging the heritage asset? Clause 2 Again "will only by permitted where benefits of the development outweigh the harm... How does the council define benefits? Who should decide? Clause 3 (f) while ensuring the setting of Castle Hill is conserved, and the council have more autonomy in decisions affecting that setting - 'where appropriate' it is the only setting in which the council have greater autonomy! No mention is made of any other local heritage site! This is not consistent with the NPPF.
SD1-MM96	Mod_SP_M62	Support	I support the modification
SD1-MM97	Mod_SP_M240	Conditional Support	For good order, whilst the proposed modification focuses on Conservation Areas, GAIL believes that the clause could usefully be expanded to make available to developers information retained by West Yorkshire Archaeology Advisory Service and Historic England etc. regarding the significance of heritage assets which may otherwise be harmed by proposed developments so that appropriate measures may be considered.

Mod ref	Rep ID	Outcome	Report text
SD1-MM97	Mod_SP_M257	Support	The proposed Modification improves the interpretation of the Policy and the considerations for development proposals likely to impact upon one of the District's Conservation Areas.
SD1-MM97	Mod_SP_M414	Object	This modification is far too weak to protect and preserve heritage assets. However we regret to say that it is consistent with Kirklees Council's appalling past record when it comes to giving due consideration to and protecting heritage assets and conservation areas. Simply making developers aware that the asset or conservation area designation exists will have no influence whatsoever.
SD1-MM98	Mod_SP_M110	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM98	Mod_SP_M131	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM98	Mod_SP_M152	Conditional Support	I support the modification and the comments made by BOLT(ED). This modification strengthens the reasons why site ME1965a should be removed from the plan.
SD1-MM98	Mod_SP_M165	Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM98	Mod_SP_M172	Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM98	Mod_SP_M178	Conditional Support	I support the proposed modification and comments made by BOLT(ED)
SD1-MM98	Mod_SP_M184	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM98	Mod_SP_M190	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM98	Mod_SP_M196	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM98	Mod_SP_M202	Conditional Support	I support the proposed modifications and the comments made by BOLT(ED)
SD1-MM98	Mod_SP_M208	Conditional Support	I support this proposed modification and the comments made by BOLT(ED)
SD1-MM98	Mod_SP_M214	Conditional Support	I agree with the comment made by BOLT(ED) on this matter.
SD1-MM98	Mod_SP_M220	Conditional Support	The proposed modification is supported. Landscape Character is detailed in PLP 32 and states that: "Proposals should be designed to take into account and seek to enhance the landscape character of the area considering in particular the setting of settlements and buildings within the landscape, the patterns of woodland, trees and field boundaries; the appearance of rivers, canals, reservoirs and other water features within the landscape". The proposed site covers an area of agricultural fields, waterways and trees. The fields are separated by dry stone walls all contributing to the character of the site. This modification strengthens the reason why this proposed site should not be in the Plan and whilst it remains in the Plan, the Plan is unsound.
SD1-MM98	Mod_SP_M245	Conditional Support	I support the proposed modifications and agree with all comments made by BOLT(ED). ME1965A is in a peaceful agricultural area and mineral development and development of this site will damage the visual and landscape character of the village of Birdsedge.
SD1-MM98	Mod_SP_M28	Conditional Support	We are not in a position to comment upon the legality of this modification.
SD1-MM98	Mod_SP_M294	Object	MM98 - 101 Using Specifically MX1905 as an example. Proposed MX1905 is a Coal Authority High Risk Development Area. The coal-mining legacy may affect ground-stability or pose other risks such as mine gas. The proposed development lies within the Surface Coal Resource Area. If the Coal Authority recommend to the local planning authority that the prospective developer needs to provide evidence with their planning application that the potential economic value of the coal resource has been considered – the aim being to avoid the potential sterilisation of potentially valuable coal reserves. The local planning authority may require prior extraction of surface coal prior to the commencement of the proposed development. If extraction is necessary MX1905 will cause such devastation prior and during development. Any surface coal up to 50m in depth may affect ground stability. The economic value of the coal should be considered (2.2 million tonne) the aim being to avoid sterilisation. Extraction of coal was disallowed at this example following public enquiry.

Mod ref	Rep ID	Outcome	Report text
SD1-MM98	Mod_SP_M415	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM98	Mod_SP_M47	Conditional Support	As ME1965A is in an area of open landscape visible for man miles around then this change is welcomed as it recognises that ME1965A would not therefore be included in any plan.
SD1-MM98	Mod_SP_M63	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM98	Mod_SP_M84	Support	I support the modification and the comments made by BOLT(ED).
SD1-MM98	Mod_SP_M90	Support	I support the modification and the comments made by BOLT(ED).
SD1-MM99	Mod_SP_M111	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM99	Mod_SP_M132	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM99	Mod_SP_M153	Conditional Support	I support the modification and the comments made by BOLT(ED). This modification strengthens the reasons why site ME1965a should be removed from the plan.
SD1-MM99	Mod_SP_M166	Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM99	Mod_SP_M173	Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM99	Mod_SP_M179	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM99	Mod_SP_M185	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM99	Mod_SP_M191	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM99	Mod_SP_M197	Conditional Support	I support the proposed modification and comments made by BOLT(ED)
SD1-MM99	Mod_SP_M203	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM99	Mod_SP_M209	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM99	Mod_SP_M215	Conditional Support	I agree with the view of BOLT(ED) on this.
SD1-MM99	Mod_SP_M221	Conditional Support	I support this modification and agree with all comments submitted by the community group BOLT(ED).
SD1-MM99	Mod_SP_M246	Conditional Support	I support the modification. BOLT(ED) has clearly shown that Kirklees has a mineral reserve of 40 to 80 years without the need for ME1965A. There is no need for the mineral to be extracted. Business needs are not relevant
SD1-MM99	Mod_SP_M29	Conditional Support	We are not in a position to comment upon the legality of this modification.
SD1-MM99	Mod_SP_M416	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM99	Mod_SP_M48	Conditional Support	Business need is no longer a criteria for this site as on Nov 2nd 2017 planning permission (PP2017/91213) was granted for a 24 ha site adding 1 million tonnes to the local reserves. This alone would give between 40 and 80 years of reserves negating the need for any other new sites. I welcome this modification as it wipes out the need for ME1965A
SD1-MM99	Mod_SP_M64	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM99	Mod_SP_M85	Support	I support the modification and the comments made by BOLT(ED).
SD1-MM99	Mod_SP_M91	Support	I support the modification and the comments made by BOLT(ED).
SD1-MM100	Mod_SP_M112	Support	I support the modification and the comments made by BOLT(ED)
SD1-MM100	Mod_SP_M133	Support	The modification is supported
SD1-MM100	Mod_SP_M154	Conditional Support	I support the modification and the comments made by BOLT(ED). This modification strengthens the reasons why Site ME1965a should be removed from the plan.

Mod ref	Rep ID	Outcome	Report text
SD1-MM100	Mod_SP_M167	Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM100	Mod_SP_M174	Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM100	Mod_SP_M180	Conditional Support	I support the proposals and the comments made by BOLT(ED)
SD1-MM100	Mod_SP_M186	Conditional Support	I support the proposed modification and comments made by BOLT(ED)
SD1-MM100	Mod_SP_M192	Conditional Support	I support the proposed modifications and the comments made by BOLT(ED)
SD1-MM100	Mod_SP_M198	Conditional Support	I support the proposed modification and comments made by BOLT(ED)
SD1-MM100	Mod_SP_M204	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM100	Mod_SP_M210	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM100	Mod_SP_M222	Conditional Support	The proposed modification is supported. The site is an area of natural beauty, it has a unique landscape character and this development to the site would destroy this. This modification strengthens the reasons why site M1965a should not be allocated in the Plan and whilst it remains in the Plan, the Plan is unsound.
SD1-MM100	Mod_SP_M247	Support	I support the proposed modification
SD1-MM100	Mod_SP_M30	Conditional Support	We are not in position to comment upon the legality of this modification.
SD1-MM100	Mod_SP_M417	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM100	Mod_SP_M49	Conditional Support	ME1965A has a very unique and special landscape and could never be returned to anything near its current state. This land is currently shaped as an upturned saucer, how would putting a very deep hole there ever be possible for a return to its normal state. It's impossible and this modification is welcomed
SD1-MM100	Mod_SP_M78	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD1-MM100	Mod_SP_M86	Support	I support the modification and the comments made by BOLT(ED).
SD1-MM100	Mod_SP_M92	Support	I support the modification and the comments made by BOLT(ED).
SD1-MM101	Mod_SP_M418	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM102	Mod_SP_M419	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM103	Mod_SP_M420	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM104	Mod_SP_M421	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM104	Mod_SP_M56	Support	I support the clarification regarding the cessation of safeguarding for a waste site. If this policy modification was not included, it would be possible for a site to be protected "in perpetuity" with extra conditions to be met to remove the safeguarding condition.
SD1-MM105	Mod_SP_M422	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM105	Mod_SP_M55	Support	I support the modification to remove WS16 from the map. This is a farm diversification which cannot be treated in the same way as a standalone waste site. It has symbiotic connections to the farm and is dependent on it for investment, access, feedstock, land, etc. If KC safeguarded this site it would be the only one in England and possible UK to be treated as such. In addition KC has surplus capacity for C&I waste and has a SUEZ contract until 2028 and so protection is not critical. The wider region's emphasis on tourism and heritage would also not be compromised.
SD1-MM106	Mod_SP_M423	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM107	Mod_SP_M424	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM108	Mod_SP_M113	Support	I support the modification
SD1-MM108	Mod_SP_M134	Support	Modification supported

Mod ref	Rep ID	Outcome	Report text
SD1-MM108	Mod_SP_M15	Conditional Support	The proposed modification is supported. Site ME 1965a is an existing open space - the area around it is used for recreational purposes by walkers, cyclists and horse riders. It borders the Trans Pennine Trail. This modification strengthens the reasons why site ME1965a should not be an allocated ME site in the plan and whilst site ME1965a is in the plan - the plan remains unsound.
SD1-MM108	Mod_SP_M155	Support	I support the modification.
SD1-MM108	Mod_SP_M40	Conditional Support	Support modification however ME1965a should be deleted from the Local Plan due to the impact of the site on numerous walkers, joggers, horse riders and in particular cyclists who use the northern, western and southern boundaries for exercise in a pretty scenic location that is currently safe. This will not be the case with an eyesore and numerous 50 ton lorries using roads not suitable and will remove that option for the hundreds of users. It could even impact on the NHS given most of these people will probably not exercise any longer should KMC take this safe environment from them all. The Trans Pennine trail also runs along the western edge of this site.
SD1-MM108	Mod_SP_M425	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM108	Mod_SP_M65	Support	I support the modification
SD1-MM109	Mod_SP_M114	Support	I support the modification
SD1-MM109	Mod_SP_M135	Support	Modification supported
SD1-MM109	Mod_SP_M156	Support	I support the modification.
SD1-MM109	Mod_SP_M16	Conditional Support	The modification is supported. Site ME 1965a is an existing open space - the area around it is used for recreational purposes by walkers, cyclists and horse riders. One of its borders forms part of the Trans Pennine Trail. This modification strengthens the reasons why site ME1965a should not be an allocated ME site in the plan and whilst site ME1965a is in the plan - the plan remains unsound.
SD1-MM109	Mod_SP_M3	Support	It is hoped that the Planning Department will bear this in mind when considering the application by Bellway Homes to build on the fields surrounding Balderstone Hall
SD1-MM109	Mod_SP_M41	Conditional Support	Support the modification as it strengthens our case that ME1965a should be deleted from the Local Plan as the proposed site will damage the wellbeing of locals not only from windblown dust particles to the residents (anyone who knows the area also knows the wind is very common that high up) from the almost constant strong winds but also to the detriment of all the Cyclists, Riders, Joggers and walkers who use the boundaries. Additionally, the Modifications consultation has been difficult to use particularly for those who do not have access to the Internet.
SD1-MM109	Mod_SP_M426	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM109	Mod_SP_M66	Support	I support the modification
SD1-MM110	Mod_SP_M115	Support	I support this modification
SD1-MM110	Mod_SP_M136	Support	Modification supported
SD1-MM110	Mod_SP_M157	Support	I support this modification
SD1-MM110	Mod_SP_M17	Conditional Support	We are not in a position to comment upon the legality of the proposal.
SD1-MM110	Mod_SP_M42	Conditional Support	Support the modification as it enhances the reasons why ME1965a should be deleted from the Local Plan due to proximity to property. Additionally, the modifications consultation was difficult to use particularly if you did not have access to the internet.
SD1-MM110	Mod_SP_M427	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM110	Mod_SP_M67	Support	I am supportive of the modification
SD1-MM111	Mod_SP_M116	Support	I support the modification
SD1-MM111	Mod_SP_M137	Support	Modification supported
SD1-MM111	Mod_SP_M158	Support	I support the modification
SD1-MM111	Mod_SP_M18	Conditional Support	We are not in a position to comment upon the legality of the modification.
SD1-MM111	Mod_SP_M428	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM111	Mod_SP_M43	Conditional Support	Support the Modification as it enhances the reasons why ME1965a should not be included in the Local Plan. Additionally, the modifications consultation was difficult to access particularly if you did not have access to the internet.
SD1-MM111	Mod_SP_M68	Support	I am supportive of the modification

Mod ref	Rep ID	Outcome	Report text
SD1-MM112	Mod_SP_M117	Support	Modification is supported
SD1-MM112	Mod_SP_M138	Support	Modification supported
SD1-MM112	Mod_SP_M159	Support	I support the modification
SD1-MM112	Mod_SP_M19	Conditional Support	We are not in a position to comment upon the legality of this modification.
SD1-MM112	Mod_SP_M429	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM112	Mod_SP_M44	Conditional Support	Yet again this enhances the reasoning as to why ME1965A should not be included in the plan. The local users of the natural safe and pretty surroundings would be compromised forever if not.
SD1-MM112	Mod_SP_M69	Support	I support the modification
SD1-MM113	Mod_SP_M118	Support	Modification is supported
SD1-MM113	Mod_SP_M139	Support	Modification supported
SD1-MM113	Mod_SP_M160	Support	The modification is supported
SD1-MM113	Mod_SP_M20	Conditional Support	We are not in a position to comment upon the legality of the modification.
SD1-MM113	Mod_SP_M295	Object	The Local Plan specifically MX1905 will lead to serious air pollution and other pollutants from manufacturing and engineering units, massive increase in traffic movement. The increase in air pollution will lead to health issues for residents and particular child respiratory diseases. The ancient woodlands of Dum and Dogloitch Wood would suffer greatly. See Professor Ian Rotherham's (Sheffield Hallam University) representation and Woodland Trust information as shown in comment made in MM90. Taking example MX1905, this is not sustainable, air pollution will increase as will the particulates and therefore should be withdrawn from the Local Plan to conform with MM113. See uploaded objection from Morley Town Council which evidences these threats.
SD1-MM113	Mod_SP_M430	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM113	Mod_SP_M45	Conditional Support	It strengthens my reasons for removal of ME196A from the plan. The winds in this area are almost always above 20mph for 90% of the year. Anyone who regularly visits the area or lives there knows the problems that having a quarry 5 metres from housing would create in terms of health issues from deadly silicone dusts that quarries generate. This is a serious health risk and must be one of the main reasons that ME1965A be removed.
SD1-MM113	Mod_SP_M70	Support	I support the modification
SD1-MM114	Mod_SP_M119	Support	Modification supported
SD1-MM114	Mod_SP_M140	Support	Modification supported
SD1-MM114	Mod_SP_M161	Support	I support the modification
SD1-MM114	Mod_SP_M21	Conditional Support	We are not in a position to comment upon the legality of the modification.
SD1-MM114	Mod_SP_M431	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM114	Mod_SP_M46	Conditional Support	Again it enhances the reasoning behind removal of ME1965A from the plan. See MM113 regarding the high winds and dust particles from a quarry
SD1-MM114	Mod_SP_M71	Support	I support the modification
SD1-MM115	Mod_SP_M432	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM116	Mod_SP_M433	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM117	Mod_SP_M434	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM118	Mod_SP_M435	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM119	Mod_SP_M436	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM120	Mod_SP_M437	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM121	Mod_SP_M262	Object	The proposed modifications to the above Green belt policies set out within SD1-MM30, SD1-MM121 and SD1-MM126 demonstrate the conflict associated with allocating site HUD23 as a Priority Employment Area where economic growth is encouraged, whilst retaining the Green Belt

Mod ref	Rep ID	Outcome	Report text
			<p>designation of the site. This approach cannot be considered sound, as set out in our previous representations. It does not result in a positively prepared plan, is not justified or effective, nor is it in line with national guidance.</p> <p>Whilst seeking to appear to offer flexibility, the supporting text as set out in the current modifications, continues to restrict the ability of employment uses associated with site HUD23 to expand or redevelopment of the site to proceed in a manner that supports the efficient future operations of the business.</p> <p>Site HUD23 has no overriding physical or environmental constraints that prevent it from being removed from the Green Belt, its release would not result in neighbouring towns merging or in urban sprawl and the new boundary would follow the same discernible physical boundary features proposed to demarcate the new settlement boundary to the neighbouring proposed housing allocations.</p>
SD1-MM121	Mod_SP_M438	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM122	Mod_SP_M216	Object	I consider the Local Plan modification to be unsound as it does not provide the potential for sufficient housing to be built. In addition much of the housing that is envisaged will greatly exacerbate already overloaded local infrastructure.
SD1-MM122	Mod_SP_M439	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM123	Mod_SP_M440	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM124	Mod_SP_M441	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM125	Mod_SP_M442	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM126	Mod_SP_M263	Object	<p>The proposed modifications to the above Green belt policies set out within SD1-MM30, SD1-MM121 and SD1-MM126 demonstrate the conflict associated with allocating site HUD23 as a Priority Employment Area where economic growth is encouraged, whilst retaining the Green Belt designation of the site. This approach cannot be considered sound, as set out in our previous representations. It does not result in a positively prepared plan, is not justified or effective, nor is it in line with national guidance.</p> <p>Whilst seeking to appear to offer flexibility, the supporting text as set out in the current modifications, continues to restrict the ability of employment uses associated with site HUD23 to expand or redevelopment of the site to proceed in a manner that supports the efficient future operations of the business.</p> <p>Site HUD23 has no overriding physical or environmental constraints that prevent it from being removed from the Green Belt, its release would not result in neighbouring towns merging or in urban sprawl and the new boundary would follow the same discernible physical boundary features proposed to demarcate the new settlement boundary to the neighbouring proposed housing allocations.</p>
SD1-MM126	Mod_SP_M443	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM127	Mod_SP_M444	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM128	Mod_SP_M445	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM129	Mod_SP_M446	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM130	Mod_SP_M447	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM131	Mod_SP_M448	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM132	Mod_SP_M449	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM133	Mod_SP_M450	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM134	Mod_SP_M451	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM135	Mod_SP_M452	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM136	Mod_SP_M453	Object	We object to inclusion of the phrase "unless the developer clearly demonstrates that it is not financially viable for the development proposal". Whilst the Plan has been prepared in the context of NPPF 2012, planning applications will be considered in the context of NPPF 2018, which takes a more robust approach to viability. We therefore consider that all viability "let-out" clauses should be deleted from the Plan, and NPPF 2018 should be relied upon as the basis for viability negotiations.
SD1-MM136	Mod_SP_M512	Object	<p>SD1_MM136 - PLP63 "New housing must contribute to new open space or improvement" - new housing will be required to provide or contribute towards new open space or an improvement of existing provision in the area - unless not financially viable for the development.</p> <p>This would seem to require some complicated arithmetic to actually materialise and is more likely to be declared not financially viable. Also - where is there likely to be any "new open space"?</p>

Mod ref	Rep ID	Outcome	Report text
			The "must" seems to require too much qualification for this to be a successful scenario. Is there a formula? More details will need to be provided.
SD1-MM136	Mod_SP_M513	Object	SD1_MM136 - PLP63 "New housing must contribute to new open space or improvement" - new housing will be required to provide or contribute towards new open space or an improvement of existing provision in the area - unless not financially viable for the development. This would seem to require some complicated arithmetic to actually materialise and is more likely to be declared not financially viable. Also - where is there likely to be any "new open space"? The "must" seems to require too much qualification for this to be a successful scenario. Is there a formula? More details will need to be provided.
SD1-MM137	Mod_SP_M454	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM138	Mod_SP_M455	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM139	Mod_SP_M303	Support	The HBF considers that the modification to the glossary definition of affordable housing is appropriate.
SD1-MM139	Mod_SP_M456	Object	We object to deletion of the local definition of "affordable housing". Our reasons for saying this are that the term "affordable housing" is extremely difficult to define and a common national definition may not be specifically applicable in (say) central Dewsbury. It may also be that the Government decides not to include a definition in National Planning Policy and that would leave the Local Plan bereft of any guidance. We accept the potential for conflict between National Policy definition and local definition. For this reason we would advocate a clause which articulates how and when, local and national, definitions would apply.
SD1-MM140	Mod_SP_M306	Support	Please refer to the enclosed letter of representations prepared by Quod. In summary, this confirms support for the main modifications reference SD1-MM-26 and SD1-MM-140. These main modifications are considered necessary to ensure the soundness of the Local Plan.
SD1-MM140	Mod_SP_M457	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM141	Mod_SP_M458	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM142	Mod_SP_M459	Object	Whilst the new glossary definition is itself innocuous, it represents a major shift in policy thinking. We are deeply concerned about splitting infrastructure requirements in to "essential" and "desirable" with essential meaning "Infrastructure that is required to make development acceptable in planning terms." In our view, if the infrastructure requirements are split in to essential and desirable, the desirable requirements will NEVER happen and developers will contest many of the "essential" requirements, arguing they are desirable, NOT essential.
SD1-MM143	Mod_SP_M460	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM144	Mod_SP_M461	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM145	Mod_SP_M462	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM146	Mod_SP_M463	Conditional Support	See comments against MM28: Whilst we support the principle of encouraging companies to employ apprentices, we are not convinced that including clauses in the Local Plan is the right way to do it or even if it is legal to do so. There is certainly nothing in the NPPF or planning law to support it. Critically we do not believe that it can be demanded, enforced or policed at any stage in the planning process. It is therefore a pointless political statement.
SD1-MM147	Mod_SP_M464	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM148	Mod_SP_M465	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM149	Mod_SP_M466	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM150	Mod_SP_M467	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM151	Mod_SP_M468	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM152	Mod_SP_M469	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM153	Mod_SP_M470	Object	Why does the target for clay and shale need to be 25 years, when the target for crushed rock is 10 years and sand & gravel only 7 years? Should there be a target for high quality stone block?
SD1-MM154	Mod_SP_M471	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM155	Mod_SP_M472	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM156	Mod_SP_M473	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM157	Mod_SP_M474	Support	KCAN & CPRE accept the changes made and have no comments to make.

Mod ref	Rep ID	Outcome	Report text
SD1-MM158	Mod_SP_M475	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM159	Mod_SP_M476	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM160	Mod_SP_M477	Support	KCAN & CPRE accept the changes made and have no comments to make.
SD1-MM160	Mod_SP_M510	Conditional Support	MM160 relates to Appendix 3 - Phasing Table. Site H138 is included in Appendix 3. The phasing included in the plan is as set out at the Examination in Public by the Diocese of Leeds. Inclusion of the Appendix as shown (as it relates to H138) is appropriate and found to be sound.
SD1-MM161	Mod_SP_M478	Object	It isn't clear to us why some open spaces are listed as protected under Policy PLP61 and some are listed as needing "an open space assessment and retention as open space considered through policy PLP61". This smacks of preconception, unfairness and a hidden intention to remove protection from some of these open spaces. In the absence of any justification for the two lists we have to reject the distinction.
SD1-MM162	Mod_SP_M479	Object	The dotted yellow line showing "indicative area in proximity to SPA and SAC" is too sharply and deeply indented towards the West in Colne Valley. In particular it runs far too close to the Peak District National Park boundary on the southern slopes of the valley. In our view, as an indicative line, it should run in an almost straight line from Holmbridge in the South to Pole Moor and the embankment of Scammonden Dam in the North. This would then be more consistent with the SPA influence zones shown on official Government maps.
Introduction	Mod_AOD_M263	"No Comment"	Leeds City Council has no objection to any of the current modifications.
Introduction	Mod_AOD_M275	"No Comment"	Thank you for notifying the Peak District National Park Authority of the latest event SD1 Kirklees Local Plan Strategy and Policies Main Modifications (Soundness) and SD2 Kirklees Local Plan Allocations and Designations Main Modifications (Soundness) and associated documents. I can confirm that the Peak District National Park Authority has no comment to make on any of the documents subject of this latest event.
Introduction	Mod_AOD_M304	"No Comment"	
Introduction	Mod_AOD_M314	Support	Save Mirfield notes that no modification is proposed in relation to safeguarded land SL2163. We are pleased to note no such modification and we maintain the position set out within our previous representations in relation to this site.
Introduction	Mod_AOD_M40	Object	ME1965A has many constraints that means it should never have been included in the plan in the first place. Two Rivers, Houses 5 metres from it boundary, Highway issues, An underground reservoir, numerous aquifers and health and safety of the homeowners and recreational users. Safety buffers that should be in place as a minimum have been removed despite being in a previous revision of the plan - why? A recent approval for another large quarry realising 1 million tonnes of sandstone negates the need for ME1965A as that alone gives KMC 40-80 years of supply. ME1965A being in the plan means the plan is not sound.
Introduction	Mod_AOD_M545	"No Comment"	I have reviewed the document and can confirm that the Coal Authority has no objections to the Main Modifications proposed.
Introduction	Mod_AOD_M565	Object	The modifications are unsound because the basic plan is fundamentally flawed. The original inspector threw out the first plan because it was flawed, this plan is still flawed. The housing projection was based back in 2002 based on a projected employment growth that was described by Councillor Khan (Leader) as "inspirational", we have moved on 16 years, we can now prove that the belief that the employment projection was flawed. All you have to do is look at Kirklees own Economic Fact Sheets to see there has been no job growth from 2003 to last year's sheet. The belief then that employment in Kirklees will grow over your time frame flies in the faith of the evidence Kirklees has. To use the Regional figures flies in the face of the evidence.
Introduction	Mod_AOD_M6	Object	This objection is to all modifications proposed by the Council in response to recommendations from the Inspector. The Council has, contrary to law, given no reasoned justification for any of the modifications. And the Council cannot rely on the fact that the Inspector has recommended the Council to act, because the Inspector has herself not given any reasons for the modifications which she has proposed. Indeed, she has made it quite clear in her letter of 15 June, that the content of that letter does not necessarily represent her final views on the plan. It follows that the Council's proposed modifications must be rejected en bloc in their present form.
Introduction	Mod_AOD_M603	"No	The Commission does not have the resources to respond to all consultations, but will respond to consultations where it considers they raise issues of

Mod ref	Rep ID	Outcome	Report text
		Comment"	<p>strategic importance.</p> <p>Local, parish and town councils and other public authorities, as well as organisations exercising public functions, have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. The PSED is an on-going legal requirement and must be complied with as part of the planning process. The Commission is the regulator for the PSED and the Planning Inspectorate is also subject to it. In essence, you must consider the potential for planning proposals to have an impact on equality for different groups of people. To assist, you will find our technical guidance here.</p>
Introduction	Mod_AOD_M605	Object	<p>We welcome the changes the planning inspector has made in some respects but not in others and our comments as submitted for The Publication Draft Local Plan consultation still hold. In particular we remain concerned about some of the housing and mineral site allocations (including safeguarded allocations), loss of employment land to housing, impact on infrastructure, sustainability and loosening of the policy controlling the siting of turbines.</p>
Introduction	Mod_AOD_M9	Object	<p>This actual section has no modifications so we have chosen this section to make a general comment.</p> <p>None of us are lawyers so we are unable to comment upon whether the plan is legal or not. We were set up with the sole purpose of assisting our communities in opposing site ME1965a's inclusion in the local plan and whilst it remains in the plan we will consider the plan to be unsound. We are supportive of some modifications and not others. We will comment individually on the modifications that are of interest to us.</p>
SD2-MM3	Mod_AOD_M118	Object	<p>Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.</p>
SD2-MM3	Mod_AOD_M133	Object	<p>Policies 64,65,66,67,68,69,70,71,72,73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.</p>
SD2-MM3	Mod_AOD_M148	Object	<p>I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative:</p> <p>I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not.</p> <p>There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive.</p> <p>I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development.</p> <p>I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny.</p> <p>I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions.</p> <p>I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would</p>

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			<p>also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions.</p> <p>It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past.</p> <p>I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –eg during that time there have been 2 NPPFs and numerous NPPGs.</p> <p>I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.</p>
SD2-MM3	Mod_AOD_M39	Object	<p>A senior planner within KMC at the hearings earlier this year clearly stated that ME1965A was going in the plan regardless. How can a plan that has someone who will probably be involved in the final planning if its approved be legal or sound with such pre-emptive and dangerous comments made in public. This alone should mean ME1965A is removed as its setting a very dangerous precedent within the council planning system that already lacks the public's confidence.</p>
SD2-MM3	Mod_AOD_M63	Object	<p>I am opposed to the inclusion of this policy. I believe it is unsound.</p> <p>I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative:</p> <p>I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not.</p> <p>There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development.</p> <p>I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development.</p> <p>I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny.</p> <p>I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions.</p> <p>I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions.</p> <p>It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past.</p> <p>I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.</p>
SD2-MM3	Mod_AOD_M77	Object	I agree with comments made by BOLT(ED).
SD2-MM3	Mod_AOD_M99	Object	I agree with the views expressed by BOLT(ED)
SD2-MM12	Mod_AOD_M1	Object	<p>Although the plan has been modified, the map only shows the gross allocation not the net allocation. As the difference is substantial (10.68 Hectares as opposed to 23.53 Hectares) surely the net area should be drawn on the map to allow interested parties to see what area will be allocated for employment use.</p>
SD2-MM12	Mod_AOD_M346	Object	<p>We object to the amendment made to the south-eastern boundary of the employment allocation E1831. Following the public examination the boundary for the employment allocation has been amended to exclude land owned by an objector, however the amendment has resulted in land</p>

Mod ref	Rep ID	Outcome	Report text
			owned by other parties who are in favour of the allocation being omitted from the allocation.
SD2-MM13	Mod_AOD_M178	Support	I support this Modification which is a very sound solution to the problems which the original proposal would have created.
SD2-MM13	Mod_AOD_M192	Support	I support the Inspectors decision to reduce the size of this site for employment to 10.68 hectares from 24.57 hectares and the removal of the high pressure gas pipe line and buffer removed from developable area.
SD2-MM13	Mod_AOD_M226	Conditional Support	This submission is on behalf of Spen Valley Civic Society. We welcome the overall reduction in the net size of the allocation, and the intention to provide what we assume will be a substantial buffer zone similar to that which we proposed in our initial submission. However the absence of a map/plan which incorporates these changes makes it impossible to determine
SD2-MM13	Mod_AOD_M641	Conditional Support	Comment transcribed by KC from attached letter: I support the reduction in size of the area of E1831 because of the Gas Main but I also state that These warehouses are completely unnecessary and the land is much more important as a buffer to the pollution and congestion around J26 and M62/A58/M606?A650 road junction as shown above (image of SD2-MM12).
SD2-MM15	Mod_AOD_M197	Support	I agree with the Inspector's decision for the buildings on this land to be carefully sited.
SD2-MM15	Mod_AOD_M2	Object	Modification states that a masterplan is required for this area and none has been supplied at the start of consultation period.
SD2-MM15	Mod_AOD_M648	Object	<p>I am forwarding the correspondence I have had with Tim Lawrence about the situation at M62 junction 26 (Chain Bar). I made some comments to him when I replied on 10 September (see below). I still remain completely dissatisfied with the Inspector's position about sites surrounding Chain Bar (those listed in the header). This particularly stems from the housing site, but the cumulative impact of all three sites on the junction (including air quality) is in my view very serious. I realise that none of these sites are included in the re-consultation stemming from the Inspector's communication. However, I should be grateful if you were able to pass these concerns on in the spirit in which they are made.</p> <p>I will also be forwarding email correspondence which Kath has had with a Hunsworth resident. This includes an email from Paula Bedford of Highways England, which does nothing to allay our fears over the possible effects of these three large developments. In this email there is the following text, which emphasises my point.</p> <p>"In terms of the proposed development at Merchant Fields I am yet to receive a formal planning consultation from Kirklees Council however, at the point where a formal planning application is submitted Highways England, as a statutory consultee, should be consulted on the application. Our review of the application will include a full and comprehensive assessment of the traffic generated by the development including its impact on the safe and continued operation of the SRN. Any mitigation required to address this impact will then be conditioned as part of Highways England's formal recommendation to the planning authority should they choose to grant permission.</p> <p>In relation to planned or committed schemes in this area we have been working on developing a solution at the M62/M606 Chain Bar junction however, due to the nature of the junction, a very complex solution is required, which has raised projected costs. Additionally capacity constraints between junction 26 and 27 on the M62 are impacting on the potential benefits derived from this scheme. Therefore other solutions on the M62 will need to be looked at and as such we have put this scheme into review for consideration as part of the future road investment planning."</p> <p>I should be grateful if this could be passed to the Inspector</p>
SD2-MM17	Mod_AOD_M649	Object	<p>I am forwarding the correspondence I have had with Tim Lawrence about the situation at M62 junction 26 (Chain Bar). I made some comments to him when I replied on 10 September (see below). I still remain completely dissatisfied with the Inspector's position about sites surrounding Chain Bar (those listed in the header). This particularly stems from the housing site, but the cumulative impact of all three sites on the junction (including air quality) is in my view very serious. I realise that none of these sites are included in the re-consultation stemming from the Inspector's communication. However, I should be grateful if you were able to pass these concerns on in the spirit in which they are made.</p> <p>I will also be forwarding email correspondence which Kath has had with a Hunsworth resident. This includes an email from Paula Bedford of Highways England, which does nothing to allay our fears over the possible effects of these three large developments. In this email there is the following text, which emphasises my point.</p> <p>"In terms of the proposed development at Merchant Fields I am yet to receive a formal planning consultation from Kirklees Council however, at the point where a formal planning application is submitted Highways England, as a statutory consultee, should be consulted on the application. Our review of the application will include a full and comprehensive assessment of the traffic generated by the development including its impact on the safe and continued operation of the SRN. Any mitigation required to address this impact will then be conditioned as part of Highways England's formal recommendation to the planning authority should they choose to grant permission.</p>

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			In relation to planned or committed schemes in this area we have been working on developing a solution at the M62/M606 Chain Bar junction however, due to the nature of the junction, a very complex solution is required, which has raised projected costs. Additionally capacity constraints between junction 26 and 27 on the M62 are impacting on the potential benefits derived from this scheme. Therefore other solutions on the M62 will need to be looked at and as such we have put this scheme into review for consideration as part of the future road investment planning.” I should be grateful if this could be passed to the Inspector
SD2-MM21	Mod_AOD_M260	Support	As a resident of Leeds Road, Mirfield, I wish to add my support to the proposal of the planning inspector to remove development of the land at Nun Brook from the Council’s plan. This land of great historic value to the District, has potential for tourism and should remain in the green belt for recreational purposes and for farming.
SD2-MM21	Mod_AOD_M30	Support	I support the Local Plan modification in relation to site E 1832c as this will protect the current Green Belt status of the this historically and environmentally important land that clearly marks the edge of the Huddersfield areas. The proposed development would also have had a negative impact on the listed historical park and gardens surrounding the grade 1 listed Kirklees Hall and also on the context of other grade 1 and grade 2 listed buildings on the Kirklees Estate.
SD2-MM22	Mod_AOD_M177	Support	I support this Modification which preserves the integrity of an area of heritage.
SD2-MM22	Mod_AOD_M189	Support	I support the changes made to this employment plan. To secure the land on which some of the oldest buildings in Kirklees stand is essential, it is unnecessary to include this land for employment. I support the use of land of the former waste water treatment, Leeds Road Mirfield.
SD2-MM22	Mod_AOD_M203	Support	I support the amendments to the plan SD2MM22
SD2-MM22	Mod_AOD_M213	Support	Support
SD2-MM22	Mod_AOD_M227	Support	This submission is on behalf of Spen Valley Civic Society. We fully support this main modification, which reduces the size of the employment allocation, and restricts it to the former Cooper Bridge Water Treatment works. This decision has saved one of the most important areas of land in terms of the historic environment anywhere in West Yorkshire. It is a triumph for common sense.
SD2-MM22	Mod_AOD_M258	Support	I support the amendments as detailed in SD2-MM22. (E1832c - Modification).
SD2-MM22	Mod_AOD_M261	Support	The area of comment I have is the proposed industrialisation of land to the north of Leeds Road, Mirfield, east of the Three Nuns. This land is currently green belt, and is one of the few rural areas between Leeds and Huddersfield. The land is of historic interest, great beauty and a habitat for all sorts of wild life. It was unsound for it to be included with the former sewage works south of Leeds Road for a proposed major industrial park. I agree with the Inspector’s modifications that this should be taken out of the Local Development Plan and remain as green belt.
SD2-MM22	Mod_AOD_M378	Support	I would like to express my support for recent planning inspector's decision to maintain the status quo on land at Roberttown lane and proposed industrial site at Cooper bridge. We are more than happy that this land should remain classified as green belt.
SD2-MM22	Mod_AOD_M380	Support	I would like to express my support for recent planning inspector's decision to maintain the status quo on land at Roberttown lane and proposed industrial site at Cooper bridge. We are more than happy that this land should remain classified as green belt.
SD2-MM22	Mod_AOD_M381	Support	I strongly agree with the major modifications at the Robert town Lane site and Cooper Bridge
SD2-MM22	Mod_AOD_M383	Support	I strongly agree with the major modifications at the Robert town Lane site and Cooper Bridge
SD2-MM22	Mod_AOD_M385	Support	I strongly agree with the major modifications at the Robert town Lane site and Cooper Bridge
SD2-MM22	Mod_AOD_M387	Support	I would like to advise that I agree with the major modifications at the Roberttown Lane site and Cooper Bridge
SD2-MM22	Mod_AOD_M396	Support	I support the amendments as detailed in SD2-MM22. (E1832c - Modification).
SD2-MM22	Mod_AOD_M404	Support	I strongly agree with the major modifications at the Roberttown Lane site and Cooper Bridge, for the allocation to be removed from the local plan and retained as greenbelt
SD2-MM22	Mod_AOD_M42	Support	I support these changes which sensibly reduce the size of the site and preserve the area of heritage importance.
SD2-MM22	Mod_AOD_M425	Support	I would like to advise that I agree with the major modifications at the Roberttown Lane site and Cooper Bridge.
SD2-MM22	Mod_AOD_M528	Support	I agree with the modifications to ensure the land at Roberttown Lane and Cooper bridge remains as green belt.
SD2-MM22	Mod_AOD_M530	Support	Support
SD2-MM22	Mod_AOD_M533	Support	I strongly agree with the major modifications at the Robert town Lane site and Cooper Bridge
SD2-MM22	Mod_AOD_M535	Support	I support the modifications to the Local Plan, specifically the modifications related to Roberttown Lane and Cooper Bridge.

Mod ref	Rep ID	Outcome	Report text
SD2-MM22	Mod_AOD_M548	Support	Support
SD2-MM22	Mod_AOD_M550	Support	I have reviewed the above and AGREE with the Main Modifications of The Local Plan - Allocations and Designations
SD2-MM22	Mod_AOD_M552	Support	I am emailing on behalf of Frank C Parkin. He would like to say that he agrees with the Government Planning Inspector's recommendations that both proposed sites for development, Roberttown Lane and Cooper Bridge, should be removed from the Local Plan. I have tried to express this as requested on the website but am floundering, I'm afraid, and I consider myself fairly web-savvy. I don't have a lot of time to try and work it out and read all the required documents, but Dad and I are very keen to express agreement with these recommendations during the consultation period.
SD2-MM22	Mod_AOD_M559	Support	As a resident I was naturally concerned about the proposed plan to develop the area for housing and warehousing. I have supported the rejection of the plan on the grounds of; Lack of infrastructure to support additional residents - schools, doctors, roads, transport system. Insufficient access and roads for increased road haulage. The destruction of green belt site when there are brown field sites available. I was delighted to receive a letter from local MPs informing me that the independent planning officer had reviewed and rejected the recent modifications made to the application and therefore the application was unlikely to succeed. Once again I wish to add my support to the totally rejection of the plan to redevelop this 'green field' site adjacent to Leeds Road at Cooper Bridge.
SD2-MM22	Mod_AOD_M606	Support	Comment transcribed by KC from attached letter: I wish to agree with the plan to remove both sites and retain the green belt.
SD2-MM22	Mod_AOD_M608	Support	Comment transcribed by KC from attached letter: I agree with the recommendation that both sites should be kept as green belt. For these plans to go ahead would have caused more problems for the area.
SD2-MM22	Mod_AOD_M610	Support	I would like to register my approval with the recommendations made by the Government Planning Inspector to remove the proposal for the site for the Industrial Estate at Cooper Bridge from the Local Plan. I heartily approve the removal.
SD2-MM22	Mod_AOD_M611	Support	I would like to add my backing to the removal of the plan to put housing on the fields on Roberttown Lane bordered by Richmond Park Avenue, Huddersfield Road and Sunnyside Avenue & the 100 acre industrial estate at Cooper Bridge, behind Miller & Carter. I am a resident of Hartshead & wish it be known that our local councillors & Roberttown residents committee have my full support on the detrimental impact this would have on our villages.
SD2-MM22	Mod_AOD_M614	Support	Comment transcribed by KC from attached letter: Site designated for Industrial Estate at Cooper Bridge. I heartily agree that the site be removed from the plan and retained in the green belt.
SD2-MM22	Mod_AOD_M617	Support	Comment transcribed by KC from attached letter: I am writing to register my full support for the following modifications 1. Removal of housing site H442 (Roberttown) and its retention as green belt (loss of this greenbelt would result in the village of Roberttown merging with nearby settlements. 2. Reduction of employment site E1832c at Cooper Bridge - retaining as green belt land to the rear of Miller & Carter Steakhouse (formerly The Three Nuns). This area of countryside off the A62 is an important asset to this part of the district and should be safeguarded.
SD2-MM22	Mod_AOD_M619	Support	Comment transcribed by KC from attached letter: I fully support the recommendation that the site for a 100-acre industrial estate at Cooper Bridge be removed from the plan.
SD2-MM22	Mod_AOD_M620	Support	Comment transcribed by KC from attached letter: My wife and I fully agree with the Inspector to remove both sites (E1832c and H442) from the plan and retain as green belt.
SD2-MM22	Mod_AOD_M624	Support	Comment transcribed by KC from attached letter: My husband and I agree wholeheartedly that the site designated for 100 acre industrial estate at Cooper Bridge be removed from the plan and retained as green belt.
SD2-MM22	Mod_AOD_M625	Support	Comment transcribed by KC from attached letter: My husband and I agree wholeheartedly with the recommendation that the site designated for a 100 acre industrial estate at Cooper Bridge be removed from the plan and retained as green belt.
SD2-MM22	Mod_AOD_M628	Support	Comment transcribed by KC from attached letter: I agree to the decision to keep the land at Cooper Bridge as green belt.
SD2-MM22	Mod_AOD_M629	Support	Comment transcribed by KC from attached letter: I write in support of the recommendation by the Government Planning Inspector that both sites for development at Cooper Bridge and in Roberttown be removed from the Local Plan. I feel very strongly that the two sites should be retained in the green belt, as recommended by the Planning Inspector.

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SD2-MM23	Mod_AOD_M279	Support	Site E1832c adjoins the boundary of the Grade II Registered Historic Park and Garden of Kirklees Park. Kirklees Park provides the setting for a number of important designated heritage assets including the Grade I Listed Kirklees Hall and a group of nine Listed farm buildings at Home Farm The development of Site E1832c at Cooper Bridge would have resulted in considerable harm to the rural setting of this well-preserved example of a mid to late-eighteenth Century designed landscape - an important element of its character. The development would also have resulted in considerable harm to the rural setting of two sixteenth and seventeenth century Listed buildings on Leeds Road. Therefore, we welcome the reduction in the extent of this allocation through the deletion of the part of the site which was most likely to harm the significance of the Registered Historic Park and Garden and its associated designated heritage assets.
SD2-MM28	Mod_AOD_M283	Support	This site lies just over 725 metres from the boundary of the Grade II Registered Historic Park and Garden at Breton Hall. Whilst Historic England were satisfied that the development of Site E2333a would not have affected the significance of the principal building in this landscape (the Grade II* Listed Bretton Hall) or be visible from the centre of the Park, Historic England were unconvinced that the increased proximity of large-scale urban development would not harm elements which contribute to the significance of the Registered Historic Park and Garden. Therefore, we welcome the deletion of this allocation.
SD2-MM28	Mod_AOD_M43	Support	UDVET wishes to express its total support for the proposed modification and welcomes it wholeheartedly. No exceptional circumstances ever existed for the development of greenbelt in this area. UDVET supports the Council's decision to remove this proposed employment site from the Local Plan.
SD2-MM28	Mod_AOD_M476	Support	I support the removal of site E2333a from the Local Plan. No exceptional circumstances have been shown for this development in the Green Belt.
SD2-MM28	Mod_AOD_M49	Support	we fully support and greatly welcome this modification. No exceptional circumstances ever existed for the allocation of this greenbelt.
SD2-MM28	Mod_AOD_M563	Object	The effect of this Modification is to delete allocation E2333a from the Plan. The allocation would have given rise to circa 15ha of new, prime employment land in the South Kirklees FEA. The allocation has been deleted in favour of other sites based on the Inspector's stated concerns regarding the effect of development on the character and setting of the countryside and village. These concerns are not fully explained in the Inspector's post-hearing correspondence and it is difficult to reconcile them with the substantial body of evidence that has been prepared by both the Council and CWDCL in support of the proposed allocation. The site's allocation was supported by a robust evidence base which demonstrated it was both necessary to meet market needs in this part of the Borough (and therefore deliver the Plan's strategic vision and spatial approach), suitable and achievable. For the reasons set out above, deletion of allocation E2333a will render the Plan unsound. The Plan will not be positively prepared, justified, effective or consistent with national policy, contrary to Paragraph 182 of the NPPF.
SD2-MM28	Mod_AOD_M62	Support	I support the removal of E2333a from the local plan. This preserves the clear river boundary between Clayton West and Emley, and will prevent ribbon development. If development was approved on the perimeter of Emley's boundary, future in-filling would be more likely. There is no commercial demand for this site and it is unsuitable for development due to flooding, high visibility from local vantage points and heritage assets. There would also be significant impact on traffic, light and noise pollution.
SD2-MM32	Mod_AOD_M541	Conditional Support	Three of the proposed modifications (SD2 MM32, MM147, and MM189) seek to amend a generic detail of the proposed allocation from; "Replacement playing pitch provision or mitigation measures of equivalent value will be required to meet local needs having regard to the most up-to-date evidence base for sport and recreation" To; "Replacement playing pitch provision or mitigation measures of equivalent or better quantity and quality will be required in a suitable location unless an assessment clearly shows the site to be surplus to requirements having regard to the most up-to-date evidence for sport and recreation needs" Kirklees has been successful in bidding to become a Parklife Football Hubs Programme. The aim of the programme is to create a sustainable model for football facilities based around artificial grass pitches (AGPs) on hub sites. The Council in conjunction with partners at the Football Foundation and Sport England is currently a refresh of its Playing Pitch Strategy to benchmark the adequacy of its pitch stock and test scenarios as to how many Artificial Grass Pitches are required in the area to address local footballing needs. This will then inform the number of Parklife Hubs are to be developed across Kirklees and the number of AGPs to be developed on each Hub. The Hubs have the potential to see a significant amount of community football transferred away from the current [grass] playing pitch stock, but in order to understand their impact, the Council are committed to undertaking a further Playing Pitch Strategy refresh commencing two years after the opening of the final Parklife hub site. The proposed modification builds in further flexibility into how the Council addresses the loss of existing and lapsed / disused playing fields associated with the respective allocations. Given the impending Parklife programme, and the uncertainty around its impact Sport England acknowledges the need for a wider range of responses to be accommodated and is therefore content with modification numbers SD2 MM32, SD2

Mod ref	Rep ID	Outcome	Report text
			MM147, and SD2 MM189
SD2-MM33	Mod_AOD_M249	Support	Natural England welcomes SD2-MM195, SD2-MM233, SD2-MM237, SD2-MM238, SD2-MM239, SD2-MM251, SD2-MM260, SD2-MM361 and SD2-MM33 which reflect the approach agreed in the Habitats Regulations Assessment and helps address the concerns we raised previously regarding impacts from the plan on European designated sites.
SD2-MM42	Mod_AOD_M100	Object	I agree with the comments made by BOLT(ED)
SD2-MM42	Mod_AOD_M11	Object	We have serious concerns about this. We are deeply concerned that officers who are so involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised. We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan.(Please see our response to SD2-MM353 for a more detailed explanation)
SD2-MM42	Mod_AOD_M119	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.
SD2-MM42	Mod_AOD_M134	Object	Policies 64,65,66,67,68,69,70,71.72.73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.
SD2-MM42	Mod_AOD_M149	Object	I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would

Mod ref	Rep ID	Outcome	Report text
			<p>also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions.</p> <p>It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past.</p> <p>I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –e.g. during that time there have been 2 NPPFs and numerous NPPGs.</p> <p>I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.</p>
SD2-MM42	Mod_AOD_M28	Object	I support comments made by BOLT(ED).
SD2-MM42	Mod_AOD_M284	Support	This proposed additional Policy clarifies the purpose of the information contained in the orange boxes in the Allocations and Designations Document. As such, it now makes it clear to users of the Plan that the details in this document will need to be taken into account both in preparing schemes for the development of these Allocations and in determining any subsequent applications. This will help to ensure that the Plan's Allocations are developed in a manner which will deliver sustainable development.
SD2-MM42	Mod_AOD_M419	Object	Please cross reference these comments with those in relation to SD2-MM352, 353, 360, 362, 364, 367, 406 and 295 where the same principles apply. Throughout the modifications there is this proposal to introduce an expectation (Pre-determination) of consent. This seeks to usurp the role of officers and councillors. The language used is unspecific as it does not define who should have that expectation and to what purpose, for example, should councillors considering applications proceed on the basis of a presumption of consent - effectively approaching the matter with a closed mind. This is a proposal which is fundamentally undemocratic.
SD2-MM42	Mod_AOD_M432	Object	Kirklees Council summary: Maintains position on the objection to the exclusion of a rejected site.
SD2-MM42	Mod_AOD_M64	Object	<p>I am opposed to the inclusion of this policy. I believe it is unsound. I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.</p>
SD2-MM43	Mod_AOD_M265	Object	GAIL has significant concerns as to the soundness of the first proposed modification as already outlined in its response to SD1-MM's 10,11 and 12 (above), i.e.: the differing approaches to essential and desirable infrastructure, the doubts as to the effectiveness of any joint masterplan which may be delivered and the lack of clarity in the extent (if any) of any stakeholder involvement in the development of a joint masterplan. Critically, the second proposed modification regarding adverse ecological impacts states that '.... measures may be required (which) may involve'.Without going into any of the detail of previously submitted reports/submissions, the range of biodiversity/ecology issues affecting H2684a are such that far

Mod ref	Rep ID	Outcome	Report text
			stronger and more positive wording is required if Policy PLP30 is to be delivered (as a minimum, may should be changed to will or must).
SD2-MM43	Mod_AOD_M631	Conditional Support	Comment transcribed by KC from attached letter: I have concerns as to soundness of the proposed modification as already outline in SD1 MM10, 11 and 12 on the approach to essential and desirable infrastructure. the effectiveness of any joint masterplan to be delivered. I also have concerns about when and to what extent other stakeholder will be involved in the development of a joint masterplan. Re Tracked Change - Insert Text There are a range of biodiversity/ecology issues affecting site H2684a and as already outline in SD1, I do believe that avoidance, mitigation and/or compensation measure will conserve and protect the abundant wildlife on this site.
SD2-MM44	Mod_AOD_M266	Object	Whilst the H2730a Modification Map now incorporates the proposed entrance via Hermitage Park, it doesn't reflect the impact of SD2-MM46 and the statement that there should be no development in the area marked as moderate significance in the Council's Heritage Impact Assessment on H2730a GAIL is uncertain if the map needs to be amended to reflect this point.
SD2-MM45	Mod_AOD_M267	Conditional Support	Whilst the clause refers to the existence of public rights of way (PROW's) and tree preservation orders (TPO's), GAIL believes that for the clause to be sound it needs to be extended to confirm that all the existing PROW's and TPO's on the site must be retained and protected in the event of any development.
SD2-MM45	Mod_AOD_M285	Object	Whilst we welcome the identification of the Grade II Listed Building adjacent to this site as a Constraint, development of this site could also impact upon the setting of the Grade I Listed Woodsome Hall. This should also be identified as a consideration
SD2-MM45	Mod_AOD_M482	Object	The council have not considered or acknowledged the impact of development on sites H2684a & H2730a in relation to Woodsome Hall, a grade 1 listed building.
SD2-MM45	Mod_AOD_M632	Object	Comment transcribed by KC from attached letter: Please clarify "where appropriate" such schemes must include arrangements for the homes to remain affordable in perpetuity. What are the criteria that will be applied? Who will decide whether a scheme is appropriate? How will the Council ensure/guarantee homes remain affordable in perpetuity, when year on year we see an escalation of homeless people and annual increases in the cost of living. Additionally the Council is experiencing cuts to it's budget year on year, so how will this be funded? The Kirklees Strategic Housing Market assessment report 2016 clearly shows an affordable housing deficit in Kirklees of 1049 pa. with a back log of 6513 in 2016. The strategic policy main market assessment shows just 121 affordable homes were built in 2016/2017 and only 77 in 2017/18, while the number of affordable homes is set to rise slightly over the next three years, the number that will be built will not be sufficient to clear the backlog of affordable homes that are needed. (see Affordable Housing Trajectory SD1-MM52)
SD2-MM46	Mod_AOD_M268	Object	GAIL has significant concerns as to the soundness of the first proposed modification as already outlined in its response to SD1-MM's 10,11 and 12 (above), ie. the differing approaches to essential and deliverable infrastructure, the doubts as to the effectiveness of any joint masterplan which may be delivered and the lack of clarity in the extent (if any) of any stakeholder involvement in the development of a joint masterplan. Similarly, GAIL is concerned about the second proposed modification in this clause regarding adverse ecological impacts which states that '.... measures may be required which may involve'.As with SD2-MM43, GAIL believes that amended wording is required if Policy PLP30 is to be sound and suggests that, as a minimum, may should be changed to will or must. Importantly, whilst SD2-MM46 states that no development shall take place in the field/area marked as moderate influence in the Council's HIA, GAIL believes that this would only partially protect the Grade II listed Crowtrees: the setting/view from Crowtrees doesn't simply stop at the 'invisible line' which separates H2730a from the adjacent H2684a.Put simply, the eye line from Crowtrees extends beyond the site boundary to Woodley Villa (Beldon Brook Green) and beyond into H2684a.Development in that vicinity would still significantly harm the rural view/setting and perception of Crowtrees being a significant Grade II property. For the proposed modification to be sound (and any subsequent potential amendment which may be considered in H2684a), the area not to be developed needs to reflect the longer/wider view and setting of the heritage asset.
SD2-MM46	Mod_AOD_M286	Support	Other Site Specific Considerations, third, fourth and fifth bullet points Crow Trees to the north of this area is a Grade II Listed Building. The Heritage Impact Assessment accepted that the westernmost part of this site contributed to the setting of this Listed Building and concluded that its development would be likely to harm its significance. The proposed Modification now clearly sets out the requirements for any development on this site and, as a result, these will help to ensure that any housing is delivered in a manner which conserves the setting of this building.
SD2-MM46	Mod_AOD_M287	Object	Development of this site could impact upon the setting of the Grade I Listed Woodsome Hall. Although for many properties from this period it was generally the building itself which was designed to impress visitors rather than views out towards the surrounding landscape, the siting of Woodsome

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			Hall on such a commanding position overlooking the valley of Feney Beck and its easterly orientation would indicate that views from the Hall were considered to be important. The rising hillside with its patchwork of fields and woodland is extremely prominent in views from not just the terrace of Woodsome Hall but also the all rooms on its eastern elevation. This rural setting, therefore, makes a very important contribution to one's experience of The Hall and to the significance of this Grade I Listed Building. Occupying, as it does, the higher land, the development of virtually all of Site H2730a, would be particularly noticeable in views from the Hall. It is important, therefore, that the development of this site takes full account of the potential impact upon this important Listed Building.
SD2-MM46	Mod_AOD_M491	Conditional Support	The recommendation to remove the site detailed as moderate importance to Crow Trees is required to protect the grade 2 listed buildings curtilage and as such is welcomed. However, LE98 does not take account of the south easterly position of Crow Trees and the views from the listed building. The views from the listed building overlook the area detailed as high importance in HIA (LE98:5), the historic field boundary/ TPO's (Crow Trees). As such, the area detailed as slightly significant is in fact of high significance to this listed building. consequential change CCH2730a has removed an area of land from the greenbelt. The land within CCH2730a abuts the proposed removed 'moderate significance' site located to the south of Crow Trees. This is obviously a major oversight on the councils behalf! land within CCH2730a is located within site allocation H2684a, why has an impact assessment not been done on H2684a? any building on land within the consequential change area will adversely impact the views to and from the listed building and are as important to the building as the proposed area to be removed.
SD2-MM46	Mod_AOD_M634	Object	Comment transcribed by KC from attached letter: I have already outlined my concerns as to soundness of the proposed modifications in SD1-MM10, 11, and 12. Equally I am concerned about the second clause in this section regarding adverse ecological impacts. "Avoidance, mitigation and/or compensation measures may be required to address any identified adverse ecological impacts.... As previously stated, the overriding factor is to protect and I cannot see how this clause can guarantee 100% protection. Simply inserting 'measures' 'may' be required, does not rectify any protection or harm that will occur. I do not believe the modification satisfies PLP30 and the policy is therefore unsound.
SD2-MM51	Mod_AOD_M557	Object	Comment transcribed by KC from attached letter: I expressed support for site H1679 as it was originally submitted (along with other sites) with the following narrative which it is now proposed should be deleted: "This site is owned by Kirklees Council, and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard." Deleting this narrative conflicts with an underlying principal of the plan to the extent that the plan is not positively prepared to meet a stated housing policy and is therefore unsound. A key plank of the Housing Mix and Affordability Policy, developed and adopted by Kirklees, is to encourage and drive increased construction of affordable housing in the area. By eliminating a narrative that supports this principal, Kirklees are undermining this policy and failing to set an appropriate example to private developers of other sites. Kirklees Council have included a policy which requires the inclusion of a minimum of 20% of Affordable Housing within housing developments. As such, Kirklees have a responsibility to the community to support and deliver against this Policy.
SD2-MM51	Mod_AOD_M635	Object	Comment transcribed by KC from attached letter: As outlined earlier in SD1, the Strategic Housing Market Assessment Report 2016 clearly shows an affordable housing deficit in Kirklees of 1049 per annum, with a backlog of 6315 in 2016. In the last 3 years there has been a sharp decline in the number of affordable homes being built (see earlier comments) with projections of 93, 239 and 588 being built over the next 3 years. However to meet the need the Council needs to prioritise affordable housing on all council owned sites, however the original clause "This site is owned by Kirklees and as such it could deliver enhanced affordable housing and green infrastructure and offer design and quality that is of a high standard" has been deleted on all Council owned sites. How then can the Council begin to tackle the affordable housing deficit and backlog and prioritise affordable homes for ordinary families, as this modification does not fully address the problem.
SD2-MM63	Mod_AOD_M27	Object	Bradley Park Golf Course Site H17471. The main premise used by the Council for the justification of this allocation is flawed. It is based on the assumption that golf is a declining activity and that the loss of Bradley Park Golf Course will be of no detriment to the Kirklees area. This assumption is flawed in the following ways:-a) Some members of local golf clubs struggle to pay a large upfront fee of several hundred pounds so they resign and many choose to pay and play at Bradley Park GC, the only municipal golf course in the district, which is as busy as it ever has been. b) It is argued by the Council that the Driving range is not required. It is the only Driving Range in the district and on a recent visit on a working day it was full with a queue of seven waiting to practice.2. The Council originally developed the golf course to provide working members of the public with a facility within their reach and of comparable standard to other golf courses in the area. This met their stated policies on Equal Opportunities as well as providing surplus income to supplement other council projects. Bradley Park GC was established on the basis of, "not costing rate payers a penny", and it has

Mod ref	Rep ID	Outcome	Report text
			<p>fulfilled that objective. 3. There are two serious landfill sites, one on-site and the other contiguous to the northern boundary. Both contain unknown material which could be a danger to residents of any houses built nearby. The former refuse tip must be undevelopable because of stability problems.4. There are two expensive Multi-use pitches proposed at the norther part of the site. One could not think of a worse location for such expensive leisure facilities. They are proposed to be on an exposed location on unstable ground! One can only think that the council's consultants have introduced these to influence the perception that somehow they will replace what will be lost on a smaller land footprint.5. I have always understood that the allocation of Council land in a Local Development Plan was and ethical and sensitive issue. Under these circumstances the council need to be seen to be even handed in reaching a balance between Council owned and privately owned land without bias. It would appear that the Council have made decisions here based on financial benefit to the Council, not necessarily what is best for the district.6. The above mentioned points are crystallised to a great extent, when following the floods over the winter of 2015/6, a leading councillor was asked at a public consultation meeting, if they would be reviewing the Local Development Plan in the light of sites which had flooded, when the alleged answer was, "No, because we are relying on the Local Development Plan to resolve our budget problems in the future".</p>
SD2-MM63	Mod_AOD_M288	Support	<p>New site allocation textbox, especially 'Other Site Specific Considerations', thirteenth and fourteenth bullet-points</p> <p>The barn at Shepherd's Thorn Farm is a Grade II Listed Building. The Heritage Impact Assessment identified a number of areas of SiteH1747/H351 which it considered contributed to the setting of this Listed Building. For the areas of 'High Significance', the documenter commended that these be retained as open areas with consideration given to the removal of a number of the less-mature trees that were planted to screen the golf course. It also noted, that the development of this area provides a real opportunity to enhance the setting of this building. The proposed Modification now clearly sets out the requirements for any development on this site and, as a result, these will help to ensure that any housing is delivered in a manner which not only conserves the setting of this building but also results in an improvement to its setting.</p>
SD2-MM63	Mod_AOD_M426	Object	<p>Comment transcribed by KC from attached letter:</p> <p>We write on behalf of our client, Bradley Park Golf Club, in respect of the above proposed Main Modification. Whilst our comments below relate to this proposed modification, they are made without prejudice to our position on this site that seeks the retention of an 18-hole golf course and its associated facilities.</p> <p>MM63</p> <p>We make the following comments;</p> <p>The need to ensure that there is no gap in golf provision on the site should be listed as a constraint. This would be consistent with the 'other site specific considerations' and make it clear that it has to be considered as part of the site planning.</p> <p>In respect of the final bullet point, we made representations at the Examination in Public sessions that the size of the proposed 9-hole course on the indicative masterplan for the site was too small. This was a view supported by Sport England. To be an effective 9-hole course that is capable of providing double tees to allow 18-holes to be played and allow handicaps to be secured and meet competition standards it would need to allow for a mix of predominantly par 4 and par 3 holes.</p> <p>Given that the Council have modified both the gross and net site areas of the allocation and assumed that they have set-aside sufficient land for a redesigned 9 hole golf course. As the land-take needed for the redesigned 9-hole course has not been properly established by the Council we remain concerned that unless the Council acknowledge the need for further work here, then the golf hole course will be squeezed into the area that has been set-aside for it. We believe that this approach has the potential to produce a repurposed 9-hole course that would be unsatisfactory.</p> <p>During the Hearings the Council confirmed that the advice of a suitable Golf Course Designer would be sought along with England Golf and Sport England to ensure that the redefined course would be fit for purpose and sustainable. This needs to be recognised in the text. As a consequence, the final bullet point under Other site specific considerations should be amended as follows;</p> <p>The development of this site must allow for a repurposed 9 hole course to allow for a mix of preponderantly par 4 and par 3 holes combined with a floodlit driving range, dedicated clubhouse and two full sized 3G pitches. There should be no gap in golfing provision on the site. The design of the reconfigured course should be agreed with a recognised Golf Course designer in association with input from Sport England, England Golf and existing Members of Bradley Park Golf Club.</p>
SD2-MM63	Mod_AOD_M544	Conditional Support	<p>Sport England notes the following changes;</p> <p>The development of this site must allow for a repurposed 9 hole course combined with a floodlit driving range, clubhouse and two full sized 3G pitches. Proposals should aim to ensure there is no gap in golfing provision on the site.</p>

Mod ref	Rep ID	Outcome	Report text
			<p>This is also accompanied by the Council's commitment to undertake a masterplan for the proposal.</p> <p>Both these modifications are in line with the Statement of Common Ground that was agreed by the Council and Sport England.</p> <p>There remain some concerns on our behalf however. The Council prepared an indicative layout to illustrate how the allocation could be amended to accommodate a retained 9 hole course and floodlit driving. Both Sport England and England Golf raised some concerns as to the need to incorporate a variety of length / par holes and suitable tee positions to facilitate this. These points were acknowledged by the Council but they advised that the layout was merely indicative and they would continue to work with England Golf, Sport England and the golf club. There is no mention of this intention in the modified site specific considerations. Moreover the Council has modified both the gross and net site areas of the allocation, and behind these increases is an assumption that they have set-aside sufficient land for a redesigned 9 hole golf course. As the land-take needed for the redesigned 9 hole course has not been properly established by the Council we are concerned that unless the Council acknowledge the need for further work here, then the golf hole course will be squeezed into the area that has been set-aside for it. We believe that this approach has the potential to produce a repurposed 9 hole course that would be unsatisfactory.</p>
SD2-MM65	Mod_AOD_M233	Object	Kirklees Council summary: Maintains position on the objection to the local plan on basis of Political and Environmental Aspect and Environmental Loss
SD2-MM65	Mod_AOD_M289	Support	This site lies some 330 metres from the edge of the Honley Conservation Area. The proposed Modification alerts potential developers of the proximity of the Conservation Area and, as a result, the need to ensure that any proposals conserve those elements which contribute to its significance.
SD2-MM67	Mod_AOD_M290	Support	<p>Other site specific considerations, first and second bullet-points</p> <p>The site also some 330 metres from the edge of the Honley Conservation Area. The Heritage Impact Assessment considered that the open area between Netherton and Honley contributed highly to the significance of the Honley Conservation Area. The proposed Modification now clearly sets out the requirements for any development on this site and, as a result, these will help to ensure that any housing is delivered in a manner which conserves the setting of the Conservation Area.</p>
SD2-MM67	Mod_AOD_M3	Object	<p>My comments below are not a repeat of the submission that I previously made but present new evidence that should be taken into account.</p> <p>The NPPF is clear that plans are to be approved as 'sound' if they are Consistent with policies enabling the delivery of sustainable development. NPPF states that achieving sustainable development includes a "Social Objective – to support strong, vibrant and healthy communities..... and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.</p> <p>The proposed modification still includes the words: "Additional mitigation on the wider local highway network may be required." This wording was in the original proposals for this site.</p> <p>This wording is inadequate because it fails to meet the key Social Objectives of (1) creating "healthy communities" (2) "fostering a well-designed and safe built environment" and (3) "support communities' health.."</p> <p>In fact it is in direct contravention of national policy, because without a requirement for highway improvements to be carried out, the development of this land will undermine the health and safety of the community by introducing increased highway danger.</p> <p>The elevation of this site above the nearby arterial road network and the narrow, steep tortuous nature of the connecting local roads makes it essential that there should be a requirement for highway improvements to be carried out before traffic generation from new development takes place.</p> <p>These connecting roads which lack pavement provision are frequented on foot on a daily basis by large numbers of local children to access Newsome High School and Honley High School. These are already dangerous routes and additional traffic will make the situation worse.</p> <p>My written and oral submission to the public examination provided a straightforward explanation of the situation in relation to traffic generation and highway planning. This should have been sufficient to prompt the Inspector to visit the site and take account of the special circumstances existing in the Pennine topography and give due consideration to the danger that the development of this site will add to pedestrians and particularly children using local roads.</p>
SD2-MM70	Mod_AOD_M235	Object	Kirklees Council summary: Maintains position on the objection to the local plan on basis of Political and Environmental Aspect and Environmental Loss
SD2-MM70	Mod_AOD_M291	Support	<p>Constraints, second bullet point</p> <p>The site also lies close to the boundary of the Honley Conservation Area. The proposed Modification now more accurately describes the relationship of the Allocation to the Conservation Area.</p>

Mod ref	Rep ID	Outcome	Report text
SD2-MM72	Mod_AOD_M292	Support	Other site specific considerations, The site lies some 330 metres from the edge of the Honley Conservation Area. The Heritage Impact Assessment considered that the open area between Netherton and Honley contributed highly to the significance of the Honley Conservation Area. The proposed Modification now clearly sets out the requirements for any development on this site and, as a result, these will help to ensure that any housing is delivered in a manner which conserves the setting of the Conservation Area.
SD2-MM72	Mod_AOD_M5	Object	My comments below are not a repeat of the submission that I previously made but present new evidence that should be taken into account. The NPPF is clear that plans are to be approved as 'sound' if they are Consistent with policies enabling the delivery of sustainable development. NPPF states that achieving sustainable development includes a "Social Objective – to support strong, vibrant and healthy communities..... and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. The proposed modification still includes the words: "Additional mitigation on the wider local highway network may be required." This wording was in the original proposals for this site. This wording is inadequate because it fails to meet the key Social Objectives of (1) creating "healthy communities" (2) "fostering a well-designed and safe built environment" and (3) "support communities' health.." In fact it is in direct contravention of national policy, because without a requirement for highway improvements to be carried out, the development of this land will undermine the health and safety of the community by introducing increased highway danger. The elevation of this site above the nearby arterial road network and the narrow, steep tortuous nature of the connecting local roads makes it essential that there should be a requirement for highway improvements to be carried out before traffic generation from new development takes place. These connecting roads which lack pavement provision are frequented on foot on a daily basis by large numbers of local children to access Newsome High School and Honley High School. These are already dangerous routes and additional traffic will make the situation worse. My written and oral submission to the public examination provided a straightforward explanation of the situation in relation to traffic generation and highway planning. This should have been sufficient to prompt the Inspector to visit the site and take account of the special circumstances existing in the Pennine topography and give due consideration to the danger that the development of this site will add to pedestrians and particularly children using local roads.
SD2-MM81	Mod_AOD_M293	Support	12 and 13 Warren House Lane and the adjacent barn which lie to the west of this area are Grade II Listed Buildings. The Heritage Impact Assessment considered that part of Site H623 contributed to the rural setting of the Listed Buildings to the north. The loss of this area, therefore, would be likely to result in harm to the setting of these buildings. Historic England considered that it was unclear how any development on the area identified as being of 'Moderate Significance' in the Council's Heritage Impact Assessment could be achieved in a manner consistent with the conservation of these assets and were not convinced that the form of development being proposed in that document would have effectively reduced the harm to an acceptable level. Therefore, we welcome the deletion of this Allocation.
SD2-MM82	Mod_AOD_M294	Support	Middle Burn Farmhouse and Lower Burn Farmhouse at the northern edge of this area are Grade II Listed Buildings. The Heritage Impact Assessment identified that parts of Site H706 contributed to the setting of these properties and concluded that their loss and subsequent development would be likely to cause harm to elements which contribute to their significance. The proposed Modification reflects the reduction in the size of the site that the Heritage Impact Assessment considered necessary to protect the setting of the Listed Buildings
SD2-MM83	Mod_AOD_M295	Support	Middle Burn Farmhouse and Lower Burn Farmhouse at the northern edge of this area are Grade II Listed Buildings. The proposed Modification alerts potential developers of the proximity of these Listed Buildings and, as a result, the need to ensure that any proposals conserve those elements which contribute to their significance.
SD2-MM85	Mod_AOD_M296	Support	Middle Burn Farmhouse and Lower Burn Farmhouse at the northern edge of this area are Grade II Listed Buildings. The Heritage Impact Assessment identified that parts of Site H706 contributed to the setting of these properties and concluded that their loss and subsequent development would be likely to cause harm to elements which contribute to their significance. The proposed Modification now clearly sets out the requirements for any development on this site and, as a result, these will help to ensure that any housing is delivered in a manner which conserves the setting of these Listed Buildings.

Mod ref	Rep ID	Outcome	Report text
SD2-MM91	Mod_AOD_M297	Support	This development of the area that was originally Allocated in the Submission Draft would have resulted in the loss of an open area which has been identified as being important to the rural setting of the Scheduled Monument of Castle Hill. We support the reduction in the extent of this site. This will ensure that any housing is delivered in a manner which will conserve the setting of Castle Hill.
SD2-MM93	Mod_AOD_M298	Support	This development of the area that was originally Allocated in the Submission Draft would have resulted in the loss of an open area which has been identified as being important to the rural setting of the Scheduled Monument of Castle Hill. We support the reduction in the extent of this site. This will ensure that any housing is delivered in a manner which will conserve the setting of Castle Hill.
SD2-MM95	Mod_AOD_M299	Object	This development of the site that was originally Allocated in the Submission Draft would have resulted in the loss of an open area which has been identified as being important to the rural setting of the Scheduled Monument of Castle Hill. Historic England had fundamental concerns about the evaluation of the degree to which this site is visible from Castle Hill in the Heritage Impact Assessment and considered that it considerably underplayed the degree of harm that the loss of this site and its subsequent development might have upon the setting of the monument. The reduction in the size of this allocation should ensure that the development of this site will not impact upon the significance of Castle Hill. Since the reference to the evidence in the Heritage Impact Assessment is only likely to lead to confusion about how this site should be developed, it should be deleted.
SD2-MM96	Mod_AOD_M300	Support	Taylor Hill Working men's Club at the northern end of this area is a Grade II Listed Building. The proposed Modification reflects the conclusions of the Heritage Impact Assessment and the reduction in the size of the site necessary to protect the setting of the Listed Buildings
SD2-MM97	Mod_AOD_M301	Support	Taylor Hill Working men's Club at the northern end of this area is a Grade II Listed Building. The proposed Modification alerts potential developers of the proximity of this Listed Building and, as a result, the need to ensure that any proposals conserve those elements which contribute to its significance.
SD2-MM100	Mod_AOD_M302	Support	Taylor Hill Working men's Club at the northern end of this area is a Grade II Listed Building. The proposed Modification now clearly sets out the requirements for any development on this site and, as a result, these will help to ensure that any housing is delivered in a manner which conserves the setting of this Listed Building.
SD2-MM106	Mod_AOD_M305	Support	This development of this site would have resulted in the loss of an open area which has been identified as being important to the rural setting of the Scheduled Monument of Castle Hill. We welcome the deletion of this site as an Allocation.
SD2-MM107	Mod_AOD_M306	Support	There are a number of Listed Buildings to the east of this area including the Grade II* Crosland Hall. The Heritage Impact Assessment considered that parts of this site contributed to the setting of Crosland Hall and concluded that their loss and subsequent development would be likely to cause harm to elements which contribute to its significance. The proposed Modification alerts potential developers of the proximity of this Listed Building and, as a result, the need to ensure that any proposals conserve those elements which contribute to its significance.
SD2-MM107	Mod_AOD_M330	Support	Background Empire Knight Group is the freehold owner of approximately 30 ha of land to north of Blackmoorfoot Road and to the east of Felks Stile Road, Huddersfield ("the site"). In the Kirklees Publication Draft Local Plan the site was allocated as a mixed use allocation (reference: MX1930), with an indicative capacity to deliver 441 dwellings and 44,258 sq m of employment floorspace. Since March 2017, Empire Knight Group has been in discussion with the Council over the proposed allocation of the site. Such discussions have focused on the likely achievable mix of land uses and the fact that the employment element of the proposed allocation is not considered to be deliverable. This is reflected in the Statement of Common Ground between Empire Knight Group and the Council (ID: SC005). In September 2017, Empire Knight Group submitted a formal pre-application request (ref. 2017/20381) to the Council for a development comprising up to 625 residential dwellings (Use Class C3), up to 70 extra care apartments (Use Class C2) and associated development at the site. Following ongoing community consultation and discussion with the Council, an outline planning application was submitted in March 2018 (reference: 2018/60/90748/W) for a residential-led, mixed use development comprising up to 630 residential dwellings (Use Class C3), up to 70 care apartments (Use Class C2/C3/D1), a local centre of up to 500 sq m (Use Class A1/A2/A3/A4/A5/D1) as well as associated development. Proposed Main Modification Main Modification SD2-MM298 proposes to delete the site's existing mixed use allocation, while Main Modification SD2-MM107 proposes to allocate the site as a new housing allocation (reference H3397), with an indicative capacity of 684 dwellings during the Local Plan period. Empire Knight Group fully supports the proposed amendment to the site's allocation from mixed use to housing. The original mixed use allocation was not effective or justified in accordance with paragraph 182 of the National Planning Policy Framework (2012), as the proposed employment provision at the site was not viable or deliverable. The amendment to a wholly residential allocation is considered to be both effective and justified and therefore sound.

Mod ref	Rep ID	Outcome	Report text
SD2-MM108	Mod_AOD_M250	Support	Natural England notes the extensions to allocations in modifications SD2-MM108, SD2-MM190,SD2-MM290 and SD2-MM182 as well as the new allocations proposed in modificationsSD2-MM136, SD2-MM191, SD2-MM289, SD2-MM291. We note and welcome the assessment undertaken for these modifications and have no further concerns.
SD2-MM110	Mod_AOD_M430	Support	<p>Comment transcribed by KC from attached letter:</p> <p>SITE REF. H559 – LAND TO THE EAST OF LEEDS ROAD, CHIDSWELL</p> <p>1.1 We write on behalf of our client Barratt Homes & David Wilson Homes (BDW) to provide their representations to the Kirklees Local Plan Main Modifications which are currently being consulted on by Kirklees Council.</p> <p>1.2 As the Council are aware BDW have submitted a substantial level of evidence to support their land interests in Kirklees through the initial consultation on the Local Plan and the Examination in Public (EIP) stages of the Kirklees Local Plan.</p> <p>1.3 The comments made in these representations should therefore be considered alongside BDW’s representations to the Publication Draft Kirklees Local Plan (PDLP) and each of their previous hearing statements submitted as part of the EiP process. 1.4 For issues of brevity, we will not seek to repeat comments we have previously made as part of the EiP process. However, we will refer to the submitted evidence where required. These representations therefore seek to focus on the implications of soundness associated with the proposed Main Modifications.</p> <p>1.5 BDW want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough’s housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, BDW believe that a sound Local Plan can be achieved through the modifications process.</p> <p>1.6 We set out below our representations to the Main Modifications associated with BDW’s land interest at East of Leeds Road, Chidswell.</p> <p>SITE REF. H559 – LAND TO THE EAST OF LEEDS ROAD, CHIDSWELL</p> <p>2.1 The Council are proposing the following modifications to the site allocation: - SD2-MM110 – Indicative Capacity - Delete and insert text: 279 280 SD2-MM111 – Other Site Specific Considerations - Delete and insert text: - Access to MX1905 to be provided as a part of this allocation Access to MX1905 to be provided as part of this allocation including, no right turn onto Chidswell Lane and the provision of a new roundabout at the junction with the B6128 (Owl Lane). A landscaped buffer will be provided along the southern boundary of the site. A masterplan is required for this site to be prepared in accordance with policies in the Local Plan. Additional mitigation on the wider highway network will be required. Development of this site has the potential for a significant impact on the Strategic Road Network. Measures will be required to reduce and mitigate that impact. The transport assessment will need to demonstrate that any committed schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, development may need to contribute to additional schemes identified by Highways England and included in the Infrastructure Delivery Plan (IDP) or other appropriate schemes. If development is dependent upon construction of a committed scheme, then development will need to be phased to take place following scheme opening”</p> <p>2.2 Our client supports the proposed increase in the site’s capacity to 280 and has no objections to the proposed modifications associated with the proposed development of the site. The amendments align with evidence they have previously submitted as part of Local Plan Examination in Public process.</p> <p>2.3 With regards to highways matters, initial assessment work has been undertaken in respect of the site. Fore Consulting Limited (Fore) were commissioned by BDW to support the development of Site Ref. H559 in respect of transport and highways matters. A technical note prepared by Fore was enclosed with our previous hearing statement, which set out the work undertaken to date in respect of the access arrangements for the proposed development.</p> <p>2.4 A range of options for accessing the proposed allocation have been investigated on a preliminary basis. These investigations have included taking account of the proposed mixed-use allocation (site reference MX1905) adjacent to the site. The proposed new junction with Owl Lane has been assessed in terms of capacity and a new roundabout is proposed in order to ensure that sufficient highway junction capacity is provided to cater for the proposed development of this site and allocation MX1905. Operational assessments have been undertaken and the proposed junction provides adequate highway capacity.</p>

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			<p>2.5 With regards to the proposed second part of the first bullet point of proposed Main Modification SD2-MM111, it is our view that this amendment isn't necessary for reasons of soundness, as this matter can be discussed in detail with the Council's Highways Officers prior to the submission of a planning application. At present our client's draft Planning Layout identifies that a potential access link between the new proposed link road and Chidswell Lane can be provided (to enhance permeability/connectivity). However, should this create an adverse highways impact along Chidswell Lane then measures to restrict access, such as a "no right turn", will be considered.</p> <p>2.6 In respect of the fourth bullet point of proposed Main Modification SD2-MM111, discussions with the Council's highways officers and Highways England will take place as part of the planning application and Development Management process. These discussions will identify whether further mitigation is required in addition to any committed schemes to enable the development of the site. However, at this stage it is envisaged that the highways works provided as part of the development of the site will be sufficient to enable to delivery of the site without having an adverse impact on the wider highway network.</p> <p>CONCLUSION</p> <p>3.1 BDW want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough's housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, BDW believe that a sound Local Plan can be achieved through the modifications process.</p> <p>3.2 We have provided site specific comments in respect of each of BDW's land interests and the Council's proposed Main Modifications relating to each.</p> <p>3.3 Our client supports the proposed increase in the site's capacity to 280 and has no objections to the proposed modifications associated with the proposed development of Site Ref. H559 Land East of Leeds Road, Chidswell the site. The proposed amendments to the site-specific policy align with evidence they have previously submitted as part of Local Plan Examination in Public process.</p> <p>3.4 Finally, as pre-application discussions for full planning applications are currently taking place with the Council in respect of the Chidswell site, all of the technical comments raised within this and previous representations are underpinned by extensive and detailed technical work that BDW has undertaken as part of this process.</p>
SD2-MM111	Mod_AOD_M431	Support	<p>Comment transcribed by KC from attached letter: SITE REF. H559 – LAND TO THE EAST OF LEEDS ROAD, CHIDSWELL</p> <p>INTRODUCTION</p> <p>1.1 We write on behalf of our client Barratt Homes & David Wilson Homes (BDW) to provide their representations to the Kirklees Local Plan Main Modifications which are currently being consulted on by Kirklees Council.</p> <p>1.2 As the Council are aware BDW have submitted a substantial level of evidence to support their land interests in Kirklees through the initial consultation on the Local Plan and the Examination in Public (EiP) stages of the Kirklees Local Plan.</p> <p>1.3 The comments made in these representations should therefore be considered alongside BDW's representations to the Publication Draft Kirklees Local Plan (PDLP) and each of their previous hearing statements submitted as part of the EiP process. 1.4 For issues of brevity, we will not seek to repeat comments we have previously made as part of the EiP process. However, we will refer to the submitted evidence where required. These representations therefore seek to focus on the implications of soundness associated with the proposed Main Modifications.</p> <p>1.5 BDW want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough's housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, BDW believe that a sound Local Plan can be achieved through the modifications process.</p> <p>1.6 We set out below our representations to the Main Modifications associated with BDW's land interest at East of Leeds Road, Chidswell.</p> <p>SITE REF. H559 – LAND TO THE EAST OF LEEDS ROAD, CHIDSWELL</p> <p>2.1 The Council are proposing the following modifications to the site allocation: - SD2-MM110 – Indicative Capacity - Delete and insert text: 279 280 SD2-MM111 – Other Site Specific Considerations - Delete and insert text: - Access to MX1905 to be provided as a part of this allocation Access to MX1905 to be provided as part of this allocation including, no right turn onto Chidswell Lane and the provision of a new roundabout at the junction with the B6128 (Owl Lane). A landscaped buffer will be provided along the southern boundary of the site.</p>

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<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 893</p>			<p>A masterplan is required for this site to be prepared in accordance with policies in the Local Plan.</p> <p>Additional mitigation on the wider highway network will be required. Development of this site has the potential for a significant impact on the Strategic Road Network. Measures will be required to reduce and mitigate that impact. The transport assessment will need to demonstrate that any committed schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, development may need to contribute to additional schemes identified by Highways England and included in the Infrastructure Delivery Plan (IDP) or other appropriate schemes. If development is dependent upon construction of a committed scheme, then development will need to be phased to take place following scheme opening”</p> <p>2.2 Our client supports the proposed increase in the site’s capacity to 280 and has no objections to the proposed modifications associated with the proposed development of the site. The amendments align with evidence they have previously submitted as part of Local Plan Examination in Public process.</p> <p>2.3 With regards to highways matters, initial assessment work has been undertaken in respect of the site. Fore Consulting Limited (Fore) were commissioned by BDW to support the development of Site Ref. H559 in respect of transport and highways matters. A technical note prepared by Fore was enclosed with our previous hearing statement, which set out the work undertaken to date in respect of the access arrangements for the proposed development.</p> <p>2.4 A range of options for accessing the proposed allocation have been investigated on a preliminary basis. These investigations have included taking account of the proposed mixed-use allocation (site reference MX1905) adjacent to the site. The proposed new junction with Owl Lane has been assessed in terms of capacity and a new roundabout is proposed in order to ensure that sufficient highway junction capacity is provided to cater for the proposed development of this site and allocation MX1905. Operational assessments have been undertaken and the proposed junction provides adequate highway capacity.</p> <p>2.5 With regards to the proposed second part of the first bullet point of proposed Main Modification SD2-MM111, it is our view that this amendment isn’t necessary for reasons of soundness, as this matter can be discussed in detail with the Council’s Highways Officers prior to the submission of a planning application. At present our client’s draft Planning Layout identifies that a potential access link between the new proposed link road and Chidswell Lane can be provided (to enhance permeability/connectivity). However, should this create an adverse highways impact along Chidswell Lane then measures to restrict access, such as a “no right turn”, will be considered.</p> <p>2.6 In respect of the fourth bullet point of proposed Main Modification SD2-MM111, discussions with the Council’s highways officers and Highways England will take place as part of the planning application and Development Management process. These discussions will identify whether further mitigation is required in addition to any committed schemes to enable the development of the site. However, at this stage it is envisaged that the highways works provided as part of the development of the site will be sufficient to enable to delivery of the site without having an adverse impact on the wider highway network.</p> <p>CONCLUSION</p> <p>3.1 BDW want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough’s housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, BDW believe that a sound Local Plan can be achieved through the modifications process.</p> <p>3.2 We have provided site specific comments in respect of each of BDW’s land interests and the Council’s proposed Main Modifications relating to each.</p> <p>3.3 Our client supports the proposed increase in the site’s capacity to 280 and has no objections to the proposed modifications associated with the proposed development of Site Ref. H559 Land East of Leeds Road, Chidswell the site. The proposed amendments to the site-specific policy align with evidence they have previously submitted as part of Local Plan Examination in Public process.</p> <p>3.4 Finally, as pre-application discussions for full planning applications are currently taking place with the Council in respect of the Chidswell site, all of the technical comments raised within this and previous representations are underpinned by extensive and detailed technical work that BDW has undertaken as part of this process.</p>
SD2-MM111	Mod_AOD_M445	Object	<p>As currently drafted Wakefield does not consider the proposed main modifications to this policy to be sound. The policy is not justified in terms of dealing with potential impacts on the local highway network outside of Kirklees.</p> <p>The Council is concerned that the third bullet point refers to the ‘wider highway network’ but then proceeds to deal exclusively with potential</p>

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			impacts on the strategic highway network. It should be clear in the policy that the 'wider highway network' includes the local network in Wakefield, particularly as it is this network that traffic from this allocation is likely to use to access the M1. The Council supports the inclusion of the first bullet point with regard to no right turn being permitted onto Chidswell Lane and the provision of a new roundabout on Owl Lane if this allocation proceeds.
SD2-MM119	Mod_AOD_M598	Support	Trustees of the Savile Estate continue to support the proposed allocation of the site and acknowledge modifications to SD2-MM119 and SD2-MM120 in relation to site H85 – Kimberley Street.
SD2-MM120	Mod_AOD_M599	Support	Trustees of the Savile Estate continue to support the proposed allocation of the site and acknowledge modifications to SD2-MM119 and SD2-MM120 in relation to site H85 – Kimberley Street.
SD2-MM121	Mod_AOD_M307	Support	This site adjoins the boundary of the Thornhill Conservation Area and lies opposite a group of seventeenth Century Grade II Listed Buildings at Thornhill Hall. The loss of this site and its subsequent development would have harmed elements which contribute to the significance of these assets. This harm was unlikely to be effectively mitigated. Consequently, we welcome the deletion of this Allocation
SD2-MM121	Mod_AOD_M600	Object	This representation seeks to raise that the proposed modification to SD2-MM121 in relation to site H95 – Coombs Street is unsound. Over the years, a number of sites and premises owned by the Savile Estate have been submitted through the Kirklees development plan process. This has been through various Call for Sites through the LDF, for the Strategic Housing (and Employment) Land Availability Assessment. Deleting H95 from the proposed housing allocations and leaving the site unallocated within the Local Plan, would create a site that is surrounded on all sides by allocated land. H95 provides a natural extension to housing allocation H3379 (Joint Venture with Kirklees Council) and was considered previously (ahead of this proposed main modification) to provide a deliverable housing site. We request the site remains allocated for housing to assist with the provision of 18 units (supporting the adjacent H3379 - 38 units and Kirklees Council joint venture to provide 56 units) within the Local Plan. We acknowledge comments received from Historic England and assessments required in relation to the neighbouring Scheduled Monument at Thornhill Hall and adjacent Thornhill Conservation Area. Previous assessments as part of the Local Plan justified there are no known site conditions that would restrict the development of the site or adjacent allocation H3379, that could not be dealt with through general planning considerations. The Heritage Impact Assessment completed by FC Architects on behalf of Kirklees Council concluded "this land has been assessed and it is the opinion of this report that any harm will be less than substantial and can be mitigated". To disregard previous evidence, prepared as part of the Local Plan process goes against preparing a justified and sound Local Plan, by not incorporating the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.
SD2-MM129	Mod_AOD_M303	Conditional Support	Save Mirfield fully support the reduction in houses being delivered on this site within the Plan Period. However, Save Mirfield want to ensure that this reduction means that the housing within the Mirfield boundary is not developed within the Plan Period to ensure the regeneration of the Ravensthorpe and Dewsbury area prior to the development of the Mirfield land. The Mirfield land being more attractive to developers in terms of financial return, if it were to be developed, would not contribute to the regeneration of Ravensthorpe and Dewsbury. The Local Plan needs to clearly show that the Mirfield land although allocated is not to be delivered until the land within the Ravensthorpe/Dewsbury boundaries has been fully developed.
SD2-MM129	Mod_AOD_M584	Support	Miller Homes supports the clarification regarding the delivery of Dewsbury Riverside (H2089) and level of housing within and beyond Plan period. This provides greater certainty to the scheme and allows for the comprehensive delivery of the scheme and associated infrastructure.
SD2-MM129	Mod_AOD_M597	Support	Trustees of the Savile Estate support the proposed allocation and acknowledge modifications to SD2MM129 in relation to site H2089 – Land to the south of, Ravensthorpe Road / Lees Hall Road, Dewsbury. Acknowledging the proposed modifications offer a pragmatic approach to housing delivery over the plan period.
SD2-MM130	Mod_AOD_M26	Support	Not Applicable - representation of support for the amendment in line with discussion at Inquiry Hearing.
SD2-MM130	Mod_AOD_M446	Object	As currently drafted Wakefield does not consider the proposed main modifications to this policy to be sound. The policy is not justified in terms of dealing with potential impacts on the local highway network outside of Kirklees. The Council is concerned that the third bullet point refers to the 'wider highway network' but then proceeds to deal exclusively with potential impacts on the strategic highway network. It should be clear in the policy that the 'wider highway network' includes the local network in Wakefield, particularly as it is this network that traffic from this allocation is likely to use to access the M1. The Council supports the inclusion of more detailed policy in the first bullet point with regard to education provision.

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SD2-MM130	Mod_AOD_M449	Object	H2089 – Land to the south of, Ravensthorpe Road, Thornhill Lees, Dewsbury We have previously raised concerns about this allocation which have not been fully dealt with. Please see our response from December 2016. The proposed allocation is intended for housing. The site lies adjacent to a Local Wildlife Site with parts within the Wildlife Habitat Network. As such, should the development lead to biodiversity impacts, it will not be compliant with Paragraphs 8(c), 170(a and d) and 174(b) of the NPPF. Paragraph 8:8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. Paragraph 170:170. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; Paragraph 174:174. To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
SD2-MM130	Mod_AOD_M586	Conditional Support	Miller Homes supports the clarification changes to Site Allocation H2089, which provide greater certainty to the schemes delivery.
SD2-MM130	Mod_AOD_M602	Object	Local Plan - Dewsbury Riverside Development. Concern 1: No local thru roads in plan for 5000 homes. (Ok for 200 homes but not 5000). Concern 2: Planned road bridges, over railway & river, to Huddersfield Road (A644) would just further congest an already busy road. People driving from most of these houses to the nearby areas, Thornhill & Lower Hopton, will have to drive via congested Ravensthorpe (main Huddersfield Road A644) or Slaithwaite Road (B6117). - For example a drive to the nearby Dewsbury Golf Club should not involve the A644 for residents of Thornhill, Thornhill Lees & the new Riverside development. The 5000+ new residents should be able to drive to Lower Hopton (Perhaps via an improved Sands Lane) & Thornhill (via a new road to the Whitley Road) directly. The plan needs some thru roads to avoid local journeys congesting trunk roads. - This would be a selling point for existing residents living near the new development. There is a mention of this issue in the papers but no details of proposed solutions. - The plans connect the bulk of the homes only to Thornhill Lees - This will cause major traffic congestion issues for everyone in the area.
SD2-MM130	Mod_AOD_M642	Object	Comment transcribed by KC from attached letter: I refer to the proposed development for housing around the Thornhill Lees, Forge Lane, Ouzlewell area up to and beyond the railway and river bridges that span Calder Road. In your documentation regarding this particular development I have not been able to locate a temporary traffic management plan that will be put in place both before, during and after completion of the Contract building works. In addition, there does not appear to be notifications as to who will be responsible for the maintenance, cleaning and upkeep of the main and temporary highways and site access roads in what can only be described as a very heavily congested location. Under general circumstances a temporary transport plan indicating the times when special plant and heavy equipment, substantial increases in site delivery vehicles and other types on construction transport can and cannot use public highways, especially during the early phases of development when groundworks and civil engineering operations are taking place. It should be noted from the onset that Calder Road is extremely restrictive due to parked vehicles at the Ravensthorpe end junction with Huddersfield Road, whilst there is a special school close to the junction at Forge Lane. As outlined above, a temporary and safe transport plan needs to be put in place and it is essential that the plan makes recognition of the fact that the public will be moving into dwellings as soon as possible whilst other sections of the development remain under development by the chosen building /development contractor. This in turn could lead to a problem whereby Kirklees owned property falls within the boundaries and temporary works of the contractor. The foregoing are only a few small elements associated with a development of this nature in the location outlined, and accordingly it is of paramount importance that the Kirklees department who will become ultimately responsible for the upkeep and safety of all roads and access points to the site, whether of a permanent or temporary nature, are fully in control of the acts and omissions of the Contractor and his suppliers at all times,
SD2-MM133	Mod_AOD_M308	Support	Sheep Ings Farmhouse and its attached barn immediately adjacent to this area are Grade II Listed Buildings. The proposed Modification reflects the

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			conclusions of the Heritage Impact Assessment and now clearly sets out the requirements for any development on this site. As a result, these will help to ensure that any housing is delivered in a manner which conserves the setting of these Listed Buildings.
SD2-MM136	Mod_AOD_M254	Support	Natural England notes the extensions to allocations in modifications SD2-MM108, SD2-MM190,SD2-MM290 and SD2-MM182 as well as the new allocations proposed in modificationsSD2-MM136, SD2-MM191, SD2-MM289, SD2-MM291. We note and welcome the assessment undertaken for these modifications and have no further concerns.
SD2-MM147	Mod_AOD_M542	Conditional Support	Three of the proposed modifications (SD2 MM32, MM147, and MM189) seek to amend a generic detail of the proposed allocation from; "Replacement playing pitch provision or mitigation measures of equivalent value will be required to meet local needs having regard to the most-up-to-date evidence base for sport and recreation" To; "Replacement playing pitch provision or mitigation measures of equivalent or better quantity and quality will be required in a suitable location unless an assessment clearly shows the site to be surplus to requirements having regard to the most up-to-date evidence for sport and recreation needs" Kirklees has been successful in bidding to become a Parklife Football Hubs Programme. The aim of the programme is to create a sustainable model for football facilities based around artificial grass pitches (AGPs) on hub sites. The Council in conjunction with partners at the Football Foundation and Sport England is currently a refresh of its Playing Pitch Strategy to benchmark the adequacy of its pitch stock and test scenarios as to how many Artificial Grass Pitches are required in the area to address local footballing needs. This will then inform the number of Parklife Hubs are to be developed across Kirklees and the number of AGPs to be developed on each Hub. The Hubs have the potential to see a significant amount of community football transferred away from the current [grass] playing pitch stock, but in order to understand their impact, the Council are committed to undertaking a further Playing Pitch Strategy refresh commencing two years after the opening of the final Parklife hub site. The proposed modification builds in further flexibility into how the Council addresses the loss of existing and lapsed / disused playing fields associated with the respective allocations. Given the impending Parklife programme, and the uncertainty around its impact Sport England acknowledges the need for a wider range of responses to be accommodated and is therefore content with modification numbers SD2 MM32, SD2 MM147, and SD2 MM189
SD2-MM147	Mod_AOD_M637	Support	MM147 relates to site H138 and the text relating to playing pitch provision and strategic road network improvements. The text has been amended to: a) Provide an amended policy test in relation to playing pitch provision; and b) Remove reference to the "need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity" In relation to element a) and sports pitch provision, the amendment seeks provision of facilities of better or equivalent quantity or quality "unless an assessment clearly shows the site to be surplus to requirements having regard to the most up-to-date evidence for sport and recreation needs." This approach is in accordance with policy contained in paragraph 97 of the NPPF (July 2018). Main Modification SD2-MM147 is found to be sound on this basis. In relation to element b) the site is proposed to be allocated for residential development. In this regard the impacts of the proposed development on the Strategic Road Network (SRN) have previously been considered as part of the development plan examination, and have been found to be acceptable. This element of the policy is therefore not required. In any event, any future planning application will be considered against the NPPF and the Local Plan in its entirety, including Policy PLP21. This element of MM-147 is therefore found to be sound.
SD2-MM150	Mod_AOD_M309	Support	This site lies adjacent to Old Hall, which is a Grade II* Listed Building, and to the boundary of Birstall Conservation Area. The Heritage Impact Assessment considered that parts of Site H761 contributed to the setting of these assets and concluded that their loss and subsequent development would be likely to cause harm to elements which contribute to their significance. We support the reduction in the extent of this site resulting from the requirement that no development should take place to the east of Birstall old Hall. This will ensure that any housing is delivered in a manner which will conserve the setting of this Grade II* Listed Building..
SD2-MM151	Mod_AOD_M310	Support	This site lies adjacent to Old Hall, which is a Grade II* Listed Building, and to the boundary of Birstall Conservation Area. The proposed Modification alerts potential developers of the proximity of these heritage assets and, as a result, the need to ensure that any proposals conserve those elements which contribute to their significance.
SD2-MM153	Mod_AOD_M311	Support	This site lies adjacent to Old Hall, which is a Grade II* Listed Building, and to the boundary of Birstall Conservation Area.

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			The Heritage Impact Assessment considered that parts of Site H761 contributed to the setting of these assets and concluded that their loss and subsequent development would be likely to cause harm to elements which contribute to their significance. The proposed Modification sets out the measures by which this harm will be reduced together with the other requirements for any development on this site. These will help to ensure that any housing is delivered in a manner which conserves the setting of these heritage assets.
SD2-MM159	Mod_AOD_M56	Support	This representation on behalf of Spen Valley Civic Society is in respect of Housing allocation H69 - Merchant Fields. We welcome the proposal to reduce the developable area by 0.45ha to enable the retention of existing hedgerows and a vegetated buffer adjacent to Nann Hall Beck. We hope the site developers will work with the Council and the local population to achieve the enhancement of the local ecological network, as mentioned in the narrative.
SD2-MM161	Mod_AOD_M647	Object	I am forwarding the correspondence I have had with Tim Lawrence about the situation at M62 junction 26 (Chain Bar). I made some comments to him when I replied on 10 September (see below). I still remain completely dissatisfied with the Inspector's position about sites surrounding Chain Bar (those listed in the header). This particularly stems from the housing site, but the cumulative impact of all three sites on the junction (including air quality) is in my view very serious. I realise that none of these sites are included in the re-consultation stemming from the Inspector's communication. However, I should be grateful if you were able to pass these concerns on in the spirit in which they are made. I will also be forwarding email correspondence which Kath has had with a Hunsworth resident. This includes an email from Paula Bedford of Highways England, which does nothing to allay our fears over the possible effects of these three large developments. In this email there is the following text, which emphasises my point. "In terms of the proposed development at Merchant Fields I am yet to receive a formal planning consultation from Kirklees Council however, at the point where a formal planning application is submitted Highways England, as a statutory consultee, should be consulted on the application. Our review of the application will include a full and comprehensive assessment of the traffic generated by the development including its impact on the safe and continued operation of the SRN. Any mitigation required to address this impact will then be conditioned as part of Highways England's formal recommendation to the planning authority should they choose to grant permission. In relation to planned or committed schemes in this area we have been working on developing a solution at the M62/M606 Chain Bar junction however, due to the nature of the junction, a very complex solution is required, which has raised projected costs. Additionally capacity constraints between junction 26 and 27 on the M62 are impacting on the potential benefits derived from this scheme. Therefore other solutions on the M62 will need to be looked at and as such we have put this scheme into review for consideration as part of the future road investment planning." I should be grateful if this could be passed to the Inspector
SD2-MM162	Mod_AOD_M228	Support	This submission is on behalf of Spen Valley Civic Society. We welcome the modification to reduce the net site area, with a proportionate reduction in housing capacity. This will afford additional protection to the Heritage asset.
SD2-MM162	Mod_AOD_M312	Support	This site adjoins the churchyard of Whitechapel Church - a Grade II Listed Building. The loss of the southern part of this site and its subsequent development would be likely to harm elements which contribute to the significance of this building. We support the reduction in the extent of this Allocation that has resulted from the requirement that no development take place in the most sensitive part of this site. This will ensure that any housing is delivered in a manner which will conserve the setting of this Grade II Listed Building.
SD2-MM162	Mod_AOD_M433	Object	Comment transcribed/summarised by KC from attached letter: Our client strongly objects to the proposed Main Modifications which relate to the Whitechapel Road, Cleckheaton site. It is our view that the proposed modifications have not given sufficient weight to the evidence provided by our client within their previously submitted hearing statements; the verbal case put forward at the site-specific hearing session; or discussions that have taken place as part of the pre-application process in respect of the development of the site. The modification seeks to respond to the site-specific comments made by the Inspector in her letter dated 15th June 2018, where she requested that the Council "Amend the policy to specify that the whole area of moderate significance identified in the Council's HIA (LE73) should not be developed but retained as open land". Importantly, the Inspector does not include reference in her letter to the area of "high significance" needing to be retained as open land. We believe this is due to the Inspector agreeing with the arguments that we put forward within our hearing statements and at the site-specific hearing session. This point is discussed further below.

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			<p>There is also no specific request from the Inspector to reduce the allocation's net site area of dwelling capacity. Where the Inspector has made similar requests on other sites, the Council have not responded by reducing the net site area or dwelling capacity of the allocation.</p> <p>It should be noted at the outset, the grade II listed asset in question and the surrounding churchyard and boundary wall are not located within the allocation.</p> <p>It is our view that the net site area or dwelling capacity should remain unchanged as these matters should be influenced by the Development Management process. A process where sufficient time is available for the developer, the Council and Historic England to discuss and agree the impact that the development proposals could have on the heritage assets located within proximity of the site and to discuss whether these impacts can be adequately addressed through the delivery of appropriate mitigation measures.</p> <p>At present a decision has been made to substantially reduce the site's net area and dwelling capacity following insufficient discussions involving all relevant parties. Indeed, it became apparent at the site-specific hearing session that there are currently four different opinions associated with the heritage impact of the site's development. The opinions of our client's heritage consultants, the Council's conservation officer, Historic England and those identified within the Council's Heritage Impact Assessment (HIA)</p> <p>There are a substantial number of mitigation measures that need to be discussed and considered fully before the final net developable area and dwelling capacity of the site can be finalised. Such measures need to be discussed as part of the pre-application and post-application submission process. A process that can take 12 months+ in total. Not a couple of hours across the table at an Examination on Public hearing session.</p>
SD2-MM163	Mod_AOD_M313	Support	<p>This site adjoins the churchyard of Whitechapel Church - a Grade II Listed Building. The loss of the southern part of this site and its subsequent development would be likely to harm elements which contribute to the significance of this building. We support the reduction in the indicative capacity that has resulted from the requirement that no development take place in the most sensitive part of this site. This will ensure that any housing is delivered in a manner which will conserve the setting of this Grade II Listed Building.</p>
SD2-MM163	Mod_AOD_M435	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Our client strongly objects to the proposed Main Modifications which relate to the Whitechapel Road, Cleckheaton site. It is our view that the proposed modifications have not given sufficient weight to the evidence provided by our client within their previously submitted hearing statements; the verbal case put forward at the site-specific hearing session; or discussions that have taken place as part of the pre-application process in respect of the development of the site.</p> <p>The modification seeks to respond to the site-specific comments made by the Inspector in her letter dated 15th June 2018, where she requested that the Council "Amend the policy to specify that the whole area of moderate significance identified in the Council's HIA (LE73) should not be developed but retained as open land".</p> <p>Importantly, the Inspector does not include reference in her letter to the area of "high significance" needing to be retained as open land. We believe this is due to the Inspector agreeing with the arguments that we put forward within our hearing statements and at the site-specific hearing session. This point is discussed further below.</p> <p>There is also no specific request from the Inspector to reduce the allocation's net site area of dwelling capacity. Where the Inspector has made similar requests on other sites, the Council have not responded by reducing the net site area or dwelling capacity of the allocation.</p> <p>It should be noted at the outset, the grade II listed asset in question and the surrounding churchyard and boundary wall are not located within the allocation.</p> <p>It is our view that the net site area or dwelling capacity should remain unchanged as these matters should be influenced by the Development Management process. A process where sufficient time is available for the developer, the Council and Historic England to discuss and agree the impact that the development proposals could have on the heritage assets located within proximity of the site and to discuss whether these impacts can be adequately addressed through the delivery of appropriate mitigation measures.</p> <p>At present a decision has been made to substantially reduce the site's net area and dwelling capacity following insufficient discussions involving all relevant parties. Indeed, it became apparent at the site-specific hearing session that there are currently four different opinions associated with the heritage impact of the site's development. The opinions of our client's heritage consultants, the Council's conservation officer, Historic England and those identified within the Council's Heritage Impact Assessment (HIA)</p> <p>There are a substantial number of mitigation measures that need to be discussed and considered fully before the final net developable area and dwelling capacity of the site can be finalised. Such measures need to be discussed as part of the pre-application and post-application submission</p>

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			process. A process that can take 12 months+ in total. Not a couple of hours across the table at an Examination on Public hearing session.
SD2-MM164	Mod_AOD_M195	Support	I support the Inspector's recommendations.
SD2-MM164	Mod_AOD_M315	Support	This site adjoins the churchyard of Whitechapel Church - a Grade II Listed Building. The loss of the southern part of this site and its subsequent development would be likely to harm elements which contribute to the significance of this building. The proposed Modification sets out the measures by which this harm will be reduced and the requirements for any development on this site. As a result, these will help to ensure that any housing is delivered in a manner which conserves the setting of this Listed Building.
SD2-MM164	Mod_AOD_M434	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>Our client strongly objects to the proposed Main Modifications which relate to the Whitechapel Road, Cleckheaton site. It is our view that the proposed modifications have not given sufficient weight to the evidence provided by our client within their previously submitted hearing statements; the verbal case put forward at the site-specific hearing session; or discussions that have taken place as part of the pre-application process in respect of the development of the site.</p> <p>The modification seeks to respond to the site-specific comments made by the Inspector in her letter dated 15th June 2018, where she requested that the Council "Amend the policy to specify that the whole area of moderate significance identified in the Council's HIA (LE73) should not be developed but retained as open land".</p> <p>The Council are aware that our client has previously asked Pegasus Group to undertake a Heritage Appraisal of the site. The Heritage team at Pegasus consists of 10 professional staff based in offices across the UK with expertise in archaeology, built heritage and the historic landscape. The Pegasus Heritage team have a proven track record in the provision of sound advice at all stages of the planning process, from site allocations, including providing verbal and written support during Examinations in Public to undertaking robust Heritage Assessments all the way to providing Expert Witness services at Public Inquiry. Laura Garcia of the Pegasus Heritage team is a heritage professional with over 14 years' experience in the consultancy sector. She has acted as heritage expert witness at Public Inquiry and appeared for clients to provide specific heritage advice at Inspector led EiP's. Laura is a full Member of the Chartered Institute for Archaeologists and sits on the Validation Committee panel for that organisation, assessing new member applications. Laura undertook the Heritage Appraisal for this site, which included a detailed site walkover and provided support during the EiP and is familiar with the heritage issues and opportunities this site provides.</p> <p>The Council will recall that correspondence was previously exchanged with my client with regards to the proposed wording to include in the site-specific policy. It remains our client's position that robust evidence has been provided to justify that the only site specific wording that should be attached to the policy with regards to heritage matters should be as follows: -</p> <p>"There should be a sensitive approach to building orientation, massing, height, density and layout on the site in order to minimise harm to the significance of the Church and its setting, taking into account the evidence presented in the Council's Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process."</p> <p>The above wording mirrors that identified by the Council in the third bullet point of Main Modification Ref. SD2-MM164.</p> <p>Following the undertaking of detailed and site-specific discussions as part of the pre-application process, Pegasus Group would prepare a new and up to date HIA to support the submission of the planning application. The submitted HIA would of course include agreed mitigation measures based on agreed and clearly defined areas of heritage significance. The site-specific policy for the allocation therefore needs to be flexible enough should the updated assessment provide a different conclusion to that which the proposed site-specific policy text is based. Which the proposed wording in the third bullet of Main Modification Ref. SD2-MM164 correctly allows for.</p> <p>If the updated HIA provides a different conclusion to the Council HIA (prepared in 2015), then this would render the proposed Main Modifications within Ref. SD2-MM162, Ref.SD2-MM163 and the first two proposed bullet points of Ref. SD2-MM164 as being immediately out of date. As such the proposed Main Modifications as written could contradict one another.</p> <p>Therefore, as it is essential that flexibility is provided within the policy, it is our view that the only proposed Main Modification that should be retained is that proposed within third bullet point of Ref. SD2-MM164. This approach will not only provide flexibility, but it will also provide the Council with the ability to manage the development of the site to ensure that: -</p> <p>A sensitive approach has been taken in respect of the design of the site's access in order to minimise harm to the significance of the area to the west of the Church and its setting</p>

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			A sensitive approach to building orientation, massing, height, density and layout on the site in order to minimise harm to the significance of the area to the west of the Church and its setting; & A sensitive approach to building orientation, massing, height, density and layout on the site in order to minimise harm to the significance of the area to the east of the Church and its setting;
SD2-MM165	Mod_AOD_M640	Object	Comment transcribed by KC from attached letter: This is about the land/field in Cleckheaton between Brookfield View and Nan Hall Beck MM165. The beck runs under the road Cliffe Lane via a culvert-straight into the Spen River. I don't want to sound 'general' this is about modifications, but 21 houses or 25 houses or more makes no difference to the outcome for these planned houses and existing properties. I will however refer to my letter of 18/1116 regarding flooding with photographic evidence and the same from others in Brookfield View. Can I also refer you to a letter sent 16/6/08 ref 2008/90871 regarding demolishing Brookhouse Mill and building 19 dwellings. This plan was turned down but not because of flooding but 'other' reasons. Would it not be possible to study the reasoning behind that planning refusal and relate it to this one? I still don't understand why you are still going ahead with building on a flood plain. Mine and numbers 1 and 3 have experienced flooding in our house foundations for many years every time we have prolonged rain the beck becomes a lake and global warming isn't going to get any better, only worse. I understand from my visit to Huddersfield Town Hall on the 3rd September that inspections have been carried out in this area and flooding has not been identified. A proper inspection has clearly NOT been carried out, perhaps done on a fine dry day and he/she not spoken to any local residents or any other agencies. I would like to see evidence of this inspection. I do object to 25 houses being built, 5 would be nearer the mark or slightly further away from the beck but only after changes have been made.
SD2-MM171	Mod_AOD_M316	Support	Heckmondwike Cemetery Chapel to the south of this area is a Grade II Listed Building. The loss of the part of this site to the rear of the Chapel and its subsequent development would have harmed elements which contribute to its significance. Therefore, we welcome the deletion of this site as an allocation.
SD2-MM176	Mod_AOD_M232	Support	This submission is on behalf of Spen Valley Civic Society. We support the intention to retain the existing MUGA. We also support the intention to preserve and possibly enhance the existing footpath. We note the comments about the site having the capacity to deliver enhanced, affordable housing and green infrastructure, and hope that the Council as land owners will work to achieve this aim, and involve others in the process. Spen Valley Civic Society would welcome the opportunity to be involved in the planning of such a development with the Council and produce something noteworthy.
SD2-MM176	Mod_AOD_M317	Support	Thornbush Farm, 100 metres to the south of this area, is a Grade II Listed Building. The loss this site and its subsequent development could harm elements which contribute to its setting. The proposed Modification sets out the measures by which this harm will be reduced and the requirements for any development on this site. These will help to ensure that any housing is delivered in a manner which conserves the setting of this Listed Building.
SD2-MM176	Mod_AOD_M592	Support	It is noted that Historic England submitted a representation to the Local Plan Examination in relation to site H198, recommending that the extent of the developable are should extend no further south than the curtilage of the southernmost property on Lyncs Wold, so as to protect the setting of the nearby Thornbush Farm (Grade II listed). At Main Modification SD2-MM176 the Council has responded to this recommendation by adding further comments to the 'site specific considerations' for that site, as follows: 'There should be a sensitive approach to building orientation, massing, height, density, and layout on the site in order to minimise harm to Thornbush farm to preserve existing views towards and from Thornbush Farmhouse and Barn 'This pragmatic response is justified, as it is not appropriate to sterilise part of the site as Historic England recommended prior to a layout being produced and further work being undertaken at the application stage. Indeed, it is considered that a similar approach could be taken at site H596, and that subject to appropriate masterplanning the site can be delivered in a way that could not only minimise harm and retain views of the heritage asset, but could make a greater feature of it. Even if our comments above about providing a buffer to provide greater flexibility are not accepted, the allocation of H596 (site capacity 140 units) would at least ensure that the overall supply of sites meets the identified minimum requirements.
SD2-MM177	Mod_AOD_M179	Support	I support the removal of H442 from the Plan and the allocation of that area, together with the cricket ground, as green belt.
SD2-MM177	Mod_AOD_M193	Support	I support the removal of this site from the Local Plan as it on green belt land. I agree with the Inspector's opinion.
SD2-MM177	Mod_AOD_M196	Support	I support the Inspector's decision for this land to remain in the green belt.
SD2-MM177	Mod_AOD_M212	Support	Support
SD2-MM177	Mod_AOD_M219	Support	Support

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SD2-MM177	Mod_AOD_M229	Support	I support and welcome the Inspector's and Council's recommendation that the site H442 should be deleted from the housing allocation and together with UGS3333 (cricket ground) be part of the Green Belt as in the map (H442-Modification).
SD2-MM177	Mod_AOD_M230	Support	This submission is on behalf of Spen Valley Civic Society. We welcome and support the main modification which has resulted in the retaining of this allocation as Green Belt. We consider this is the correct interpretation of NPPF guidance.
SD2-MM177	Mod_AOD_M238	Support	I support and welcome the Inspector's and council's recommendation that the site H442 should be deleted from the housing allocation and together with UGS3333 (cricket ground) be part of the Green Belt as in the map (H442-Modification).
SD2-MM177	Mod_AOD_M262	Support	My husband and I object to the proposed development in both Roberttown and Hartshead because the A62 road is only one car wide most of its length and will not support any more traffic Also the schools and doctors surgeries cannot deal with more pupils and patients..
SD2-MM177	Mod_AOD_M264	Support	I support the removal of H442 from the Plan and the allocation of that area, together with the cricket ground, as green belt. The infrastructure and public facilities in this area are already oversubscribed and would not cope with such a large scale housing development.
SD2-MM177	Mod_AOD_M318	Support	Old Hall Farmhouse, to the north-west of this site is a Grade II* Listed Building. The loss of the northern part of this site and its subsequent development would have harmed elements which contribute to its significance. Therefore, we welcome the deletion of this site as an allocation.
SD2-MM177	Mod_AOD_M377	Support	I would like to express my support for recent planning inspector's decision to maintain the status quo on land at Roberttown lane and proposed industrial site at Cooper bridge. We are more than happy that this land should remain classified as green belt.
SD2-MM177	Mod_AOD_M379	Support	I would like to express my support for recent planning inspector's decision to maintain the status quo on land at Roberttown lane and proposed industrial site at Cooper bridge. We are more than happy that this land should remain classified as green belt.
SD2-MM177	Mod_AOD_M382	Support	I strongly agree with the major modifications at the Robert town Lane site and Cooper Bridge
SD2-MM177	Mod_AOD_M384	Support	I strongly agree with the major modifications at the Robert town Lane site and Cooper Bridge
SD2-MM177	Mod_AOD_M386	Support	I strongly agree with the major modifications at the Robert town Lane site and Cooper Bridge
SD2-MM177	Mod_AOD_M388	Support	I would like to advise that I agree with the major modifications at the Roberttown Lane site and Cooper Bridge
SD2-MM177	Mod_AOD_M393	Support	The decision to maintain H442 as green belt is welcomed. The local infrastructure is already above capacity, especially the road network. It also maintains the separate identity of community in Roberttown Village, and the neighbouring heritage site. There can be no justification for developing green belt land when there are sufficient brown field locations available for development.
SD2-MM177	Mod_AOD_M395	Support	I support the decision to retain the Roberttown Lane site as green belt and agree that it represents an important space to the local community and the wider environment.
SD2-MM177	Mod_AOD_M397	Support	I strongly agree with the removal of H442 from the Plan and the allocation of that area, and the cricket ground, as green belt. I fully agree that this land should remain classified as green belt.
SD2-MM177	Mod_AOD_M403	Support	I strongly support the inspector's decision to remove site H442 from the local plan and to return the site to green belt.
SD2-MM177	Mod_AOD_M405	Support	I support the removal of this site from the Local Plan as it on green belt land. I agree with the Inspector's opinion.
SD2-MM177	Mod_AOD_M427	Support	I would like to advise that I agree with the major modifications at the Roberttown Lane site and Cooper Bridge.
SD2-MM177	Mod_AOD_M428	Support	Support
SD2-MM177	Mod_AOD_M429	Object	<p>Comment transcribed/summarised by KC from attached letter:</p> <p>It is important to note that both the Inspector and the Council accepts that Green Belt releases would be required to deliver the objectively assessed housing need. On a wider basis, therefore, exceptional circumstances have been demonstrated to accommodate the strategic need given the constraints of the borough and site specific consideration. It is also relevant to note that during the examination hearing sessions, Site H442 was considered against heritage asset concerns raised by Historic England but in light of a Statement of Common Ground, prepared jointly by the Council and Strata, it would seem from the Inspector's initial review that she is satisfied that the issue can be mitigated as the reason for deletion relates purely to the implications on the purposes of Green Belt. It will be recognised that as part of promoting the site through the Local Plan process, Strata Homes have undertaken a significant amount of planning, environmental and technical work to justify the suitability and deliverability of Site H442 and we are confident that there are no fundamental issues to prevent the development coming forward. Similarly, the Council as part of their evidence base approach has undertaken a thorough and systematic approach as part of selecting this site within the Publication Version of their plan. We consider that this assessment work was soundly based and the decision to release Site H442 as a housing allocation is one of the most suitable</p>

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			<p>and appropriate when considered against alternatives.</p> <p>Specifically in relation to Green Belt analysis, we consider the evidence base work provided by both the Council and Strata Homes identified strong grounds to confirm that the site does not materially contribute to the five purposes of Green Belt identified in the original NPPF at Paragraph 80. Indeed, in response to the discussion at the Hearing Session, a Statement of Common Ground was prepared between the Council and Strata which elaborated further on the role and function of the Green Belt particularly in terms of preventing the merging of settlements as well as a site specific assessment against the other purposes of Green Belt. The evidence in the Statement of Common Ground clearly explains that the urban areas of Roberttown, Liversedge and Norristhorpe have grown together over time and now form one large urban area. As such, there is a strong perception that the settlements have already joined and therefore our view is that the role of Site H442 in preventing the merging of towns as recognised by one of the purposes of Green Belt is not critical.</p> <p>In terms of the other relevant purposes of Green Belt, our case is as follows:</p> <p>To check the unrestricted sprawl of large built up areas</p> <p>As a whole Site H442 is well contained by adjacent urban development to the north and south and by the ribbon development along Roberttown Lane. The site's role, therefore, in preventing urban sprawl is limited and indeed the proposed new boundary along Roberttown Road would provide a stronger more defensible boundary to check further development.</p> <p>To Assist in Safeguarding the Countryside from Encroachment</p> <p>The degree of overlooking of the site from housing at the edge on three of its sites limits its rural character. As such these detracting features gives the site more of an urban fringe characteristic which significantly impact on the appreciation of the countryside. It is appreciated that there is public rights of way that run through Site H442 but we have shown that appropriate green corridors can be created within the development to ensure that they have strong visual links to the wider countryside with views out to the north west.</p> <p>To Preserve the Setting and Special Character of Historic Towns</p> <p>It has been demonstrate that Roberttown is not a historic town therefore the Green Belt does not perform the role of preserving its setting.</p> <p>On balance, we consider this site does not materially contribute to any of the purposes of Green Belt and the limited harm is outweighed by the need to provide additional land for housing to address the shortfall in the objectively assessed housing need as identified within the Local Plan. Another key factor to consider is the strong deliverability of Site H442. The site is being actively promoted by Strata Homes a leading regional housebuilder who has a reputation for delivering sites within West Yorkshire and as demonstrated there has been a willingness to commit on an upfront basis to the technical work required to promote it through the planning system. Therefore, its reinstatement as a housing allocation would ensure that delivery could commence relatively quickly following the adoption of the Local Plan and would make a significant contribution to meeting the housing requirement in the short term.</p>
SD2-MM177	Mod_AOD_M451	Support	Support
SD2-MM177	Mod_AOD_M531	Support	I strongly agree that the area designated as H442 should be green belt land. The area can't cope with more traffic and the infrastructure isn't good enough for more houses and the resulting traffic in this area.
SD2-MM177	Mod_AOD_M534	Support	I strongly agree with the major modifications at the Robert town Lane site and Cooper Bridge
SD2-MM177	Mod_AOD_M536	Support	I support the modifications to the Local Plan, specifically the modifications related to Roberttown Lane and Cooper Bridge.
SD2-MM177	Mod_AOD_M549	Support	Support
SD2-MM177	Mod_AOD_M551	Support	I have reviewed the above and AGREE with the Main Modifications of The Local Plan - Allocations and Designations
SD2-MM177	Mod_AOD_M553	Support	<p>I am emailing on behalf of my father Frank C Parkin.</p> <p>He would like to say that he agrees with the Government Planning Inspector's recommendations that both proposed sites for development, Roberttown Lane and Cooper Bridge, should be removed from the Local Plan.</p> <p>I have tried to express this as requested on the website but am floundering, I'm afraid, and I consider myself fairly web-savvy. I don't have a lot of time to try and work it out and read all the required documents, but Dad and I are very keen to express agreement with these recommendations during the consultation period.</p>
SD2-MM177	Mod_AOD_M558	Support	We fully agree that the decision to retain the green belt is the right one, if only because the roads cannot cope as it is.
SD2-MM177	Mod_AOD_M561	Support	I agree with the modifications to ensure the land at Roberttown Lane and Cooper bridge remains as green belt.

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SD2-MM177	Mod_AOD_M562	Support	Support
SD2-MM177	Mod_AOD_M566	Support	I would like to thank all involved regarding refusal of planning application to build in fields backing onto sunny side aven it would have been a disaster for the village with traffic congestion and the village losing much needed green belt thank you again for all those involved.
SD2-MM177	Mod_AOD_M596	Support	Comment transcribed by KC from attached letter: We agree with the new recommendations that the land should remain in the Green Belt.
SD2-MM177	Mod_AOD_M607	Support	Comment transcribed by KC from attached letter: I wish to agree with the plan to remove both sites and retain the green belt.
SD2-MM177	Mod_AOD_M609	Support	Comment transcribed by KC from attached letter: I agree with the recommendation that both sites should be kept as green belt. For these plans to go ahead would have caused more problems for the area.
SD2-MM177	Mod_AOD_M612	Support	I would like to add my backing to the removal of the plan to put housing on the fields on Roberttown Lane bordered by Richmond Park Avenue, Huddersfield Road and Sunnyside Avenue & the 100 acre industrial estate at Cooper Bridge, behind Miller & Carter. I am a resident of Hartshead & wish it be known that our local councillors & Roberttown residents committee have my full support on the detrimental impact this would have on our villages.
SD2-MM177	Mod_AOD_M613	Support	I would like to register my approval with the recommendations made by the Government Planning Inspector to remove the proposal for the site for housing on fields in Roberttown Lane, Roberttown from the Local Plan. I heartily approve the removal.
SD2-MM177	Mod_AOD_M615	Support	Comment transcribed by KC from attached letter: Site designated for housing on Roberttown Lane bounded by Richmond Park Avenue, Huddersfield Road and Sunnyside Avenue. I heartily agree that the site be removed from the plan and retained as green belt.
SD2-MM177	Mod_AOD_M616	Support	Comment transcribed by KC from attached letter: I am writing to register my full support for the following modifications 1. Removal of housing site H442 (Roberttown) and its retention as green belt (loss of this greenbelt would result in the village of Roberttown merging with nearby settlements. 2. Reduction of employment site E1832c at Cooper Bridge - retaining as green belt land to the rear of Miller & Carter Steakhouse (formerly The Three Nuns). This area of countryside off the A62 is an important asset to this part of the district and should be safeguarded.
SD2-MM177	Mod_AOD_M618	Support	Comment transcribed by KC from attached letter: I fully support the removal of the housing allocation on fields at Roberttown Lane bordered by Richmond Park Avenue, Huddersfield Road and Sunnyside Avenue.
SD2-MM177	Mod_AOD_M621	Support	Comment transcribed by KC from attached letter: My wife and I fully agree with the decision by the Inspector to remove both sites (E1832c and H442) from the plan and to retain the land as green belt.
SD2-MM177	Mod_AOD_M622	Support	Comment transcribed by KC from attached letter: I note with a sense of relief that the Government Planning Inspector has recommended the removal of land adjoining Sunnyside Avenue, Roberttown. This is absolutely the correct decision as this area is already over populated with grid locked roads, Doctors appointments like gold dust, Hospital waiting times ever increasing, and local Schools full to capacity. It is vital that green belt is retained to maintain the identity of the area and is such a valuable asset to every local resident.
SD2-MM177	Mod_AOD_M623	Support	Comment transcribed by KC from attached letter: My husband and I agree wholeheartedly that the site designated for housing on the fields on Roberttown Lane bordered by Richmond Park Ave, Huddersfield Road and Sunnyside Ave be removed from the plan and retained as green belt.
SD2-MM177	Mod_AOD_M626	Support	Comment transcribed by KC from attached letter: My husband and I agree wholeheartedly with the recommendation that the site designated for housing on the fields on Roberttown Lane bordered by Richmond Park Avenue, Huddersfield Road and Sunnyside Avenue be removed from the plan and retained as green belt.
SD2-MM177	Mod_AOD_M627	Support	Comment transcribed by KC from attached letter: I agree to the decision to keep the land on Roberttown Lane as green belt.
SD2-MM177	Mod_AOD_M630	Support	Comment transcribed by KC from attached letter: I write in support of the recommendation by the Government Planning Inspector that both sites for development at Cooper Bridge and in Roberttown be removed from the Local Plan. I feel very strongly that the two sites should be retained in the green belt, as recommended by the Planning Inspector.
SD2-MM177	Mod_AOD_M652	Object	Thank you for your recent letter on behalf of the Conservative Councillors for the Roberttown Liversedge area. I wish to raise an objection to the proposed developments outlined in your letter. My reason for the objection is due to the additional traffic noise and congestion this would cause to an already very busy Child Lane/Huddersfield Road and Roberttown Village. Mrs. B. L. Wood on behalf of Mrs. J. Oliver
SD2-MM177	Mod_AOD_M7	Support	Support
SD2-MM179	Mod_AOD_M593	Support	KCS Developments Ltd continues to support the proposed allocation and acknowledge modifications to SD2-MM179, MM-180 and MM-181 in relation

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			to site H591– Land to the west of Cliffe Mount, Ferrand Lane, Gomersal. These comments are made in addition to previous representations submitted in January 2018 during consultation into the soundness and legal compliance of the Kirklees Publication Draft Local Plan.
SD2-MM180	Mod_AOD_M594	Support	KCS Developments Ltd continues to support the proposed allocation and acknowledge modifications to SD2-MM179, MM-180 and MM-181 in relation to site H591– Land to the west of Cliffe Mount, Ferrand Lane, Gomersal. These comments are made in addition to previous representations submitted in January 2018 during consultation into the soundness and legal compliance of the Kirklees Publication Draft Local Plan.
SD2-MM181	Mod_AOD_M157	Conditional Support	<p>I think the modification is satisfactory as far as it goes as it states that "there should be a sensitive approach to the design and landscaping of the site in order to maintain the agricultural character of Ferrand Lane". I think it is unsound however, as it has not been positively prepared to address the following point in Kirklees Draft Local Plan: Strategy & Policies November 2015 which states: "12.4 Trees Policy DLP 34. Trees Proposals should normally retain any valuable or important trees within the application site where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment, including the Wildlife Habitat Network and green infrastructure networks. Where development is approved on sites containing valuable or mature trees, proposals will need to comply with relevant national standards."</p> <p>The modification has not taken into account the mature trees covered by the Kirklees Tree Preservation Area map. This map includes trees at the eastern end of Ferrand Lane, opposite the Methodist Chapel Conservation area, and within the proposed site, H591.</p> <p>The Kirklees Local Plan Submission Documents Accepted Site Options - Technical Appraisal July 2017 states: "The Arboriculture Predevelopment Report submitted by the site promoter has been assessed by the Kirklees Tree Officer. It is considered that the site is suitable as an allocation although there are some tree conflicts which would require to be addressed at the Planning application stage." "Conflicts" has rather negative connotations; there is no reference in this appraisal to the fact that there are trees with preservation orders on the site. The modification should take the presence of protected trees into account, to be in accordance with the Trees Policy in the Draft Local Plan. What should be included in the modification statement is a clear positive directive as to the importance of retaining protected trees if at all possible.</p>
SD2-MM181	Mod_AOD_M332	Object	<p>I consider the plan is not sound as it has not been positively prepared to take into account the importance of the agricultural heritage, including hedgerows, and protecting the listed building/conservation area as indicated in the following: Kirklees Council Action 174: H591 Land to the west of Cliffe Mount, Ferrand Lane, Gomersal Matter 371.1 This note forms a response to the Inspector's request at the matter 37 hearings on 22nd March for clarification on mitigation measures in relation to historic assets. Clarification was sought on the following issues: a) clarification on the mitigation measures required to retain the continued agricultural character of Ferrand Lane; b) clarification on whether any mitigation measures are required to protect the listed buildings/conservation area in the north-eastern corner of the site from the proposed allocation</p> <p>Council Response to Inspector's request for a note on: At the Inspector's request, the council to set out a note to identify how the agricultural character of Ferrand Lane will continue to be protected. I refer to Appendix 4 below. Appendix 4Matter 37 H591 1.2 Measures to retain the agricultural character of Ferrands Lane could include supplementing tree planting, keeping hedgerows and landscaping. Policy PLP35 provides the framework to address these issues. As part of a future planning application, consideration could be given to removing permitted development right to prevent further structures and fencing along the rear boundary of the site. The council considers that it is too prescriptive to include text within the Local Plan on this issue and the best time to consider this is at the development management stage. I consider that some reference to the importance of the particular hedgerows should be made in the modification statement to address the following:- As per attached map, Site H591 was part of the large estate owned by the Sigston family who were amongst the largest landowners in Gomersal by 1830, the map dated 1809 clearly shows all the agricultural fields they owned. Sigston House is still standing and is across the road at the junction of West Lane and Oxford Road (A651)Field 35 on the map, although partly built on to the north east, shows clearly the boundary line, which is now a hedgerow, running from a wall at the south east to Ferrand Lane at the north east. The attached map shows the line of the hedgerow marking the boundary between fields 35 and 36Account should be taken as to the historical importance of this hedgerow, which is at right angles to Ferrand Lane, as it is part of the historical record from 1809. It is recorded in a document held at the relevant date at a Record Office as an integral part of a field system pre-dating the Enclosure Acts (8); Field boundaries: Considerable significance - This field boundary is an historic field boundary and relates directly to the former agricultural use of the land which in turn relates back to the former agricultural identity of Sigston House. Loss of this field boundary would affect and cause significant harm to the link to the 19th Century agricultural history of this area and as such it should be retained Retaining the hedgerow would further enhance the agricultural nature of Ferrand Lane as already stipulated by Kirklees in their modification statement I now refer to Council document 1.4 below</p>

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			<p>Appendix 4 Impact on listed buildings/conservation area 1.4 The council reaffirms its position that it supports the findings of the site promoter’s heritage impact assessment (HIA) that the proposed development will not have an impact on the adjacent conservation area or the listed buildings. “There should be a sensitive approach to the design and landscaping of the site in order to maintain the agricultural character of Ferrand Lane”. I do not believe that further consideration has been acknowledged or carried out as I have no evidence of this. The modification has not taken into account the heritage importance of the Grade 2 Listed Building Methodist Chapel and Burial Ground on the north eastern corner at the top of Ferrand Lane across from the eastern end of the site. It has been underplayed in that The views to and from the Chapel and cemetery are still of significance and they are historic views and enable us to appreciate the former agricultural setting of the Chapel and burial ground and its surroundings. The Grade 11 Listed Chapel and cemetery are adjacent to the site however it is of high significance to the heritage aspect as it contributes to the agricultural history and to the setting. The proximity of this land forms the setting to the historic views. The effect of developing this area of land close to the chapel and cemetery should be carefully considered and if this open area of land was to be lost there is the potential for it to cause less than substantial harm to the listed building and conservation area. If this area is carefully designed the harm could be mitigated. The allocated site area is of significance as it provides a rural/agricultural setting and contributes to historic views from the Grade 11 Chapel and cemetery at the top of the lane, adjacent to and overlooking the site. I also question how impartial the heritage impact assessment actually is, as Carter Jonas, acting for KCS Development, were the clients, and not Kirklees Council, therefore, this could determine a conflict of interest. All the other sites in the Kirklees draft plan which required a heritage assessment were organised by Kirklees Council and they were, I believe, carried out by Farrell and Clark. I would therefore deem it appropriate for Farrell and Clark to carry out a second assessment on site H591 to compare results and to establish consistency across the plan. I also spoke with Ian Smith at Historic England who expressed concern that the Heritage Impact Assessment had possibly underplayed the contribution the fields make to the character of this part of the Conservation area and the harm that the loss of the field adjacent to the graveyard would have upon the rural character of Ferrand Lane. He also stated that there is potential impact upon the appreciation of the rural setting of the Gomersal Conservation Area as one travels up the hill in an easterly direction along Ferrand Lane towards the church which is part of the Spen Way Heritage Trail. Furthermore, the impact which residential development might have upon this aspect of the setting of the Conservation Area does not seem to have been evaluated. Ian Smith subsequently visited the site and confirmed his comments. It would also appear that they had not been approached by Kirklees Council to comment on Site H591. Furthermore, Site H442 Roberttown has, I believe, been retained as greenbelt and I would suggest that there are similarities on this site and Site H591 which have been looked into thoroughly by Farrell and Clarke, whilst the heritage impact assessment for site H591 by Cater Jonas has not gone into thorough detail. I believe that all the sites should have been allocated the same treatment, so that the surveys are like for like and there would not be such discrepancies. Also, the greenbelt review was carried out by the developer’s clients, so it is in their interest to build. Indeed, it would appear that Carter Jonas acting for KCS Developments arranged and supplied the majority of documentations required, which again could suggest that it is in their interest and beneficial to favour their clients.</p>
SD2-MM181	Mod_AOD_M595	Support	<p>KCS Developments Ltd continues to support the proposed allocation and acknowledge modifications to SD2-MM179, MM-180 and MM-181 in relation to site H591– Land to the west of Cliffe Mount, Ferrand Lane, Gomersal. These comments are made in addition to previous representations submitted in January 2018 during consultation into the soundness and legal compliance of the Kirklees Publication Draft Local Plan.</p>
SD2-MM182	Mod_AOD_M234	Object	<p>This submission is on behalf of Spen Valley Civic Society. We do not consider this allocation proposal to be sound, as it involves the inclusion of additional green belt land which has not been previously discussed at the Local Plan consultation stage, and which should not be allocated for housing development.</p> <p>We supported the allocation of H2537 in the original consultation, providing that the Luddite Trail footpath could be safeguarded. We considered that the infringement into green belt was minimal and at the same time retained a logical green belt boundary. However H2537a now includes more green belt land, increasing the site area from 0.8ha to 1.2ha, and the indicative housing capacity from 23 to 42 dwellings. The green belt boundary is significantly and adversely altered. This presents a number of issues.</p> <ol style="list-style-type: none"> 1 No evidence has been presented to justify the loss of additional green belt land. 2 The strip of land proposed includes an old 'green lane', which is now a footpath and has been in use for at least 150 years. Our 1882 map shows this clearly marked as Tanhouse Lane, and led down to a collection of buildings - Tanhouse Leather Works - situated at the bottom of the valley, next to the stream. The buildings are no longer there, but the footpath is. 3 This proposal is clearly linked to new site H709. This allocation was included in the draft Local Plan as safeguarded land - SL2181, but has been re-designated as a housing allocation. It must have escaped the attention of the Council that SL2181 has no direct access to the road network. The

Mod ref	Rep ID	Outcome	Report text
			solution is to extend H2537 in to green belt and so create access to site H709. We have no recollection of this being proposed during the Hearings. 4 The proposal to link these 2 sites raises capacity and traffic issues which do not appear to have been considered. The combined indicative capacity is 79 houses. Exit/entry will be by one road on to Halifax Road, using the existing track. The original capacity of H2537 of 23 houses was manageable, 79 is not; especially since a new small development has been built on the corner of the existing exit and Halifax Road.
SD2-MM182	Mod_AOD_M253	Support	Natural England notes the extensions to allocations in modifications SD2-MM108, SD2-MM190, SD2-MM290 and SD2-MM182 as well as the new allocations proposed in modificationsSD2-MM136, SD2-MM191, SD2-MM289, SD2-MM291. We note and welcome the assessment undertaken for these modifications and have no further concerns.
SD2-MM189	Mod_AOD_M181	Conditional Support	I support this Modification though I think it would be clearly preferable to retain and reuse the School buildings, walls and railings in any development of this Conservation area. The amended text in the second bullet point could be deleted after 'any development proposals.....'
SD2-MM189	Mod_AOD_M194	Support	It is necessary to retain the railings and frontage of Gomersal Primary School, this building is in a Conservation area. Therefore it should fit in with the existing buildings close to the school.
SD2-MM189	Mod_AOD_M206	Support	The building is in a Conservation Area. Therefore the buildings walls and railings should be retained.
SD2-MM189	Mod_AOD_M236	Conditional Support	This submission is on behalf of Spen Valley Civic Society. We support the proposal which seeks to retain and re-use the school buildings as part of any development, but we do not support the inclusion of the additional wording 'where possible unless adequate justification is provided for their loss'. Which should be deleted. Kirklees Council does not have a good track record for the protection of quality buildings such as Gomersal Primary School, as can be seen in their active support of the recent destruction of Whitcliffe Mount School Foundation Building for no good reason, and despite being in excellent condition. We believe the same will happen to this school building if 'get out clauses' are included as proposed.
SD2-MM189	Mod_AOD_M319	Support	This site lies within the Gomersal Conservation Area and, in Gomersal Primary School, includes a building which makes a positive contribution to its character. The loss of the school building would have had an adverse impact upon the character of this part of the Conservation Area. The proposed Modification sets out a requirement for the retention of the building, its railings and boundary wall. As a result, these will help to ensure that any housing is delivered in a manner which conserves the character of this part of the Conservation Area.
SD2-MM189	Mod_AOD_M543	Conditional Support	Three of the proposed modifications (SD2 MM32, MM147, and MM189) seek to amend a generic detail of the proposed allocation from; "Replacement playing pitch provision or mitigation measures of equivalent value will be required to meet local needs having regard to the most-up-to-date evidence base for sport and recreation" To; "Replacement playing pitch provision or mitigation measures of equivalent or better quantity and quality will be required in a suitable location unless an assessment clearly shows the site to be surplus to requirements having regard to the most up-to-date evidence for sport and recreation needs" Kirklees has been successful in bidding to become a Parklife Football Hubs Programme. The aim of the programme is to create a sustainable model for football facilities based around artificial grass pitches (AGPs) on hub sites. The Council in conjunction with partners at the Football Foundation and Sport England is currently a refresh of its Playing Pitch Strategy to benchmark the adequacy of its pitch stock and test scenarios as to how many Artificial Grass Pitches are required in the area to address local footballing needs. This will then inform the number of Parklife Hubs are to be developed across Kirklees and the number of AGPs to be developed on each Hub. The Hubs have the potential to see a significant amount of community football transferred away from the current [grass] playing pitch stock, but in order to understand their impact, the Council are committed to undertaking a further Playing Pitch Strategy refresh commencing two years after the opening of the final Parklife hub site. The proposed modification builds in further flexibility into how the Council addresses the loss of existing and lapsed / disused playing fields associated with the respective allocations. Given the impending Parklife programme, and the uncertainty around its impact Sport England acknowledges the need for a wider range of responses to be accommodated and is therefore content with modification numbers SD2 MM32, SD2 MM147, and SD2 MM189
SD2-MM189	Mod_AOD_M8	Support	Support
SD2-MM190	Mod_AOD_M237	Support	This submission is on behalf of Spen Valley Civic Society. We regret the loss of this valuable area of urban green space, but accept this is a necessary allocation by virtue of the fact that development of the site is already at an advanced stage, as a consequence of a successful planning appeal.
SD2-MM190	Mod_AOD_M251	Support	Natural England notes the extensions to allocations in modifications SD2-MM108, SD2-MM190, SD2-MM290 and SD2-MM182 as well as the new allocations proposed in modificationsSD2-MM136, SD2-MM191, SD2-MM289, SD2-MM291. We note and welcome the assessment undertaken for these modifications and have no further concerns.

Mod ref	Rep ID	Outcome	Report text
SD2-MM191	Mod_AOD_M239	Object	<p>This submission is on behalf of Spen Valley Civic Society.</p> <p>We consider this new site allocation to be unsound, as it requires the release of additional green belt land, not previously discussed, in order to make it viable. This allocation has to be seen in conjunction with site H2537a, as the two are interlinked and dependent on each other for implementation. The areas of concern are outlined in our submission in respect of H2537a and so are not repeated here except for the following additional information.</p> <p>At the Local Plan hearings we asked that the existing PROW - part of the Luddite Trail which crosses H2537 be protected, and this has been reflected in the current comments which include reference to the need to maintain the integrity of the Luddite Trail. However this new proposal will achieve exactly the opposite as the new road link into H709 will cut across the existing PROW.</p>
SD2-MM191	Mod_AOD_M255	Support	Natural England notes the extensions to allocations in modifications SD2-MM108, SD2-MM190, SD2-MM290 and SD2-MM182 as well as the new allocations proposed in modifications SD2-MM136, SD2-MM191, SD2-MM289, SD2-MM291. We note and welcome the assessment undertaken for these modifications and have no further concerns.
SD2-MM191	Mod_AOD_M320	Support	Haigh Hall to the north of this allocation is a Grade II Listed Building. The proposed Modification alerts potential developers of the proximity of this Listed Building and, as a result, the need to ensure that any proposals conserve those elements which contribute to its significance.
SD2-MM195	Mod_AOD_M241	Support	Natural England welcomes SD2-MM195, SD2-MM233, SD2-MM237, SD2-MM238, SD2-MM239, SD2-MM251, SD2-MM260, SD2-MM361 and SD2-MM33 which reflect the approach agreed in the Habitats Regulations Assessment and helps address the concerns we raised previously regarding impacts from the plan on European designated sites.
SD2-MM196	Mod_AOD_M321	Support	This site lies to the south of a group of mid-nineteenth Century Grade II Listed Buildings. The loss of this site and its subsequent development would have harmed elements which contribute to the significance of these assets. Consequently, we welcome the deletion of this allocation.
SD2-MM197	Mod_AOD_M322	Support	This site adjoins the boundary of the Slaithwaite Town Centre Conservation Area and there are a number of Listed Buildings to the north and west of this site. The loss of parts of this site and their subsequent development could have harmed elements which contribute to the significance of these assets. We support the reduction in the extent of this site that has resulted from, firstly, the requirement that the tree belt along the site's northern boundary is retained and, secondly, that the layout safeguards the setting of the Listed Baptist Chapel. This will ensure that any housing is delivered in a manner which will conserve the setting of these heritage assets.
SD2-MM198	Mod_AOD_M323	Support	This site adjoins the boundary of the Slaithwaite Town Centre Conservation Area and there are a number of Listed Buildings to the north and west of this site. The loss of parts of this site and their subsequent development could have harmed elements which contribute to their significance. We support the reduction in the indicative capacity that has resulted from, firstly, the requirement that the tree belt along the site's northern boundary is retained and, secondly, that the layout safeguards the setting of the Listed Baptist Chapel. This will ensure that any housing is delivered in a manner which will conserve the setting of these heritage assets
SD2-MM200	Mod_AOD_M324	Support	This site adjoins the boundary of the Slaithwaite Town Centre Conservation Area and there are a number of Listed Buildings to the north and west of this site. The loss of parts of this site and their subsequent development could have harmed elements which contribute to their significance. The proposed Modification sets out the measures by which this harm will be reduced and the requirements for any development on this site. As a result, these will help to ensure that any housing is delivered in a manner which conserves the setting of the nearby heritage assets.
SD2-MM205	Mod_AOD_M259	Object	The proposed wording is held to be vague and ambiguous and therefore imprecise. As such, the Plan is not considered to be Positively Prepared and the wording is not considered to be Justified.
SD2-MM207	Mod_AOD_M325	Support	This site lies within the Marsden Conservation Area. As originally proposed in the Submission Draft, the extent of the area identified for development coupled with the lack of any specific measures within the Plan to ensure that development takes place in a manner consistent with the conservation of the Conservation Area, could have resulted in form development which would have harmed elements which contribute to its significance. We support the reduction in the extent of this site that has resulted from the requirement that the south/south-western part of this site should remain open. This will ensure that any housing is delivered in a manner which will conserve the character of this part of the Conservation Area
SD2-MM208	Mod_AOD_M326	Support	This site lies within the Marsden Conservation Area. As originally proposed in the Submission Draft, the extent of the area identified for development coupled with the lack of any specific measures within the Plan to ensure that development takes place in a manner consistent with the conservation of the Conservation Area, could have resulted in form development which would have harmed elements which contribute to its significance. The proposed Modification alerts potential developers of the Listed Building and Conservation Area and, as a result, the need to ensure that any proposals

Mod ref	Rep ID	Outcome	Report text
			conserve those elements which contribute to their significance.
SD2-MM209	Mod_AOD_M327	Support	This site lies within the Marsden Conservation Area. As originally proposed in the Submission Draft, the extent of the area identified for development coupled with the lack of any specific measures within the Plan to ensure that development takes place in a manner consistent with the conservation of the Conservation Area, could have resulted in form development which would have harmed elements which contribute to its significance. We support the reduction in the indicative capacity that has resulted from the requirement that the south/south-western part of this site should remain open. This will ensure that any housing is delivered in a manner which will conserve the character of this part of the Conservation Area .
SD2-MM210	Mod_AOD_M328	Support	This site lies within the Marsden Conservation Area. As originally proposed in the Submission Draft, the extent of the area identified for development coupled with the lack of any specific measures within the Plan to ensure that development takes place in a manner consistent with the conservation of the Conservation Area, could have resulted in form development which would have harmed elements which contribute to its significance. The proposed Modification sets out the measures by which the harm will be reduced and the requirements for any development on this site. These will help to ensure that any housing is delivered in a manner which conserves those elements which contribute to the character of this part of the Conservation Area.
SD2-MM213	Mod_AOD_M486	Object	The proposed modifications only guarantee right of way through the site. The many concerns, especially highways, for the village as a whole have not been, and seem unlikely to be addressed by Kirklees Council.
SD2-MM216	Mod_AOD_M46	Support	UDVET welcomes the reduction in capacity of this site. However, we believe the total number of houses planned for Skelmanthorpe is way beyond the capacity of the local infrastructure and road network to support. We also doubt the level of demand in the area.
SD2-MM217	Mod_AOD_M60	Object	The increased use of our roads will adversely affect the safety of existing residents. improvements are necessary. The removal of the paragraph should reversed and the new paragraph left in, both are required.
SD2-MM222	Mod_AOD_M329	Support	This site adjoins the churchyard of the Church of St Aidan, a Grade II Listed Building. The loss of the central part of this site and its subsequent development could have harmed elements which contribute to its significance. The proposed Modification alerts potential developers of the proximity of the Listed Building and, as a result, the need to ensure that any proposals conserve those elements which contribute to its significance.
SD2-MM223	Mod_AOD_M333	Support	This site adjoins the churchyard of the Church of St Aidan, a Grade II Listed Building. The loss of the central part of this site and its subsequent development could have harmed elements which contribute to its significance. The proposed Modification sets out the measures by which the harm will be reduced and the requirements for any development on this site. These will help to ensure that any housing is delivered in a manner which conserves those elements which contribute to the setting of the Listed Building and adjacent Conservation Area.
SD2-MM224	Mod_AOD_M47	Object	UDVET believes 'soundness' would be improved if it were a 'requirement' that cycling and car parking be included in any development plans, given the Council's stated policy of encouraging the use of public transport - people in rural areas have to drive/cycle to the station and need space for this. Additional parking was planned years ago when the 'interchange' was first planned but was never delivered! Now is the chance to rectify past mistakes.
SD2-MM225	Mod_AOD_M44	Object	We welcome the modifications proposed. However, it is our view that this site should be retained for employment use as at present. There are already far too many houses being proposed at on the western fringes (A636) end of Clayton West given the existing road and access conditions.
SD2-MM225	Mod_AOD_M48	Conditional Support	UDVET fully supports and welcomes this change. However, we believe this site should be retained for employment use as far too much development is planned in the surrounding area for the local infrastructure to support.
SD2-MM226	Mod_AOD_M546	Object	We object on behalf of the joint landowners to the proposed modification of H3325a with regard to the deletion of the area of land north of the watercourse. This is considered to be an unsound strategy for the following reasons. Of critical importance to the deliverability of H3325a is where the housing allocation will take its access from. By proposing to delete the section of land north of the watercourse, any possible new access taken from Wakefield Road is eliminated as such development would be classed as inappropriate in the Green Belt under current planning policy. The current and only available access utilising Manor Road through to its junction with Wakefield Road is unsafe and therefore unsuitable to serve the proposed 91 dwellings. This is in addition to over 60 houses currently using Manor Road for access and egress. The Manor Road access is fundamentally unsafe for two reasons: It is substandard in width for a significant stretch largely east of its junction with Pack Horse Close, which does not allow the safe or convenient passage of two vehicles past one another, particularly if service vehicles are present. Given the fact over 150 dwellings will use this access once the

Mod ref	Rep ID	Outcome	Report text
			<p>allocation is developed, this is a serious highway safety consideration. Please refer to photo below (see attached) of showing the key stretch of substandard width.</p> <p>Moreover, the location of this substandard piece of highway is immediately adjacent to both: (a) the junction with the access proposed to serve the allocation; and (b) the blind bend as Manor Road turns 90 degrees. Combined with the stretch of substandard width highway, this will increase the risk of head-on vehicular collisions as the likelihood of vehicles being on the wrong side of the road on a blind bend as a result of the constrained road width.</p> <p>The visibility splays at the junction with Wakefield Road are substandard and therefore unsafe. There is a consequently a significantly greater risk that collision type accidents will occur at this junction.</p> <p>With reference to the photos below, taken at the requisite minimum 2.4m x distance while sat in a standard medium sized car, it is clear that the left visibility splay is substandard in terms of obstructions within the splay (signage and bollards), and the available Y distance, which is below the minimum necessary for a 40mph speed zone on the busy main 'A' distributor road. The right visibility splay is also substandard in that there are views in the vertical plane are compromised by the stone wall running parallel with Wakefield Road. It is clear from the photograph below that vehicles are at the very least partially obscured, which increases the risk that oncoming vehicles will not be seen. This is a serious potential highway safety risk for vehicles emerging from Manor Road. Furthermore, Manual for Streets also advises (at paragraph 7.6.3) that any obstructions as low as 600mm are inappropriate because small children will not be visible. It is clear that the wall in question (approximately 1m high) will obscure views of children walking along Wakefield Road towards the junction with Manor Road. Finally, the close proximity of proposed housing allocations H454a and H498 will mean a further 54 houses needing access on to Wakefield Road in very close proximity to the Manor Road / Wakefield Road junction. This will inevitably create further highway safety hazards with numerous road junctions and vehicular movements all in close proximity to one another. By retaining the area of land north of the watercourse / south of Wakefield Road within H3325a, there is an option to provide a safe access to serve the proposed allocation. As such, the proposed modification is unsound as the introduction of an additional 91 dwellings on a substandard access / egress will result in a materially increased risk to highway safety.</p>
SD2-MM227	Mod_AOD_M45	Support	UDVET welcomes the decrease in the number of houses but see earlier comment about concerns about the level of development proposed in the area surrounding this site.
SD2-MM232	Mod_AOD_M564	Object	<p>The basis on which the Inspector proposes to remove housing allocation H814, on biodiversity and amenity issues, is not based on proportionate evidence, therefore is not justified and is unsound. The housing allocation site has an extensive planning history. The Council have historically supported the development of this site for housing through the approval of numerous applications dating from 1989, with the most recently consented application in 2013. Past consents were granted subject to a number of conditions, including the requirement to submit an ecological assessment to include evaluation of the site's biodiversity features; analysis of impacts of the development; and proposed avoidance, mitigation of compensation (application reference 2013/90715). Moreover, as noted in the Councils response to Matter 42 (Kirklees Rural Sub-Area – Matters, Issues and Questions), the Council confirmed that they are supportive of the provision of housing development on the site, as any development would be subject to relevant planning conditions to ensure that no development commenced until an ecological assessment of the site, satisfying Local Plan policy PLP30, had taken place, in order any impacts to the priority habitats can be mitigated or compensated against. Notwithstanding the above, the Inspector has concluded that in order to make the plan sound, this allocation be deleted, however it is unclear what information this decision has been made on, given a full ecological assessment of the site has not yet been submitted as part of the evidence base to the Local Plan, nor discharged pursuant to planning conditions on the previous consents. Therefore, there is no evidence to suggest that the site cannot be acceptably and sensitively developed, without having any adverse impacts on biodiversity. Further initial assessments of the site's biodiversity have been carried out on behalf of our client, Urban Development Projects, and an Extended Phase 1 Habitat and Protected Species Survey and Report, prepared by JCA, is submitted in support of these representations. Although it is acknowledged the site is sensitive and contains some areas of high ecological value, the site's ecological characteristics are not unusual for a site of this nature, and do not present insurmountable hurdles to any future development of the site. The report considers that the area of the site with least ecological importance can be sensitively developed for housing, whilst maintaining and enhancing the areas of higher ecological importance, increasing the biodiversity and amenity value of this part of the site. As such, it is reasonable to consider that any ecological impacts to the site can be readily capable of being mitigation through sensitive design. Please refer to the enclosed report for further information. The inspector also notes loss of amenity as a reason for removal of the housing allocation. Again, it is not clear on what evidence this is based on. The site is covered by a TPO, however the site is not ancient woodland, and there are no record of any trees of particular</p>

Mod ref	Rep ID	Outcome	Report text
			merit. The site also currently provides little access to the public, thus the majority of the trees are not readily visible. An Arboricultural Report was submitted as part of the most recent planning application for the site (reference 2017/93333), which concluded that the existing trees on site provide a reasonable visual amenity to the surrounding area, whilst only one tree across the whole site identified as category 'A'. It has previously been accepted through the previous consents that, through careful layout and design, it is possible to respond to the impact on local amenity of loss of trees, through increasing the amenity value of part of the site. It is therefore not considered this is a sufficient reason to remove the site as a housing allocation, as any potential impacts on amenity could be sufficiently addressed and mitigated against. As set out above, it is not considered there is proportionate evidence in order to justify the proposed removal of the housing site allocation H814. As submitted in support of these representations, it can be considered by the Phase 1 report that through appropriate mitigation, design and layout, that the site can sensitively developed for housing without having unacceptable impacts on biodiversity or amenity.
SD2-MM233	Mod_AOD_M242	Support	Natural England welcomes SD2-MM195, SD2-MM233, SD2-MM237, SD2-MM238, SD2-MM239, SD2-MM251, SD2-MM260, SD2-MM361 and SD2-MM33 which reflect the approach agreed in the Habitats Regulations Assessment and helps address the concerns we raised previously regarding impacts from the plan on European designated sites.
SD2-MM233	Mod_AOD_M440	Support	Support
SD2-MM237	Mod_AOD_M243	Support	Natural England welcomes SD2-MM195, SD2-MM233, SD2-MM237, SD2-MM238, SD2-MM239, SD2-MM251, SD2-MM260, SD2-MM361 and SD2-MM33 which reflect the approach agreed in the Habitats Regulations Assessment and helps address the concerns we raised previously regarding impacts from the plan on European designated sites.
SD2-MM238	Mod_AOD_M244	Support	Natural England welcomes SD2-MM195, SD2-MM233, SD2-MM237, SD2-MM238, SD2-MM239, SD2-MM251, SD2-MM260, SD2-MM361 and SD2-MM33 which reflect the approach agreed in the Habitats Regulations Assessment and helps address the concerns we raised previously regarding impacts from the plan on European designated sites.
SD2-MM239	Mod_AOD_M245	Support	Natural England welcomes SD2-MM195, SD2-MM233, SD2-MM237, SD2-MM238, SD2-MM239, SD2-MM251, SD2-MM260, SD2-MM361 and SD2-MM33 which reflect the approach agreed in the Habitats Regulations Assessment and helps address the concerns we raised previously regarding impacts from the plan on European designated sites.
SD2-MM240	Mod_AOD_M334	Support	30 and 32 Gynn Lane, to the west of this site, are Grade II Listed Buildings. The Heritage Impact Assessment considered that the loss of the woodland would cause considerable harm to the setting of the Listed Buildings. It recommends that this should be retained. The proposed Modification alerts potential developers of the fact that these trees are protected by a TPO.
SD2-MM240	Mod_AOD_M555	Support	Representations to Proposed Modifications to Draft Local Plan. In support of proposed allocation H584 – Land at Gynn Lane Honley. On behalf of the landowner, we write in respect of the land at Gynn Lane, Honley (reference H584) which is proposed for residential allocation within the emerging plan. This letter gives our continued support for the allocation of the site and should be read in conjunction with representations made at previous stages of consultation. Detailed matters of site background are therefore not repeated here A positive Pre-application discussion was held with Kirklees Council Planning officers in May 2018 and a number of technical reports have been prepared to support the allocation of the site. It was concluded that the principle of development would be agreed should Draft Local Plan be adopted with the inclusion of the Proposed Allocation H584. It is clear that the Land at Gynn Lane has been found to be a deliverable and developable site by the Inspector and the council. It remains an opportunity for a highly sustainable development with a strong vision, in a location in an area where the role and function of the Green Belt is no longer required. We continue to support the draft allocation of Land at Gynn Lane, Honley. The land is immediately available and an application could be brought forward on the site in 2019. Commentary on Proposed Modifications – Proposed Allocation H584 We fully support draft allocation H584 and recognise that it is a developable and deliverable site over the 0-5 year period, subject to appropriate mitigation namely in respect of the approach to protected tree mitigation and green infrastructure treatment which were discussed at pre-app and which have been included in the draft allocation as a main modification. We further note the site constraints, including the Grade II listed building to the North West, the tree belt located off site and the woodland and stream along the northern boundary and acknowledge that these can be incorporated into the evolving illustrative layout which was presented to colleagues over the course of our pre-application submission to the extent that we are both in principle content that the site can accommodate a layout which achieves the policy aims. We would welcome further discussion with Kirklees and hope to continue to work productively with the Council in order to support the allocation of the site and future application on site.
SD2-MM241	Mod_AOD_M335	Support	30 and 32 Gynn Lane, to the west of this site, are Grade II Listed Buildings. The Heritage Impact Assessment considered that the loss of the woodland

Mod ref	Rep ID	Outcome	Report text
			would cause considerable harm to the setting of the Listed Buildings. It also identified a number of areas whose loss would cause considerable harm to the setting of the Listed Buildings. The proposed Modification sets out the measures by which the harm will be reduced and the requirements for any development on this site. As a result, these will help to ensure that any housing is delivered in a manner which conserves those elements which contribute to the significance of this building.
SD2-MM241	Mod_AOD_M439	Object	It is unclear how the deficiencies in the Sustainability Appraisal Matrices and Maps for this Site (pages 1616-1619) - which were used as the basis for allocating this Site for development - have been addressed as highlighted in previous comments. It contains numerous factual inaccuracies and these should be reviewed to ensure that the factual basis on which this site is allocated for development is factually correct and therefore the decision to allocate is legally compliant and sound. The only "Significant Positive" in allocating this site for development was the belief that a footpath runs along the Southern boundary of the Site. This is not true, and there is no access from the Southern boundary to any footpaths. Given that the only "Significant Positive" justifying the allocation is false and the numerous other false assumptions and statements made in the Sustainability Appraisal Matrices and Maps, a decision to allocate this Site for development based on the myriad factual inaccuracies must of itself be legally noncompliant and unsound. If the decision is ultimately taken to allocate this Site for development despite the basis on which it was made is being factually incorrect in numerous respects (which would be likely subject to legal challenge) it should be a condition that detailed wildlife and environmental surveys are undertaken to mitigate the impact of development on the variety of wildlife on or around the site. Deer, pheasants, bats and other species are regularly seen in and around the site and their habitat should not be arbitrarily destroyed. See attached photo of the deer in the field for example.
SD2-MM241	Mod_AOD_M556	Support	Representations to Proposed Modifications to Draft Local Plan. In support of proposed allocation H584 – Land at Gynn Lane Honley. On behalf of the landowner, we write in respect of the land at Gynn Lane, Honley (reference H584) which is proposed for residential allocation within the emerging plan. This letter gives our continued support for the allocation of the site and should be read in conjunction with representations made at previous stages of consultation. Detailed matters of site background are therefore not repeated here. A positive Pre-application discussion was held with Kirklees Council Planning officers in May 2018 and a number of technical reports have been prepared to support the allocation of the site. It was concluded that the principle of development would be agreed should Draft Local Plan be adopted with the inclusion of the Proposed Allocation H584. It is clear that the Land at Gynn Lane has been found to be a deliverable and developable site by the Inspector and the council. It remains an opportunity for a highly sustainable development with a strong vision, in a location in an area where the role and function of the Green Belt is no longer required. We continue to support the draft allocation of Land at Gynn Lane, Honley. The land is immediately available and an application could be brought forward on the site in 2019. Commentary on Proposed Modifications – Proposed Allocation H584 We fully support draft allocation H584 and recognise that it is a developable and deliverable site over the 0-5 year period, subject to appropriate mitigation namely in respect of the approach to protected tree mitigation and green infrastructure treatment which were discussed at pre-app and which have been included in the draft allocation as a main modification. We further note the site constraints, including the Grade II listed building to the North West, the tree belt located off site and the woodland and stream along the northern boundary and acknowledge that these can be incorporated into the evolving illustrative layout which was presented to colleagues over the course of our pre-application submission to the extent that we are both in principle content that the site can accommodate a layout which achieves the policy aims. We would welcome further discussion with Kirklees and hope to continue to work productively with the Council in order to support the allocation of the site and future application on site.
SD2-MM242	Mod_AOD_M436	Support	Comment transcribed by KC from attached letter: KIRKLEES LOCAL PLAN EIP – MAIN MODIFICATIONS CONSULTATION REPRESENTATIONS – BARRATT HOMES & DAVID WILSON HOMES SITE REF. H664 – LAND NORTH OF SCOTGATE ROAD, HONLEY INTRODUCTION 1.1 We write on behalf of our client Barratt Homes & David Wilson Homes (BDW) to provide their representations to the Kirklees Local Plan Main Modifications which are currently being consulted on by Kirklees Council. 1.2 As the Council are aware BDW have submitted a substantial level of evidence to support their land interests in Kirklees through the initial consultation on the Local Plan and the Examination in Public (EIP) stages of the Kirklees Local Plan. 1.3 The comments made in these representations should therefore be considered alongside BDW's representations to the Publication Draft Kirklees Local Plan (PDLP) and each of their previous hearing statements submitted as part of the EIP process. 1.4 For issues of brevity, we will not seek to repeat comments we have previously made as part of the EIP process. However, we will refer to the submitted evidence where required. These representations therefore seek to focus on the implications of soundness associated with the proposed Main Modifications. 1.5 BDW want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough's housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, BDW believe that a sound Local Plan can be achieved through the modifications process. 1.6 We set out below our representations to the Main Modifications associated with BDW's land interest at Land North of Scotgate Road, Honley. SITE REF. H664 – LAND

Mod ref	Rep ID	Outcome	Report text
			<p>NORTH OF SCOTGATE ROAD, HONLEY.2.1 The Council are proposing the following modifications to the site allocation: -</p> <p>SD2-MM242 – Constraints – Delete and insert text: - Ecological Assessment Part of this site contains This site is adjacent to a Habitat of Principal Importance Heritage Impact Assessment SD2-MM243 – Reports Required – Delete and insert text: Ecological Assessment SD2-MM244 – Other Site Specific Considerations - Delete and insert text: - N/A</p> <p>Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development in order to minimise harm to the significance of the Listed Building, taking into account the evidence presented in the Council’s Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process. In order to safeguard the setting of the Listed Building, no development should take place in the areas of 'high' and 'considerable' significance as identified in the Council's Heritage Impact Assessment.</p> <p>2.2 Our client has no objections to the proposed modifications associated with the proposed development of the site. The amendments align with evidence they have previously submitted as part of Local Plan Examination in Public process.2.3 In respect of ecology matters, Brooks Ecological have undertaken an Ecological Appraisal and Bat Survey work of the site. This work has identified that on-site habitats are not considered to represent a significant constraint to the development, however woodland located immediately offsite is considered to have a higher ecological value, and potential impacts will need to be addressed during the design of the development proposals. Our client’s latest draft planning layout identifies landscape buffer areas and stand-off areas provided by public open space along the site northern boundary, adjacent to the woodland.2.4 With regards to heritage matters, our client’s development proposals will be designed to respect the setting of the listed building located adjacent to the west of the site. With a sufficient stand-off being proposed adjacent to the property, which accords with the Council’s HIA. An updated HIA will also be submitted alongside the planning application to demonstrate how the development proposals will be designed to ensure that they do not harm the setting of the listed building.2.5 Pegasus Group have been instructed to assess the impact of the proposed development on the heritage assets located within proximity of the site and to identify potential measures of mitigation to address any impact identified. Pegasus Group’s Heritage Appraisal was previously enclosed with our site specific hearing statement.2.6 Pegasus previously identified that the proposed “non-developable area” of the site should correspond completely with the areas of “high” and “considerable” significance identified in the HIA.2.7 Pegasus’ Heritage Appraisal found that the potential impacts of development on heritage assets raised by the HIA would be adequately addressed instructing that no development should take place within the identified areas of “high” or “considerable” heritage significance. Pegasus’ appraisal identified that there were no overriding constraints which would preclude the development of the site of the site.2.8 Our client is currently undertaking pre-application discussions with the Council. Ecology and heritage matters will be discussed in greater detail as part of this process, along with all of the other technical matters that need to be considered.CONCLUSION3.1 BDW want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough’s housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, BDW believe that a sound Local Plan can be achieved through the modifications process.3.2 We have provided site specific comments in respect of each of BDW’s land interests and the Council’s proposed Main Modifications relating to each.3.3 BDW has no objections to the proposed modifications associated with the proposed development of Site Ref. H664 Land North of Scotgate Road, Honley. The proposed amendments to the site- specific policy align with evidence they have previously submitted as part of Local Plan Examination in Public process.3.4 Finally, as pre-application discussions for full planning applications are currently taking place with the Council in respect of the site, all of the technical comments raised within this and previous representations are underpinned by extensive and detailed technical work that BDW has undertaken as part of this process.</p>
SD2-MM243	Mod_AOD_M437	Support	<p>Comment transcribed by KC from attached letter: REPRESENTATIONS – BARRATT HOMES & DAVID WILSON HOMES SITE REF. H664 – LAND NORTH OF SCOTGATE ROAD, HONLEY</p> <p>1.1 We write on behalf of our client Barratt Homes & David Wilson Homes (BDW) to provide their representations to the Kirklees Local Plan Main Modifications which are currently being consulted on by Kirklees Council.</p> <p>1.2 As the Council are aware BDW have submitted a substantial level of evidence to support their land interests in Kirklees through the initial</p>

Mod ref	Rep ID	Outcome	Report text
			<p>consultation on the Local Plan and the Examination in Public (EiP) stages of the Kirklees Local Plan.</p> <p>1.3 The comments made in these representations should therefore be considered alongside BDW’s representations to the Publication Draft Kirklees Local Plan (PDLP) and each of their previous hearing statements submitted as part of the EiP process.</p> <p>1.4 For issues of brevity, we will not seek to repeat comments we have previously made as part of the EiP process. However, we will refer to the submitted evidence where required. These representations therefore seek to focus on the implications of soundness associated with the proposed Main Modifications.</p> <p>1.5 BDW want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough’s housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, BDW believe that a sound Local Plan can be achieved through the modifications process.</p> <p>1.6 We set out below our representations to the Main Modifications associated with BDW’s land interest at Land North of Scotgate Road, Honley. SITE REF. H664 – LAND NORTH OF SCOTGATE ROAD, HONLEY</p> <p>2.1 The Council are proposing the following modifications to the site allocation: - SD2-MM242 – Constraints – Delete and insert text: - Ecological Assessment Part of this site contains This site is adjacent to a Habitat of Principal Importance Heritage Impact Assessment SD2-MM243 – Reports Required – Delete and insert text: Ecological Assessment SD2-MM244 – Other Site Specific Considerations - Delete and insert text: - N/A Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development in order to minimise harm to the significance of the Listed Building, taking into account the evidence presented in the Council’s Heritage Impact Assessment or any updated Heritage Impact Assessment submitted by the applicant as part of the planning application process. In order to safeguard the setting of the Listed Building, no development should take place in the areas of 'high' and 'considerable' significance as identified in the Council's Heritage Impact Assessment.</p> <p>2.2 Our client has no objections to the proposed modifications associated with the proposed development of the site. The amendments align with evidence they have previously submitted as part of Local Plan Examination in Public process.</p> <p>2.3 In respect of ecology matters, Brooks Ecological have undertaken an Ecological Appraisal and Bat Survey work of the site. This work has identified that on-site habitats are not considered to represent a significant constraint to the development, however woodland located immediately offsite is considered to have a higher ecological value, and potential impacts will need to be addressed during the design of the development proposals. Our client’s latest draft planning layout identifies landscape buffer areas and stand-off areas provided by public open space along the site northern boundary, adjacent to the woodland.</p> <p>2.4 With regards to heritage matters, our client’s development proposals will be designed to respect the setting of the listed building located adjacent to the west of the site. With a sufficient stand-off being proposed adjacent to the property, which accords with the Council’s HIA. An updated HIA will also be submitted alongside the planning application to demonstrate how the development proposals will be designed to ensure that they do not harm the setting of the listed building.</p> <p>2.5 Pegasus Group have been instructed to assess the impact of the proposed development on the heritage assets located within proximity of the site and to identify potential measures of mitigation to address any impact identified. Pegasus Group’s Heritage Appraisal was previously enclosed with our site specific hearing statement.</p> <p>2.6 Pegasus previously identified that the proposed “non-developable area” of the site should correspond completely with the areas of “high” and “considerable” significance identified in the HIA.</p> <p>2.7 Pegasus’ Heritage Appraisal found that the potential impacts of development on heritage assets raised by the HIA would be adequately addressed instructing that no development should take place within the identified areas of “high” or “considerable” heritage significance. Pegasus’ appraisal identified that there were no overriding constraints which would preclude the development of the site of the site.</p> <p>2.8 Our client is currently undertaking pre-application discussions with the Council. Ecology and heritage matters will be discussed in greater detail as</p>

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			<p>part of this process, along with all of the other technical matters that need to be considered.</p> <p>CONCLUSION</p> <p>3.1 BDW want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough's housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, BDW believe that a sound Local Plan can be achieved through the modifications process.</p> <p>3.2 We have provided site specific comments in respect of each of BDW's land interests and the Council's proposed Main Modifications relating to each.</p> <p>3.3 BDW has no objections to the proposed modifications associated with the proposed development of Site Ref. H664 Land North of Scotgate Road, Honley. The proposed amendments to the site- specific policy align with evidence they have previously submitted as part of Local Plan Examination in Public process.</p> <p>3.4 Finally, as pre-application discussions for full planning applications are currently taking place with the Council in respect of the site, all of the technical comments raised within this and previous representations are underpinned by extensive and detailed technical work that BDW has undertaken as part of this process.</p>
SD2-MM244	Mod_AOD_M336	Support	<p>Clitheroe Farmhouse and barn, to the west of this area, is a Grade II Listed Building. The loss of part of this site around the Listed Building and its subsequent development could have harmed elements which contribute to its significance. The proposed Modification sets out the measures by which the harm will be reduced and the requirements for any development on this site. These will help to ensure that any housing is delivered in a manner which conserves those elements which contribute to the significance of this Listed Building.</p>
SD2-MM244	Mod_AOD_M438	Support	<p>Comment transcribed by KC from attached letter:</p> <p>REPRESENTATIONS – BARRATT HOMES & DAVID WILSON HOMES SITE REF. H664 – LAND NORTH OF SCOTGATE ROAD, HONLEY</p> <p>1.1 We write on behalf of our client Barratt Homes & David Wilson Homes (BDW) to provide their representations to the Kirklees Local Plan Main Modifications which are currently being consulted on by Kirklees Council.</p> <p>1.2 As the Council are aware BDW have submitted a substantial level of evidence to support their land interests in Kirklees through the initial consultation on the Local Plan and the Examination in Public (EiP) stages of the Kirklees Local Plan.</p> <p>1.3 The comments made in these representations should therefore be considered alongside BDW's representations to the Publication Draft Kirklees Local Plan (PDLP) and each of their previous hearing statements submitted as part of the EiP process.</p> <p>1.4 For issues of brevity, we will not seek to repeat comments we have previously made as part of the EiP process. However, we will refer to the submitted evidence where required. These representations therefore seek to focus on the implications of soundness associated with the proposed Main Modifications.</p> <p>1.5 BDW want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough's housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, BDW believe that a sound Local Plan can be achieved through the modifications process.</p> <p>1.6 We set out below our representations to the Main Modifications associated with BDW's land interest at Land North of Scotgate Road, Honley. SITE REF. H664 – LAND NORTH OF SCOTGATE ROAD, HONLEY</p> <p>2.1 The Council are proposing the following modifications to the site allocation: - SD2-MM242 – Constraints – Delete and insert text: - Ecological Assessment Part of this site contains This site is adjacent to a Habitat of Principal Importance Heritage Impact Assessment SD2-MM243 – Reports Required – Delete and insert text: Ecological Assessment SD2-MM244 – Other Site Specific Considerations - Delete and insert text: - N/A</p> <p>Proposals will identify an appropriate layout, scale, appearance and materials of the proposed residential development in order to minimise harm to the significance of the Listed Building, taking into account the evidence presented in the Council's Heritage Impact Assessment or any updated</p>

Mod ref	Rep ID	Outcome	Report text
			<p>Heritage Impact Assessment submitted by the applicant as part of the planning application process.</p> <p>In order to safeguard the setting of the Listed Building, no development should take place in the areas of 'high' and 'considerable' significance as identified in the Council's Heritage Impact Assessment.</p> <p>2.2 Our client has no objections to the proposed modifications associated with the proposed development of the site. The amendments align with evidence they have previously submitted as part of Local Plan Examination in Public process.</p> <p>2.3 In respect of ecology matters, Brooks Ecological have undertaken an Ecological Appraisal and Bat Survey work of the site. This work has identified that on-site habitats are not considered to represent a significant constraint to the development, however woodland located immediately offsite is considered to have a higher ecological value, and potential impacts will need to be addressed during the design of the development proposals. Our client's latest draft planning layout identifies landscape buffer areas and stand-off areas provided by public open space along the site northern boundary, adjacent to the woodland.</p> <p>2.4 With regards to heritage matters, our client's development proposals will be designed to respect the setting of the listed building located adjacent to the west of the site. With a sufficient stand-off being proposed adjacent to the property, which accords with the Council's HIA. An updated HIA will also be submitted alongside the planning application to demonstrate how the development proposals will be designed to ensure that they do not harm the setting of the listed building.</p> <p>2.5 Pegasus Group have been instructed to assess the impact of the proposed development on the heritage assets located within proximity of the site and to identify potential measures of mitigation to address any impact identified. Pegasus Group's Heritage Appraisal was previously enclosed with our site specific hearing statement.</p> <p>2.6 Pegasus previously identified that the proposed "non-developable area" of the site should correspond completely with the areas of "high" and "considerable" significance identified in the HIA.</p> <p>2.7 Pegasus' Heritage Appraisal found that the potential impacts of development on heritage assets raised by the HIA would be adequately addressed instructing that no development should take place within the identified areas of "high" or "considerable" heritage significance. Pegasus' appraisal identified that there were no overriding constraints which would preclude the development of the site of the site.</p> <p>2.8 Our client is currently undertaking pre-application discussions with the Council. Ecology and heritage matters will be discussed in greater detail as part of this process, along with all of the other technical matters that need to be considered.</p> <p>CONCLUSION</p> <p>3.1 BDW want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough's housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, BDW believe that a sound Local Plan can be achieved through the modifications process.</p> <p>3.2 We have provided site specific comments in respect of each of BDW's land interests and the Council's proposed Main Modifications relating to each.</p> <p>3.3 BDW has no objections to the proposed modifications associated with the proposed development of Site Ref. H664 Land North of Scotgate Road, Honley. The proposed amendments to the site- specific policy align with evidence they have previously submitted as part of Local Plan Examination in Public process.</p> <p>3.4 Finally, as pre-application discussions for full planning applications are currently taking place with the Council in respect of the site, all of the technical comments raised within this and previous representations are underpinned by extensive and detailed technical work that BDW has undertaken as part of this process.</p>
SD2-MM251	Mod_AOD_M246	Support	Natural England welcomes SD2-MM195, SD2-MM233, SD2-MM237, SD2-MM238, SD2-MM239, SD2-MM251, SD2-MM260, SD2-MM361 and SD2-MM33 which reflect the approach agreed in the Habitats Regulations Assessment and helps address the concerns we raised previously regarding impacts from the plan on European designated sites.
SD2-MM254	Mod_AOD_M337	Support	Sandygate Farm, to the north of this area, is a Grade II Listed Building. The development of the vast majority of the area that was originally allocated would have harmed the setting and appreciation of this Listed farm. Consequently, we support the reduction in the extent of this site. This will ensure that any housing is delivered in a manner which will conserve the setting of this Listed Building
SD2-MM255	Mod_AOD_M338	Support	Sandygate Farm, to the north of this area, is a Grade II Listed Building. The development of the vast majority of the area that was originally allocated would have harmed the setting and appreciation of this Listed farm. Consequently, we support the reduction in the extent of this site. This will ensure

Mod ref	Rep ID	Outcome	Report text
			that any housing is delivered in a manner which will conserve the setting of this Listed Building
SD2-MM256	Mod_AOD_M339	Support	Sandygate Farm, to the north of this area, is a Grade II Listed Building. The development of the vast majority of the area that was originally allocated would have harmed the setting and appreciation of this Listed farm. Consequently, we support the reduction in the indicative capacity that has resulted from the removal of the northernmost part of this site from the Allocation. This will ensure that any housing is delivered in a manner which will conserve the setting of this Listed Building .
SD2-MM258	Mod_AOD_M340	Support	Sandygate Farm, to the north of this area, is a Grade II Listed Building. The development of the vast majority of the area that was originally allocated would have harmed the setting and appreciation of this Listed farm. The proposed Modification sets out the measures by which any harm on that portion of the original allocation which remains will be reduced and the requirements for any development on this site. These will help to ensure that any housing is delivered in a manner which conserves those elements which contribute to the setting of the Listed Building.
SD2-MM259	Mod_AOD_M560	Object	<p>For and on behalf of Holmbridge Residents Group</p> <p>As residents of Holmbridge, we are concerned that there has been no explanation as to why H626 has been left in the Local Plan after it was proven at the hearing that the local highway network could not be improved (which was the concern of the Inspector) to accommodate further housing.</p> <p>It is noted that H725 (which also could have used Bankfield Drive or Laithe Avenue for access) was taken out of the plan by Kirklees and comments as to why this was subsequently removed included the lack of acceptable visibility splays off Laithe Avenue. The visibility splays at the bottom of Bankfield Drive are worse and the junction is far busier than any proposed access off Laithe Avenue would have been. Dobb Top Road is also said by Kirklees to be unsuitable for any intensification of use at the point of another potential access to H725. This same road network would be used by any dwellings built on H626.</p> <p>Regarding the junctions involving Bankfield Drive, Laithe Avenue and Dobb Top Road, it is stated by Kirklees that there have been no reported accidents within the last 5 years. It is true that there have been no accidents reported, however there have been numerous accidents at these junctions. Kirklees are well aware of this as they have had to repair the retaining wall on a number of occasions. Incidentally, in the last few days Kirklees have again put up a temporary fence in front of the retaining wall as it appears to be close to giving way once more.</p> <p>In years gone by, H626 has been consistently turned down for development both by Kirklees and by the Planning Inspectorate due to highway safety concerns. The local inferior road network is now busier than it has ever been and, as residents of Holmbridge, we are both surprised and frustrated by the lack of consistency from Kirklees. We therefore feel that we deserve a thorough explanation as to why H626 has been left in the Local Development Plan. We do hope that our concerns could find their way to the Inspector as we cannot see anywhere for us to voice our comments by referencing the amendments documentation as they do not appear to be relevant to highways.</p>
SD2-MM260	Mod_AOD_M247	Support	Natural England welcomes SD2-MM195, SD2-MM233, SD2-MM237, SD2-MM238, SD2-MM239, SD2-MM251, SD2-MM260, SD2-MM361 and SD2-MM33 which reflect the approach agreed in the Habitats Regulations Assessment and helps address the concerns we raised previously regarding impacts from the plan on European designated sites.
SD2-MM260	Mod_AOD_M424	Conditional Support	<p>As Katie Child, Planning Inspector has recommended that to comply with EU regulations a Habitat Assessment should be carried out I must agree with this. The surveys so far carried out under the Habitat Regulations Assessment appears to be inaccurate. For example 5.3.8 Allocation H626 Table 10 states that no molehills are present in this field which is incorrect - there are many molehills in this field indicating the presence of earthworms which would be suitable for golden plover. The cry of the curlew can be heard from this field which would suggest H626 is functionally connected to the nearby SPA .</p> <p>The site is within 600m of the Peak District Natural Park boundary. Natural England commented on the Draft Local Plan (ID DLP_SA53,logged 2/2/16): "Natural England note that para 4.53 of the Sustainability Appraisal report identifies the adoption of a 500m buffer for landscape impacts on the Peak District National Park. As a precautionary distance, we would consider 500m too short..".</p> <p>Development of the site would have an adverse effect on biodiversity. The site is within the South Pennine Moor Special Protection Area 2.5km buffer. It is an improved field used as horse grazing which is farmed organically with a wildlife border to one side. It provides a habitat for many species of wildlife that border the Peak District including brown hares, bats, , hedgehogs, swifts, house martins, swallows, fieldfare, sparrow hawks and many more insects and birds. The cry of the curlew can frequently be heard across this field.</p> <p>This site is approximately 55metres from Yateholme Reservoirs & Plantations Local Wildlife Site, approximately 205m from Digley Reservoir/Marsden</p>

Mod ref	Rep ID	Outcome	Report text
			Clough Local Wildlife Site, approximately 825m from Digley Quarries, Holmbridge Local Geological Site, approximately 865m Carr Green Meadows Holmbridge Local Wildlife Site and within 955m of New Laith Fields Holmbridge Local Wildlife Site; therefore development here could have a significant negative effect on the habitats of local wildlife. The wildlife are not aware of the imposition of a 500 m buffer or by the council or of any theoretical boundary and move freely through and across this site. I believe that a much more detailed habitat assessment should be carried out on this site. The field and the habitat that it provides should be protected and preserved and not built upon just because Kirklees need to meet a housing target.
SD2-MM261	Mod_AOD_M341	Support	This site lies adjoins the boundary of the Netherthong Conservation Area. The loss of part of this open area and its subsequent development could have harmed an element which contributes to its character. Consequently, we support the reduction in the extent of this site. This will help to ensure that any housing is delivered in a manner which will conserve the character of the Conservation Area .
SD2-MM262	Mod_AOD_M342	Support	This site lies adjoins the boundary of the Netherthong Conservation Area. The loss of part of this open area and its subsequent development could have harmed an element which contributes to its character. Consequently, we support the reduction in the indicative capacity of this site. This will help to ensure that any housing is delivered in a manner which will conserve the character of the Conservation Area.
SD2-MM263	Mod_AOD_M343	Support	This site lies adjoins the boundary of the Netherthong Conservation Area. The loss of part of this open area and its subsequent development could have harmed an element which contributes to its character. The proposed Modification sets out the measures by which any harm will be reduced and the requirements for any development on this site. These will help to ensure that any housing is delivered in a manner which conserves those elements which contribute to the significance of the Conservation Area.
SD2-MM265	Mod_AOD_M389	Object	Adding traffic to the north of this site could increase danger to other road users on Stoney Bank Lane, particularly at the junction with New Mill Road as well as on Springwood Road. Rather users of the playing fields should be encouraged to park on the school car park and walk thus increasing their fitness and improving their health. Access to the site can also be obtained through the new estate on Tenter Hill.
SD2-MM266	Mod_AOD_M344	Support	This site adjoins the boundary of the Wooldale Conservation Area and makes an important contribution to its rural setting. The loss of several parts of this area and their subsequent development would have harmed elements which contribute to its significance. Consequently, we support the reduction in the extent of this site. This will help to ensure that any housing is delivered in a manner which will conserve the character of the Conservation Area .
SD2-MM267	Mod_AOD_M345	Support	This site adjoins the boundary of the Wooldale Conservation Area and makes an important contribution to its rural setting. There are also a number of Listed Buildings in its vicinity. The loss of several parts of this area and their subsequent development would have harmed elements which contribute to their significance. The proposed Modification alerts potential developers of the proximity of the Listed Buildings and, as a result, the need to ensure that any proposals conserve those elements which contribute to their significance
SD2-MM268	Mod_AOD_M347	Support	This site adjoins the boundary of the Wooldale Conservation Area and makes an important contribution to its rural setting. There are also a number of Listed Buildings in its vicinity. The loss of several parts of this area and their subsequent development would have harmed elements which contribute to its significance. Consequently, we support the reduction in the indicative capacity of this site. This will help to ensure that any housing is delivered in a manner which will conserve the character of the Conservation Area.
SD2-MM269	Mod_AOD_M348	Support	This site adjoins the boundary of the Wooldale Conservation Area and makes an important contribution to its rural setting. There are also a number of Listed Buildings in its vicinity. The loss of several parts of this area and their subsequent development would have harmed elements which contribute to their significance. The proposed Modification sets out the measures by which any harm will be reduced and the requirements for any development on this site. These will help to ensure that any housing is delivered in a manner which conserves those elements which contribute to the significance of the Conservation Area.
SD2-MM272	Mod_AOD_M349	Support	This site includes one of the principal buildings in the Hinchliffe Mill Conservation Area. We welcome this Modification which will ensure that this important building is retained and reused.
SD2-MM281	Mod_AOD_M492	Object	1. The field opposite #2-15 (approx.) which has apparently space for 25 houses has a right of way through it which is not shown on the map. Who this right of way belongs to and where it runs exactly, I am not certain, but be assured, there is one.2. Cross Lane already has an increase in the number of private cars using it as a result (probably) of increased sat. nav. use. It has become a race track (not just a 'rat run') in the mornings and evenings. Houses nearing completion nearer to Fulstine Rd. will result in more cars parked kerbside as many of these houses seem to have no garage. I should

Mod ref	Rep ID	Outcome	Report text
			like to remind Kirklees there has already been one child fatality on this road. There will be more. If building continues.3. There is no shop in Stocksmoor and people will probably use the Co-Op in Shepley. This already results in severe congestion at the junction of Station Rd and Marsh Lane. It is becoming dangerous.4. Stone Wood Lane is single Lane, narrow (with some unmarked places where passing is possible), steep in both directions, unlit and has no pedestrian pavement. Increased traffic will cause (more) accidents. 5. The number of houses built in the village has surpassed 10% each time a development has taken place: Fulstone Rd - 20 houses added to a hamlet of fewer than 120 houses; Crangle Field - another 17 added, Stocksmead - another 17 added. How many are we supposed to accept? There is no work around the area, people will have to commute and an hourly train will force people into car usage. There is a bus, but it takes 40 mins to get to Huddersfield, not what working people are prepared to tolerate today.6. Further increases in sewerage and surface run-off will cause traffic health and other problems in Thunderbridge: the system will be overloaded. Again.
SD2-MM281	Mod_AOD_M532	Object	1. The street of Cross Lane does not have space to accommodate for increased on-road car parking. The development risk increased risk of fatal car accident which had happened already in the past.2. The closest shop to Stocksmoor is in Shepley which requires driving through dangerously narrow, steep, and winding roads (Stone Wood Lane). More residence in the area and concentration of traffic is likely to result in accidents.3. The sewerage and run-off of rain has previously caused system overload in Thunderbridge. The infrastructure in place around the area is not built to cope with increased number of residence.4. There is a right of way through the field being considered for development.
SD2-MM281	Mod_AOD_M601	Object	Comment transcribed by KC from attached letter: I write in objection to the planned development of further housing to the west of my home. (Already I am suffering from loss of light due to Conroy and Brooks development to the east) In particular I understand the proposed building will encroach upon the right of way behind my home (No xx) and No's xx + xx Cross Lane which extends further up to the plantation area as you will find on your Wakefield archive map. This right of way was given by XX redacted name XX in 1934 and is on their deeds. Would you be in error of the law if you were to give permission and encroach on this land?
SD2-MM281	Mod_AOD_M604	Object	Comment transcribed by KC from attached letter: Regarding SD2 MM281 and general comment on the H538 site we wish to point out that the track leading to xx and xx Cross lane is unregistered land but is a permanent right of way for both houses. A Deed of Conveyance dated xx/xx/1934 shows this right of way extending through site H538 to the top of the field. This is shown as a single right of way and is a right of way for numbers xx and xx Cross Lane only. This right of way has never been extinguished and we use it regularly to visit our friends who have the land at the top of the field and to turn our vehicles round at the top of our drive. Also this lane is very narrow and regularly claims our wing mirrors and we feel it should be widened by a meter before any final plans are in place.
SD2-MM283	Mod_AOD_M350	Support	This site lies within the Thurstonland Conservation Area and the loss of this site and its subsequent development would have harmed an element which makes a positive contribution to its significance. Consequently, we support the reduction in the extent of this site. This will help to ensure that any housing is delivered in a manner which will conserve the character of the Conservation Area .
SD2-MM284	Mod_AOD_M351	Support	This site lies within the Thurstonland Conservation Area and the loss of this site and its subsequent development will harm an element which makes a positive contribution to its significance. Consequently, we support the reduction in the extent of this site. This will help to ensure that any housing is delivered in a manner which will conserve the character of the Conservation Area .
SD2-MM285	Mod_AOD_M352	Support	This site lies within the Thurstonland Conservation Area and the loss of this site and its subsequent development will harm an element which makes a positive contribution to its significance. The proposed Modification corrects a mistake regarding the relationship of the site to the Conservation Area and alerts potential developers of its proximity and, as a result, the need to ensure that any proposals conserve those elements which contribute to its significance
SD2-MM286	Mod_AOD_M353	Support	This site lies within the Thurstonland Conservation Area and the loss of this site and its subsequent development will harm an element which makes a positive contribution to its significance. Consequently, we support the reduction in the indicative capacity of this site. This will help to ensure that any housing is delivered in a manner which will conserve the character of the Conservation Area.
SD2-MM288	Mod_AOD_M354	Support	This site lies within the Thurstonland Conservation Area and the loss of this site and its subsequent development will harm an element which makes a positive contribution to its significance The proposed Modification sets out the measures by which any harm will be reduced and the requirements for any development on this site. These will help to ensure that any housing is delivered in a manner which conserves those elements which contribute to the significance of the Conservation Area.
SD2-MM289	Mod_AOD_M256	Support	Natural England notes the extensions to allocations in modifications SD2-MM108, SD2-MM190,SD2-MM290 and SD2-MM182 as well as the new

Mod ref	Rep ID	Outcome	Report text
			allocations proposed in modificationsSD2-MM136, SD2-MM191, SD2-MM289, SD2-MM291. We note and welcome the assessment undertaken for these modifications and have no further concerns.
SD2-MM290	Mod_AOD_M252	Support	Natural England notes the extensions to allocations in modifications SD2-MM108, SD2-MM190,SD2-MM290 and SD2-MM182 as well as the new allocations proposed in modificationsSD2-MM136, SD2-MM191, SD2-MM289, SD2-MM291. We note and welcome the assessment undertaken for these modifications and have no further concerns.
SD2-MM291	Mod_AOD_M257	Support	Natural England notes the extensions to allocations in modifications SD2-MM108, SD2-MM190,SD2-MM290 and SD2-MM182 as well as the new allocations proposed in modificationsSD2-MM136, SD2-MM191, SD2-MM289, SD2-MM291. We note and welcome the assessment undertaken for these modifications and have no further concerns.
SD2-MM291	Mod_AOD_M355	Support	Constraints Bent Ley Silk Mill to the south-east of this site is a Grade II Listed Building. The proposed Modification alerts potential developers of the proximity of the Listed Buildings and, as a result, the need to ensure that any proposals conserve those elements which contribute to their significance Reports required Bent Ley Silk mill to the south-east of this site is a Grade II Listed Building. The proposed Modification sets out a requirement for a Heritage Impact Assessment to accompany any application. This will help ensure that any proposals conserve those elements which contribute to the significance of this building
SD2-MM292	Mod_AOD_M101	Object	I agree with the comments made by BOLT(ED)
SD2-MM292	Mod_AOD_M12	Object	We have serious concerns about this. We are deeply concerned that officers who are so involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised. We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan.(Please see our response to SD2-MM353 for a more detailed explanation)
SD2-MM292	Mod_AOD_M120	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.
SD2-MM292	Mod_AOD_M135	Object	Policies 64,65,66,67,68,69,70,71.72.73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.
SD2-MM292	Mod_AOD_M150	Object	I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will

Mod ref	Rep ID	Outcome	Report text
			have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past. I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –e.g. during that time there have been 2 NPPFs and numerous NPPGs. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM292	Mod_AOD_M356	Support	This proposed additional Policy clarifies the purpose of the information contained in the orange boxes in the Allocations and Designations Document. As such, it now makes it clear to users of the Plan that the details in this document will need to be taken into account both in preparing schemes for the development of these Allocations and in determining any subsequent applications. This will help to ensure that the Plan's Allocations are developed in a manner which will deliver sustainable development.
SD2-MM292	Mod_AOD_M65	Object	I am opposed to the inclusion of this policy. I believe it is unsound. I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM292	Mod_AOD_M78	Object	I agree with comments made by BOLT(ED)
SD2-MM295	Mod_AOD_M102	Object	I agree with the comments made by BOLT(ED)
SD2-MM295	Mod_AOD_M121	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the

Mod ref	Rep ID	Outcome	Report text
			public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.
SD2-MM295	Mod_AOD_M13	Object	We have serious concerns about this. We are deeply concerned that officers who are so involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised. We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan.(Please see our response to SD2-MM353 for a more detailed explanation)
SD2-MM295	Mod_AOD_M136	Object	Policies 64,65,66,67,68,69,70,71.72.73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.
SD2-MM295	Mod_AOD_M151	Object	<p>I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative:</p> <p>I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not.</p> <p>There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive.</p> <p>I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development.</p> <p>I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny.</p> <p>I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions.</p> <p>I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions.</p> <p>It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past.</p> <p>I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –eg during that time there have been 2 NPPFs and numerous NPPGs.</p> <p>I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.</p>

Mod ref	Rep ID	Outcome	Report text
SD2-MM295	Mod_AOD_M357	Support	This proposed additional Policy clarifies the purpose of the information contained in the orange boxes in the Allocations and Designations Document. As such, it now makes it clear to users of the Plan that the details in this document will need to be taken into account both in preparing schemes for the development of these Allocations and in determining any subsequent applications. This will help to ensure that the Plan's Allocations are developed in a manner which will deliver sustainable development.
SD2-MM295	Mod_AOD_M418	Object	Please cross reference with comments in relation to SD2-MM352, 353, 360, 362, 364, 367 and 406 all of which include proposals to effectively pre-determine applications or elements of applications. This seeks to take away discretion from officers and councillors in respect of applications to be determined throughout the lifespan of the plan. This is fundamentally undemocratic as it will reduce the ability of officers and councillors to influence and decide applications based upon facts extant at the date of the application rather than at the formulation of the plan.
SD2-MM295	Mod_AOD_M66	Object	I am opposed to the inclusion of this policy. I believe it is unsound. I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM295	Mod_AOD_M79	Object	I agree with the comments made by BOLT(ED)
SD2-MM295	Mod_AOD_M80	Object	I support the comments made by BOLT(ED).
SD2-MM298	Mod_AOD_M331	Support	Background Empire Knight Group is the freehold owner of approximately 30 ha of land to north of Blackmoorfoot Road and to the east of Felks Stile Road, Huddersfield (“the site”). In the Kirklees Publication Draft Local Plan the site was allocated as a mixed use allocation (reference: MX1930), with an indicative capacity to deliver 441 dwellings and 44,258 sq m of employment floorspace. Since March 2017, Empire Knight Group has been in discussion with the Council over the proposed allocation of the site. Such discussions have focused on the likely achievable mix of land uses and the fact that the employment element of the proposed allocation is not considered to be deliverable. This is reflected in the Statement of Common Ground between Empire Knight Group and the Council (ID: SC005).In September 2017, Empire Knight Group submitted a formal pre-application request (ref. 2017/20381) to the Council for a development comprising up to 625 residential dwellings (Use Class C3), up to 70 extra care apartments (Use Class C2) and associated development at the site. Following ongoing community consultation and discussion with the Council, an outline planning application was submitted in March 2018 (reference: 2018/60/90748/W) for a residential-led, mixed use development comprising up to 630 residential dwellings (Use Class C3), up to 70 care apartments (Use Class C2/C3/D1), a local centre of up to 500 sq m (Use Class A1/A2/A3/A4/A5/D1) as well as associated development. Proposed Main Modification Main Modification SD2-MM298 proposes to delete the site's existing mixed use allocation, while Main Modification SD2-MM107 proposes to allocate the site as a new housing allocation (reference H3397), with an indicative capacity of 684 dwellings during the Local Plan period. Empire Knight Group fully supports the proposed amendment to the site's allocation from mixed use to housing. The original mixed use allocation was not effective or justified in accordance with paragraph 182 of the National Planning Policy Framework (2012), as the proposed employment provision at the site was not viable or deliverable. The amendment to a wholly residential allocation

Mod ref	Rep ID	Outcome	Report text
			is considered to be both effective and justified and therefore sound.
SD2-MM308	Mod_AOD_M358	Support	The buildings at Kirklees College are Grade II* Listed and there is also a Grade II Listed statue within the site. The proposed Modification alerts potential developers of these Listed structures and, as a result, the need to ensure that any proposals conserve those elements which contribute to their significance
SD2-MM311	Mod_AOD_M359	Support	The buildings at Kirklees College are Grade II* Listed and there is also a Grade II Listed statue within the site. The proposed Modification sets out the requirements regarding these Listed Buildings and for any additional development on this site. These will help to ensure that any housing is delivered in a manner which conserves those elements which contribute to the significance of these assets.
SD2-MM316	Mod_AOD_M636	Object	Maintains objection on allocation as set out in response and previous submissions
SD2-MM316	Mod_AOD_M638	Object	Maintains objection on allocation as set out in response and previous submissions
SD2-MM316	Mod_AOD_M639	Object	Maintains objection on allocation as set out in response and previous submissions
SD2-MM317	Mod_AOD_M447	Object	As currently drafted Wakefield does not consider the proposed main modifications to this policy to be sound. The policy is not justified in terms of dealing with potential impacts on the local highway network outside of Kirklees. The Council is concerned that the new text refers to the 'wider highway network' but then proceeds to deal exclusively with potential impacts on the strategic highway network. It should be clear in the policy that the 'wider highway network' includes the local network in Wakefield, particularly as it is this network that traffic from this allocation is likely to use to access the M1.
SD2-MM317	Mod_AOD_M478	Object	Removal of flood risk vulnerability of proposed uses and exception testing. No water management plan has been provided to date which addresses the fact that the site is adjacent to and addresses active floodplain and floodzone 3. This is a strategic life and death issue, as all water drained from the site flows to Heybeck then to Alverthorpe in the City of Wakefield which has history of flooding. In the delivery statement for CSUE previously submitted in point 3.1.4 drainage and flooding they state "the site falls primarily in Flood Zone 1. Drainage capacity work has been undertaken which has informed the location and scale of drainage ponds shown on the masterplan". It is unclear on the masterplan where these drainage ponds are and no drainage report has been made available to view for assessment or comment. According to the report of Professor Ian Rotherham p6 it states 'above the ground storage would be more likely...however for this scale of mitigation wetland construction takes considerable space'. Where is the space to construct these wetlands if SuDs are to be applied, considering the size of the development, the amount of land available, and the flood zone to the east? A complication is that if sufficient land is not available for surface mitigation of water, the water may flow into the sewer. This has negative consequences for the ancient woodlands but also according to the previously submitted report by WYG for CSUE 'a water main and existing sewerage infrastructure crosses the site which may need to be diverted, removed or altered. Additional capacity for foul water drainage may also need to be provided. No solution has been provided for this just that it will be assessed at planning application stage. This is inadequate considering the size of the development, deliverability and does not give opportunity to comment on the extent and location of works which may extend beyond the proposed site boundary. This lack of protection is enhanced by the proposed SD1MM89 pg. 125 para 12.20 requiring no further sequential tests to be done. The evidence supplied to date has not addressed these issues sufficiently. Removal of this text removes protection on these matters. Please see attached representation of Professor Ian Rotherham
SD2-MM317	Mod_AOD_M507	Object	The removal of these sentences about flood management and flood prevention are very worrying. The fields up to Heybeck frequently flood and the number of floods is increasing and take place much more regularly than they have over the last 60 years. It is very concerning that no information has been given about to what extent and where works will be required to enable capacity for fresh water and sewer provision and how this will affect the area, the disruption it will cause possibly beyond the proposed site boundary and how this will affect the streams.
SD2-MM317	Mod_AOD_M643	Object	Comment transcribed by KC from attached letter: 1. The development of 1535 houses, a primary school and industrial/business will lead to a massive increase in traffic on already over congested roads. The modifications proposed will barely alleviate the current problems with the traffic flow at peak times. 2. The increase in pollution generated by the additional traffic will affect public health particularly since there will be no green space left. At GPs are already full. 3. A 2 form primary school will be inadequate to serve the needs of 1535 households. 4. Kirklees has removed reference to any exception test requirement for the site, MX1905, and failed to address the flood risk affecting the whole site. The fields to the rear of my property are regularly waterlogged in heavy rain as is the bottom of my garden. The proposed development would further increase these problems. 5. The buffer zones around Dum and Dogloitch woods - the council has failed to allocate a large enough area of protection for land surrounding ancient woodlands putting both woodlands at risk.

Mod ref	Rep ID	Outcome	Report text
SD2-MM318	Mod_AOD_M479	Object	<p>A Masterplan is required for this site to be prepared in accordance with policies in the Local Plan SD1 MM90 is wholly inadequate in offering protection to the ancient woodlands, aged, veteran and important trees (as commented against SD1 MM90).</p> <p>Policy SD1 MM93 is welcomed. In order to help protect the UKBAP priority habitat watercourses and as highlighted in the EA consultation for the draft local plan that no pipes should enter the Heybeck/Bushy Beck watercourse due to the nature of the watercourse for most of its length and to conform to the Water Framework Directive specifications should include the need for buffers along watercourses to protect the valuable habitat (LDG core strategy: proposed submission September 2012 Policy development sCS7). This has not been included in the previously submitted masterplan and it is unclear how proposed MX1905 can conform to policy SD1MM93.</p> <p>This proposed development has not provided evidence of how it can conform to proposed policy SD1 MM113, pg 176, policy PLP51 relating to air quality. According to environmental researcher Michael Ryan, areas such as Dewsbury and Batley not only have the highest levels of deprivation in the borough, they also have the poorest air quality. Proposed policy SD1MM113 clearly states that proposals that have the potential to increase local air pollution either individually or cumulatively must be accompanied by evidence to show that the impact of the development has been assessed in accordance with the relevant guidance. Whilst clearly a professional document Kirklees Council Air Quality Assessment Development Association with the Local Plan Council Project Number 60274233 March 2017 states on pg 11 ‘the assessment presented in this report does not constitute a detailed assessment of each piece of land and does not consider the effects of construction of these sites’. It continues on page 15 point 3.2 – ‘the effect descriptors re set out for the consideration of the potential effects of individual, rather than the cumulative impacts of a set of developments such as those set out in the local plan. However, in the absence of specific guidance for the assessment of wider area plans, these descriptors have been used within this assessment. On pg 17 point 4.1.2 Local Monitoring Data it states ‘Monitoring data collected by Kirklees Council has been used to verify model performance at locations throughout the study area. The location of and previous concentrations measured at monitoring sites used are described in Appendix A’. On page 24 it states the ‘effect of local plan on ecosystems is presented in the Habitats Regulations Assessment therefore effect on Local Plan on ecosystems regarding air pollution is not included in this report. The nearest tubes, DT67, DT69, DT73 and DT74, to the site are located away from this proposed site at least a mile away. On Kirklees document LE118 Kirklees Council Air Quality Assessment Study shows the borders around proposed MX1905 are ‘modelled’ receptors.</p> <p>This does not provide direct evidence of the impact of this development. No evidence has been provided how this will include sustainable mitigation as required under proposed policy SD1 MM113 pg 176 policy PLP51, which states ‘if sustainable measures cannot be introduced the development will not be permitted. NPPF 2012 para 24 states ‘planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas...’. No sustainable mitigation is shown on the concept masterplan already submitted. No evidence has been shown how the site can conform to proposed policy SD1 MM113 pg 176 PLP51. Evidence has been produced by Morley Town Council which provides evidence highlighting potential negative impacts on the area of this proposed development.</p> <p>SD1 MM90 Natural environment pg 133 Policy PLP 30 “benefits of development clearly shown to outweigh the need to safeguard the local conservation value of the site or feature and there is no alternative”</p> <p>CD75 Kirklees Council Fourth Draft Kirklees Trees and Woodlands Strategy and Action Plan clearly shows on the map Land Use in Kirklees on page 9 Dum Wood and Dogloitch wood as forming key ancient woodland and indeed woodland in North Kirklees and is shown to be some of the only ancient woodland in this top section of Kirklees. As a major component of ancient woodland and woodland generally in this area it is more important than ever that this woodland is protected and conserved.</p> <p>CD75 point 3 Woodland cover clearly states South Kirklees has 3.5ha of woodland cover whilst North Kirklees has 1.9ha: contrasting woodland area to population ratios between South Kirklees and North Kirklees per 1000 people is 12.4ha to 3ha respectively. These woodlands form a vital resource for the area, not only in that they are woodland, in addition they are even more vital as a resource as they are ancient woodland. CD75 pg 10 clearly states ancient woodlands are “immensely valuable for numerous reasons including: trees, shrubs, wildlife and soil communities are often little modified by human activities; wildlife communities are often richer than those of more recent woods; very high percentage of the rare and vulnerable wildlife in England; these woodlands re of crucial importance for the conservation of biodiversity”. Dum Wood and Dogloitch Wood are listed on the ancient woodland register as having been wooded continuously since at least 1600AD. Additional evidence below proves the ancient value of these woodlands showing a request to thin them dated 1309-1310, the woods were even more dense at the time of the request. Reference: RB/70/3/13-</p>

Mod ref	Rep ID	Outcome	Report text
			<p>731/Lewis Please Ask For: Search room We have searched our catalogues and found the following references that relate to Savile estates in the West Ardsley area. Reference: DD/SR/26/37 Grant by Henry son of Sir John de Sothill', brother and heir of William de Soothill', to Joan, widow of William, of the manor of Soothill' etc, with all William's lands etc in Morlay, Batelay, Heckmundwick', Erdeslawe and Chiddeshill' (Soothill, Yk Morley, Yk Batley, Yk Heckmondwike, Yk Ardsley, Yk Chidsall, Yk) as dower Henry to have two thirds and Joan one third of the profits from thinning the woods: [other conditions are stated], 1309 – 1310. Photo of original document DD/SR/26/37 Request to thin woods at Chidsall dated 1309-1310 can be shown though it would not upload to this document. In addition to the rarity of ancient woodland in this area, the broader benefits provided by them are clearly stated in CD75 point 2 including green infrastructure, health, climate change, biodiversity Dum Wood and Dogloitch Wood contribute towards meeting CD75 climate change objective 4 (pg 19) reducing the heat island effect. They are strategically located between the main conurbations of Leeds, Wakefield and Batley and Dewsbury. They contribute towards good health. CD75 pg 6 “tree leaves trap harmful particulates from air pollution which play a negative role in health problem such as the increase in asthma and similar respiratory complaints”, noise reduction, quicker recovery from illness, recreational value, shade and reduction in heat during heat waves which are predicted to increase. CD75 pg 21 states as objective 1 for natural environment as “Prioritise maintaining the character and make up of ancient woodlands in accordance with the National vegetation classification and managing these in line with current best practice, seeking to further enhance these areas by additional planting or natural regeneration.” Pg 21 objective 4 ‘Establish links between existing woodlands by way of tree planting or natural regeneration in intermediate areas where possible. ‘This is possible in its present state. The benefits of the woodland and exceptional in this area.</p> <p>Landscape and amenity value and its rarity have been previously recognised and valued by Kirklees. In Kirklees and Wakefield Council’s statement of case to the Planning Inspectorate ref App/Z4718/A/98/300898 and app/X4725/A/98/300899 they consistently argue the benefits of this same area of land as open countryside. In Kirklees Council’s Officers Report dated 18/7/1997 reference 97/62/92234/EO recommending refusal of the opencast mining it describes in point (i) this same area of land as being of ‘rural character’ and a ‘rare piece of open land lying within the West Yorkshire conurbation’; and in point (ii) refers to the ‘enjoyment of residents of the surrounding area and other users of the network of public footpaths which crosses the pleasant area of open countryside’. No exceptional circumstance has been provided to show this land is less valuable now that it was then nor exceptional circumstance provided to justify changing this land for unexceptional reasons nor to conform with SD1MM90.</p> <p>Benefits of Greenbelt and its proposed removal</p> <p>As previously submitted no exceptional circumstance has been submitted evidencing the need to remove this land which is fundamental in preventing urban sprawl and other functions of the greenbelt. The proposed development creates urban sprawl. The modifications do not address the losses from removal of the current greenbelt and the roles that it serves. NPPF 134. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It would not be possible for sites such as MX1905 to meet the requirements of policy SD1MM29 in its current designation as greenbelt. There is no exceptional circumstance for release of Greenbelt at Chidswell (MX1905) and does not embrace the purpose of the Greenbelt therefore should be removed from the local plan. SD1MM 30 contradicts SD1MM29 and does not embrace the NPPF specifically the Greenbelt at Chidswell MX1905 as raised in specific comments on SD1MM29 and SD1MM30. The reliance of greenbelt land for employment growth is unrealistic when the M62 and M1 corridor are already littered with industrial units and, with the close proximity of Leeds and Wakefield providing employment areas the vision of Kirklees is unrealistic, unsustainable and undeliverable. This is evidenced by the representation from CPRE and KCAN previously uploaded in this set of modification representations. From freedom of information request reference EIR-514 dates 8th March 2018 it states “The Chidswell site in Kirklees was first identified in the 2012 investment ledger... having been submitted by Kirklees Council as a priority in the Ledger the Chidswell site was then referenced in the 2013 Leeds City Region (LCR) Investment Plan as a ‘strategic employment site accessible from the M1 (J40) and M62 (J28).” There are many issues regarding highways which it has not been proven can be overcome to meet this reason for inclusion in the 2013 ledger as highlighted in the previously submitted Highways Objection by Morley Town Council. Even if these issues could be overcome alleged proximity to these motorways is not an exceptional circumstance. A Buffer will be required to protect the ancient woodlands at Dum Wood and Dogloitch Wood This proposed scope for the protection for the ancient woodlands is inadequate as it does not take into consideration all requirements of the woodlands, a buffer is not enough. This is clearly detailed in the representation previously submitted by Professor Ian Rotherham and “Planners Manual for Ancient Woodland and Veteran Trees, Woodland Trust, October 2017”. More than proposed policy SD2 MM318 pg 172 is required. The Aged and veteran trees should be included wherever they are located on the site to conform with good practice; hedgerows and trees</p>

Mod ref	Rep ID	Outcome	Report text
			which have TPOs on them should also be protected as referred to in the Professor Rotherham representation and Woodland Trust Planners Manual. Concept masterplan for MX1905 shows extensive employment areas between the two woods. As shown on pg 14 of the Woodland Trust Planners' Manual and on pp 8-9 of the previous submission by Professor Rotherham other threats to ancient woodland and hedgerows provide evidence that the green fingers point 6 proposed on the concept masterplan would not meet CD75. As highlighted in the Professor Rotherham submission pp 4- 7 'there is a real risk that the woods will become dessicated and move into terminal decline'. 'Intricate and very careful design and maintenance would be required to meet the needs of the woodlands and the hedgerows to prevent their drying. To this end there will be a significant requirement for land allocation and necessary long term finance... When dividing catchments into small sections it is important to retain a perspective on how this affects the whole catchment management and hydrological cycle...Any industrial development will require more stages within the treatment train because the run-off from industry is likely to be more polluted and more complex...essential care would be required from domestic development drainage due to UKBAP Priority habitat of the watercourses. If sufficient land is not available for surface mitigation of water the flow of water into the sewer will take water away from the woodlands threatening their long term survival.'SD2 MM318 should therefore include text that the required land should be allocated and long term finance proven to meet all needs of the woodlands to ensure their long term survival.
SD2-MM318	Mod_AOD_M501	Object	The modification does not provide protection for the ancient woodlands as buffer zones alone are not enough. These woods especially Dunn/Dum wood are very wet and could die over time by drying. These woods, hedges and aged and veteran trees are very important for lots of wildlife including many bats, birds and mammals which I frequently see.
SD2-MM318	Mod_AOD_M529	Object	The modifications do not provide protection for these rare and unique ancient woodlands. Buffers are not enough. The woods will dry overtime if they are not protected properly against this with an integrated water management plan. These woods provide shelter and habitat for wildlife and respite and relaxation for people. No protection is being provided for the hedgerows, full of nesting birds and at dusk the fields, hedgerows and woods are full of bats.
SD2-MM318	Mod_AOD_M547	Object	Comment transcribed by KC from attached letter: Written Objection to Kirklees Local Plan Modifications Site Allocation MX1905 Chidswell In response to the modifications put forward during the public consultation stage of the Kirklees Council's Local Plan, I would like to formally object to all modifications based on the following reasons: - Green Belt Release - The National Planning Policy Framework (NPPF) clearly states that the development on green belt should only be permitted under exceptional circumstances. Following representations by Kirklees Council and the Church Commissioner landowners relating to the site MX1905 Chidswell, it is clear that these circumstances do not exist and the site allocation should be removed from the Local Plan. - Buffer Zones Around Dum and Dogloitch Woods - The scope of the protection for the ancient woodlands is too small and does not provide adequate protection for them, as it does not take into consideration all requirements of the woodlands - aged and veteran trees should also be included for protection wherever their locations - Additional Comments - *Green belt ignored *Ancient Woodland ignored *Necessary and large scale supporting infrastructure not detailed and proven *Excessive and disproportionate burden on one community
SD2-MM318	Mod_AOD_M644	Object	Comment transcribed by KC from attached letter: 1. The development of 1535 houses, a primary school and industrial/business will lead to a massive increase in traffic on already over congested roads. The modifications proposed will barely alleviate the current problems with the traffic flow at peak times. 2. The increase in pollution generated by the additional traffic will affect public health particularly since there will be no green space left. At GPs are already full. 3. A 2 form primary school will be inadequate to serve the needs of 1535 households. 4. Kirklees has removed reference to any exception test requirement for the site, MX1905, and failed to address the flood risk affecting the whole site. The fields to the rear of my property are regularly waterlogged in heavy rain as is the bottom of my garden. The proposed development would further increase these problems. 5. The buffer zones around Dum and Dogloitch woods - the council has failed to allocate a large enough area of protection for land surrounding ancient woodlands putting both woodlands at risk.
SD2-MM318	Mod_AOD_M651	Object	We still consider that the proposed allocation of site MX1905 is "unsound". No exceptional circumstances have been demonstrated to support the release of this site for development from the Green Belt. The proposed modifications do not make the plan "sound". Many members of the Chidswell Action Group have provided individual objections (circa 250) and in the interests of saving the Council time we attach these as one document to these representations. However, we urge the Council and the Inspector to consider these individually as they contain a number of important comments.
SD2-MM326	Mod_AOD_M360	Support	Policy PLP35 identifies the buildings associated with the District's textile industry as being one of the defining elements which contributes to the character of the area and, as a result, these should be retained. Bank Bottom Mills makes an important contribution to the character of the local area.

Mod ref	Rep ID	Outcome	Report text
			The Marsden Conservation Area Appraisal identifies it as a key unlisted building and considered that the large mill development at Bank Bottom Mill is essential in understanding the architectural and historic character of the settlement. As a result, it proposed that this building be included in the Conservation Area. The loss of so prominent a building would harm the character of the local area. Therefore we support the intention that proposals should retain and reuse this building.
SD2-MM329	Mod_AOD_M361	Support	Policy PLP35 identifies the buildings associated with the District's textile industry as being one of the defining elements which contributes to the character of the area and, as a result, these should be retained. New Mills makes an important contribution to the character of the local area The Marsden Conservation Area Appraisal identifies it as a key unlisted building and considered that the towers at New Mills is a locally significant landmark and contributes to the roofscape of Marsden. The loss of so prominent a building would harm the character of the local area. Therefore we support the intention that proposals should retain and reuse this building.
SD2-MM333	Mod_AOD_M362	Support	Policy PLP35 identifies the buildings associated with the District's textile industry as being one of the defining elements which contributes to the character of the area and, as a result, these should be retained. Dobroyd Mills Dobcroft Mill is an extensive and largely intact mill in the valley bottom in Hepworth and makes an important contribution to the character of the local area. The loss of so prominent a building would harm the character of this part of the District. Therefore we support the intention that proposals should retain and reuse this building.
SD2-MM335	Mod_AOD_M589	Support	Miller Homes supports the new text in Site Allocation TS5, which provides greater certainty for a potential new road scheme to the south of Dewsbury through Dewsbury Riverside, which will improve the A644 and provides greater certainty for the delivery of Dewsbury Riverside (H2089).
SD2-MM336	Mod_AOD_M363	Support	We support the proposals to improve the attractiveness and access to Dewsbury Station. The town is currently one of the three settlements in Yorkshire which is designated a Heritage Action Zone. In order to help facilitate the regeneration of the town centre is essential to create high-quality sense of arrival at the town's station.
SD2-MM351	Mod_AOD_M364	Support	The proposed Modification clarifies how heritage assets are depicted on the Local Plan Policies Map and will assist users of the document.
SD2-MM351	Mod_AOD_M4	Object	I do not think the document is sound as it is misleading & potentially may lead to unwitting damage to undesignated heritage assets, details of which are not held by either Historic England nor the Local Planning Authority. It would be significantly improved & be more helpful to readers if it could be amended in line with the suggestion below.
SD2-MM352	Mod_AOD_M111	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.
SD2-MM352	Mod_AOD_M126	Object	Policies 64,65,66,67,68,69,70,71.72.73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.
SD2-MM352	Mod_AOD_M14	Object	We have serious concerns about this. We are deeply concerned that officers who are so involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised. We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan.(Please see our response to SD2-MM353 for a more detailed explanation)

Mod ref	Rep ID	Outcome	Report text
SD2-MM352	Mod_AOD_M141	Object	I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past. I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –e.g. during that time there have been 2 NPPFs and numerous NPPGs. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM352	Mod_AOD_M274	Object	A senior planning officer has stated that ME1965A is going in the plan no matter what when it is neither wanted by the community nor needed for mineral reserves, which in Kirklees currently stand at between 40 and 80 years supply, i.e. well beyond the scope and time limit of this plan. There is something seriously wrong here when KMC's employed officials state that they intend to ride roughshod over our community and councillors who are elected to look after our interests.
SD2-MM352	Mod_AOD_M33	Object	How can a Senior Planning officer who has already stated that ME196A will be in the plan regardless be involved any further especially in the disastrous event ME1965A is left in. He surely must not be allowed involvement directly or indirectly in any final planning decision given his pre-emptive comments at the hearing. Our local MP and councillors must have their say in this they have already objected hence this level of interest must be listened to. Object to the inclusion of ME1965a
SD2-MM352	Mod_AOD_M365	Support	This proposed additional Policy clarifies the purpose of the information contained in the orange boxes in the Allocations and Designations Document. As such, it now makes it clear to users of the Plan that the details in this document will need to be taken into account both in preparing schemes for the development of these Allocations and in determining any subsequent applications. This will help to ensure that the Plan's Allocations are developed in a manner which will deliver sustainable development.
SD2-MM352	Mod_AOD_M407	Object	Planning permission will be expected to be granted if proposals accord with the development principles set out in the relevant site boxes, relevant development plan policies and as shown on the Policies Map. The adoption of this phraseology is fundamentally inappropriate as it lacks definition and clarity in that there is no specific identification of by whom it would be expected that planning permission should be granted. The suggestion would seem to be that on any such application local councillors might themselves be "expected" to support the application, to consider it a "done deal" or to the extent that they sit on planning committees might they be "expected" to accede to any application? It would seem to be implicit in the choice of these specific words that the "expectation" might be in the minds of local councillors when considering how to respond to any future application whereas in fact it would be better for elected members to approach these matters with an open mind uninfluenced by expectations which they might feel their residents would not wish them to acceded to. It should be absolutely clear that any application should be subject to full and

Mod ref	Rep ID	Outcome	Report text
			detailed scrutiny rather than being approached with the "expectation" of it being decided in any particular way - whether that be positive or negative. Any such application in relation to a mineral site is likely to be a substantial application and therefore should be subjected to full and detailed consideration without any preconceived opinions. Achieving compliance with predetermined requirements should be a prerequisite to any application proceeding to a determination not determinate in itself. This objection is really about ensuring that in every case in future justice is seen to be done - this plan and its policies are going to be in place for many years and any such expectation (presumption) would fall to be applied in years to come when circumstances on the ground and in the environs to any site may be very different from those extant when the plan is formulated.
SD2-MM352	Mod_AOD_M67	Object	I am opposed to the inclusion of this policy. I believe it is unsound. I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM352	Mod_AOD_M81	Object	I support the comments made by BOLT(ED).
SD2-MM352	Mod_AOD_M98	Object	I agree with the comments made by BOLT(ED)
SD2-MM353	Mod_AOD_M10	Object	We have serious concerns about this. We are deeply concerned that officers who are so involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised. We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan. (Please see our response to SD2-MM353 for a more detailed explanation)
SD2-MM353	Mod_AOD_M112	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.
SD2-MM353	Mod_AOD_M127	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If

Mod ref	Rep ID	Outcome	Report text
			<p>a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.</p>
SD2-MM353	Mod_AOD_M142	Object	<p>I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative:</p> <p>I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not.</p> <p>There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive.</p> <p>I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development.</p> <p>I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny.</p> <p>I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions.</p> <p>I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions.</p> <p>It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past.</p> <p>I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –eg during that time there have been 2 NPPFs and numerous NPPGs.</p> <p>I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.</p>
SD2-MM353	Mod_AOD_M15	Object	<p>We have serious concerns about this. Let us explain why? We are a community group that was asked by the Communities of Birds Edge and surrounding areas to represent them in opposing the inclusion of Site ME1965a in the plan. We have actively engaged in the consultation process in the belief that our opinions would have been listened to by the Council and where appropriate acted upon by them. We have prepared detailed reports outlining how this site fails to comply with the Local Plan policies and parts of the NPPF. We have responded to Stage 2 MIQs and we represented the local community at the public planning inspector hearings. We have sought to ensure the local community was aware of the impact this site could have upon their lives. Some of our members live only 5 metres from the proposed site. We truly believed that with a strong argument and strong public opinion KMC would remove the site from the plan just as they had done with other ME sites where they said that their removal was as a direct result of listening to the public. These now removed sites had fewer comments about them and fewer constraints than site ME1965a. Imagine then our shock when at the public meetings we were told by the Senior Mineral Planner present that the site we had opposed ME1965a was going into the local plan “no matter what”. We were effectively told that all the effort we had put into objecting to the inclusion of the site in the plan had been a waste of time and it made no difference who objected to its inclusion - the site was going in the plan. In all there were 330 comments objecting to the inclusion of the site in the PDLP - people who had objected included our local MP Paula Sherriff (this was the only site she</p>

Mod ref	Rep ID	Outcome	Report text
			<p>objected to), 7 councillors (including a cabinet member), local businesses (including the largest employer in our local area), numerous wildlife groups, people who use the area for recreation and people who lived there. There were no comments received from the developer or the landowner. Very strong opposition, amongst the most for any site in the plan, and over the two plan consultation processes over 530 objections – far more than any other ME site and far more than any of the ME sites that the council say were removed from the plan because they had listened to public opinion. We have raised the issue of the Senior Mineral Planner’s “no matter what” comments in a letter that has been seen by several senior officers in the council - none have countered his comments which we must now assume is council policy. No one has explained to us why this site must be in the plan no matter what is said against it nor how many constraints are placed against it. At the inspector’s public meeting we were challenged by officers over the validity of claims we made that KMC had produced a report stating that an appropriate buffer zone, usually 250 metres from the River Dearne to the extraction site would be required to mitigate harm. It was agreed that a copy of the report containing this information would be given to the inspector. KMC, only after prompting by us, took six months to forward a copy of this report to the inspector (now document ID35 in the library). As we have had to challenge to obtain this report - what other reports, that we are not aware of, exist? How can we be assured that officers, who are so determined to ensure that site ME 1965a is in the LP, “no matter what”, will be carrying out the planning assessment of the site and will have the final say in granting planning permission for this site, that their ability to objectively assess the site is not compromised. They have already gone on public record (prior to the public consultation process Document BP30 para 8.4) stating that the proposal is likely to be acceptable in planning terms. Will the doggedness of sticking to the decision to include Site ME1965a in the Local Plan “no matter what” transfer to the actual planning appraisal process? It has only been through the intervention of the independent planning inspector that constraints we highlighted over 2 years ago have been included in the plan and the name of the site changed to reflect its true status. All we currently have for Site ME1965a is an identified area of land - there is no publicly available planning proposal, if there is one at all. No one knows what is actually planned for the area. There have been no public consultation exercises conducted by the developer outlining their proposals to local communities. What we do know is that there are many constraints on the site – many of which would require safety zones, we know that a buffer of 250m from the rivers has been suggested to stop pollution and that for the last major quarry development a buffer zone of 235m from people’s houses was seen as barely adequate by the planning committee – so why have buffer zone maps determining the actual developable area not been produced to show the actual potential developable area? We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are predetermined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe there is a danger that the Strategic Planning Committee will feel that they are simply rubber stamping officer decisions and therefore those decisions have effectively been delegated to officers- in the case of Site ME1965a, the very people who have a “no matter what” attitude to including the site in the plan and who have already stated that the proposal is likely to be acceptable in planning terms. We hoped that “no matter what” we would have been given the opportunity to present our case to the Planning committee for it to be taken into account before a final decision was made on the application. We fear that with this policy this will not be the case. We therefore believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan.</p>
SD2-MM353	Mod_AOD_M152	Object	I am opposed to this modification and support the comments made by BOLT(ED). I believe the final say should rest with councillors
SD2-MM353	Mod_AOD_M159	Object	I oppose this modification - it removes a significant role of local elected councillors. I agree with the comments made by BOLT(ED).
SD2-MM353	Mod_AOD_M167	Object	I oppose this proposed modification. I feel that the only way the planners ever listen to the public is by means of a public meeting where Councillors can listen to the views of the public. They certainly have not listened to us during this process. If they had then site ME1965a would not be in the plan. I agree with the comments made by BOLT(ED).
SD2-MM353	Mod_AOD_M172	Object	I oppose this modification. I feel that a key role of Councillors is to have the final say in planning applications. This proposal would remove the right of the public to appear before the Council's planning committee and have their views considered by them, which is the public's right. I support the comments made by BOLT(ED)
SD2-MM353	Mod_AOD_M180	Object	I am opposed to the proposed modification. I feel that Councillors should have the final say in planning decisions and the public should have a right to be heard. I support the comments made by BOLT(ED).

Mod ref	Rep ID	Outcome	Report text
SD2-MM353	Mod_AOD_M186	Object	I am opposed to this modification. I believe that the community should have an opportunity to have its say before Councillors make the final decision. I support BOLT(ED)
SD2-MM353	Mod_AOD_M198	Object	I am opposed to this modification. I believe that people should be able to present their views to Councillors who can then make planning decisions. I support the comments made by BOLT(ED)
SD2-MM353	Mod_AOD_M204	Object	I am opposed to the proposed modification. I feel that this modification removes a key role for Councillors - that of being able to listen to and take account of the views of local communities when making planning decisions. I support the comments made by BOLT(ED).
SD2-MM353	Mod_AOD_M214	Object	I agree with the comment made by BOLT(ED)
SD2-MM353	Mod_AOD_M220	Object	As a resident of Birdside, and a member of the community group BOLT(ED) I would like to confirm that I agree with the detailed comments submitted by the group. In particular, I am concerned with the suggestion here that the identification of a site in the Plan will imply that planning permission will be accepted. It is not possible to give further details here as the details plans for this site have not been made publicly available. There have been no consultation exercises and I, as a member of the community and a resident living with close proximity of this site, have not been allowed to comment on specifics of the site. Given the concerns regarding the proximity to resident's properties and the likely impact on wildlife, water sources, I would argue that these restrictions should be reflected in the Plan. Would like to see the buffers of 250m from rivers and 235m from people's houses reflected in the Plan. I believe that it is not acceptable to say that the site plan should be given planning permission if it is included in the Plan. This leaves no opportunity for public consultation - particular with local residents who are not familiar with the Local Plan consultation process. I would as the Planning Inspector to review this modification and remove it from the suggested modifications to the Plan.
SD2-MM353	Mod_AOD_M273	Object	At the public hearings which I attended, the Senior planner for KMC clearly stated that "ME1965A was going in the Plan no matter what and nothing will prevent it going in" - surely that shows a bias that a council employee is willing to disregard over 300 objections and pre-empt the decision of the Inspectorate. What does he know that we don't? We have proved time and time again that the inclusion of ME1965 is not wanted by the community and is not needed as Kirklees already has stone reserves for the next 40 to 80 years, well outside the 15 year scope of the plan. Against all common sense this site seems to be favoured. One might almost think it suspicious.
SD2-MM353	Mod_AOD_M276	Object	My comments mirror those made by BOLTED
SD2-MM353	Mod_AOD_M31	Object	I have serious concerns about this given that the Senior planner for KMC at the last public hearings I attended clearly stated that "ME1965A was going in the Plan no matter what and nothing will prevent it going in" - surely that has wasted all the efforts of the 300+ people who objected and the huge efforts of BOLT(E)D our community group who I fully support. How can at a public hearing with the Inspector present this Senior figure at KMC planning pre-empt the outcome of something that hasn't yet been approved by the Government.
SD2-MM353	Mod_AOD_M366	Support	This proposed additional Policy clarifies the purpose of the information contained in the orange boxes in the Allocations and Designations Document. As such, it now makes it clear to users of the Plan that the details in this document will need to be taken into account both in preparing schemes for the development of these Allocations and in determining any subsequent applications. This will help to ensure that the Plan's Allocations are developed in a manner which will deliver sustainable development.
SD2-MM353	Mod_AOD_M408	Object	Planning permission will be expected to be granted if proposals accord with the development principles set out in the relevant site boxes, relevant development plan policies and as shown on the Policies Map. Please see also the comments re SD2 - MM352. This is very poor drafting. It is not clear who might have the "expectation" e.g. an applicant, residents, consultee, councillor etc. Proceeding on the basis that any application might be expected to be successful would seem to substantially affect the balance of consideration of the merits of any such application tending towards an element of pre-determination. This plan and its policies will be extant for many years and therefore there is a risk of applications in years to come effectively being pre-determined in circumstances where those affected by them may feel that the odds are stacked against them. In those circumstances residents (and other interested parties) might consider the process to be undemocratic in the sense that they might feel their ability to influence planning applications in their locale had been greatly restricted.
SD2-MM353	Mod_AOD_M481	Object	I fully support the comments made by BOLT(ED)
SD2-MM353	Mod_AOD_M50	Object	UDVET would like to fully support the comments made by BOLT(ED) and share their concerns.
SD2-MM353	Mod_AOD_M68	Object	I am opposed to the inclusion of this policy. I believe it is unsound. I also support the comments made by BOLT(ED). I also believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the

Mod ref	Rep ID	Outcome	Report text
			following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM353	Mod_AOD_M82	Object	I support the comments made by BOLT(ED).
SD2-MM353	Mod_AOD_M92	Object	I have seen and agree with the comments made by BOLT(ED). I am concerned that if implemented this modification would remove the ability of local people to have their views heard and considered by the local planning committees before they reached a planning decision.
SD2-MM354	Mod_AOD_M107	Conditional Support	I fully support the modification. At last someone has recognised that Site ME1965a contains these two rivers. They both need to be protected from the pollution that comes from quarrying and the only guaranteed way to do that is for Site ME1965a to be removed from the plan - until this happens the plan is unsound. I also support the comments made by BOLT(ED).
SD2-MM354	Mod_AOD_M122	Conditional Support	Modification is supported. I also support the comments made by BOLT(ED). It is time Site ME1965a was removed from the Plan
SD2-MM354	Mod_AOD_M137	Conditional Support	I support the modification and the comments made by BOLT(ED). The River Dearne and Park Dyke are waterways that need to be protected. The best way to do this is to remove site ME1965a from the plan.
SD2-MM354	Mod_AOD_M153	Conditional Support	I support the modification and the comments made by BOLT(ED)
SD2-MM354	Mod_AOD_M160	Conditional Support	I agree with the proposed modification - it recognises the importance of the River Dearne and Park Dyke. Park Dyke provides water for our farm animals - any pollution of this water source would have an adverse impact on our business. I agree with the comments made by BOLT(ED)
SD2-MM354	Mod_AOD_M163	Object	I cannot consider these modifications to be legal or sound. The planning process rules morph with each challenge a proposed development takes. These modifications have been made in response to considered challenges to the proposal. Clearly those who have made the proposal have not investigated the site, surroundings and general environment to any depth. Consequently I feel the whole proposal can be deemed unsound.
SD2-MM354	Mod_AOD_M168	Conditional Support	I support this proposed modification and the comments made by BOLT(ED). It is obvious to anyone that if the quarry goes ahead on this site it will significantly impact these water sources.
SD2-MM354	Mod_AOD_M173	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). I am glad that at last someone has recognised the importance of protecting from contamination the two rivers on this site. I believe that if Site ME1965a was developed it would have a significant negative impact on the wildlife and livestock that rely on these water sources.
SD2-MM354	Mod_AOD_M182	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). I am glad that the River Dearne and Park Dyke have been recognised as constraints. Park Dyke and the run off is used to water our livestock.
SD2-MM354	Mod_AOD_M187	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). Our farm relies on water that runs in Park Dyke to water our livestock. This water needs to be protected. Best way to do this is to remove site ME1965a from the plan.
SD2-MM354	Mod_AOD_M199	Conditional	I support the proposed modification and the comments made by BOLT(ED). Park Dike runs across our farm and is used by our livestock. It needs to be

Mod ref	Rep ID	Outcome	Report text
		Support	protected and the best way to do this is for Site ME1965a to be removed from the plan.
SD2-MM354	Mod_AOD_M205	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). Park Dyke runs across our farm and is used by our livestock. It needs to be protected and the best way to achieve that is for Site ME1965a to be removed from the plan.
SD2-MM354	Mod_AOD_M215	Conditional Support	I support the views of BOLT(ED) on this issue.
SD2-MM354	Mod_AOD_M221	Conditional Support	I welcome this modification and support its inclusion. The River Dearne and Park Dyke need to be protected from interference and pollution. I agree with all detailed comments submitted by BOLT(ED). I would like to see the required buffer zones reflected in the Plan to ensure that the river and dyke are protected in any future development at site ME1965.
SD2-MM354	Mod_AOD_M24	Conditional Support	We are not in a position to comment upon the legality of this modification.
SD2-MM354	Mod_AOD_M269	Support	I support this modification. The River Dearne and Park Dike need to be protected by appropriate stand off distances/buffer zones. Reference: the report at ID35 Urban Vision document stating that appropriate buffer zones of 250 metres would be required to mitigate harm.
SD2-MM354	Mod_AOD_M277	Conditional Support	My comments mirror those made by BOLTED
SD2-MM354	Mod_AOD_M34	Conditional Support	Our two rivers running through the proposed ME1965A should be protected given the amount of biodiversity they support for many miles downstream as well as the local employment at the mill they feed. It actually justifies our concerns and supports our reasoning's for removal of ME1965A from the plan.
SD2-MM354	Mod_AOD_M409	Conditional Support	The recognition of these rivers is very important and very significant. However, it comes late in the day and begs the question as to whether the significance of these watercourses has been properly considered throughout the process of developing the plan and the proposals in relation to site M1965a. When one considers these points in addition to other constraints on the site, for example the application of buffer zones in relation to adjacent housing and so forth, then it really is quite inappropriate for the allocation of this site to remain in the plan.
SD2-MM354	Mod_AOD_M442	Conditional Support	I support the comments made by BOLTED.
SD2-MM354	Mod_AOD_M51	Conditional Support	UDVET would like to support the statements made by BOLT(ED) on this matter.
SD2-MM354	Mod_AOD_M73	Support	I support the modification. I am glad that someone has at last recognised the need to protect the two rivers. I also support the comments made by BOLT(ED)
SD2-MM354	Mod_AOD_M88	Conditional Support	I fully support this modification. I am surprised that it has taken over three years to recognise the two rivers as major constraints but very pleased that the inspector has supported those who have been requesting this for some time. Surely it is now time for KMC to reassess their approach to this Site. It clearly has had a lot of public opposition against it and it has many, many constraints against it. It should not have been put forward in the first place and clearly given the additional constraints and the new proposed modifications to several policies it really is time it is removed. Please Kirklees listen to what people are saying and change your attitude of "this site is going in the plan no matter what" to one that takes account of all the LP policies, takes account of all the constraints and one that listens to what the public have to say. One that removes this site from the LP.(I have seen the comments made by BOLT(ED) and I am fully supportive of them.)
SD2-MM354	Mod_AOD_M93	Conditional Support	I agree with the comments made by BOLT(ED) and support this modification. It has taken 3 years for there to be recognition that a 12,000 year old river would be affected by this development. I believe that this creates even further reason why site ME1965a should be removed from the plan. While it remains in the Plan the Plan is unsound.
SD2-MM355	Mod_AOD_M108	Conditional Support	I fully support the modification. The area around and covered by Site ME1965a has an underground network of waterways. There is a collapsed well on the site and two wells on the Trans Pennine Trail on Dearne Dyke Lane. Again the best way to protect this underground water is for quarrying not to happen on Site ME1965a. It should not be in the plan and whilst it remains the plan is unsound. I also support the comments made by BOLT(ED)
SD2-MM355	Mod_AOD_M123	Support	I support the modification and the comments made by BOLT(ED). It is time site ME1965a was removed from the plan.
SD2-MM355	Mod_AOD_M138	Conditional	I support this modification and the comments made by BOLT(ED). Site ME1965a has a network of underground waterways that run onto the site and

Mod ref	Rep ID	Outcome	Report text
		Support	across it. The best way to protect this network is to remove Site ME1965a from the plan.
SD2-MM355	Mod_AOD_M154	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD2-MM355	Mod_AOD_M161	Conditional Support	I support this proposed modification and the comments made by BOLT(ED). There is a large underground water network that feeds into the River Dearne and Park Dyke that needs to be protected
SD2-MM355	Mod_AOD_M164	Object	The proposal to allow a developer to update their shallow case based upon the findings of those to be affected appears to be a considerable conflict of interest. It is not the responsibility of the general public to prove these matters it is that of the governmental bodies and the proposers. To allow a strengthened case in these circumstances cannot be legal or sound.
SD2-MM355	Mod_AOD_M169	Conditional Support	I support this proposed modification and the comments made by BOLT(ED).
SD2-MM355	Mod_AOD_M174	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). These natural water resources are probably geographically historical but still must be protected and not contaminated. Somewhere along their run people (?) wildlife and livestock will benefit from them.
SD2-MM355	Mod_AOD_M183	Conditional Support	I support the proposed modification and the comments made by BOLT(ED).
SD2-MM355	Mod_AOD_M188	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). There is a lot of underground water in this area that needs to be protected.
SD2-MM355	Mod_AOD_M200	Conditional Support	I support the proposed modifications and the comments made by BOLT(ED). Park Dike is fed by a number of sources and there is a great deal of underground water on Site ME1965a. Site ME1965a should be removed from the plan
SD2-MM355	Mod_AOD_M207	Conditional Support	I support this proposed modification and the comments made by BOLT(ED). Site ME1965a has a network of underground water courses and a lot of ground water which must mean that it cannot be quarried. This site ME1965a needs to be removed from the plan.
SD2-MM355	Mod_AOD_M216	Conditional Support	I agree with the comments made by BOLT(ED) on this.
SD2-MM355	Mod_AOD_M222	Conditional Support	I welcome this modification and fully support its inclusion in the Local Plan. This report should identify the underground water sources and networks that are visible from water wells on Dearne Dyke Lane. Within 10 metres of the site are two well buildings, the flow of underground water is towards site M1965a. There is also a collapsed well on Site ME1965a near to the River Dearne. It is my view that Site ME1965a should be removed from the Plan, and whilst it remains in the Plan, the Plan is unsound.
SD2-MM355	Mod_AOD_M23	Conditional Support	We are not in a position to comment upon the legality of this modification
SD2-MM355	Mod_AOD_M270	Support	I support the modification. There are two functioning wells and one collapsed one either on or immediately next to ME1965A. These have not yet been taken into account by any analysis carried out by KMC
SD2-MM355	Mod_AOD_M278	Conditional Support	My comments mirror those made by BOLT(ED)
SD2-MM355	Mod_AOD_M35	Conditional Support	This is welcomed as you now recognise the critical waterways and underground water sources are present on the site and justifies our reasons why it should not be included in the plan.
SD2-MM355	Mod_AOD_M391	Conditional Support	We are not in a position to comment upon the legality of the modification
SD2-MM355	Mod_AOD_M410	Conditional Support	This proposed modification begs the question as to how it was not included earlier given that site M1965a and its environs are riddled with watercourses, wells and so forth. Hydrological issues ought properly to be one of the fundamental issues in relation to this site but when this is read in conjunction with SD2-MM354 the impression could be formed that these are in fact matters considered as an afterthought. That should call into question the veracity of the original due diligence in respect of this site.
SD2-MM355	Mod_AOD_M448	Object	Whilst I generally welcome the inspectors comments and suggested modifications, I am not sure they go far enough and fail to protect the river course adequately, and residents from noise, dust and potential pollution of the water course.

Mod ref	Rep ID	Outcome	Report text
			<p>Does she believe that the business case is strong enough given that an existing planning application on a nearby quarry seems to have been held up, if this is granted, does she feel that all this capacity is warranted in after all what is a very depressed market</p> <p>The fact remains that the site is too large and too close to existing residents. I would urge the inspector to review the submission and reject it, for the reasons stated.</p>
SD2-MM355	Mod_AOD_M52	Conditional Support	UDVET would like to support the comments made by BOLT(ED) on this matter.
SD2-MM355	Mod_AOD_M74	Conditional Support	I support the modification. I am pleased that the need to have some form of risk assessment of the underwater network on Site NE1965a is required. The site after all has a collapsed well on and two others wells on its western boundary. I support the comments made by BOLT(ED)
SD2-MM355	Mod_AOD_M89	Conditional Support	I support the modification - this will take account of the extensive network of underground waterways that are on the site. These are clearly shown by the three wells on or very near to the site.
SD2-MM355	Mod_AOD_M94	Conditional Support	I agree with the comments made by BOLT(ED) and support this modification - it is a recognition of just how complex the underground water network is in this area. On or near Site ME1965a are three wells (two working and one collapsed) which show just how much underground water there is in this area.
SD2-MM356	Mod_AOD_M110	Conditional Support	I fully support the modification. At last it has been recognised that this proposal is for a new site not an extension to an existing quarry. Perhaps now KMC will, given the huge public opposition to this site and the significant number of serious constraints on this site, recognise that it is not a suitable site for a quarry. Whilst site ME1965a remains on the plan the plan is unsound. I also support the comments made by BOLT(ED)
SD2-MM356	Mod_AOD_M124	Conditional Support	I support the modification and comments made by BOLT(ED). It is good that someone has recognised that this is a proposed new quarry and not an extension to an existing one. All that is required now if for Site ME1965a to be removed from the plan.
SD2-MM356	Mod_AOD_M140	Conditional Support	I welcome and support the proposed modifications to change the name of Site ME1965a. This is the recognition we have been looking for, for nearly three years that Site ME1965a is a proposed new quarry not just an extension to an existing one. Given this and the new constraints and policy modifications proposed by the inspector – the need to protect landscape character; the need to protect the rivers and waterways in particular for Site ME1965a the River Dearne and Park Dyke and the requirement for a developer to demonstrate the need for the minerals – and the existing significant highway dangers and issues with this site, as highlighted by the KMC Highways person who spoke at the inspector’s public meeting and of the possibility that the site is the location of the historically significant Burnt Cumberworth - then KMC surely must review the need to include Site ME1965a in the Local Plan. I believe that the site should be removed from the Local Plan and have been asking for this for some time. I also support the comments made by BOLT(ED).
SD2-MM356	Mod_AOD_M155	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD2-MM356	Mod_AOD_M162	Conditional Support	I support the modification and the comments made by BOLT(ED). I am pleased that it has been recognised that site ME1965a is a proposal for a new quarry not an extension to an existing one. There are so many constraints with this site that it must be removed from the local plan.
SD2-MM356	Mod_AOD_M165	Object	The current name accurately reflects the proposal. To amend the name to something bland and non-specific is clearly a shallow attempt to disguise the actual proposal from those that may have concerns. This practice should not be allowed within any sensible planning legislation and its underhand nature is clearly unsound.
SD2-MM356	Mod_AOD_M170	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). I am happy that it has been recognised that this is a proposal for a new site not an extension to an existing one.
SD2-MM356	Mod_AOD_M175	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). I am glad that at last it has been recognised that this proposal is for a new quarry and not an extension to an existing one. Having said that, another major concern is the amount of heavily laden trucks dealing with existing quarry sites that are speeding around the narrow lanes and roads of our area sometimes at break neck speed. It is only a matter of time before for the first fatal accident to occur due to these trucks. If a new quarry was to be built the extra amount of trucks would only exacerbate the road problems we have now. Site ME1965a must be removed from this plan - be it on your conscience if the worst does happen.
SD2-MM356	Mod_AOD_M184	Conditional Support	I proposed the proposed modification and the comments made by BOLT(ED). It really is time that site ME1965a was removed from the plan. We thought all this had gone away.

Mod ref	Rep ID	Outcome	Report text
SD2-MM356	Mod_AOD_M190	Conditional Support	I agree with the modification and the comments made by BOLT(ED). Site ME1965a should be removed from the plan. It should not have been there in the first place.
SD2-MM356	Mod_AOD_M201	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). I am pleased that the name of the site has been changed but what really is required is for the site to be removed from the plan.
SD2-MM356	Mod_AOD_M208	Conditional Support	I support the proposed modifications and the comments made by BOLT(ED). We all thought that this quarry site had already been removed from the plan. We can't believe that it is still in the plan - it needs to be removed
SD2-MM356	Mod_AOD_M209	Conditional Support	I support the proposed modifications and the comments made by BOLT(ED). We all thought that this quarry site had already been removed from the plan. We can't believe that it is still in the plan - it needs to be removed
SD2-MM356	Mod_AOD_M210	Conditional Support	I support the proposed modifications and the comments made by BOLT(ED). We all thought that this quarry site had already been removed from the plan. We can't believe that it is still in the plan - it needs to be removed
SD2-MM356	Mod_AOD_M217	Conditional Support	I agree with BOLT(ED) on this.
SD2-MM356	Mod_AOD_M22	Conditional Support	We are not in a position to comment upon the legality of this modification.
SD2-MM356	Mod_AOD_M223	Conditional Support	I welcome the modification and fully support its inclusion in the Plan. The proposed development site is not an extension of the existing quarry. The original site is on a main road (thus reducing the impact of traffic on smaller roads). This is a new site of 24 hectares. Its inclusion in the Plan would damage local wildlife, local character, waterways and increase traffic on the existing Trans Pennine Trail - a route frequented by walkers, cyclists (of all ages) and horse riders. I believe that this site should be removed from the Local Plan. If it remains in the Plan, the proposed site should be reduced to reflect the need to consider the impact on all of these factors.
SD2-MM356	Mod_AOD_M271	Support	I support the change of name of ME1965A. This site is not an extension to the existing Appleton Quarry as it is over the ridge and is a completely new site affecting the village of Birdsedge. I support all of BOLT(ED)'s comments on this question.
SD2-MM356	Mod_AOD_M280	Conditional Support	My comments mirror those made by BOLTED
SD2-MM356	Mod_AOD_M281	Conditional Support	My comments mirror those made by BOLTED
SD2-MM356	Mod_AOD_M32	Support	I appreciate you have finally recognised this is not an extension to any existing quarries.
SD2-MM356	Mod_AOD_M392	Object	We are not in a position to comment about the legality of this modification.
SD2-MM356	Mod_AOD_M411	Conditional Support	This modification quite properly recognises the fact that this proposed allocation is for an entirely new quarry site separate and distinct from other quarry sites in the locality. This, therefore, begs the question as to whether throughout the process of development, consultation, consideration and examination of the plan this site has been considered on a false premises and therefore the analysis undertaken is fundamentally flawed.
SD2-MM356	Mod_AOD_M443	Conditional Support	I support the comments made by BOLTED
SD2-MM356	Mod_AOD_M53	Conditional Support	UDVET would like to support the comments made by BOLT(ED) on this matter.
SD2-MM356	Mod_AOD_M75	Conditional Support	I support the modification and the comments made by BOLT(ED) I welcome and support the proposed modifications to change the name of Site ME1965a. This is the recognition we have been looking for, for almost three years that ME1965a is a proposed new quarry not just an extension to an existing one. Given this and the new constraints and policy modifications proposed by the inspector – the need to protect landscape character; the need to protect the rivers and waterways in particular for Site ME1965a the River Dearne and Park Dyke and the requirement for a developer to demonstrate the need for the minerals then KMC surely must review the need to include Site ME1965a in the Local Plan. I believe that the site should be removed from the Local Plan and have been asking for this for some time.
SD2-MM356	Mod_AOD_M90	Conditional Support	The modification is supported. Thank goodness someone in authority has finally recognised that this is a proposed new quarry site and not an extension to an existing one. I have read the submission by BOLT(ED) and fully support what they say. It really is time that KMC recognised the very

Mod ref	Rep ID	Outcome	Report text
			strong opposition to this site, the many constraints on the site and that there is no need for any more sandstone quarries in Kirklees during the LP time period. Let's hope KMC use these modifications as the catalyst that spurs them on to do the right thing and remove Site ME1965a from the Plan. Whilst it is present the plan is unsound.
SD2-MM356	Mod_AOD_M95	Conditional Support	I agree with the comments made by BOLT(ED) and support this modification. At last it has been recognised that Site ME1965a is a proposed new quarry and not just an extension to an existing one. There are so many constraints on this site that I remain absolutely at a loss as to why KMC are so wedded to keeping this site on the plan. Surely they must see what the rest of us see - just how did this site even get selected in the first place and why must it be on the plan "no matter what". Site ME1965a should be removed from the plan, whilst it remains on the plan the plan is unsound.
SD2-MM357	Mod_AOD_M109	Conditional Support	I fully support this modification. With the YW infrastructure adjacent to this site and pipes apparently crossing this site the best way to protect them is not to quarry at all on Site ME1965a. The site should be removed from the plan and whilst it remains on the plan the plan is unsound. I also support the comments made by BOLT(ED)
SD2-MM357	Mod_AOD_M125	Conditional Support	I support the modification and the comments made by BOLT(ED). Here are another set of constraints that goes to show that site ME1965a is unsuitable as an ME site. It is time that site ME1965a was removed from the plan.
SD2-MM357	Mod_AOD_M139	Conditional Support	I support the modification and the comments made by BOLT(ED). The best way to protect the YW infrastructure is to have quarrying nowhere near it. To ensure this happens site ME1965a should be removed from the plan.
SD2-MM357	Mod_AOD_M156	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD2-MM357	Mod_AOD_M158	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). These underground reservoirs provide drinking water to many communities and they need to be protected. Another reason why site ME1965a should be removed from the Plan.
SD2-MM357	Mod_AOD_M166	Object	As with all modifications to this proposal they are solely based upon the challenges of the residents to be affected. I feel the phrase "give them enough rope to hang themselves" comes to mind. Producing poorly researched proposals to force those affected to provide relevant details is at best underhand and at worst illegal.
SD2-MM357	Mod_AOD_M171	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD2-MM357	Mod_AOD_M176	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). I wish the 50,000+ people that this water infrastructure serves could add their comments to vote against this proposed site. The only way to absolutely guarantee the safety of this infrastructure from the potential negative impacts of the development of ME1965a is for it not to go ahead, Safeguarding this infrastructure is paramount - guarantee it by removing site ME1965a from this local plan.
SD2-MM357	Mod_AOD_M185	Conditional Support	I support the proposed modification and the comments made by BOLT(ED)
SD2-MM357	Mod_AOD_M191	Conditional Support	I agree with the modification. The reservoirs need protecting. I support BOLT(ED)
SD2-MM357	Mod_AOD_M202	Conditional Support	I support the proposed modification and the comments made by BOLT(ED). Surely now given all the constraints and issues on this site - the site is not capable of being a quarry and should be removed from the plan.
SD2-MM357	Mod_AOD_M21	Conditional Support	We are not in position to comment upon the legality of this modification.
SD2-MM357	Mod_AOD_M211	Conditional Support	I support the proposed modification and the comments made by BOLT(ED).
SD2-MM357	Mod_AOD_M218	Conditional Support	I agree with BOLT(ED) on this.
SD2-MM357	Mod_AOD_M224	Conditional Support	I welcome this modification that will ensure the protection of critical drinking water infrastructure and fully support its inclusion in the Plan. This modification strengthens the reasons why site M1965a should not be an allocated site in the Plan and whilst it remains in the Plan, the Plan is unsound.
SD2-MM357	Mod_AOD_M272	Support	I support the proposal. Critical drinking water supplies should be protected.

Mod ref	Rep ID	Outcome	Report text
SD2-MM357	Mod_AOD_M282	Conditional Support	My comments mirror those made by BOLTED
SD2-MM357	Mod_AOD_M36	Conditional Support	I support this and again it justifies why ME1965A should not be included.
SD2-MM357	Mod_AOD_M412	Conditional Support	The proposed modification is entirely proper and ties in with the proposed modification SD2-MM355 regarding watercourses.
SD2-MM357	Mod_AOD_M54	Conditional Support	UDVET would like to support the comments made by BOLT(ED) on this matter.
SD2-MM357	Mod_AOD_M76	Conditional Support	I support the modification and the comments made by BOLT(ED)
SD2-MM357	Mod_AOD_M91	Conditional Support	I support the modification and comments made by BOLT(ED). Another issue for this site but safeguarding the infrastructure is essential. People need to know that their water supply is not threatened - the best way to do that is not to even contemplate having a quarry on Site ME1965a. This is yet another reason why site ME1965a should be removed from the LP. Whilst it remains in the LP the LP is unsound.
SD2-MM357	Mod_AOD_M96	Conditional Support	I agree with the comments made by BOLT(ED). This constraint recognises the presence of the reservoirs in Rusby Wood. As these are shown on most maps and were subject on a planning permission in 1992 why were they not considered in the KMC assessment of this Site. The same must be said of the presence of the River Dearne, Park Dyke and the three wells connecting to the underground water network. With such obvious constraints how can the result of the site assessment, which did not account for these, be valid? I have also noticed that since this assessment an additional one million tonnes of sandstone has been added to the Kirklees sandstone reserve. There are clear new issues which need to be taken into account. All these factors make it clear that site ME1965a should be removed from the local plan and whilst it remains the Plan is unsound.
SD2-MM360	Mod_AOD_M113	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.
SD2-MM360	Mod_AOD_M128	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.
SD2-MM360	Mod_AOD_M143	Object	I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to

Mod ref	Rep ID	Outcome	Report text
			be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past. I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –e.g. during that time there have been 2 NPPFs and numerous NPPGs. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM360	Mod_AOD_M16	Object	We have serious concerns about this. We are deeply concerned that officers who are so involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised. We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan.(Please see our response to SD2-MM353 for a more detailed explanation)
SD2-MM360	Mod_AOD_M29	Object	I am opposed to the inclusion of this policy. I believe it is unsound. I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM360	Mod_AOD_M367	Support	This proposed additional Policy clarifies the purpose of the information contained in the orange boxes in the Allocations and Designations Document. As such, it now makes it clear to users of the Plan that the details in this document will need to be taken into account both in preparing schemes for the development of these Allocations and in determining any subsequent applications. This will help to ensure that the Plan's Allocations are developed in a manner which will deliver sustainable development.
SD2-MM360	Mod_AOD_M38	Object	The pre-emptive comments made by the planner have made the proposed plan a done deal for ME1965A which needs to be challenged along with the numerous reasons on an environmental, health and safety and biodiversity level that mean ME196A shouldn't be included in the plan.

Mod ref	Rep ID	Outcome	Report text
			Additionally, the consultation on the Modifications was difficult to access particularly if you did not have access to the Internet.
SD2-MM360	Mod_AOD_M413	Object	Please refer to the comments in relation to modifications SD2-MM352 and 353. The same points are relevant in relation to the presumption of planning consent referred to here. There should be no such presumption and every application should be subjected to full, transparent scrutiny without any form of pre-determination whatsoever. To do otherwise is fundamentally ant-democratic having regard to the longevity of the plan.
SD2-MM360	Mod_AOD_M83	Object	I support comments made by BOLT(ED).
SD2-MM360	Mod_AOD_M97	Object	I agree with the comments made by BOLT(ED)
SD2-MM361	Mod_AOD_M248	Support	Natural England welcomes SD2-MM195, SD2-MM233, SD2-MM237, SD2-MM238, SD2-MM239, SD2-MM251, SD2-MM260, SD2-MM361 and SD2-MM33 which reflect the approach agreed in the Habitats Regulations Assessment and helps address the concerns we raised previously regarding impacts from the plan on European designated sites.
SD2-MM362	Mod_AOD_M103	Object	I support the comments made by BOLT(ED)
SD2-MM362	Mod_AOD_M114	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.
SD2-MM362	Mod_AOD_M129	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.
SD2-MM362	Mod_AOD_M144	Object	<p>I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative:</p> <p>I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not.</p> <p>There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive.</p> <p>I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development.</p> <p>I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny.</p> <p>I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions.</p> <p>I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions.</p> <p>It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past.</p>

Mod ref	Rep ID	Outcome	Report text
			I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –e.g. during that time there have been 2 NPPFs and numerous NPPGs. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM362	Mod_AOD_M17	Object	We have serious concerns about this. We are deeply concerned that officers who are so involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised. We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan.(Please see our response to SD2-MM353 for a more detailed explanation)
SD2-MM362	Mod_AOD_M368	Support	This proposed additional Policy clarifies the purpose of the information contained in the orange boxes in the Allocations and Designations Document. As such, it now makes it clear to users of the Plan that the details in this document will need to be taken into account both in preparing schemes for the development of these Allocations and in determining any subsequent applications. This will help to ensure that the Plan's Allocations are developed in a manner which will deliver sustainable development..
SD2-MM362	Mod_AOD_M37	Object	Based on the Senior KMC planners comments this is a closed deal and it shouldn't be acceptable that anyone who is making the decision of what goes into a plan should be allowed involvement should this crazy plan for ME1965A be approved in the plan. Its not conducive with a true and proper process and probably illegal given the fact this individual has pre-empted the decision before its even had chance to be opposed by the locals directly involved in the mess it would create for them.
SD2-MM362	Mod_AOD_M414	Object	Please see also the comments for SD2-MM352, 353 and 360.The presumption of consent this modification seeks to introduce is inappropriate and undemocratic having regard to the predicted life expectancy of the plan. There may be residents and councillors who will have to consider applications under these policies in years to come who are yet to be born, or who are still at school. Their decision making process should not be fettered by presumptions laid down now.
SD2-MM362	Mod_AOD_M69	Object	I am opposed to the inclusion of this policy. I believe it is unsound. I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past. I would therefore ask the

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			inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM362	Mod_AOD_M84	Object	I agree with the comments made by BOLT(ED).
SD2-MM363	Mod_AOD_M25	Support	Not Applicable - register of support for the amendment as being in line with discussions at the Inquiry hearing
SD2-MM364	Mod_AOD_M104	Object	I agree with the comments made by BOLT(ED)
SD2-MM364	Mod_AOD_M115	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.
SD2-MM364	Mod_AOD_M130	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.
SD2-MM364	Mod_AOD_M145	Object	I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past. I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –e.g. during that time there have been 2 NPPFs and numerous NPPGs. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM364	Mod_AOD_M18	Object	We have serious concerns about this. We are deeply concerned that officers who are so involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised. We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe that it is premature to say that a site in the plan should, provided caveats are

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			met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan.(Please see our response to SD2-MM353 for a more detailed explanation)
SD2-MM364	Mod_AOD_M369	Support	This proposed additional Policy clarifies the purpose of the information contained in the orange boxes in the Allocations and Designations Document. As such, it now makes it clear to users of the Plan that the details in this document will need to be taken into account both in preparing schemes for the development of these Allocations and in determining any subsequent applications. This will help to ensure that the Plan's Allocations are developed in a manner which will deliver sustainable development.
SD2-MM364	Mod_AOD_M417	Object	Please refer to comments in relation to SD2-MM352, 353, 360, 362, 364, 367, 406.The same principles apply in relation to this policy in that the proposal seeks to fetter the ability of officers and councillors in terms of decision making going forward and as such is undemocratic and should be removed.
SD2-MM364	Mod_AOD_M70	Object	I am opposed to the inclusion of this policy. I believe it is unsound. I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM364	Mod_AOD_M85	Object	I agree with comments made by BOLT(ED)
SD2-MM366	Mod_AOD_M402	Support	I support the move to remove WS16 from being safeguarded as a waste site , it is a business linked farm diversification and cannot be treated in this way due to the close operating structure with the farm. Further to have continued would have national implications and effect all other Anaerobic Digestion plants in the country.
SD2-MM366	Mod_AOD_M406	Support	This is an entirely appropriate modification which reflects the discussions before the inspector at the examination hearings. The previously proposed allocation did not take account of the fact that this was a modest scale private electrical generation site which happened to consume waste material. To have allocated the site as a waste site would not have protected this facility in any way but could have impacted on the operation and development of the farm and the business.
SD2-MM366	Mod_AOD_M61	Support	I support the modification to remove WS16 from the map. This is a farm diversification which cannot be treated in the same way as a standalone waste site. It has symbiotic connections to the farm and is dependent on it for investment, access, feedstock, land, etc. If KC safeguarded this site it would be the only one in England and possible UK to be treated as such. In addition KC has surplus capacity for C&I waste and has a SUEZ contract until 2028 and so protection is not critical. The wider region's emphasis on tourism and heritage would also not be compromised.
SD2-MM367	Mod_AOD_M105	Object	I agree with the comments made by BOLT(ED)
SD2-MM367	Mod_AOD_M116	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats

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			planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.
SD2-MM367	Mod_AOD_M131	Object	Policies 64,65,66,67,68,69,70,71.72.73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.
SD2-MM367	Mod_AOD_M146	Object	I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past. I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –eg during that time there have been 2 NPPFs and numerous NPPGs. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM367	Mod_AOD_M19	Object	We have serious concerns about this. We are deeply concerned that officers who are so involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised. We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan.(Please see our response to SD2-MM353 for a more detailed explanation)
SD2-MM367	Mod_AOD_M370	Support	This proposed additional Policy clarifies the purpose of the information contained in the orange boxes in the Allocations and Designations Document.

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			As such, it now makes it clear to users of the Plan that the details in this document will need to be taken into account both in preparing schemes for the development of these Allocations and in determining any subsequent applications. This will help to ensure that the Plan's Allocations are developed in a manner which will deliver sustainable development..
SD2-MM367	Mod_AOD_M416	Object	It is not clear in whom the expectation of consent would be found. It seems this is an attempt to fetter the discretion of planning officers and councillors in years to come throughout the lifetime of the plan. It is therefore fundamentally undemocratic. Please cross reference with my comments regarding SD2-MM352, 353, 360, 362 and 406 where the same principles apply.
SD2-MM367	Mod_AOD_M71	Object	I am opposed to the inclusion of this policy. I believe it is unsound. I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM367	Mod_AOD_M86	Object	See comments made by BOLT(ED).
SD2-MM370	Mod_AOD_M371	Support	The Lodge, its gates and gate piers at the north-eastern corner of this area are Grade II Listed Buildings. The proposed Modification alerts users to the presence of these structures and the need to conserve them as part of any development proposals.
SD2-MM372	Mod_AOD_M567	Object	~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”. ~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council's overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years' time, but it is

Mod ref	Rep ID	Outcome	Report text
			protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.
SD2-MM373	Mod_AOD_M568	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>
SD2-MM374	Mod_AOD_M420	Support	Although as a first preference we have put forward a strong case for the allocation of the site for housing development, our client (landowner) is reasonably content that by removing the 'safeguarded land' designation, the site can come forward for development within a short timescale subject to (a) the implementation of the extant planning permission for 9 houses; and (b) planning permission being obtained for the remainder of the land (an application is currently under consideration). The site is sustainably located in the greater Huddersfield urban area and its development will allow around 35 - 40 houses to be built on non-Green Belt land.
SD2-MM374	Mod_AOD_M569	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good</p>

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			<p>thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>
SD2-MM375	Mod_AOD_M570	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>
SD2-MM376	Mod_AOD_M372	Support	<p>Nether Hall Barn at the southern end of this area is a Scheduled Monument and also a Grade II Listed Building. Development of this site could have affected elements which contribute to the significance of these assets. Consequently, we welcome the deletion of this area as Safeguarded Land</p>
SD2-MM376	Mod_AOD_M571	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>

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SD2-MM376	Mod_AOD_M583	Support	We support reallocation of this site from “safeguarded land” to “urban green space”
SD2 - MM377	Mod_AOD_M373	Support	The northern part of this site would have resulted in the loss of an open area in the Quarmby Fold Conservation Area. The Stables to the former farm at Holly Bank adjacent to the site’s north-eastern corner are Grade II Listed Buildings. Development of this site could have affected elements which contribute to the significance of these assets. Consequently, we welcome the deletion of this area as Safeguarded Land
SD2 - MM377	Mod_AOD_M572	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>
SD2 - MM378	Mod_AOD_M554	Object	It is considered that Main Modification SD2-MM378 is unjustified and therefore unsound. The site was previously identified in the Publication Draft of the Local Plan as Safeguarded Land (ref: SL2271), having been designated as Provisional Open Land (a form of safeguarded land) in the 1999 Unitary Development Plan. The modification seeks to change the designation of the site to a housing allocation. It is understood that the modification has been put forward by the Council as a result of planning application 2017/93846 for 32 dwellings at the site which was recommended for approval by planning committee in February 2018. However, this application has been recommended for approval subject to the completion of a Section 106 Agreement, which has yet to take place, and the recommendation should not therefore be regarded as a planning approval. Furthermore, the site has now been purchased by Lidl, which is pursuing the development of a food store on the site. Application 2017/93846 will therefore never be implemented and as site owner Lidl has no intention of developing the site for housing. The Agents for application 2017/93846 were instructed to formally withdraw the application on 28th September 2018, following Lidl’s purchase of the site. A pre-application enquiry for the development of a new Lidl store at the site has now been submitted to Kirklees Council, and it is anticipated that a public consultation event regarding the food store

Mod ref	Rep ID	Outcome	Report text
			proposal will be held in mid-October 2018. The site area which will be covered by the Lidl proposal includes the former Spotted Cow pub site as well as the open land to rear (former SL2271) and therefore matches the boundaries of the newly proposed housing allocation H641a. There is therefore no prospect of H641a accommodating any housing development, and the modification is unjustified.
SD2 - MM378	Mod_AOD_M587	Support	We support reallocation of these sites from “safeguarded land” to “building land”
SD2 - MM379	Mod_AOD_M573	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>
SD2 - MM380	Mod_AOD_M574	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to</p>

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SD2 - MM381	Mod_AOD_M374	Support	There is a group of Listed Buildings adjacent to the north-eastern corner of this area. This includes the Grade I Listed Thornhill Lees Hall and the Grade II* Listed Second Hall. Development of this site could have affected elements which contribute to the significance of these assets. Consequently, we welcome the deletion of this area as Safeguarded Land
SD2 - MM381	Mod_AOD_M575	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>
SD2 - MM382	Mod_AOD_M576	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would</p>

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SD2 - MM383	Mod_AOD_M577	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>
SD2 - MM384	Mod_AOD_M578	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply</p>

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			calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.
SD2 - MM385	Mod_AOD_M579	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>
SD2-MM386	Mod_AOD_M441	Support	SD2-MM386 proposes the identification of land at Liversedge for housing under ref H709. This is supported. No further changes required.
SD2-MM386	Mod_AOD_M588	Support	We support reallocation of these sites from “safeguarded land” to “building land”
SD2-MM387	Mod_AOD_M375	Support	The Barn 20 yards to west of Lower Busker Farmhouse to the south of this site is a Grade II Listed Building. Development of this site could have affected elements which contribute to the significance of this asset. Consequently, we welcome the deletion of this area as Safeguarded Land
SD2-MM387	Mod_AOD_M55	Support	UDVET fully supports and welcomes this modification.
SD2-MM387	Mod_AOD_M585	Support	We support reallocation of this site from “safeguarded land” to “green belt”
SD2-MM388	Mod_AOD_M580	Object	<p>~ These modifications relate to reallocation of 15 sites, from “safeguarded land” to “unallocated land”. However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with “unallocated land”. We have been advised by planners that “there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings”.</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as “unallocated”? It also raises the wider question of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt.</p>

Mod ref	Rep ID	Outcome	Report text
			Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years' time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such "off-plan" applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.
SD2-MM389	Mod_AOD_M590	Support	We support reallocation of these sites from "safeguarded land" to "building land"
SD2-MM390	Mod_AOD_M591	Support	We are not happy that this site was recently granted planning permission as it extends the Eastern urban boundary of Meltham by a substantial margin, is disconnected from the built up area, is unsustainable on many counts and has effectively forced an unsustainable change in the Local Plan. Nevertheless, in the circumstances, we have no option but to accept the change in allocation.
SD2-MM391	Mod_AOD_M376	Support	This site lies in the Golcar Conservation Area. In addition, there are Listed Buildings to the north and west of this area. Development of this site could have affected elements which contribute to the significance of these assets. Consequently, we welcome the deletion of this area as Safeguarded Land
SD2-MM391	Mod_AOD_M581	Object	<p>~ These modifications relate to reallocation of 15 sites, from "safeguarded land" to "unallocated land". However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with "unallocated land". We have been advised by planners that "there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings".</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as "unallocated"? It also raises the wider question of how much "unallocated land" there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take any land out of the green belt, until they have answered that question in some detail AND incorporated a formal "unallocated land policy" in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra "unofficial" land supply safety factor, in a similar way to brownfield windfalls. If these "unofficial" sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council's overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years' time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such "off-plan" applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>
SD2-MM392	Mod_AOD_M390	Object	There is no need to change the designation of this tract of land from safeguarded to unallocated as there has been sufficient land allocated for house building in the Holme Valley to meet local need. The change in allocation places this tract of land at immediate risk of development and will increase the urbanisation of what is essentially a rural settlement. This would irrevocably change the nature of the place.
SD2-MM392	Mod_AOD_M582	Object	<p>~ These modifications relate to reallocation of 15 sites, from "safeguarded land" to "unallocated land". However it is not clear why the sites have been reallocated or indeed what policy the Council has for dealing with "unallocated land". We have been advised by planners that "there is a lot of unallocated land in Kirklees but it is mostly very small sites that will only accommodate one or two dwellings".</p> <p>~ Our first concern is that this is patently not true in most of these particular plan modifications and may well not be true in other unallocated land situations, which have not been identified within the Plan. Some of the sites are quite large and would accommodate a significant number of dwellings. Some may have access constraints or other sustainability issues but others do not. That being the case it seems reasonable to ask the question why these 15 sites have not been allocated for development, instead of being categorised as "unallocated"? It also raises the wider question</p>

Mod ref	Rep ID	Outcome	Report text
			<p>of how much “unallocated land” there is in Kirklees which could reasonably be allocated for building, instead of taking land from the green belt, and why greater efforts have not been made to do so? As we see it the Council cannot claim the exceptional circumstances needed to take ANY land out of the green belt, until they have answered that question in some detail AND incorporated a formal “unallocated land policy” in the Local Plan. At present it seems to us that unallocated land is being treated as an unofficial, hidden land supply, giving planners an extra “unofficial” land supply safety factor, in a similar way to brownfield windfalls. If these “unofficial” sources of land supply are maintained, Kirklees will very soon be awash with land supply options and developers will (quite naturally) cherry-pick the most profitable. Land supply options on this scale are a bad thing – not a good thing – and the green belt will already have been significantly diminished. The bottom line is that we are not happy with the Council’s overall approach and/or the interconnected policies for brownfield windfalls, safeguarded land, unallocated land and removal of land from the green belt. Our second concern is that safeguarded land may well be on the first step of a conveyor belt towards ultimate development in 15 years’ time, but it is protected from development for the duration of the current plan. Rather perversely, unallocated land is not protected against development and applications for development on unallocated land could be brought forward for development at any time. The Council have indicated that they would treat such “off-plan” applications as windfalls. However we feel that, given the large amount of unallocated land available, the Plan needs to incorporate a formal policy for dealing with it during the lifetime of the plan. We feel that this policy needs to be properly reflected in land supply calculations and allocations – thereby reducing the need for removal of equivalent amounts of land from the green belt.</p>
SD2-MM392	Mod_AOD_M645	Object	<p>Comment transcribed by KC from attached letter: SD2-MM392 - land off Laithe Avenue - now ref SL2188 - and now designated as unallocated - "This land will potentially accommodate development beyond the end of the plan period (under PLP6). The identification of safeguarded land will ensure that the green belt boundaries will last beyond the end of the local plan period". This land has been an eyesore for far too long and the "excuses" for not building on it are not acceptable. If there is a need for housing then "Brownfield" sites should be used first. Dereliction is not good for tourism or residents. To build on a "Greenfield" site (H626) that is cared for and productive as required, is a complete waste of a resource. It is unacceptable in a rural tourist area where views and wildlife are the attraction and encouragement for recreational activities. not only that, it is a "wildlife green corridor" which is now considered essential for wildlife conservation (see photo) To allow any more coalescence within the 2.5km so called "protection zone" - especially when the area proposed is an obvious wildlife corridor is hardly good planning. It also undermines any conservation objectives. Can the CIL replace this loss to the community - if so how? Sustainable? NO! Has there been any calculation of the grazing/forage production requirements in the area for the sheep, cattle, horses, alpacas and goats that live here and enrich the environment? The only development that should be allowed within the 2.5km radius of the SSSI should be that of Brownfield sites. One of them already has lapsed planning!! That plus the 24 houses originally propose for SL2188, provides 41 houses and 40 are apparently required so that would solve the current demand. Future "Greenfield" development consideration, will need to carefully check the impact of the developed brownfield sites on the community, the community infrastructure and the SSSI before any further development in the area is considered. The inadequate road system is not likely to cope anyway.</p>
SD2-MM392	Mod_AOD_M646	Object	<p>Comment transcribed by KC from attached letter: SD2-MM392 - land off Laithe Avenue - now ref SL2188 - and now designated as unallocated - "This land will potentially accommodate development beyond the end of the plan period (under PLP6). The identification of safeguarded land will ensure that the green belt boundaries will last beyond the end of the local plan period". This land has been an eyesore for far too long and the "excuses" for not building on it are not acceptable. If there is a need for housing then "Brownfield" sites should be used first. Dereliction is not good for tourism or residents. To build on a "Greenfield" site (H626) that is cared for and productive as required, is a complete waste of a resource. It is unacceptable in a rural tourist area where views and wildlife are the attraction and encouragement for recreational activities. not only that, it is a "wildlife green corridor" which is now considered essential for wildlife conservation (see photo) To allow any more coalescence within the 2.5km so called "protection zone" - especially when the area proposed is an obvious wildlife corridor is hardly good planning. It also undermines any conservation objectives. Can the CIL replace this loss to the community - if so how? Sustainable? NO! Has there been any calculation of the grazing/forage production requirements in the area for the sheep, cattle, horses, alpacas and goats that live here and enrich the environment? The only development that should be allowed within the 2.5km radius of the SSSI should be that of Brownfield sites. One of them already has lapsed planning!! That plus the 24 houses originally propose for SL2188, provides 41 houses and 40 are apparently required so that would solve the current demand. Future "Greenfield" development consideration, will need to carefully check the impact of the developed brownfield sites on the community, the community infrastructure and the SSSI before any further development in the area is considered. The inadequate road system is not likely to cope anyway.</p>
SD2-MM397	Mod_AOD_M225	Support	Support

Mod ref	Rep ID	Outcome	Report text
SD2-MM397	Mod_AOD_M538	Support	I support and welcome the Inspector's and council's recommendation that the site H442 should be deleted from the housing allocation and together with UGS3333 (cricket ground) be part of the Green Belt as in the map (H442-Modification).
SD2-MM397	Mod_AOD_M539	Support	I support and welcome the Inspector's and Council's recommendation that the site H442 should be deleted from the housing allocation and together with UGS3333 (cricket ground) be part of the Green Belt as in the map (H442-Modification).
SD2-MM397	Mod_AOD_M540	Support	I support the removal of H442 from the Plan and the allocation of that area, together with the cricket ground, as green belt. The infrastructure and public facilities in this area are already oversubscribed and would not cope with such a large scale housing development.
SD2-MM406	Mod_AOD_M106	Object	I support the comments made by BOLT(ED)
SD2-MM406	Mod_AOD_M117	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 - all roughly propose the same thing - that once a site is in the plan that given a number of caveats planning permission should be given. I am totally opposed to these modifications. I believe that these modifications remove a safeguard in the system - that of the final say being one in a public forum undertaken by locally elected Councillors who represent their communities. There is a need for the public to have a voice and to lawfully be able to have the opportunity to have their views publicly taken into account before a final planning decision is made. This modification removes that. This modification should not be included in the plan.
SD2-MM406	Mod_AOD_M132	Object	Policies 64,65,66,67,68,69,70,71,72,73 and 74 effectively say the same thing - that once a site is in the plan it is expected to get planning permission. If a site is in the plan then it should already comply with the policies of the plan and the NPPF. I do not support this modification. I have serious concerns that a major function of the local authority is being curtailed. Local planning permission now ultimately lie in the hands of local Councillors who through public committees make planning decisions. The public have the right to attend and participate in these meetings. They have the ability to voice concerns and have their views publicly heard and taken into account before a planning decision is reached. This policy removes that right from the public. There would be no role for the public voice or weight of public opinion to influence planning decisions. This just does not feel right.
SD2-MM406	Mod_AOD_M147	Object	I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. – an example of an effect of this could be land price becoming such that meeting affordable housing targets become cost prohibitive. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making system where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. If the sites do not meet the caveats why are they in the plan. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our Councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will fix decision makers to a particular point in history and will not allow them through the life of this plan to respond to the ever changing environments in which they operate. Their decisions must be based on current requirements not those of the past. I feel that this policy if it remains inhibits the ability of local people to influence and impact upon those decisions that affect lives and blocks the ability of local politicians from carrying out many of the functions for which they were elected. This policy seems to be tying the hands of these local politicians and planning officers, therefore affecting their ability to respond to the changing needs of communities. Just look at the number of community based and planning initiatives there have been since 2010 –e.g. during that time there have been 2 NPPFs and numerous NPPGs. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM406	Mod_AOD_M20	Object	We have serious concerns about this. We are deeply concerned that officers who are so involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to

Mod ref	Rep ID	Outcome	Report text
			objectively assess could be seen to be compromised. We believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers who are not subject to public challenge and scrutiny. We believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. We believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. We would ask the inspector to review this modification and remove it from the suggested modifications to the plan.(Please see our response to SD2-MM353 for a more detailed explanation)
SD2-MM406	Mod_AOD_M41	Object	I have mentioned in virtually all my other comments about the pre-emptive comments of a KMC Senior Planner who admitted he had never visited the site yet stated its going in the plan regardless - enough said.
SD2-MM406	Mod_AOD_M415	Object	Proposals such as this which presuppose the grant of a planning consent are fundamentally undemocratic in that they seek to tie future generations to an expectation on the part of applicants, and indeed all those supposed to be involved in the planning process, that any application throughout the life of the plan will be based on facts extant at this point in time rather than at the material time in respect of the application. There should be no predetermination and all applications should fall to be determined on their merits and in the light of the factual circumstances extant at the time of application. Please cross reference with the comments regarding SD2-MM352, 353, 360 and 362 where the principles apply equally.
SD2-MM406	Mod_AOD_M72	Object	I am opposed to the inclusion of this policy. I believe it is unsound. I believe that this modification has been made with the best of intent but fear that it will have an unintended very restricting effect. I will detail why and set out my concerns in the following narrative: I am concerned that this will give an expectation to developers that because a particular site is in the Local Plan it will be given planning permission. I also feel that it places undue pressure on planning officers to ensure that sites that are in the plan are approved – whether they fully meet requirements or not. There is a danger that this policy could create a market in LP sites where the prices of land sites within the plan are artificially inflated because of the belief that planning permission is almost guaranteed for that development. I am concerned that officers, who have been involved in determining which sites are included in the LP, will be carrying out the planning assessment of the sites and will have the final say in granting planning permission for these sites. Their ability to objectively assess could be seen to be compromised – after all they have already decided the site is suitable for development. I believe that this policy creates a closed decision making process where decisions involving sites listed in the LP are pre-determined. Such closed systems lack openness and transparency and there are significant dangers with planning decision makers whose decisions are not subject to public challenge and scrutiny. I believe that it is premature to say that a site in the plan should, provided caveats are met, be given planning permission. This leaves no avenue for public opinion to impact on decisions. I believe there is a role for our councillors in the process and there is still a need for the public to be given the opportunity to be involved in the final determination of major planning decisions. I am concerned that no reference is made to the NPPF – the new NPPF for instance encourages pre-planning public consultation. This policy would also not take account of potential new initiatives such as the Government's new Civil Society Strategy which amongst its proposals is one to empower/involve local communities in local planning decisions. It feels that this policy will limit decision makers to a particular point in history and will not allow them through the life of this plan to respond to the environments in which they operate. Their decisions must be based on current requirements not those of the past. I would therefore ask the inspector to review this modification and remove it from the suggested modifications to the plan.
SD2-MM406	Mod_AOD_M87	Object	I agree with comments made by BOLT(ED)

APPENDIX 5

Additional Modifications – Strategy and Policies

In addition to the Main Modifications, the council published Additional Modifications (Minor changes) for consultation. Additional Modifications were made to provide clarification, corrections, minor up-dates to text and the correction of minor mapping errors to the policies Map. These changes do not relate to the soundness of the plan and were therefore not considered by the Inspectors within their report. The Inspectors were sent a copy for information and the table below represents the officer response on the comments as part of the council’s Statement of Community Involvement commitment to feedback on consultation.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
Doc Intro	Mod_SP_A21	No Comment	Natural England notes the additional modifications but has no comments to make.	No Change No comments on the Proposed Modifications noted.
Doc Intro	Mod_SP_A5	Object	There is no proposed modification for this section but we wish to make the following comment: At the public hearing we were told by the Senior Minerals Planner present that the site to which we are opposed Site ME1965a was going in the Local Plan, no matter what. It made no difference what people said, no matter who said it or what constraints were identified the site was going in the plan. At that point we felt that we were being told that the time and effort we had spent in the last two years in opposing the inclusion of site ME1965a in the plan had been a waste. It would have been easy for us to take the view that whatever we said in any consultation process would be a waste of time. However having taken part in the Inspector led consultation process	No Change The comment does not relate to an Additional Modification. Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan. It is noted that the BOLT (ED) acknowledges that the Inspector listened and considered their views.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			we do feel that our views are listened to and account is taken of them by the Inspector. Therefore we are engaging in this process so that the views of the Communities of Birds Edge and surrounding areas communities who asked us to represent them are placed on public record.	
Doc Intro	Mod_SP_A20	Object	To ask the Senior Planner why he commented at a previous hearing that ME1965A would be in the plan regardless.	No Change The comment does not relate to an Additional Modification. Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan.
Doc Intro	Mod_SP_A27	Object	<p>This objection is to all modifications proposed by the Council in response to recommendations from the Inspector. The Council has, contrary to law, given no reasoned justification for any of the modifications. And the Council cannot rely on the fact that the Inspector has recommended the Council to act, because the Inspector has herself not given any reasons for the modifications which she has proposed. Indeed, she has made it quite clear in her letter of 15 June that the content of that letter does not necessarily represent her final views on the plan. It follows that the Council's proposed modifications must be rejected en-bloc in their present form.</p> <p>The Council should provide a written justification in respect of each and every modification, stating what has changed since the original submission draft.</p>	<p>No Change</p> <p>Both the Main Modifications and Additional Modification consultation documents reports contained a reason for the modification and tracked change text was included to ensure transparency and clarity.</p> <p>With regard to the Main Modifications, the Inspector is the decision maker and detailed reasons for the Modifications are set out in the Inspector's Report.</p> <p>Additional Modifications were made to provide clarification, corrections, minor up-dates to text and the correction of minor mapping errors to the policies Map. By having the track changes alongside the reason, it is considered that there is</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
				clarity in the documents as to why the change is required.
Doc Intro	Mod_SP_A28	Object	<p>The modifications are unsound because the basic plan is fundamentally flawed. The original inspector threw out the first plan because it was flawed, this plan is still flawed. The housing projection was based back in 2002 based on a projected employment growth that was described by Councillor Khan (Leader) as "inspirational", we have moved on 16 years, we can now prove that the belief that the employment projection was flawed. All you have to do is look at Kirklees own Economic Fact Sheets to see there has been no job growth from 2003 to last year's sheet. The belief then that employment in Kirklees will grow over your time frame flies in the faith of the evidence Kirklees has. To use the Regional figures flies in the face of the evidence.</p> <p>Use Kirklees' Employment Figures from 2002 to justify a far limited growth in housing based on the grounds that most growth in Employment will be</p>	<p>No Change The comment does not relate to an Additional Modification. To inform the Local Plan, the council commissioned new and updated evidence to ensure that its housing and employment strategies were effective and justified. This evidence was tested at the Local Plan examination. Additionally, the council monitors housing and employment through its annual monitoring report to ensure that the strategies are robust and justified based on up to date evidence.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			outside Kirklees and it will be a dormitory area for workers outside Kirklees. Plan for Low Cost Housing Association rented accommodation and Council Houses for Kirklees Residents with additional limited 4 or 4+ Executive Housing with no Housing Association buildings on sites as there is no suitable employment in those areas.	
Doc Intro	Mod_SP_A29	No Comment	No comments to make on the Modifications.	No Change No comments on the Proposed Modifications noted.
Doc Intro	Mod_SP_A13	Object	I agree with BOLT	No Change The comment does not relate to an Additional Modification. Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan.
SD1-AM2	Mod_SP_A6	Support	The proposed modification is supported. In the case of sandstone KMC have already demonstrated a sufficient supply of this mineral by approving P.P 2017/91213 which adds an additional one million tonnes to the existing reserve of 865,000 tonnes. A reserve of between 40 and 80 years. There is therefore no need to identify any other ME site for sandstone extraction and Site ME1965a should be removed from the LP.	No Change Support for the Modification SD1-AM2 is noted. Site ME1965a was subject to consideration by the Local Plan Inspector through written and oral representations.
SD1-AM11	Mod_SP_A2	Object	In Paragraph 10.41 and 10.42 the "clarifications" are less specific and therefore less clear. In Paragraph 10.67 why has this clarification been made? Why are	No Change

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			<p>these particular measures been identified? Is this list limiting or suggesting the proposals that could be made?</p> <p>It seems to me that most of these improvements have been identified as necessary but the solution has not been identified. I wouldn't expect a solution would be identified at this stage due to the distance in the future. May be the problem should be outline rather than the solution. For example "the such-and-such slip road is estimated to reach capacity". Also where have the solutions come from? Does terms relating to the enhancement of the road network preclude schemes involving other modes that could address the problems on the road network?</p>	<p>The proposed modification was made in response to an updated Highways England programme and on advice from Highways England.</p>
SD1-AM19	Mod_SP_A10	Conditional Support	<p>The proposed modification is supported. This modification strengthens the reasons why site ME1965a should not be an allocated Mineral extraction site in the plan and whilst site ME1965a is in the plan - the plan remains unsound.</p>	<p>No Change Support for the Proposed Modification (SD1_AM19) is noted.</p> <p>Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan.</p>
SD1-AM19	Mod_SP_A17	Conditional Support	<p>Supported as it enhances the reasons why ME1965A should not be in the plan.</p>	<p>No Change Support for the Proposed Modification (SD1-AM19) noted.</p> <p>Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
SD1-AM19	Mod_SP_A22	Object	<p>Whilst the proposed modification appears to enforce and be in step with the NPPF, GAIL believes that the text also needs to explicitly show the range of measures and actions the Council intends to introduce to: meet the Local Plan key objective of protecting and enhancing the integrity of the natural environment etc., and monitor its performance and effectiveness in delivering on the objective.</p> <p>Need to define what measures the council intends to introduce to monitor its performance and effectiveness in protecting and enhancing the integrity of the natural environment.</p>	<p>No Change</p> <p>The council considers that the objector's concerns are outlined in the monitoring measures contained at Appendix 2 of the Kirklees Local Plan Strategy and Policies Plan.</p>
SD1-AM20	Mod_SP_A16	Conditional Support	<p>Again this supports the reasons we have for exclusion of ME1965A from the plan.</p>	<p>No Change</p> <p>Support for the Proposed Modification is noted.</p> <p>Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan.</p>
SD1-AM20	Mod_SP_A23	Object	<p>At face value, the proposed modification should be supported. However, the wording is essentially meaningless if the Local Plan results in housing developments which its own Sustainability Appraisals confirm will result in significant negative effects on Biodiversity and Geodiversity (as, for example, with H2684a and H2730a which variously contain Habitats of Principal Importance, lie adjacent to a UK BAP priority network/ the Kirklees Wildlife Habitat network and are also adjacent to a formally</p>	<p>No Change</p> <p>The site allocation methodology sets out how all allocations were assessed against biodiversity and geodiversity.</p> <p>H2684a and H2730a were subject to written and oral representations at the Local Plan examination and assessed by the Inspector.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			<p>recognised Local Wildlife Site and a Local Geological Site). (GAIL's concerns are heightened when the landowners/developers own ecological appraisals highlight the range of legally protected species (including but not limited to badgers, water voles, white clawed crayfish and great crested newts) which may be found on the Sites).</p> <p>To enable it to meet its policy objectives, the Council needs to extend the proposed modification by adding Development(s) will not be permitted which may result in a significant negative effect on a sites ecology/biodiversity.</p>	<p>Policy PLP30 seeks to protect and enhance the biodiversity and geodiversity of Kirklees and further protection is set out in PLP31 criterion iv). It is considered that the policy framework is consistent with NPPF.</p> <p>The planning application process provides a further opportunity to ensure that satisfactory mitigation measures (if required) are agreed to ensure that development does not adversely impact on biodiversity and geodiversity.</p>
SD1-AM20	Mod_SP_A9	Conditional Support	The proposed modification is supported. This modification strengthens the reasons why site ME1965a should not be an allocated Mineral Extraction site in the plan and whilst site ME1965a is in the plan - the plan remains unsound.	<p>No Change</p> <p>Support for the Proposed Modification is noted.</p> <p>Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan.</p>
SD1-AM21	Mod_SP_A24	Object	GAIL believes that the proposed modification weakens the Councils commitment to ensuring a rigorous approach in this area: what criteria are envisaged to assess the benefits of the development clearly outweigh the impacts on the features that support the sites special conservation features value? Additionally, the clause needs to identify which parties would be involved in carrying out the assessments.	<p>No Change</p> <p>The Proposed Modification was identified by the Inspector following the Local Plan Examination Stage 3.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			Need to define the criteria for assessing how the benefits of the development outweigh the impacts on the features that support.	
SD1-AM22	Mod_SP_A15	Conditional Support	This is supported as it enhances my reasons for exclusion of ME1965A in the plan.	No Change Support for the Proposed Modification noted. Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan.
SD1-AM22	Mod_SP_A8	Conditional Support	The proposed modification is supported. This modification strengthens the reasons why site ME1965a should not be an allocated Mineral Extraction site in the plan and whilst site ME1965a is in the plan - the plan remains unsound.	No Change Support for the Proposed Modification is noted. Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan.
SD1-AM22	Mod_SP_A3	Object	The insertion of "not to result in" means that the sentence doesn't make sense. All development in Kirklees, as set out in national policy and the policies described in this document, will be expected to avoid not result in significant loss or harm to biodiversity through protection, avoidance, mitigation and compensatory measures and seek opportunities to enhance biodiversity value and ecological links...	No Change The reference to avoid was deleted as this is referenced later in the text. The Proposed Modifications were made to accord with the mitigation hierarchy set out in the NPPF.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
SD1-AM22	Mod_SP_A25	Object	Again, the proposed modification has resulted in a weaker commitment to and protection of local biodiversity and ecology: what is wrong with actively working to avoid significant loss or harm, how is significant loss or harm defined, who makes the assessment, how are mitigation and compensatory measures to be defined, who is responsible for seeking opportunities to enhance biodiversity value and ecological links, and how is performance on this objective to be measured, and by whom.	No Change The reference to avoid was deleted as this is referenced later in the text. The Proposed Modifications were made to accord with the mitigation hierarchy set out in the NPPF.
SD1-AM23	Mod_SP_A14	Support	This is welcomed as the amount of use the boundaries of ME1965A has from joggers, walkers, cyclists and horse riders is huge. Every hour of every day between 6am and 10pm there are people using these lanes for their exercise, currently it's a safe way of doing so. This wouldn't be the case if 50 tonne lorries were using the tiny lanes.	No Change Support for the Proposed Modification is noted.
SD1-AM23	Mod_SP_A7	Conditional Support	The proposed modification is supported. Site ME 1965a has a coterminous boundary with the Trans Pennine Trail - used by walkers, cyclists and horse riders. This modification strengthens the reasons why site ME1965a should not be an allocated Minerals Extraction site in the plan and whilst site ME1965a is in the plan - the plan remains unsound.	No Change Support for the Proposed Modification is noted. Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan.
SD1-AM23	Mod_SP_A4	Object	Why has bridleway been added when the comment is regarding Core Walking and Cycling Network specifically?	No Change The reference to bridleways was inserted at the request of the Inspector following discussion at the Kirklees Local Plan Examination.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			Bridleway should be removed and a separate point addressing Bridleways should be made.	
SD1-AM24	Mod_SP_A26	Object	<p>The original wording was a useful baseline indicator with nothing to be gained from its deletion (GAIL would suggest retaining representing 18% of the woodlands in the district or 1.5%).</p> <p>Need to re-introduce representing 18% of the woodlands in the district or 1.5%.</p>	<p>No Change</p> <p>The reason for the text deletion was to avoid confusion with data outlined earlier in the paragraph.</p>
SD1-AM24	Mod_SP_A1	Object	<p>This seems a strange paragraph to delete? Is it correct that you have taken out the commitment to increase the number of trees in Kirklees, or is it just the sentence that is struck through that is to be deleted? It's not clear.</p> <p>The Local Plan still retains the commitment to protect valuable trees. The second reference to the percentage of woodlands has been deleted as the total area of woodland in Kirklees is referenced earlier in the paragraph.</p>	<p>No Change</p> <p>The Local Plan still contains a commitment to protect trees. The deleted text was considered to clarify the policy justification as there was some overlap with figures contained earlier in the paragraph.</p>
SD1-AM25	Mod_SP_A12	Support	The proposed modification is supported.	Support for the Proposed Modification is noted.
SD1-AM25	Mod_SP_A19	Support	Supported.	Support for the Proposed Modification is noted.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
SD1-AM26	Mod_SP_A11	Support	The proposed modification is supported.	Support for the Proposed Modification is noted.
SD1-AM26	Mod_SP_A18	Conditional Support	Supported as it enhances why ME1965A must be excluded.	Support for the Proposed Modification is noted. Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan.

Additional Modifications – Allocations and Designations

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
Doc Intro	Mod_AOD_A10	No Comment	Natural England notes the additional modifications but has no comments to make.	No Change No comments noted.
Doc Intro	Mod_AOD_A5	Object	<p>I would like to point out how very difficult this site is to navigate and put a comment or objection against each modification etc. There will be a very low number of objectors not because they don't wish to but this site is not user friendly for anybody other than professional IT users and/or those with planning experience who probably use similar difficult systems. In my area the population who wish to object and did so in the previous round are of an older generation and they have no chance in working out the complexity of this portal. KMC should review their methods and give everyone a basic platform or platforms to object and make sure the plan isn't pushed through with greatly reduced levels of objections which would make it unfair and I would suggest unsound because of their restriction to object.</p> <p>Make it much simpler to navigate, remove the constant repeating questions and give everyone who wants to a fair method of objecting. This plan is</p>	No Change The council's consultation methods were considered by the Planning Inspector through written and oral representations at the Local Plan Examination. The council considers that previous consultation and the consultation on the Proposed Modifications is in accordance with statutory and regulatory requirements. It also considers that it complies with the council's Statement of Community Involvement. Comments could be made through paper forms and electronically and drop in events were held to explain the process.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			supposed to be decided and agreed using public opinion, currently that's far from being the case.	
Doc Intro	Mod_AOD_A4	Object	<p>At the public hearing we were told by the Senior Minerals Planner present that the site to which we are opposed Site ME1965a was going in the Local Plan no matter what. It made no difference what people said, no matter who said it or what constraints were identified the site was going in the plan. At that point we felt that we were being told that the time and effort we had spent in the last two years in opposing the inclusion of site ME1965a in the plan had been a waste. It would have been easy for us to take the view that whatever we said in any consultation process would be a waste of time. However having taken part in the Inspector led consultation process we do feel that our views are listened to and account is taken of them by the Inspector. Therefore we are engaging in this process so that the views of the Communities of Birds Edge and surrounding areas the communities who asked us to represent them are placed on public record.</p>	<p>No Change Site ME1965a was the subject of written and oral representations considered by the Inspectors into the Kirklees Local Plan. It is noted that the BOLT (ED) acknowledges that the Inspector listened and considered their views.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
Doc Intro	Mod_AOD_A25	Object	<p>This objection is to all modifications proposed by the Council in response to recommendations from the Inspector. The Council has, contrary to law, given no reasoned justification for any of the modifications. And the Council cannot rely on the fact that the Inspector has recommended the Council to act, because the Inspector has herself not given any reasons for the modifications which she has proposed. Indeed, she has made it quite clear in her letter of 15 June, that the content of that letter does not necessarily represent her final views on the plan. It follows that the Council's proposed modifications must be rejected en bloc in their present form.</p> <p>The Council should provide a written justification in respect of each and every modification, stating what has changed since the original submission draft.</p>	<p>No Change</p> <p>Both the Main Modifications and Additional Modification consultation documents reports contained a reason for the modification and tracked change text was included to ensure transparency and clarity.</p> <p>With regard to the Main Modifications, the Inspector is the decision maker and detailed reasons for the Modifications are set out in the Inspector's Report.</p> <p>Additional Modifications were made to provide clarification, corrections, minor up-dates to text and the correction of minor mapping errors to the policies Map. By having the track changes alongside the reason, it is considered that there is clarity in the documents as to why the change is required.</p>
Document Introduction	Mod_AOD_A26	Object	<p>The modifications are unsound because the basic plan is fundamentally flawed. The original inspector threw out the first plan because it was flawed, this plan is still flawed. The housing projection was based back in 2002 based on a projected employment growth that was described by Councillor Khan (Leader) as "inspirational", we have moved on 16 years, we can now prove that the belief that the employment projection was flawed. All you have to do is look at Kirklees own Economic Fact Sheets to</p>	<p>No Change</p> <p>The comment does not relate to an Additional Modification. To inform the Local Plan, the council commissioned new and updated evidence to ensure that its housing and employment strategies were effective and justified. This was outlined in evidence paper SD22 Employment Technical Paper 2017 and the evidence was tested at the Local Plan examination. Additionally, the council monitors housing and employment through its annual</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			<p>see there has been no job growth from 2003 to last year's sheet. The belief then that employment in Kirklees will grow over your time frame flies in the faith of the evidence Kirklees has. To use the Regional figures flies in the face of the evidence.</p> <p>Use Kirklees' Employment Figures from 2002 to justify a far limited growth in housing based on the grounds that most growth in Employment will be outside Kirklees and it will be a dormitory area for workers outside Kirklees. Plan for Low Cost Housing Association rented accommodation and Council Houses for Kirklees Residents with additional limited 4 or 4+ Executive Housing with no Housing Association buildings on sites as there is no suitable employment in those areas.</p>	<p>monitoring report to ensure that the strategies are robust and justified based on up to date evidence.</p>
SD2-AM8	Mod_AOD_A11	Object	<p>Whilst the proposed modification refers to noise from road traffic on Penistone Road (which is critical given the extra volume of traffic likely to result from developments in neighbouring villages), GAIL believes the clause should, for the avoidance of doubt, also specifically refer to Reliance Precision Limited as the noise source near site. Need to refer specifically to Reliance Precision Limited as the noise source near site</p>	<p>No Change The issue of industry noise has not been identified by Environmental Health</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
SD2-AM9	Mod_AOD_A12	Object	<p>Given its close proximity to H2684a, GAIL believes that the proposed modification should, for the avoidance of doubt, also specifically refer to Reliance Precision Limited as the noise source near site (see SD2-MM8, above).</p> <p>Need to refer specifically to Reliance Precision Limited as the noise source near site.</p>	No Change Industry noise has not been identified as an issue by Environmental Health.
SD2-AM14	Mod_AOD_A1	Object	There is a considerable high amount of traffic therefore noise is a big issue. Interrupted sleep during night, during day noise is constant as well as evening. Traffic has multiplied over years living here therefore quality of life is disturbed.	No Change Site H519 was the subject of written and oral representations considered by the Planning Inspector at the Local plan Examination. Issues covered included traffic and noise. The site box recognises that traffic noise is a potential issue and a planning application for the site would need to identify mitigation measures to address this.
SD2-AM51	Mod_AOD_A27	Support	SD2-AM51 relates to site H138 and constraints associated with the redevelopment of the site. The amendment seeks to provide further clarification regarding noise and odour sources adjacent to the site. The policy as amended therefore identifies noise and odour sources as potential constraints to the development of the site, but not to the extent that the site is not developable or deliverable. Policy continues by requiring any future planning application to be accompanied by noise and odour assessments which assess the impact of these sources on the residential amenity of the future residents of the site. In this context clarification of	Support is noted.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			the main sources to be included in any assessment is supported.	

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
SD2-AM161	Mod_AOD_A22	Conditional Support	<p>I support the Council's designation of LWS1, LWS2, LWS3 and LWS4 as local wildlife sites. The proposed development site MX1905 is unable to satisfy keeping LWS1 Dogloitch Wood and LWS2 Dunn/Dum Wood which are both rare ancient woodland as local wildlife sites. Proposed MX1905 also prevents enhancement and connection of these sites.</p> <p>Remove MX1905 from the Local Plan. Optimise the current UKBAP priority habitats wildlife habitat network, habitats of principle importance, their existing and potential for green infrastructure, wildlife habitat, sustainable agriculture, air quality, and benefits to health for the population of north Kirklees and surrounding area by putting together a plan to optimise these natural existing assets in this location, linking these woodlands to form a sustainable example of nature conservation, agriculture, green lung, cooling zone, recreational zone, natural flood and water management, green space and positive contributor to health and education for the community. This combination of habitats and natural assets here is unique to the area and in an area deprived of such assets. The rarity of these ancient woodlands is clearly shown in Kirklees' document CD75 pg 9 map Land-use in Kirklees.</p>	<p>No Change Support for the protection of Local Wildlife sites is noted.</p> <p>Site MX1905 was the subject of the Kirklees Local Plan examination where representations were considered on the issues raised. No further Modifications are proposed.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
SD2-AM163	Mod_AOD_A21	Conditional Support	<p>I support the Council's designation of LWS1, LWS2, LWS3 and LWS4 as local wildlife sites. The proposed development site MX1905 is unable to satisfy keeping LWS1 Dogloitch Wood and LWS2 Dunn/Dum Wood which are both rare ancient woodland as local wildlife sites. Proposed MX1905 also prevents enhancement and connection of these sites.</p> <p>Remove MX1905 from the Local Plan. Optimise the current UKBAP priority habitats wildlife habitat network, habitats of principle importance, their existing and potential for green infrastructure, wildlife habitat, sustainable agriculture, air quality, and benefits to health for the population of north Kirklees and surrounding area by putting together a plan to optimise these natural existing assets in this location, linking these woodlands to form a sustainable example of nature conservation, agriculture, green lung, cooling zone, recreational zone, natural flood and water management, green space and positive contributor to health and education for the community. This combination of habitats and natural assets here is unique to the area and in an area deprived of such assets. The rarity of these ancient woodlands is clearly shown in Kirklees' document CD75 pg 9 map Land-use in Kirklees.</p>	<p>Support for the protection of Local Wildlife Sites is noted.</p> <p>Site MX1905 was the subject of the Kirklees Local Plan examination where representations were considered on the issues raised. No further Modifications are proposed.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
SD2-AM165	Mod_AOD_A15	Support	The proposed amendment now correctly identifies the boundary of the Registered Battlefield.	Support for the Proposed Modification noted.
SD2-AM165	Mod_AOD_A2	Support	Proposed modification to boundary of Registered battlefield of Adwalton Moor is in accordance with the latest boundary designated by Historic England.	Support for the Proposed Modification noted.
SD2-AM166	Mod_AOD_A3	Object	<p>We have no comment on the specific modification but ask that consideration be given to our proposal in the text box below.</p> <p>We notice that site MX 1903 has the suggested modification- SD2-AM104 - that the text adjacent to Wildlife Habitat Network is added to its list of constraints. We therefore request that the constraints of Site ME1965a are likewise modified with the inclusion of the text adjacent to Wildlife Habitat Network and Strategic Green Infrastructure</p>	<p>No Change</p> <p>The "No comment" in relation to the Proposed Modification on site ME2568 is noted. ME1965a does not lie adjacent to the Wildlife Habitat Network and therefore there would be no justification to include the suggested text.</p>
SD2-AM171	Mod_AOD_A23	Support	SD2-AM171 Main modification is supported. No further changes required.	Support for the Proposed Modification noted.
SD2-AM174	Mod_AOD_A7	Support	I agree with the new recommendations.	Support for the Proposed Modification is noted.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
SD2-AM174	Mod_AOD_A16	Support	Old Hall Farmhouse, to the north-west of this site is a Grade II* Listed Building. The loss of the northern part of this site and its subsequent development could have harmed elements which contribute to its significance. Consequently, we support the deletion of this area as a housing Allocation and its identification as Green Belt	Support for the Proposed Modification noted.
SD2-AM174	Mod_AOD_A13	Support	We fully support the proposed changes to Roberttown's green belt in SD2 AM174. This keeps the separate identity of the village, thus avoiding urban sprawl. Thank you!	Support for the Proposed Modification noted.
SD2-AM174	Mod_AOD_A8	Support	I agree with and support the modifications as detailed in SD2-AM174.	Support for the Proposed Modification noted.
SD2-AM174	Mod_AOD_A9	Support	I fully support the proposed additional modifications as described and shown in the SD2-AM174 - Modification Map.	Support for the Proposed Modification noted.
SD2-AM175	Mod_AOD_A20	Support	I agree with the decision to remove the site at Copper Bridge as a designation for an industrial estate should be removed and the land should be retained as green belt. The development would have been devastating for the wildlife, desecrating beautiful countryside and destroying a green space enjoyed by local people.	Support for the Proposed Modification noted.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
SD2-AM175	Mod_AOD_A17	Support	Site E1832c adjoins the boundary of the Grade II Registered Historic Park and Garden of Kirklees Park. Kirklees Park provides the setting for a number of important designated heritage assets including the Grade I Listed Kirklees Hall and a group of nine Listed farm buildings at Home Farm The development of Site E1832c at Cooper Bridge would have resulted in considerable harm to the rural setting of this well-preserved example of a mid to late-eighteenth Century designed landscape - an important element of its character). The development would also have resulted in considerable ham to the rural setting of two sixteenth and seventeen century Listed buildings on Leeds Road. Consequently, we support the deletion of this area as an employment Allocation and its identification as Green Belt	Support for the Proposed Modification noted.
SD2-AM175	Mod_AOD_A6	Support	I agree with the new recommendations.	Support for the Proposed Modification noted.
SD2-AM175	Mod_AOD_A14	Support	We fully support the modifications to green belt at Cooper Bridge. Great news!	Support for the Proposed Modification noted.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
SD2-AM176	Mod_AOD_A18	Support	<p>This site lies just over 725 metres from the boundary of the Grade II Registered Historic Park and Garden at Breton Hall. Whilst Historic England were satisfied that the development of Site E2333a would not affect the significance of the principal building in this landscape (the Grade II* Listed Bretton Hall) or be visible from the centre of the Park, Historic England were unconvinced that the increased proximity of large-scale urban development would not harm other elements which contribute to the significance of the Registered Historic Park and Garden. Consequently, we support the deletion of this area as an employment Allocation and its identification as Green Belt.</p>	Support for the Proposed Modification noted.
SD2-AM177	Mod_AOD_A19	Support	<p>This site lies within the Thurstonland Conservation Area and the loss of this site and its subsequent development would have harmed an element which makes a positive contribution to its significance. Consequently, we support the deletion of this area as a housing Allocation and its identification as Green Belt.</p>	Support for the Proposed Modification noted.

APPENDIX 6

Sustainability Appraisal Modifications (August 2018)

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
Doc - All	Mod_SA_Mod1	Object	We are meeting Thelma Walker MP Friday 14 September 2018 to raise "formal complaint" over the difficulty hundreds of our citizens are having registering their final comments on the Kirklees Plan! The final consultation process in our Group's opinion is "badly flawed" for the simple reason it is far too difficult for the ordinary citizen to follow! Hence the Planning Inspector needs to intervene and ensure 'the process' is easy for the Public to comment, our concerns have been relayed to the Kirklees Officer responsible. Moreover, the Huddersfield Examiner (Newspaper) also reiterated such facts to the Public in an article dated 6 September 2018 and Kirklees Planning Dept need to take note that matters need urgent change!!	No Change The council's consultation methods were considered by the Planning Inspector through written and oral representations at the Local Plan Examination. The council considers that previous consultation and the consultation on the Proposed Modifications is in accordance with statutory and regulatory requirements. It also considers that it complies with the council's Statement of Community Involvement. Comments could be made through paper forms and electronically and drop in events were held to explain the process.
Doc - All	Mod_SA_Mod2	Support	Natural England welcomes the updated Sustainability Appraisal and has no further comments to make	Comments noted.
Doc – All	Mod_SA_Mod3	Object	The comments relate to site H2730a/H2684a and Section 2 and 5 of the Sustainability Appraisal. Detailed comments are made on the soundness of the Sustainability Appraisal in relation to SA Objective 13 and heritage issues.	No Change The Sustainability Appraisal and the site allocations were fully considered by the Inspector as part of the examination on the Kirklees Local Plan, including any significant effects identified.

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			<p>GAIL assumes that the SA ratings for H2730a in Section 5 of April 2017 document have been superseded by the ratings shown in the Modifications SA document which now shows a significant negative effect for SA objective 5.</p>	
Doc - All	Mod_SA_Mod4	Object	<p>The comments relate to site E1831.</p> <p>Object to the allocation of this site on the grounds of the sustainability appraisal and Habitat Regulations Assessment. The site is subject to pollution and congestion, air quality and health issues. The site is a buffer for pollution from the heavily congested Motorway/Trunk Road junctions.</p>	<p>No Change</p> <p>Site E1831 was the subject of written and oral representations and fully considered by the Inspector at the Kirklees Local Plan Examination. This included the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>Main modifications were consulted on to reduce site size, capacity to reflect the high pressure gas pipeline and buffer which may go some way to addressing the objector's concerns.</p> <p>Notwithstanding the above, the site will still need to be subject to a planning application at which stage further mitigation if necessary can be considered.</p>

Sustainability Appraisal – Addendum (April 2017)

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
Doc – All	Mod_SA_Addend 2	Object	<p>The comments relate to site H2730a/H2684a and Section 2 and 5 of the Sustainability Appraisal.</p> <p>Detailed comments are made on the soundness of the Sustainability Appraisal in relation to SA Objective 13 and heritage issues.</p> <p>GAIL assumes that the SA ratings for H2730a in Section 5 of April 2017 document have been superseded by the ratings shown in the Modifications SA document which now shows a significant negative effect for SA objective 5.</p>	<p>No Change</p> <p>The Sustainability Appraisal and the site allocations were fully considered by the Inspector as part of the examination on the Kirklees Local Plan, including any significant effects identified.</p>
Doc - All	Mod_SA_Addend 3	Object	<p>The comments relate to site H2730a/H2684a and Section 2 and 5 of the Sustainability Appraisal.</p> <p>Detailed comments are made on the soundness of the Sustainability Appraisal in relation to SA Objective 13 and heritage issues.</p> <p>GAIL assumes that the SA ratings for H2730a in Section 5 of April 2017 document have been superseded by the ratings shown in the Modifications SA document which now shows a significant negative effect for SA objective 5.</p>	<p>No Change</p> <p>The Sustainability Appraisal and the site allocations were fully considered by the Inspector as part of the examination on the Kirklees Local Plan, including any significant effects identified.</p>

Habitats Regulations Assessment (August 2018)

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
Doc - All	Mod_HRA_Mod1		<p>Natural England welcomes the Habitat Regulations Assessment Modifications dated August 2018. We note in particular the assessment of the new and extended allocations which we consider to be comprehensive and in line with the Regulations and have no further comments to make.</p> <p>Finally we advise that a recent judgment from the Court of Justice of the European Union (Case C-323/17 People Over Wind v Coillte Teoranta) has provided authoritative interpretation relating to the use of mitigation measures at the screening stage of a Habitats Regulations Assessment ('HRA') when deciding whether an appropriate assessment of a plan or project is required. The court concluded that measures intended to avoid or reduce the harmful effects of a plan or project on a European Site can only be considered as part of the appropriate assessment stage of HRA, and not at the preceding screening stage. This means that it is no longer appropriate to rely on these measures when deciding whether a plan or project is likely to have a significant effect on a European site(s). In light of this judgment, Natural England advises that local plan-making authorities</p>	<p>No Change</p> <p>The Inspectors report (paragraph 13) highlights that the Council confirmed during the examination it considers the HRA work to be legally compliant taking account of the recent EU Court of Justice Judgement.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			<p>may wish to take legal advice on the implications of the judgment to fully understand whether any further assessment of, or changes to, their Plans are now required to ensure their compliance with the Conservation of Habitats & Species Regulations 2017.</p> <p>We advise that, if reviewing a draft HRA of a Plan, plan-making authorities consider whether there are measures in the Plan that are intended to avoid or reduce the risk or the possibility of significant effects on European Sites that are being relied upon to rule out the need for an appropriate assessment. Where you consider this to be the case, we advise that an appropriate assessment should be undertaken to consider the impacts on the integrity of the European site(s), either alone or in-combination with other plans and projects, in view of the available advice about the site's conservation objectives. However, when determining whether the plan will have an adverse effect on the integrity of the European site at the appropriate assessment stage, a competent authority may take account of those avoidance and mitigation measures. Natural England must be consulted on any appropriate assessment.</p> <p>Plan-making authorities may also wish to consider the advice about this judgment currently provided</p>	

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			<p>by the Planning Inspectorate (PINS Note 05/2018), which recommends that, where planning cases are on-going and still being determined, any HRAs drafted which contain screening decisions that have taken into account mitigation measures should be re-examined and an appropriate assessment conducted where necessary.</p>	
Doc - All	Mod_HRA_Mod2	Object	<p>You appear to be making modifications to the Habitats Regulations Assessment to suit your local plan for MX1905 Chidswell.</p> <p>A survey for bats was carried out on ONE property on Heybeck Lane ie. No 39, to ascertain the Habitat of a local bat population (as you cannot destroy any nest when the property is demolished?)</p> <p>This only confirms the property surveyed has no bats present at the address, and hopefully confirmed there is a bat population in and around Heybeck Lane/MX1905.</p> <p>Bats have been present and witnessed on your proposed site to the rear of properties on Heybeck Lane, dependent on the environment of your proposed sustainable habitat.</p> <p>With reference to the attached document on land owner responsibilities you should not consider</p>	<p>No Change</p> <p>The HRA has been consistently applied, none of the Natura 2000 sites within and around Kirklees are designated for bats. The evidence regarding the presence of bats on site would be considered at the time of a planning application.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
			development of MX1905 as your requirement to preserve this habitat.	
Doc - All	Mod_HRA_Mod3	Object	<p>With Reference to Modifications Habitats Regulation Assessment (August 2018) you have recently surveyed one property, due to be demolished, for bat nesting as it is a legal requirement not to disturb such locations.</p> <p>This does not take into account the habitat of your proposed site MX1905 Chidswell, which has a presence of bats not to mention hundreds of wildlife population that visit, nest, breed and feed on a daily basis obviously and depend on the habitat in that area to survive.</p>	<p>No Change</p> <p>The HRA has been consistently applied, none of the Natura 2000 sites within and around Kirklees are designated for bats. The evidence regarding the presence of bats on site would be considered at the time of a planning application.</p>
Doc - All	Mod_HRA_Mod4	Object	<p>The comments relate to site E1831.</p> <p>Object to the allocation of this site on the grounds of the sustainability appraisal and Habitat Regulations Assessment. The site is subject to pollution and congestion, air quality and health issues. The site is a buffer for pollution from the heavily congested Motorway/Trunk Road junctions.</p>	<p>No Change</p> <p>Site E1831 was the subject of written and oral representations and fully considered by the Inspector at the Kirklees Local Plan Examination. This included the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>Main modifications were consulted on to reduce site size, capacity to reflect the high pressure gas pipeline and buffer which may go some way to addressing the objector's concerns.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
				<p>Notwithstanding the above, the site will still need to be subject to a planning application at which stage further mitigation if necessary can be considered.</p>
Doc - All	Mod_HRA_Mod5	Object	<p>The comments relate to the HRA and Site H626.</p> <p>Building on H626 will do nothing to enhance biodiversity or enhance the SSI and will not be of benefit to the community.</p> <p>It can and does not support habitat and is a green corridor.</p> <p>How will you compensate for its loss?</p>	<p>Modification SD2-MM260 appended to the Inspectors report states that at planning application stage: "Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u>" As such any appropriate mitigation or compensatory measures in respect of the South Pennine Moors European Sites would be determined at the planning application stage.</p> <p>The potential impact to protected species and biodiversity in general will be considered at the planning application stage and the mitigation hierarchy applied to determine any need for compensation, in line with policy PLP 30.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
Doc - All	Mod_HRA_Mod6	Object	<p>The comments relate to the HRA and Site H626.</p> <p>Building on H626 will do nothing to enhance biodiversity or enhance the SSI and will not be of benefit to the community.</p> <p>It can and does not support habitat and is a green corridor.</p> <p>How will you compensate for its loss?</p>	<p>No Change</p> <p>Modification SD2-MM260 appended to the Inspectors report states that at planning application stage: “Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u>” As such any appropriate mitigation or compensatory measures in respect of the South Pennine Moors European Sites would be determined at the planning application stage.</p> <p>The potential impact to protected species and biodiversity in general will be considered at the planning application stage and the mitigation hierarchy applied to determine any need for compensation, in line with policy PLP 30.</p>

Habitats Regulations Assessment (March 2017)

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
Doc - All	Mod_HRA_rep1	Object	<p>The comments relate to the HRA and Site H626.</p> <p>Building on H626 will do nothing to enhance biodiversity or enhance the SSI and will not be of benefit to the community.</p> <p>It can and does not support habitat and is a green corridor.</p> <p>How will you compensate for its loss?</p>	<p>No Change</p> <p>Modification SD2-MM260 appended to the Inspectors report states that at planning application stage: “Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u>” As such any appropriate mitigation or compensatory measures in respect of the South Pennine Moors European Sites would be determined at the planning application stage.</p> <p>The potential impact to protected species and biodiversity in general will be considered at the planning application stage and the mitigation hierarchy applied to determine any need for compensation, in line with policy PLP 30.</p>

Modification Ref	Rep ID	Support Object No Comment	Comment	Officer Response
Doc - All	Mod_HRA_rep2	Object	<p>The comments relate to the HRA and Site H626.</p> <p>Building on H626 will do nothing to enhance biodiversity or enhance the SSI and will not be of benefit to the community.</p> <p>It can and does not support habitat and is a green corridor.</p> <p>How will you compensate for its loss?</p>	<p>No Change</p> <p>Modification SD2-MM260 appended to the Inspectors report states that at planning application stage: “Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) <u>Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30.</u>” As such any appropriate mitigation or compensatory measures in respect of the South Pennine Moors European Sites would be determined at the planning application stage.</p> <p>The potential impact to protected species and biodiversity in general will be considered at the planning application stage and the mitigation hierarchy applied to determine any need for compensation, in line with policy PLP 30.</p>

APPENDIX 7

A guide to equality Impact Assessments (EIAs)

What are Equality Impact Assessments (EIAs)?

- EIAs are a **tool to help you analyse and make more considered decisions** about changes to service delivery, policy and practice. An EIA will help you to identify how specific communities of interest may be affected by decisions and to consider any potential discriminatory impact on people with **protected**
- EIAs can also help to improve or promote equality by encouraging you to **identify ways to remove barriers and improve participation** for people with a protected characteristic.

Why do we need to do Equality Impact Assessments (EIAs)?

- Although not a mandatory requirement, EIAs provide important **evidence** of how we have considered the implications of service and policy changes and demonstrate how we have met our legal Public Sector Equality
- The three main elements of the **Public Sector Equality Duty** are:
 - ✓ Eliminating discrimination
 - ✓ Promoting equality of opportunity
 - ✓ Fostering good relations
- In fulfilling our Public Sector Equality Duty we must ensure that we demonstrate that we have followed a number of key **principles** (based on previous case law):
 - ✓ Knowledge
 - ✓ Timeliness
 - ✓ Real consideration
 - ✓ Sufficient information
 - ✓ No delegation
 - ✓ Review
 - ✓ Proper record keeping
- We need to provide evidence that we have given **due regard to any potential discriminatory impact on people with protected characteristics** in shaping policy, in delivering and making changes to services, and
- We must always consider whether a service change, decision or policy could have a discriminatory impact on people with protected characteristics, not just any impact that is the same as it would be for everyone
- The EIA tool allows us to **capture, demonstrate and publish our rationale** of how we have considered our communities and legal responsibilities under the Public Sector Equality Duty and is our main way of
- **But above all, EIAs are about understanding and meeting the needs of local people and supporting us to deliver our vision for Kirklees.**

When do we need to do Equality Impact Assessments (EIAs)?

- Whenever you plan to **change, introduce or remove** a service, activity or policy.
- At the **VERY BEGINNING** of any process of:
 - ✓ Budget setting
 - ✓ Service review (including changes to employment practice)
 - ✓ Planning new projects and work programmes
 - ✓ Policy development and review
 - ✓ Procurement or commissioning activity

Who should do it?

- Overall responsibility for EIAs lies at a **service** level. A lead officer should be appointed from the service area that is making a proposal and all decisions should be approved by the senior management team in that
- Those directly affected (partners, stakeholders, voluntary groups, communities, equality groups etc) should be engaged with as part of the process.

How should we do it?

- Our EIA process has two stages:
Stage 1 - initial screening assessment
Stage 2 - further assessment and evidence

EIA STAGE 1 – SCREENING TOOL (initial assessment)

The purpose of this screening tool is to help you consider the potential impact of your proposal at an early stage.

Please give details of your service/lead officer then complete sections 1-3:

- 1) What is your proposal?
- 2) What level of impact do you think your proposal will have?
- 3) How are you using advice and evidence/intelligence to help you?

You will then receive your stage 1 assessment score and advice on what to do what next.

Directorate:	Senior Officer responsible for policy/service:
Place	Simon Taylor
Service:	Lead Officer responsible for EIA:
Investment and Regeneration	Richard Hollinson
Specific Service Area/Policy:	Date of EIA (Stage 1):
Planning Policy	01/02/2019

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section

1) WHAT IS YOUR PROPOSAL?	Please select YES or NO
To introduce a service, activity or policy (i.e. start doing something)	NO
To remove a service, activity or policy (i.e. stop doing something)	NO
To reduce a service or activity (i.e. do less of something)	NO
To increase a service or activity (i.e. do more of something)	NO
To change a service, activity or policy (i.e. redesign it)	YES
To start charging for (or increase the charge for) a service or activity (i.e. ask people to pay for or to pay more for something)	NO
Please briefly outline your proposal and the overall aims/purpose of making this change:	
<p>6) The adoption of the Kirklees Local Plan will provide a new local development plan for the district for the next 15 years and will be used as the basis for determining planning applications and guide strategic investment decisions linked to land use planning. It will replace the Kirklees Unitary Development Plan once adopted. The procedure to determine planning applications will not change, but there will be an up to date local plan upon which decision making will be based consisting of new local policy.</p>	

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2) WHAT LEVEL OF IMPACT DO YOU THINK YOUR PROPOSAL WILL HAVE ON...		Level of Impact
		Please select from drop down
Kirklees employees within this service/directorate? (overall)		Positive
Kirklees residents living in a specific ward/local area?		Positive
Please tell us which area/ward will be affected:		All wards
Residents across Kirklees? (i.e. most/all local people)		Positive
Existing service users ?		Positive
Each of the following protected characteristic groups ?		Please select from drop down
<i>(Think about how your proposal might affect, either positively or negatively, any individuals/communities. Please consider the impact for both employees and residents - within these protected characteristic groups).</i>		
...age	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...disability	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...gender reassignment	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...marriage/ civil partnership	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...pregnancy & maternity	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...race	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...religion & belief	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...SEX	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral
...sexual orientation	What impact is there on Kirklees employees /internal working practices?	Neutral
	What impact is there on Kirklees residents /external service delivery?	Neutral

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3) HOW ARE YOU USING ADVICE AND EVIDENCE/INTELLIGENCE TO HELP YOU?		Please select YES or NO
Have you taken any specialist advice linked to your proposal? (Legal, HR etc)?		YES
Do you have any evidence/intelligence to support your assessment (in section 2) of the impact of your proposal on...	...employees?	YES
	...Kirklees residents?	YES
	...service users?	YES
	...any protected characteristic groups?	YES
<p>An initial consultation took place in November 2014 known as "Shaping our Local Plan" where feedback from the public was sought to feed into developing the Draft Local Plan. A further period of public consultation took place between Nov 2015 and Feb 2016 on the Draft Local Plan. These comments have been analysed and used to inform the production of the publication draft local plan. A consultation methodology was prepared in accordance with the council's Statement of Community Involvement, the council's Involving Communities Framework, and the planning regulations. The Statement of Community Involvement was subject to a Equalities Impact Assessment and public consultation. Both the Statement of Community Involvement and the Involving Communities framework provide an open and transparent framework for consultation to ensure equality for all to make representations and shape planning policy documents including the Local Plan. An examination in public was held between October 2017 to April 2018 with an independent planning inspector. The Inspectors confirmed that consultation "was extensive and wide ranging and elicited a high level of response". The purpose of this was to hear issues arising from the publication draft local plan in a public arena. Numerous evidence base documents were required to provide evidence on housing, employment, infrastructure, retail, these can be viewed on the http://www.kirklees.gov.uk/beta/planning-policy/local-plan-examination-library-2017 webpage in a comprehensive local plan document library. Legal advice relating to process/case law, and a number of external consultants employed to produce evidence base reports, alongside working with other services within the council and external bodies on technical advice on for the local plan. The local plan has been prepared in accordance with European/national legislation and policy/guidance and council policies all of which seek to respond positively to the duty, furthermore the consultation has been undertaken in accordance with the Statement of Community Involvement which had its own Equalities Impapct Assessment. The Public can view all supporting evidence on the local plan, including the rationale and decision making for producing the local plan, and the Council's formal decision on the local plan. The comments received and responses on the draft local plan and publication draft local plan, have resulted in appropriate amendments to the publication draft local plan and modification to the plan including the inclusion of mitigation where appropriate. These consultation comments and responses have been set out in the Statements of Consultation setting out the community participation and stakeholder involvement in the production of the local plan. The policies included in the local plan help mitigate negative impacts. Alongside the determination of planning applications building control legislation provides a further level of mitigation prior to, during and post development. The publication draft local plan and associated modifications to the plan has an extensive evidence library available to view at kirklees.gov.uk/localplan including the Statement of Community Involvement and associated Equalities Impact Assessment.</p>		
		Please select from drop down
To what extent do you feel you are able to mitigate any potential negative impact of your proposal on the different groups of people outlined in section 2?		FULLY
To what extent do you feel you have considered your Public Sector Equality Duty?		FULLY

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Move to next section

STAGE 1 ASSESSMENT

IMPACT	RISK
Based on scoring of 1) and 2)	Based on scoring of 2) and 3)
2	18
SCORE (calculated) Max = - / + 32	SCORE (calculated) Max risk = - / + 40

You need to move on to complete a Stage 2 assessment if:

The final Impact score is negative and or the Risk score is negative.

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APPENDIX 8

Sustainability Appraisal

Initial evidence gathering

- Formulate initial aims and objectives for Local Plan
- Begin evidence gathering process
- Identify relevant environmental, economic and social objectives to inform the Sustainability Appraisal

Initial consultation and continued work on evidence gathering

- Engage with local communities, businesses and other interested parties in line with Regulation 18 of Local Plan Regulations 2012
- Take into account representations received from consultation process in line with Regulation 18(3) of Local Plan Regulations 2012
- Engage with duty to cooperate partners
- Ensure compliance with local planning authority's Statement of Community Involvement
- Continue evidence gathering
- Test emerging options through Sustainability Appraisal

Publication and submission

- Draft plan published for representations for a **minimum of 6 weeks** in line with Regulations 17 and 19 of Local Plan Regulations 2012 (and Regulation 21 if application in London)
- Plan submitted for examination, along with Sustainability Appraisal, evidence base and a statement of representations and main issues in line with Regulation 22 of Local Plan Regulations 2012

Examination of submitted plan

- Independent Inspector assesses plan to determine whether it has been prepared in line with the duty to cooperate, other legal requirements, and whether it is sound in line with section 20 of the Planning and Compulsory Purchase Act 2004 and Regulations 23 - 24 of the Local Plan Regulations 2012
- Local planning authority can ask Inspector to recommend main modifications to make plan sound or comply with other legal requirements
- Inspector issues report at end of examination
- Exceptionally, the Inspector will recommend the draft plan is withdrawn if it has not been prepared in accordance with the duty to cooperate or it is likely to be found unsound

Adoption

- Draft plan formally adopted by the local planning authority in line with section 23 the Planning and Compulsory Purchase Act 2004
- Monitoring of implementation of Local Plan policies required in line with Regulation 34 of the Local Plan Regulations 2012

Produce post adoption statement and monitor Sustainability Appraisal indicators of adopted plan