

Kirklees Draft Local Plan: Summary of comments and the Council's Responses Strategies and Policies document

This report provides the number of comments made (Support, Conditional Support, Object and No Comment) on the Draft Local Plan Consultation (November 2015 - February 2016) and summary of these comments and the Council's response, including proposed changes to the Local Plan. Comment references are listed - full details of each comment are available at www.kirklees.gov.uk/localplan

Summary of comments	Council Response			
Introduction	Support	Conditional Support	Object	No Comment
<p>No comments were received on this part of the Plan.</p>	<p>Change</p>	<p>No comments were received on this part of the Plan. However, changes are required to update the text to the introduction.</p> <p>Proposed Change Update paragraphs 1.1 - 1.3 to refer to the Publication Plan and the tests of soundness: "1.1. This document is the council's Publication Draft for the Local Plan. The purpose of the Plan is to set out how much new development there should be in the district, where it will go and what policies will be necessary to achieve the strategy. When adopted, the Kirklees Local Plan will become the main planning policy document for the district. The Local Plan covers the administrative area for Kirklees except for that area covered by the Peak District National Park. The plan covers the period 2013 - 2031.</p> <p>1.2 The council is inviting representations on the "soundness" of the Local Plan under regulations 19 and 20 of the Town and Country Planning Regulations 2012, prior to submitting the Plan to the Secretary of State for an independent examination by an Inspector.</p> <p>1.3 Four tests of soundness are set out in National Planning Policy Framework 2012: - Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; - Justified - the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence; - Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and - Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies of the Framework".</p> <p>Reason: To update the purpose of the Publication consultation in respect of seeking views on the soundness of the Plan. Also to respond to the request from Peak District National Park to clarify that the plan does not provide planning policy guidance for the area covered by the National Park.</p> <p>Proposed Change Update references to draft Local Plan to "Publication draft Local Plan" throughout the document.</p> <p>Reason: To update the stage of the plan process.</p> <p>Proposed Change Insert new paragraph 1.19 to read: "The draft Local Plan was subject to public consultation in November 2015. Feedback from this exercise and updated/new evidence has shaped the Publication draft Local Plan".</p> <p>Reason: To update the previous stages of consultation on the local plan.</p> <p>Proposed Change Amend paragraph 1.31 to read:</p>		

Summary of comments

Council Response

"The IDP provides the basis for establishing a charging schedule for the Community Infrastructure Levy (CIL). This is a system of tariff based payments for developers which councils can introduce once they have an adopted local plan. For more details see the council's website".

Reason:

To update the position with regard to the IDP and CIL.

1.1

DLP_SP34, DLP_SP68, DLP_SP74, DLP_SP94, DLP_SP128, DLP_SP156, DLP_SP174, DLP_SP194, DLP_SP236, DLP_SP254, DLP_SP285, DLP_SP314, DLP_SP337, DLP_SP462, DLP_SP562, DLP_SP631, DLP_SP686, DLP_SP731, DLP_SP771, DLP_SP810, DLP_SP837, DLP_SP958, DLP_SP997, DLP_SP1011, DLP_SP1138, DLP_SP1197, DLP_SP1216, DLP_SP1217, DLP_SP1392, DLP_SP1425, DLP_SP1568, DLP_SP1569, DLP_SP1676, DLP_SP1677, DLP_SP1776, DLP_SP1795, DLP_SP1800

Support 6 Conditional Support 3 Object 27 No Comment 1

The plan is a one eyed plan in that all the development is focussed on North Huddersfield and North Kirklees with the focus clearly on Leeds. No thought has been given to the south of Kirklees which requires a clear vision which is missing from the plan. There are significant employment opportunities in SMEs and there is potential to grow with Superfast broadband. Rural Kirklees is just seen as a place to live and the loss of existing employment sites to housing will make the area less sustainable.

No Change

It is acknowledged that there is a focus on Leeds City Region as the plan aims to deliver the overarching objectives of the Leeds City Region and the council's Economic Strategy and Health and Well-being Strategy creating opportunities for economic growth and resilience. The plan does however, support the rural area through the allocation of prime land for employment uses, the safeguarding of existing employment sites, supporting local services in rural areas and supporting the rural economy, enhancing visitor facilities, supporting education and training and facilitating improvements to transport and telecommunications.

The spatial strategy reflects the strengths and opportunities identified for each of the four sub areas.

The draft Local Plan does not reflect the vision or aspirations of the community

No Change

The vision for Kirklees has been shaped by early engagement on the plan, issues affecting Kirklees, evidence and national policy.

It is important to have a plan in place before 2017. Accept more development needed but consider the figure the government has imposed is too high.

No Change

Agree that it is important to have a plan in place before 2017. The council commissioned evidence on objectively assessed development needs to support the Local Plan and in keeping with the tests of soundness.

Consider that the plan period should be until 2033 not 2031. This would be in keeping with Leeds.

No Change

The period of time covered by the Kirklees local plan is consistent with the requirements of national planning policy.

This is a corrupt plan. How many back handers and pay off are going on?

No Change

Comment is noted. The local plan is required to meet four tests of soundness including positively prepared, justified, effective and consistent with national policy. Supporting evidence and background documents to support the Local Plan are available to view on the council's website. The council's Statement of Consultation also sets out how the Local Plan has been shaped by comments received through the Local Plan consultation. An independent Inspector will be appointed by the Secretary of State to determine the soundness of the plan.

This is another crushingly dire, boring, unambitious piece of déjà vu.

No Change

The comment is noted. The Plan has been prepared in the context of the national planning policy, regional and local strategies and plans, consultation feedback and evidence to support both the strategy and the policies to deliver the strategy and ambitions.

Selby District Council has no specific comments to make on the Kirklees draft Local Plan.

No Change

Selby District Council's response is noted.

The vision for the new Local Plan has got to be much more balanced and holistic if we are to drive forward and give much greater access to businesses and wealth creation in Kirklees. Needs more involvement of the business community.

No Change

The vision for Kirklees has been shaped by early engagement on the plan, issues affecting Kirklees, evidence and national policy.

Summary of comments

Need for a review of the way councillors work together to develop real working cohesion between political groups and independent councillors.

The plan is more cohesive and in keeping with national planning policy and is supported by evidence which is available to view.

The plan should be amended to reflect urgent climate reduction targets established by the December 2015 Paris Agreement and the UK Climate Act 2008.

The consultation document does not genuinely present credible options for most of the policies. In most instances, the alternatives are presented dismissively in the format 'more prescriptive or less prescriptive' without meaningful evidence to justify the preferred option. This makes it impossible to determine, as a consultee, whether real alternatives have been considered and what their merits might be.

Numbering system - the section, sub-section and paragraph numbering is very confusing as subsections contain the same numbers as paragraphs but are not sequential.

The plan says all the right things in very general terms. It is only when you look deeper and consider what has happened or not happened there are things to criticise.

The sustainability appraisal is weak and highly subjective with regard to mineral extraction as there are comments which say that mineral extraction would have a positive effect on job creation yet their proximity would affect home workers. The document does not make it clear that potential sites have only been identified as part of the process of producing the LDF and that there should be no presumption in favour of planning permission being granted without the proper planning process being adopted. This is especially true of MSAs - where recent guidance states that this should be made explicit (Mineral Safeguarding in England = Good Practice advice).

It is difficult to see how scores have been allocated to each option and there is inconsistency regarding impact.

The plan is retrospective and assumes that everyone wants to live in an urban area and travel to work. The balance of development between the urban and rural area is inappropriate. There is no consideration of future work patterns - growing single person businesses, home based working and short commutes from home to rural enterprise zones. Some rural communities need mixed development to make them viable places to live.

Need to build in inclusive flexibility to ensure that long term planning takes on board the unique qualities in the four character areas.

Amend Glossary to include definition of designated heritage assets. Add the following definition to the Glossary:- Designated heritage asset - A Scheduled Monument, Listed Building, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation (Historic England).

Amend definition of Conservation Area in glossary to read:
"An area of special architectural or historic interest, designated under the Planning (Listed Buildings and

Council Response

The business community have been involved in the development of the local plan through early engagement exercises, focus groups and direct contact at key consultation stages.

No Change

Comment noted but this is outside of the local plan process.

No Change

The support for the plan is noted.

No Change

It is considered that the plan approach is consistent with national policy as set out in NPPF.

No Change

All options have been tested independently through the sustainability appraisal.

No Change

The format of the document will be reviewed.

No Change

Note the comment. Each of the allocations and the policies are supported by additional information which is outlined in the Allocations and Designations document, Strategy and Policies document and Supporting evidence.

No Change

The sustainability appraisal is an independent assessment of the likely social, environmental and economic impacts of the plan. In assessing allocations/designations to be included in the local plan, a further assessment has been undertaken as outlined in the site selection methodology where consideration is given as to whether issues can be mitigated. All allocations within the local plan will be subject to planning permission and tested against the policies in the plan and in the case of minerals may include DLP 37 Proposals for mineral extraction, DLP 38 Site restoration and aftercare, DLP 39 Minerals safeguarding and other relevant plan policies. It is not considered that further text is required.

No Change

The spatial strategy sets out the amount of development for each of the four sub-areas reflecting the strengths and opportunities for growth and the principles of sustainable development. The plan makes provision for supporting the rural economy through Policy DLP10 and the broadband provision.

No Change

It is considered that the policies within the Local Plan allow flexibility to take on board the character of the four sub areas.

Change

Support the proposed change made by Historic England.

Proposed Change

Amend the glossary to read:

"Designated heritage asset - this includes a Scheduled Monument, Listed Building, Registered Park and

Summary of comments

Conservation Areas Act) 1990 by the local planning authority. There is a statutory duty to pay special attention to the desirability of preserving or enhancing their character or appearance.

The plans need to be radically modified to maintain local services, communications and support the green belt.

Welcome the acknowledgement in the Draft Local Plan introduction that the Leeds City Region Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP) sets out the spatial priority areas in order to maximise growth potential and ensure prosperity across the whole City Region. The Leeds City Region SEP identifies areas where either the growth opportunities or the level of market failure are of strategic significance to the whole of the City Region. This includes strategic employment and mixed-use sites. Five major development area proposals have been identified in the Leeds City Region that will combine easy motorway and public transport access with proximity to towns and labour markets.

It would be useful to make it clear that the Plan will be for those areas of the district outside of the National Park (Peak District National Park Authority)

Support the non-use of green belt land for building and consider that brownfield sites should be developed first and all green belt protected and preserved.

There has been a lack of joined up thinking in permission already given and new allocations and inadequate consideration given to necessary infrastructure to support development. Particularly with regard to transport infrastructure, public transport, local schools and health provision. The infrastructure needs to be in place prior to development commencing. Piecemeal development not supported by infrastructure will not work.

The Local Plan seems to be a fair attempt to shape the district for next 15 years but the community infrastructure levy as proposed must deliver to support 30,000 homes and new employment.

Council Response

Garden, Registered Battlefield or Conservation Area designated under the relevant legislation (Historic England)".

Reason:

To provide clarity of a designated heritage asset as requested by Historic England.

Proposed Change

Amend definition of Conservation Area in glossary to read:

"An area of special architectural or historic interest, designated under the Planning (Listed Buildings and Conservation Areas Act) 1990 by the local planning authority. There is a statutory duty to pay special attention to the desirability of preserving or enhancing their character or appearance.

Reason: To make reference to local planning authority and remove reference to setting of the areas.

No Change

The draft Local Plan has been reviewed in the light of representations received, a full review of the allocations and designations and further evidence commissioned by the council. While this has led to changes to the plan which are set out in the Publication draft Local Plan, the plan remains committed to the protection of local services, communications and the designation of long term defensible green belt boundaries.

No Change

The support for references to the Leeds City Region, Local Enterprise partnership and the Strategic Economic Plan are noted.

Change

Support proposed change made by the Peak District National Park.

Proposed Change

Amend paragraph 1.1 to include:

"The Local Plan covers the administrative area of Kirklees Council except for that part within the Peak District National Park".

Reason:

To clarify the coverage of the local plan.

Reason

To reflect the plan coverage.

No Change

The support for the spatial strategy is noted. The priority of development is set out in Chapter 4 of the draft local plan.

No Change

One of the benefits of having a local plan in place is that it provides a spatial strategy for the whole of the district and allows consideration of the cumulative impacts of development. The provision of an Infrastructure Delivery Plan to support the local plan enables infrastructure planning to be integral to the process.

A wide range of technical consultees and statutory consultees have commented on the plan in order to properly plan for required infrastructure, including adjoining local authorities, duty to co-operate bodies, Education School Place Planning, Clinical Commissioning Groups and transportation colleagues.

Summary of comments

Kirklees has done a good job putting the draft Local Plan together.

Support the Local Plan and strongly request rejected areas remain rejected.

Overall the draft Local Plan addresses makes a good attempt to address many complicated issues. We need buildings for housing and employment but the difficulty is finding the best locations. If land is taken out of the green belt, reconsider rejected sites put forward by Farnley Estate.

Officers should be congratulated on the compilation of such a comprehensive and detailed set of documents.

The on-line mapping system is fantastic.

The maps are inadequate and councillors are not trained in map reading or to interpret them to the public. The consultation is therefore flawed.

The consultation booklet did not contain anything of substance to make an informed decision and was not widely distributed.

The consultation exercise was fundamentally flawed. Not inclusive, most people did not know about the proposals. Writing to only those affected by the proposal is not sufficient.

The consultation process was merely a tick box exercise and there is concern that views are not listened to and there will be no feedback.

High levels of residents were unaware of the Local Plan and its proposals. Awareness raised by local councillor involvement. The fact that the deadline was extended demonstrates the lack of awareness of residents.

The website is difficult to use and navigate through the documents. The on line consultation system is difficult to use and there is too much complex information on the website.

Level of consultation on mineral extraction has been poor particularly in Shelley, Kirkburton and Highburton.

The Publication document should be delayed to enable more time to be spent on consultation.

All Kirklees Council residents should have received some kind of booklet, or information pamphlet, outlining the plan. This has not been the case and very few people have received sufficient details.

Kirklees Council held consultation events across the region, however, there was only one event held within Dewsbury at the town hall on Tuesday 24 the November 2015, which was poorly attended. The reason for the low attendance being that the council had failed in its duty to advertise and inform residents properly of the event. The council may claim that they advertised the event in the local press, however, with newspaper circulations dropping considerably, they should have informed all residents in Dewsbury of the event by posting a leaflet, particularly in areas where large land allocations are being proposed.

The focus on making on line comments discriminates against the less well off in society and the elderly, who may not have access to computers, or the knowledge of how to use them. The online response system is too complicated to use and the registration and login system itself is an obstacle to making an online response, making it difficult for residents who do not know how to use computers to make their views known. The complicated site reference system was also an obstacle for residents wanting to respond online.

Whilst the paper response form was available, it did not include a return address for respondents

Council Response

The comment on the Community Infrastructure Levy is noted.

No Change

Note the support for the Local Plan and its contents.

No Change

The comments on the draft Local Plan consultation are noted. See the Statement of Consultation for full details on the consultation process and how comments have been considered as part of the preparation of the Publication draft Local Plan. It is considered that the consultation is compliant with NPPF requirements for early engagement, the Council's Statement of Consultation and regulatory requirements.

Summary of comments

making it impossible for anyone without a computer to know where to send the form to unless they phoned the council.

Cost should not be used as a reason not to promote paper comments as well as on line as Kirklees wasted money on the previous LDF.

Unreasonable to expect communities to download documents when broadband connectivity is poor.

The plan should be delayed until a full, fair consultation has been held.

The Plan is essential and must be put in place as soon as possible. Need to have a plan in place in order to identify land for development and to protect open space.

The plan is backward looking, not visionary or realistic in forecasting future trends. Further consultation is required.

The plan fails to mention the council's duty under the human rights act. The act makes it clear that all those who work in public authorities whether devising policy or procedures or delivering services directly to the public must act in a way that is compatible with the Human Rights Act 1998.

1.2

DLP_SP18, DLP_SP67, DLP_SP315, DLP_SP465, DLP_SP664, DLP_SP715, DLP_SP1012

The allocation of Bradley Park is at odds with the Plan aims to address issue of low pay, the decline of businesses in the town centre and impact on health and well being. There is insufficient detail regarding infrastructure.

There is a gulf between strategy and implementation. Many of the aims, objectives, strategies and policies of the Draft Local Plan are reasonably sound high level statements that can be supported (NB: Policy DLP5 is NOT supported). Unfortunately there is, in many cases, a huge gulf between those high level statements and the more detailed interpretation of them elsewhere in the plan (e.g. in site allocations and the lack of practical focus on brownfield development and urban regeneration). In essence there is often an unacceptable and largely unexplained difference between strategy and implementation.

Question whether the council has complied with duty to co-operate as Wakefield had not considered the plan at the time of consultation. Wakefield should have been consulted before.

Communities need to have confidence that the green belt will remain until 2031. Important to protect the green belt once designated.

Council Response

No Change

Note the support for having a plan in place as soon as possible in order to identify land for development and to protect land from development.

No Change

The comment is noted. The vision and objectives of the plan have been shaped by the Kirklees Economic Strategy, the Kirklees Joint Health and Well-being Strategy and local plan early engagement on issues and options.

The plan is supported by a wide range of evidence to justify its approach and policies. The soundness of the plan will be subject to further consultation when the Publication draft Local Plan is published for consultation.

No Change

UK planning law complies with Human Rights Act legislation. There is therefore, no requirement to make specific reference to the Act within the Plan.

Support	Conditional Support	Object 7	No Comment
No Change	The allocation of Bradley Park is part of the council's wider strategy to meet objectively assessed housing needs within the district. It is supported by a masterplan which includes the provision of affordable housing and continued golf provision and open space to meet the needs of residents and health and well being aims. The masterplan also sets out infrastructure requirements to support the site and these will also be detailed in the site allocation text box within the plan.	The Local Plan is supported by an Infrastructure Delivery Plan which sets out infrastructure requirements to support the delivery of the strategy.	No Change
Support for the aims, objectives, strategies and policies noted. Each of the policies is linked to a strategic objective and sustainability appraisal which is set out in appendix 2. The ability of the policies to deliver the aims and objectives of the plan will be monitored through the Annual Monitoring Report.	No Change	The comment is noted. The Duty to Co-operate Statement sets out the processes that the council has put in place to consult on strategic cross boundary issues including activities with Wakefield. It also sets out the outcomes of the consultation. The council is confident that it has met its duty to co-operate requirements.	No Change
Communities need to have confidence that the green belt will remain until 2031. Important to protect the green belt once designated.	No Change		

Summary of comments

Council Response

The plan should make it clear that although sites have been allocated during the Local Plan process, that just because they have been identified there is no presumption in their favour for planning permission, They will still have to undergo the normal planning permission .

Comment noted. The council has undertaken a Green belt review to support the development strategy in order to provide long term, defensible green belt boundaries.

No Change

The Allocations and Designations document Introduction outlines that the Local plan should be read as a whole, with proposals for development being considered against relevant policies depending on the details of the proposal and its location.

1.30

Support Conditional Support Object No Comment

No comments were received on this part of the Plan.

No change.

1.4

Support Conditional Support Object 1 No Comment

DLP_SP334

There is an anomaly between the SCI which states what the council will do with regard to consultation and what has happened in reality. While individuals on the database have been informed, little was done to inform residents who in the main were unaware of the plan. An opportunity to use Kirklees Together was not taken and I am unaware of alternative measures.

No Change

The council's consultation processes are set out in its Statement of Consultation. A wide range of processes were used to inform stakeholders of the Local Plan, including letters/emails to everyone on the database, advertisements/press releases in the local press, information provided to local councillors to undertake consultation in their own areas, focus groups, drop in sessions and a summary booklet in key locations. It is considered that the consultation was in keeping with the SCI and regulatory requirements.

1.5

Support Conditional Support Object No Comment

No comments were received on this part of the Plan. However, the section requires updating to refer to the Publication draft Local Plan.

Proposed Change

Amend the plan to read: "The aims are also supportive of the Publication draft Local Plan strategic objectives".

Reason: Updating Plan reference

1.6

Support Conditional Support Object 1 No Comment

DLP_SP466

Although the Council have undertaken some consultation exercises they have not notified individual households who would be directly affected by the outcomes of this plan. For instance there are individuals who live within 5m of potential large scale mineral extraction sites who have not been informed or asked to comment.

No Change

The council's consultation processes are set out in its Statement of Consultation. It is considered that the range of methods used are in keeping with the council's Statement of Community Involvement and regulatory requirements. There is no regulatory requirement to inform individuals who are within 5m of an allocation.

1.7

Support Conditional Support Object 2 No Comment

DLP_SP876, DLP_SP878

Many policies are too loosely worded to deliver stated Vision and Objectives for the area. They are too open to different interpretation by both developers and officers. For example, on Housing Policies how is the council going to ensure the quality of materials and design reflect the heritage and character of Kirklees Rural, the need for homeworking, homes for older people and 'downsizers'? In many cases, policies need to be more structured and specifically worded to ensure policies and vision, objectives and identified needs match and will be fulfilled. A detailed 'cross check' of policy content and wording against Vision Statements, objectives and identified needs is needed at the next stage of Local Plan development.

No Change

Appendix 2 Monitoring Framework sets out which strategic objectives each policy seeks to deliver. It also provides a link to relevant sustainability appraisal indicators. Each policy has a monitoring indicator which will be monitored on an annual basis through the Annual Monitoring Report. This will demonstrate how successful the plan is in delivery strategic objectives and the vision of the plan.

Insufficient information in the delivery, implementation and sections about council controls and monitoring. Too much is left to the developers. Want development control not management.

No Change

The comment is noted. More information on monitoring is contained in the section on Monitoring and Implementation and Appendix 2 Monitoring Framework which sets out detailed monitoring indicators for the Local Plan. These will be reported on within the council's Annual Monitoring Report.

The proposed Policies, Implementation, Delivery and Land Allocation strategies will not deliver the noble

No Change

Summary of comments

statements at the beginning of the document. They destroy the very things the Council says it is setting out to preserve and enhance. A huge gulf exists between high level, overarching statements and their interpretation in the detail of documents. There is a lack of cohesion which needs to be addressed at the next stage.

Council Response

Appendix 2 Monitoring Framework sets out which strategic objectives each policy seeks to deliver. It also provides a link to relevant sustainability appraisal indicators. Each policy has a monitoring indicator which will be monitored on an annual basis through the Annual Monitoring Report. This will demonstrate how successful the plan is in delivery strategic objectives and the vision of the plan.

1.8

Support Conditional Support Object No Comment

No comments were received on this part of the plan. The reference to the policy text has been updated to remove reference to the alternatives.

Change
Proposed Change
The reference to the alternative boxes has been removed as the Publication Plan forms the council's preferred option.

1.9

Support Conditional Support Object No Comment

No comments were received on this part of the plan.

No Change

1.10

Support Conditional Support Object No Comment

No comments were received on this part of the plan. However, the Plan has been updated to make reference to the Publication draft Local Plan.

Change
Proposed Change
Update the plan to make reference to the Publication draft Local Plan.
Reason: Updating the plan reference

1.11

Support Conditional Support Object No Comment

No comments were received on this part of the plan. However, the Plan has been updated to make reference to the Publication draft Local Plan.

Change
Proposed Change
Update the plan to make reference to the Publication draft Local Plan.

1.12

Support Conditional Support Object 1 No Comment

DLP_SP925

Once the Final Plan has been adopted, it will be subjected to change, alteration, amendment as a result of local and national politics, financial, moral, environmental pressures or even as a result of changes in Key Personnel in the Council. Perhaps this should be clearly stated. (I see this is covered in Section 19, Monitoring and Implementation, but a brief comment in the introduction might put this in context).

No Change
It is considered that Chapter 19 Monitoring and Implementation reflects the purposes of monitoring the local plan and there is no reason to repeat this in the introduction of the plan. The local plan is required to be in compliance with national planning policy and changes to this could trigger a review of the plan. Where the council wished to produce guidance on a local issue, there is the possibility of producing supplementary planning guidance but this would need to be linked to a policy in the Local Plan which again would need to be in compliance with national policy. Changes to "key personnel" would not be a reason for reviewing the plan.

1.13

Support Conditional Support Object No Comment

No comments were received on this part of the Plan.

No Change

1.14

Support Conditional Support Object No Comment

No comments were received on this part of the Plan.

No Change

The context for the draft local plan

Support Conditional Support Object No Comment

No comments were received on this part of the Plan.

No Change

Summary of comments	Council Response			
1.15	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
1.16	Support	Conditional Support	Object 6	No Comment
DLP_SP468, DLP_SP665, DLP_SP998, DLP_SP1010, DLP_SP1283, DLP_SP1295				
Consultation has been inadequate with most people unaware of the proposals particularly in Bradley.	No Change			
Limited consultation undertaken but there was no notification for individual households who would be directly affected by the outcomes of the plan. Individuals who live within 5m of potential large mineral extraction sites were not informed to invited to comment.	The council's consultation processes are set out in its Statement of Consultation. It is considered that the range of methods used complies with the council's Statement of Community Involvement and regulatory requirements as set out in the Town and Country (Local Plan) Regulations 2012.			
I also believe that the Council have not fulfilled their duties under Regulation 18 of the Town and Country Planning Regulations 2012. This is demonstrated by the fact that the residents of Mirfield, and Sands Lane in particular, have not been sufficiently informed by the Council of the proposed plans. A pilot study of local residents has demonstrated that local (Mirfield) residents are not aware of the Local Plan. It is suggested that this lack of knowledge may not be confined to Mirfield, but to the wider area of Kirklees.	The Local Plan regulations do not require councils to specifically notify residents within 5m of a potential allocation.			
I am surprised that consultation is only happening after the Plan has been published, rather than during its drafting. This means that, rather than making a positive contribution to the development of ideas, residents are only left with the option of objecting. This seems an inefficient way to proceed. NPPF Paragraph 155 states Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area . There has, to date, been no consultation and no meaningful engagement, meaning proactivity has been impossible.	No Change			
Building should not be undertaken in areas prone to flood.	The Local Plan was subject to three stages of early engagement prior to the publication of the Local Plan. Details are set out in the council's Statement of Consultation. The council also undertook sessions with a series of focus groups including faith, young people, people aged 65+, disabled people and businesses to inform the local plan content. It is therefore, considered that the council has undertaken early and meaningful engagement to inform the plan preparation.			
Hope that the consultation is not just a tick box exercise. It would be helpful if the revised draft has amendments and changes printed in a different colour when re-issued.	No Change			
	The council's site selection methodology sets out that the council has undertaken a sequential approach to the consideration of flood risk in the assessment of development site options. Where a site falls wholly within Flood Zone 3b (functional floodplain), it has been rejected for development. Where a site is partly within flood zone 3b an assessment has been made as to whether there is any reasonable prospect of achieving development on that part of the site not affected by the functional floodplain.			
	No Change			
	Comment noted. The council's Statement of Consultation will include a response to all issues raised as part of the consultation exercise. Where changes arise as a result of the consultation, these will need to be agreed by Council as part of the consultation on the Publication draft Local Plan.			
1.17	Support	Conditional Support	Object	No Comment
Whilst it is accepted that Kirklees has followed Government policy , the policy itself is wrong, and fails to put the issues in a local context or to provide for a real local solution. The real opportunity to minimise the impact of development, to address historic problems, to address future issues and to leverage significant community benefits has been lost.	No Change			
	The council is required for the local plan to be compliant with national planning policy. The local plan strategy seeks to reflect local character through the promotion of place shaping. The policies to guide development management decisions also provide an opportunity to guide decisions through local evidence.			
1.18	Support	Conditional Support	Object 1	No Comment
DLP_SP467				
The presumption here is that if a development accords with this plan it will be approved. That is certainly not the case with Mineral Safeguarded Areas and all developments need to comply with existing planning safeguards and regulations. This should be made clear in the Plan.	No Change			
	The Plan reflects the guidance set out in the National Planning Policy Framework. The policy justification for Policy DLP1 states that the Local Plan will positively seek opportunities to meet the development needs of the			

Summary of comments

Council Response

1.19

DLP_SP877

Consider that the plan does not conform to NPPF: in particular, Para 7 Sustainable development - massive number of homes in unsustainable locations including 5100 in Kirklees Rural
 Para 14 - lack of objectively assessed needs
 Para 17 - proposals for Kirklees Rural including Dearne Valley fail to meet 12 core principles
 Section 9 Paragraphs 79, 80, 82, 84 concerned with preserving the greenbelt.
 Paragraph 100 development is being proposed in areas at risk of flooding or which form flood plains for rivers, particularly here in the Dearne Valley
 Paragraph 101 there are sequentially preferable sites at less risk of flooding which have not been considered or indeed, in some cases, rejected
 Paragraph 109 development plans for Kirklees Rural destroy and denigrate its natural environment an environment acknowledged for its beauty and heritage in the Vision and Objectives Section of Strategies and Policies document, but apparently, quickly forgotten.
 Paragraph 110 minimisation of pollution and other adverse effects. The large scale developments planned will channel thousands and thousands of traffic movements onto narrow, constricted roads, often in narrow valley bottoms where air and noise pollution levels will linger and rise posing a highly increased risk to public health and safety.
 Paragraph 112 the present Local Plan destroys agricultural land currently used for producing food both animal and arable based crops - in the face of a national situation where the UK is becoming more and more dependent on imported food.
 Paragraphs 114 and 119 some site allocations contravene UK BAP Priority Habitats for protected species.
 Paragraphs 120 and 121 several land allocations, particularly in the Dearne Valley are in 'high coal risk' locations.
 Paragraph 126 again some site allocations show little respect for conservation areas and local heritage and if the proposed developments were allowed to take place, would have a huge detrimental impact. In some cases, it would be just impossible for construction plant, equipment and materials to access the site. (See Site Allocation comments below).
 Paragraphs 150, 151 and 152 The draft Local Plan does not reflect the visions or aspirations of the local community we were never asked! The Draft Local Plan has been prepared 'in camera' by the Planning Department who have once again failed to engage the community from the start of the process no workshops, no Focus Groups to guide the development of the first draft. The Council have now put itself in a 'publish and defend' mode which, as pointed out by the Government in its Neighbourhood Planning Guidance, is just bad practice.
 Paragraphs 158 - 159 shows lack of understanding of real housing needs in area. Where are the requirements for social housing, sheltered housing and smaller homes.
 Paragraphs 160, 178, 179 lack of understanding of business needs of area.
 Paragraph 182 - the plan is not sound. The construction industry does not have the capacity to deliver.

district and meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. No changes are therefore, considered necessary.

Support Conditional Support Object 1 No Comment

No Change

It is considered that the spatial strategy represents sustainable development and reflects the strengths and opportunities outlined in the plan for the four sub-areas.

The council commissioned evidence on objectively assessed needs to inform the plan which forms part of the supporting evidence.

The spatial strategy for the Kirklees Rural is based on an assessment of the strengths and opportunities in each of the four sub areas and consideration of sustainable development to meet objectively assessed needs.

The council have undertaken a Green Belt Review Study to support the Local Plan which forms part of the supporting evidence.

The council's site selection methodology sets out that the council has undertaken a sequential approach to the consideration of flood risk in the assessment of development site options. Where a site falls wholly within Flood Zone 3b (functional floodplain), it has been rejected for development. Where a site is partly within flood zone 3b an assessment has been made as to whether there is any reasonable prospect of achieving development on that part of the site not affected by the functional floodplain.

The council's site selection methodology sets out that the council's approach to site selection. Technical consultees have been consulted on the impact on wildlife, biodiversity, pollution and health, high risk coal mining areas, transport, implications for agricultural land etc on site allocations. These consultations have informed site selection and any required mitigation measures.

Transport assessments have been undertaken on individual sites and a transport model has assessed the cumulative impacts of the site selection.

The Local Plan was subject to three stages of early engagement to inform the content of the plan and to shape the vision and strategic objectives. This took the form of questionnaires, letters to everyone on the local plan database/ targeted workshops and focus groups.

Business groups were targeted as part of the early engagement process in order to shape business needs. Evidence has also been undertaken to look at site viability and whole plan viability to ensure that the plan is viable.

The Plan is supported by evidence on Strategic Housing Market and objectively assessed needs to support its strategy and policies on housing mix. The plan also contains policies which promote dwelling mix, type and affordable housing.

1.20

DLP_SP1296

The House Builders Federation (HBF) welcomes the reference to the duty to co-operate and the Leeds City Region Local Enterprise Partnership Strategic Economic Plan (SEP), within paragraphs 1.20 and 1.21 of the consultation document. The HBF is keen to further explore how the ambitions of the SEP have influenced the growth ambitions of the local plan.

Support Conditional Support 1 Object No Comment

No Change

The support for the reference to the duty to co-operate is noted. The Interim Duty to Co-operate Statement sets out the processes that have been undertaken and outcomes to inform and shape the Local Plan. It forms part of the supporting evidence for the Plan.

It is, crucial that the outcome of discussions with these authorities upon housing issues are identified and appropriate actions taken within the plan. To enable such an assessment to occur in a transparent manner it is recommended that a full statement upon the compliance with the duty to co-operate be provided alongside the publication draft of the local plan.

Additional text has been included in the introduction to reference to the Leeds City Region Local Enterprise Partnership, the Strategic Economic Plan and the West Yorkshire Combined Authority to clarify the context of the Plan.

Summary of comments	Council Response			
<p>1.21 DLP_SP1297</p>	Support	Conditional Support 1	Object	No Comment
<p>The House Builders Federation (HBF) welcomes the reference to the duty to co-operate and the Leeds City Region Local Enterprise Partnership Strategic Economic Plan (SEP), within paragraphs 1.20 and 1.21 of the consultation document. The HBF is keen to further explore how the ambitions of the SEP have influenced the growth ambitions of the local plan.</p> <p>It is, crucial that the outcome of discussions with these authorities upon housing issues are identified and appropriate actions taken within the plan. To enable such an assessment to occur in a transparent manner it is recommended that a full statement upon the compliance with the duty to co-operate be provided alongside the publication draft of the local plan.</p>	No Change	<p>The support for the reference to the duty to co-operate is noted. The Interim Duty to Co-operate Statement sets out the processes that have been undertaken and outcomes to inform and shape the Local Plan. It forms part of the supporting evidence for the Plan.</p> <p>Additional text has been included in the introduction to reference to the Leeds City Region Local Enterprise Partnership, the Strategic Economic Plan and the West Yorkshire Combined Authority to clarify the context of the Plan.</p>		
<p>1.22 DLP_SP469, DLP_SP632, DLP_SP660, DLP_SP667, DLP_SP1220, DLP_SP1840</p>	Support 2	Conditional Support	Object 4	No Comment
<p>Many of health issues facing Kirklees can be addressed by exposure to green space. Support Inclusion of Farnley Country Park.</p>	No Change	<p>The Plan's vision and strategic objectives recognise the importance of open space on health and well being and the Plan contains policies to protect green infrastructure. No further changes are considered necessary.</p>		
<p>The Kirklees Economic Strategy needs to respond to developments in artificial intelligence which are changing the way we work and play and should be planned for.</p>	No Change	<p>Comment noted.</p>		
<p>Greater Huddersfield Clinical Commissioning Group - pleased to see that both the JSNA and the JHWS have been used as evidence sources to inform the local plan. The vision and objectives within the JHWS are clearly reflected throughout the Plan.</p>	No Change	<p>The support from the Greater Huddersfield Clinical Commissioning Group for the plan's vision and objectives is noted together with the support for the JSNA and JHWS as sources of evidence.</p>		
<p>The local plan needs to respond to the fact that people want more locally sourced food to fit in with green sustainability energy debate. Need to create beautiful landscaped environments for people to shop, socialise and live in.</p>	No Change	<p>It is considered that opportunities for locally sourced food is dealt with through Policy DLP 48 Healthy, Active and Safe Lifestyles which states that the council will support initiatives which enable or improve access to healthy food. For example, land for local food growing or allotments.</p> <p>The plan also contains Policy DLP33 Landscape which seeks to enhance the landscape character of the area.</p>		
<p>Kirklees obviously invest heavily in the JSNA to inform the JHWS, but the Public Health function appears to be entirely passive, making information available to services and planning, to use or ignore as they see fit. For example pollution along the A629 corridor through Birchcliffe to Ainley Top. Health professionals need to have a consultative rather than advisory role.</p>	No Change	<p>Technical consultees including health, environmental health and transport have been consulted on the site allocations and their comments used to assess the sites and where required necessary mitigation measures incorporated.</p>		
<p>Loss of golf provision at Bradley will impact on health. People need access to green space to walk and for sport</p>	No Change	<p>The Plan's vision and strategic objectives recognise the importance of open space on health and well being and the Plan contains policies to protect green infrastructure.</p> <p>The Bradley Masterplan outlines opportunities for alternative provision.</p> <p>No further changes are considered necessary.</p>		
<p>The strategy's shared commitment for a district combining great quality of life and a strong and sustainable economy leading to thriving communities etc is commendable but this LDF does not treat all parts of Kirklees equally in delivering these objectives. The strategy appears very urban centric. There is a sense throughout this strategy that certain rural parts of Kirklees will have no form of housing development and the only proposals surrounding mineral extraction and renewable energy will lend to them being less desirable places to live where the impacts of industrialised development will negatively</p>	No Change	<p>The spatial strategy has been developed in the context of the Leeds City Region Strategic Economic Plan and the council's Economic Strategy and health and Well-being Strategy. It has also been developed in the context of the strengths and opportunities for development and growth within the four sub-areas as identified in the Local Plan. This demonstrates how the strategy has been developed within rural areas.</p>		

Summary of comments

Council Response

impact on health and wellbeing. Some of the proposals in this Plan will run counter to some of the objectives proposed with certain proposals actually significantly negatively impacting on people's health and well being, quality of living standards and quality of life e.g. mineral extraction sites identified within 5m 50 m and 100m of people's houses and within 500m of a school.

1.23
DLP_SP470, DLP_SP633

The strategy's shared commitment for a district combining great quality of life and a strong and sustainable economy leading to thriving communities etc is commendable but this LDF does not treat all parts of Kirklees equally in delivering these objectives. The strategy appears very urban centric. There is a sense throughout this strategy that certain rural parts of Kirklees will have no form of housing development and the only proposals surrounding mineral extraction and renewable energy will lead to them being less desirable places to live where the impacts of industrialised development will negatively impact on health and wellbeing. Some of the proposals in this Plan will run counter to some of the objectives proposed with certain proposals actually significantly negatively impacting on people's health and well being, quality of living standards and quality of life e.g. mineral extraction sites identified within 5m 50 m and 100m of people's houses and within 500m of a school.

Support the recognition of health and well being and job creation as outlined at paragraph 1.23 by the allocation of Farnley Country Park.

1.24
DLP_SP471

Although the Council have undertaken some consultation exercises they have not notified individual households who would be directly affected by the outcomes of this plan. For instance there are individuals who live within 5m of potential large scale mineral extraction sites who have not been informed or asked to comment.

Supporting documents

No comments were received on this part of the plan.

1.25

The sustainability appraisal has chosen as the basis of decision making 19 objectives rather than carrying out an assessment based on the LDPs Vision, 10 Strategic Objectives and its proposed 65 policies. Application of these policies and objectives to some of the proposed development options proposed by the sustainability appraisal would have resulted in some of the proposed option being dismissed at this stage of the process, In some cases this would have reduced the anxiety experienced by some residents fearing developments that should not have been proposed. - see ME1965

1.26
DLP_SP473

Consider the health impact assessment is very subjective and could have been done in a different way. The impact on peoples day to day lives should have been considered.

Concerns about the way health impacts have been assessed in relation to mineral extraction sites.

Support 1 Conditional Support Object 1 No Comment

No Change

The spatial strategy has been developed in the context of the Leeds City Region Strategic Economic Plan and the council's Economic Strategy and health and Well-being Strategy. It has also been developed in the context of the strengths and opportunities for development and growth within the four sub-areas as identified in the Local Plan. This demonstrates how the strategy has been developed within rural areas.

No Change

The support for health and well being and job creation noted. Comments on Farnley Country Park are addressed as part of the response on the allocations and designation document.

Support Conditional Support Object 1 No Comment

No Change

The council's consultation processes are set out in its Statement of Consultation. A wide range of processes were used to inform stakeholders of the Local Plan, including letters/e-mails to everyone on the local plan database, advertisements/press releases in the local press, information provided to local councillors to undertake consultation in their own areas, focus groups, drop in sessions and a summary booklet in key locations. It is considered that the consultation processes are compliant with the councils Statement of Community involvement and regulatory requirements. There are no regulatory requirements to involve individuals within 5m of a potential allocation.

Support Conditional Support Object No Comment

No Change

Support Conditional Support Object No Comment

No Change

The Sustainability Appraisal process is set out in the SA Report including the method and justification to determine the 19 objectives.

Support Conditional Support Object 1 No Comment

No Change

The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.

No Change

Summary of comments

Council Response

	<p>The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.</p>			
<p>1.27 DLP_SP131, DLP_SP316, DLP_SP1013, DLP_SP1049, DLP_SP1906, DLP_SP1907</p>	Support	Conditional Support	Object 6	No Comment
<p>Comment I would like the council to go further in the local plan than simply protect the SAC from development. There is an opportunity for the plan to recognise the enormous benefit to Kirklees residents in putting the habitat of the SAC into good ecological condition. It presently is not and the Moors for the Future Partnership have as of October 2015 started on a 16m Euro project to improve this. The partnership (led by the Peak district National Park Authority) is also taking advantage of several other funding streams to further this work, much of this across the moorland landscape of Kirklees. It would be at no cost for the local plan to recognise and support this, taking a more proactive role in the partnership and the management of the Kirklees portion of the SAC.</p>	<p>No change. Kirklees Planning Authority has undertaken a Habitats Regulation Assessment of the Local Plan. It is considered that the on-going management of the SAC is most appropriately dealt with through specific management plans and not the local plan.</p>			
<p>Natural England are concerned that development to the east of the plan area may impact on the hydrology of the Denby Grange Colliery SAC.</p>	<p>No Change See the comments in the HRA document, including the revisions to the approach.</p>			
<p>Natural England welcomes the assessment framework and presentation of the report however raise a number of concerns regarding the conclusions reached which need to be addressed to ensure compliance with the Conservation of Habitats and Species Regulations 2010 (as amended). This can be summarised as concern with regard to the conclusion that adverse effects can be ruled out. This cannot be concluded until proposed mitigation has been detailed in the context of the Kirklees local plan, and ensuring that the evidence base and proposed mitigation used in the assessment is applicable to Kirklees. Set out a clear rationale for the screening distance used in the HRA.</p>	<p>No Change See the comments in the HRA document, including the revisions to the approach.</p>			
<p>Habitat Regulation Assessment - Paragraph 1.27 fails to mention the Peak District National Park (South Pennines SPA Phase 1) and the cross boundary impacts between Kirklees and the Peak Park Authority in the Colne and Holme Valleys. Concerns the plan as a whole does not place sufficient emphasis on protecting the two core Pennine SPAs and the adjacent areas in the Colne and Holme Valleys, which have an impact on the landscape and habitats of the core areas. Protection of both the core and non-core areas is a central element of the IMSACAP Programme but there is no mention in the plan of the IMSACAP programme or SCOSPA.</p>	<p>Proposed Change Text added to supporting text to clarify the SPAs included within Kirklees. In addition see the comments section in the HRA document.</p>			
<p>Has anybody assessed Oakwell Park in North Kirklees with regard to this?</p>	<p>No Change Whilst it is recognised that Oakwell Park has a variety of wildlife, it does not fall within the remit of the Habitats Regulations.</p>			
<p>1.28 No comments were received on this part of the plan.</p>	Support	Conditional Support	Object	No Comment
<p>1.29 DLP_SP474</p>	Support	Conditional Support	Object 1	No Comment
<p>It is commendable that the council has undertaken an Environmental Impact Assessment. However they should also undertake a Human Rights Act - impact assessment as it would appear that certain of the proposals have impacts in terms of Article 8, Article 14 and Article 1 of Protocol 1 and even potentially Article 2.</p>	<p>The local plan has been prepared in accordance with UK planning law which complies with Human Rights Act legislation.</p>			
<p>1.30 DLP_SP154, DLP_SP908, DLP_SP1067</p> <p>The report fails to consider the improvements needed to the A636 and A6116 to carry the additional</p>	Support	Conditional Support	Object 3	No Comment
<p>No change.</p>				

Summary of comments

traffic generated by planned development both in the Dearne Valley and Holme Valley. The A636 forms the major and only route to the M1 North from these areas.

There appears to be no commitment to improve infrastructure alongside housing development for roads, schools, doctors' surgeries and drainage systems.

The council has failed to collect developer payments (Section 106 agreements) in the past to pay for infrastructure improvements.

For Kirklees Rural, there appears to be a discrepancy in the new housing units quoted: 4386 as opposed to 5100 quoted elsewhere in Local Plan documents i.e. 714 short. Perhaps this report needs updating with a subsequent reassessment of true infrastructure capacity and needs for the next version of this report.

The proposed Infrastructure Delivery Plan is a significant improvement over the IDP associated with the former LDF core strategy. It has improved detail and a more comprehensive list of infrastructure requirements in many functional and geographic areas.

Many of the noted schemes still have vague, extended timescales. Many of the noted schemes are still unfunded and uncommitted. In most cases, there is no obvious correlation between the IDP commitments and the location, scale or timing of development within the Local Plan.

Council Response

The Local Plan is supported by a district wide transport assessment that considers the impact of the future traffic growth across the district, considered that housing and employment growth promoted in the Local Plan. The results of this assessment identify the priority routes and junctions that will require investment to ensure that the Local Plan is deliverable. These have been fed into the Infrastructure Delivery Plan, and will be updated when new information is available. This is not a comprehensive list of infrastructure to cover the plan period, and other schemes can be developed based on future needs.

No change.

The Local Plan is supported by a district wide transport assessment that considers the impact of the future traffic growth across the district, considering the housing and employment growth promoted in the Local Plan. The results of this assessment identify the priority routes and junctions that will require investment to ensure that the Local Plan is deliverable. These have been fed into the Infrastructure Delivery Plan, and will be updated when new information is available. This is not a comprehensive list of infrastructure to cover the plan period, and other schemes can be developed based on future needs. The Infrastructure Delivery Plan and Infrastructure Technical Paper make an assessment of education, health, flood risk and drainage infrastructure.

The detailed assessment of the need for future school places considering the growth proposed in the Local Plan has been on-going. This is outlined in the Infrastructure Technical Paper. The council's School Organisation and Planning Team are working with school providers to ensure future places are delivered to support future growth.

Health infrastructure is planned and delivered by different sections of the NHS. Information about the Local Plan has been shared with the North Kirklees and Huddersfield Clinical Commissioning Groups, to ensure that they can consider the growth that is forthcoming in the Local Plan when planning their service delivery and investment.

Flood risk and drainage has been assessed for Kirklees as a whole, and every site in the Local Plan has had a detailed assessment to ensure that they have no significant constraints. Planning policies will require any new development to provide suitable drainage as part of any planning application.

No change.

Infrastructure to support the Local Plan can be delivered in a number of ways. Directly by infrastructure providers, by developers, and through developer contribution such as Section 106 agreements and the Community Infrastructure Levy (CIL). The infrastructure planning process allows for schemes and methods of delivery to be considered in advance of development coming forward to ensure that it is in place and the appropriate time.

No change.

The Infrastructure Delivery Plan process has been on-going from the early stages of the Local Plan to ensure that any existing infrastructure constraints and future need could be identified at an early stage to help inform the Plan's strategy. The discrepancy in some housing numbers are a result of the clarification and update of the objectively assessed housing needs for Kirklees. The infrastructure planning process ensures that no fundamental infrastructure constraints exist, ensuring that the Local Plan is deliverable. The on-going infrastructure planning process has considered updated housing numbers for areas such as education and transport.

No change.

Comment noted.

No change.

The infrastructure planning feeding into the IDP is an on-going process that involves the sharing of information about Local Plan growth with infrastructure providers. The infrastructure evidence is therefore likely to be

Summary of comments

Identified transport investment tends to focus too strongly on large, regional impact schemes, closest to the hub of the Leeds City Region. This means that the Kirklees Rural area (in particular) is starved of badly needed investment (e.g. in commercial vehicle routes and commuter links to the M62 from the Holme and Colne Valleys: new industrial area access routes / river crossings in Slaithwaite & Milnsbridge; major junction improvements at the New Mill & Sovereign crossroads; commuter routes to the M1 (via the A636) from the Holme and Dearne valleys).

The plan relies on an expectation about the level of funding that will come from CIL and section 106 contributions. We have absolutely no faith that there will be sufficient funding from this source, given the council's failure to collect the monies owed.

The typical time gap between the need for infrastructure improvement (i.e. before the development actually takes place) and the collection of monies owed. The NPPF has further undermined the Council's ability to negotiate infrastructure contributions, which developers claim would threaten the economic viability of a specific development.

The plan does not include many local infrastructure requirements that are of critical importance to neighbourhoods and local communities. The Infrastructure Delivery Plan and hence the Local Plan are utterly dependent on the infrastructure investment decisions of various independent public and private sector bodies, over which Kirklees Council has no direct control or influence. These bodies are not bound by the Council's Local Plan and will undoubtedly make their own internalised investment decisions, which are not necessarily consistent with the plan.

The recent proposals by the two Hospital Trusts, to downgrade the Huddersfield & Dewsbury hospitals and transfer a wide range of critical hospital services to Halifax and Wakefield respectively are a topical case in point. We find it totally inappropriate that Kirklees Council should be putting forward highly aspirational plans for housing and industrial development, at the same time that Kirklees, the 11th largest local authority in the country, is being stripped of its acute hospital services.

Road infrastructure improvements appear to be restricted to the Leeds/M62 side of the Borough. People having to travel to Leeds for employment, from the South of Huddersfield tend to use the Dearne Valley corridor through Scissett and Clayton West which is already congested as a result of extensive housing development, notably at Scissett and Skelmanthorpe.

1.31

DLP_SP13, DLP_SP197, DLP_SP879, DLP_SP1068

The plan relies on an expectation about the level of funding that will come from CIL and section 106 contributions. We have absolutely no faith that there will be sufficient funding from this source, given the

Council Response

updated at each stage of the plan and throughout the plan process, as infrastructure schemes develop from these discussions, and because different infrastructure providers work to different timescales. The IDP and Infrastructure Technical Paper have assessed the quality and capacity of infrastructure across Kirklees to ensure that the Local Plan is deliverable. The outcomes identify schemes at 5, 10 and 15 year time frames to demonstrate when infrastructure will be delivered in line with the phasing of development in the Local Plan.

No change.

The Local Plan is supported by a district wide transport assessment that considers the impact of the future traffic growth across the district, considered that housing and employment growth promoted in the Local Plan. The results of this assessment identify the priority routes and junctions that will require investment to ensure that the Local Plan is deliverable. These have been fed into the Infrastructure Delivery Plan, and will be updated when new information is available. This is not a comprehensive list of infrastructure to cover the plan period, and other schemes can be developed based on future needs.

No change.

Infrastructure to support the Local Plan can be delivered in a number of ways. Directly by infrastructure providers, by developers, and through developer contribution such as Section 106 agreements and the Community Infrastructure Levy (CIL). The infrastructure planning process allows for schemes and methods of delivery to be considered in advance of development coming forward to ensure that it is in place and the appropriate time.

No change.

The IDP and Local Plan policies set out a process to ensure that the necessary infrastructure is in place for development at the appropriate time.

Comments noted.

No change.

The infrastructure planning process supporting the Local Plan involves the on-going discussion with both council based and external infrastructure providers to ensure that appropriate infrastructure will be in place at the appropriate time. By having access to information about the Local Plan at an early stage, infrastructure providers have the opportunity to plan their own services and investment with this knowledge to ensure they fulfil their requirements in an efficient and effective manner. Where neighbourhoods and local communities have their own, priorities these can be shared with the council. Neighbourhood planning provides the opportunity for neighbourhoods to establish their own infrastructure needs through a formal planning process.

No change.

The infrastructure planning process has involved discussion with North Kirklees and Greater Huddersfield Clinical Commissioning Groups who have a role in planning health care services across Kirklees. On-going consultations about the future provision of health infrastructure should consider any growth in the Local Plan.

No change.

The Local Plan is supported by a district wide transport assessment that considers the impact of the future traffic growth across the district, considering the housing and employment growth promoted in the Local Plan. The results of this assessment identify the priority routes and junctions that will require investment to ensure that the Local Plan is deliverable. These have been fed into the Infrastructure Delivery Plan, and will be updated when new information is available.

Support

Conditional Support 1

Object 2

No Comment 1

No change.

Summary of comments

council's failure to collect the monies owed.

The proposed Infrastructure Delivery Plan is a significant improvement over the IDP associated with the former LDF core strategy. It has improved detail and a more comprehensive list of infrastructure requirements in many functional and geographic areas.

Can we see details of how the demands on the physical infrastructure will be met, in particular health and education?

The recent proposals by the two Hospital Trusts to downgrade the Huddersfield & Dewsbury hospitals and transfer a wide range of critical hospital services to Halifax and Wakefield respectively are a topical case in point. We find it totally inappropriate that Kirklees Council should be putting forward highly inspirational plans for housing and industrial development, at the same time that Kirklees, the 11th largest local authority in the country, is being stripped of its acute hospital services.

The plan does not include many local infrastructure requirements that are of critical importance to neighbourhoods and local communities. The Infrastructure Delivery Plan and hence the Local Plan are utterly dependent on the infrastructure investment decisions of various independent public and private sector bodies, over which Kirklees Council has no direct control or influence. These bodies are not bound by the Council's Local Plan and will undoubtedly make their own internalised investment decisions, which are not necessarily consistent with the plan.

The typical time gap between the need for infrastructure improvement (i.e. before the development actually takes place) and the collection of monies owed. The NPPF has further undermined the Council's ability to negotiate infrastructure contributions, which developers claim would threaten the economic viability of a specific development.

Many of the noted schemes still have vague, extended timescales Many of the noted schemes are still unfunded and uncommitted In most cases, there is no obvious correlation between the IDP commitments and the location, scale or timing of development within the Local Plan.

Support for the introduction of CIL. Need to make sure it is collected and spent on the area from which it has been collected.

Infrastructure needs to be in place before housing development commences. The pressure on roads, schools and medical centres is overwhelming. In their present state they are inadequate and the people in new build property will suffer as well as existing residents.

Identified transport investment tends to focus too strongly on large, regional impact schemes, neglect

Council Response

Infrastructure to support the Local Plan can be delivered in a number of ways. Directly by infrastructure providers, by developers, and through developer contribution such as Section 106 agreements and the Community Infrastructure Levy (CIL). The infrastructure planning process allows for schemes and methods of delivery to be considered in advance of development coming forward to ensure that it is in place and the appropriate time.

No change.

Comment noted.

No change.

The Infrastructure Delivery Plan (IDP) and Infrastructure Technical Paper explain the on-going process to establish health and education infrastructure needs.

No change.

The infrastructure planning process has involved discussion with North Kirklees and Greater Huddersfield Clinical Commissioning Groups who have a role in planning health care services across Kirklees. Their on-going consultation and future plans for provision of health infrastructure can therefore consider the growth in the Local Plan.

No change.

The infrastructure planning process supporting the Local Plan involves the on-going discussion with both council based and external infrastructure providers to ensure that appropriate infrastructure will be in place at the appropriate time. By having access to information about the Local Plan at an early stage, infrastructure providers have the opportunity to plan their own services and investment with this knowledge to ensure they fulfil their requirements in an efficient and effective manner. Where neighbourhoods and local communities have their own, priorities these can be shared with the council. Neighbourhood planning provides the opportunity for neighbourhoods to establish their own infrastructure needs through a formal planning process.

No change.

The IDP and Local Plan policies set out a process to ensure that the necessary infrastructure is in place for development at the appropriate time.

Comments noted.

No change.

The infrastructure planning feeding into the IDP is an on-going process that involves the sharing of information about Local Plan growth with infrastructure providers. The infrastructure evidence is therefore likely to be updated at each stage of the plan and throughout the plan process, as infrastructure schemes develop from these discussions, and because different infrastructure providers work to different timescales. The IDP and Infrastructure Technical Paper have assessed the quality and capacity of infrastructure across Kirklees to ensure that the Local Plan is deliverable. The outcomes identify schemes at 5, 10 and 15 year time frames to demonstrate when infrastructure will be delivered in line with the phasing of development in the Local Plan.

No change.

The spending of CIL will be dealt with as part of the CIL spending process, directed by the infrastructure priorities for the Local Plan.

No change.

The IDP and Infrastructure Technical Paper explain the on-going process to establish current and future infrastructure needs. Accepted development options in the draft plan also consider the adequacy of local infrastructure and impacts further development will have.

No change.

Summary of comments	Council Response			
to the hub of the Leeds City Region. This means that the Kirklees Rural area (in particular) is starved of badly needed investment (e.g. in commercial vehicle routes and commuter links to the M62 from the Holme and Colne Valleys: new industrial area access routes / river crossings in Slaithwaite & Milnsbridge; major junction improvements at the New Mill & Sovereign crossroads; commuter routes to the M1 (via the A636) from the Holme and Dearne valleys).				
Figure 1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.				
Neighbourhood Plans	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan				
1.32 DLP_SP195	Support	Conditional Support	Object 1	No Comment
Mirfield should have a Neighbourhood Plan in order to maintain its identity and prevent it being swept up in the urban sprawl between Huddersfield and Dewsbury.	No Change			
				The comment is noted. The decision to undertake a neighbourhood plan for Mirfield is a decision for Mirfield Town Council as the responsible body. The council has a duty to support neighbourhood plans but cannot impose the decision on the Town Council to undertake a Plan.
1.33 DLP_SP196	Support 1	Conditional Support	Object	No Comment
The Mirfield Design Statement 2002 proves that community documents such as this are worth the effort needed to produce them.	No Change			
				The comment is noted. A range of community documents are outlined in paragraph 1.3. No further changes are considered necessary.
Masterplans	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
1.34	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Other relevant plans and strategies	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
1.35	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
1.36	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No Change			
1.37 DLP_SP83	Support	Conditional Support	Object 1	No Comment
The Enforcement Strategy should seek to protect cyclists and keep cycle lanes clear and unobstructed.	No Change			
				Comment noted but no further changes are considered necessary to the local plan.

Summary of comments	Council Response			
Issues facing Kirklees	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
2.1 DLP_SP75, DLP_SP1222, DLP_SP1394, DLP_SP1801	Support	Conditional Support 2	Object 2	No Comment
<p>I would be interested to know what the powers that be believe the distinctive character of Kirklees is, or perhaps should be? At the moment there are a number of great opportunities to be developed but as of the time of writing I have yet to see a real focus.</p>	No Change			Section 5 'Place Shaping' makes specific reference to the distinct characteristics of Kirklees.
<p>The document opens by identifying a number of issues facing Kirklees. It poses a series of questions, the first of which is to ask how the distinctive character of Kirklees can be retained. Probably the most obvious answer to this question is to say by leaving Kirklees as it is. However, having regard to the other 15 issues identified it is clear that this is not an option. Amongst other things there is a need to provide additional housing capacity, more jobs, improved transport infrastructure and so forth all of which inevitably lean towards change and potential change to the character of the area. So, whilst there may still be debate to be had, and questions to be asked, as to the level of development proposed and the evidence purportedly substantiating this there is a balance to be struck between the various competing interests identified in the document.</p>	No Change			Comments noted. Section 5 'Place Shaping' specifically looks at each sub-areas role and function and the distinct characteristics of that particular sub area.
<p>Looking at this in the context of the Denby Dale ward, the character of the area is very much defined by the rural landscape and the green belt. Striking the balance invariable involves compromise to the green belt but it would not take a great deal of incursion into the green belt before the nature of the area is fundamentally changed by, for example, the merging of villages.</p>				
<p>In general terms the issues identified are I believe the right questions to be asking but I would venture to suggest that the priority of those issues will vary, even within Kirklees, which therefore presents difficulties in terms of a "one size fits all" type local plan solution for the area. This again points towards compromise but, in the context of the Denby Dale ward, even a minor compromise of the green belt could have a major impact on the distinctive character of the area.</p>				
<p>One of the factors which appears to be missing from the issues set out but will be of (increasing) importance is regarding technology and communications. Much of the narrative within the Issues is with regards to the (traditional) development needs; the development and/or protection of land and resources; and transport of goods and people. However little appears to be referred to in terms of technology and communications and the effects that this may affect future development patterns.</p>	Proposed Change			New issue inserted into this section to address the opportunities new technology and communication may present in the future.
<p>Our client broadly welcomes the assessment of the issues facing Kirklees especially the recognition that the housing market and economy has been underperforming and failed to meet the needs or aspirations of its population. However it is considered equally important that the document sets out the opportunities within the Borough, such as its strategic location next to the M62. It should also recognise the significant opportunities presented by the devolution of the Leeds City Region and the potential of the 'Northern Powerhouse' to transform the economy, in particular in the northern parts of the district.</p>	Proposed Change			Comments are noted re. location advantage next to the M62 and the Northern Powerhouse. The text at 2.14 which specifically refers to Huddersfield's economy has been amended to reflect this opportunity.
<p>What the issues fail to pick up on are a number of locally distinctive characteristics to the District in terms of topography (and how this affected development patterns, transport and communication linkages), the functions and roles of centres across the District and relationship to adjacent towns and cities, in particular to Leeds to the north. The latter raises concerns in respect of commuting patterns and the degree of self-containment in the District. These are in part dealt with under Section 5 "place making". In our view it would be more appropriate for these to be included in this Section to inform the spatial development strategy.</p>				
2.2 DLP_SP186, DLP_SP224, DLP_SP475, DLP_SP733, DLP_SP1493, DLP_SP1874	Support 1	Conditional Support 2	Object 2	No Comment 1
The towns, villages and countryside of Kirklees have a distinctive local character, much of which derives	No Change			

Summary of comments

from its rich legacy of historic assets. The Kirklees Economic Strategy identified Quality Places (and the distinctive character of Kirklees) as being not only one of the five strategic priorities for delivering its Vision but also a foundation for the delivery of the other four Priorities of that Strategy.

Meeting the assessed development needs of the community in a manner which safeguards this identity is a huge challenge for the Plan and it is wholly appropriate that this is identified as one of the key issues the plan needs to address.

This plan should do all that it can to maintain that distinctiveness - however there are proposals particularly in the areas of Renewable energy and mineral extraction that will be detrimental to that distinctiveness.

Aim for buildings constructed of local sandstone rather than other, cheaper alternatives.

The housing site allocations will lead to urban sprawl, ribbon development and merger of settlements (for example in Scholes and Holmbridge, along Woodhead Road and linking Thongsbridge, New Mill and Brockholes).

2.3

DLP_SP924, DLP_SP1024, DLP_SP1254

"Character Areas" is not a good term, since there is as much diversity within an area (e.g. Batley and Spen) as between areas (Batley & Spen versus Dewsbury & Mirfield).

The Area divisions are not logical, since Batley and Dewsbury run into one another and are indistinguishable.

We applaud the recognition of character as a defining cornerstone of the Local Plan. However we are extremely concerned that the four defined character areas or Planning Districts (the terms are not used consistently in the documents) do not go far enough and bear no relation to the National Character Areas defined by Natural England. This discrepancy / relationship needs to be explained and it may be more appropriate to use different terminology OR in some instances to create sub-divisions of those districts for planning purposes. In other words, if the planning Districts are to be described as character Areas (and we believe they could be) the Council needs to make sure that the description and composition of the planning area is accurate and homogeneous not just an arbitrary administrative area. We strongly advocate that the relatively small areas of the South Pennines National Character Area (NCA36) in the Upper Colne Valley and the Dark Peak National Character Area (NCA 51), around Holmbridge should be recognised as discrete planning areas within the Local Plan, because of their distinctive planning requirements and strong relationship with the South Pennines & Peak Park Special Protection Areas.

2.4

DLP_SP157, DLP_SP330, DLP_SP694, DLP_SP880, DLP_SP1255, DLP_SP1777, DLP_SP1875

2.4, Page 9: You state the number of households is set to increase by 26,221 in the next 15 years. How have you arrived at this figure given that you state in Paragraph 2.5 the number of persons per household by 2031 will average be 2.31? $47,700$ (stated population increase) divided by $2.31 = 20,649$. Therefore, the number of new households to be formed is grossly overstated by 5572 householdsmore than the total number of new homes allocated for Kirklees Rural! So why is Kirklees seeking to deliver 29,340 homes over the plan period

No consideration is given to how new jobs will be created and insufficient jobs will be created in the Holme Valley to meet the needs of the increased number of residents.

Council Response

Comments of support noted.

No Change

Comments noted. The policies specifically referring to this type of development and its mitigation can be found sections 11 and 14.

No Change

Comments noted. The utilisation of local materials is emphasised within Policy DLP25.

No Change

Comments noted. Re site allocations. These are addressed in the Allocations and Designations document.

Support

Conditional Support

Object 3

No Comment

Proposed Change

Explanatory text for how the sub-areas are derived and their role in the spatial development strategy has been amended in Section 5.

No Change

The National Character Areas provide landscape character evidence which the council have used to develop its own landscape character evidence. On their own they are not an appropriate basis to determine the spatial development strategy.

Support 1

Conditional Support

Object 6

No Comment

No change.

The figure stated in the Draft Local Plan was the objectively assessed housing need figure at that time. This is based on wider considerations than just average household size. The figure includes many factors which influence the outcome as set out in national planning policy and national planning practice guidance. Broadly the figure is based on the latest household projections, predicted changes in the economy, migration, land prices, house prices, rents, affordability, rate of development, and overcrowding.

No change.

Information is set out in the employment chapter of the Local Plan which sets out the employment land requirements for the plan and allocations have been made to meet this requirement. Evidence on how jobs will

Summary of comments

In the region of Shelley and Shepley there should be consideration given to balancing large family houses that are of their nature expensive, with smaller homes to be used for start-up houses or for down-sizing. There is a real risk of this area becoming middle-aged, middle strata and we need as communities to keep a through-flow of all ages of our residents.

To reduce the climate impact the housing should be multi storey, affordable, and close to work. i.e. Central. Starter homes should be a priority, built in such a way that they can be used for those in retirement downsizing. This is an anathema to commercial building contractors. Who will do it? New techniques i.e. prefabrication, who will fund this?

Creating a strong economy within Kirklees will not only create income for the Council to deliver vital public services, but jobs for our residents. Jobs in Kirklees means less commuting which saves people money in transport costs, means less congestion, which improves air quality and so reduces the risk to the health of our residents. By placing the vast majority of housing close to the most important transport links, along with land allocated for business development I think that this plan will meet the needs of the residents of Kirklees for the next 15 years.

There are some questions regarding the number of homes required (and deliverable) in Kirklees over the plan period. We note that in the Strategies and Policies Document of the draft local Plan (ref 2.4) it is stated that Kirklees has a growing population expected to grow by 47,700 and households by 26,221. Para 2.5 recognises that there will be differences over parts of Kirklees but we have not found any ward-based predictions. Presumably the information is available and if so we would like to see it. We are also aware that there are challenges to the housing figures, and therefore the actual amount of land required, both at National level and locally by the Campaign for the Protection of Rural England.

2.5
DLP_SP76, DLP_SP158, DLP_SP701, DLP_SP881, DLP_SP926, DLP_SP1256, DLP_SP1287, DLP_SP1876

The housing allocation locations are not in the areas where we consider population growth is likely to occur. We believe better demographic predictions against current population profiles should be made before the Local Plan is finalised.

Before addressing the issues of type and location of housing the powers that be should address how the economy can develop and what the future holds in terms of type and nature of jobs, and where they will be located.

There are some questions regarding the number of homes required (and deliverable) in Kirklees over the plan period. We note that in the Strategies and Policies Document of the draft local Plan (ref 2.4) it is stated that Kirklees has a growing population expected to grow by 47,700 and households by 26,221. Para 2.5 recognises that there will be differences over parts of Kirklees but we have not found any ward-based predictions. Presumably the information is available and if so we would like to see it. We are also aware that there are challenges to the housing figures, and therefore the actual amount of land required, both at National level and locally by the Campaign for the Protection of Rural England.

One further objection undermines the entire Draft Plan in that there appears to be a basic error in calculations. The number of households is projected to increase by 26,221 in the next 15 years. In paragraph 2.5 the number of persons per household by 2031 is given as an average 2.31. $47,700$ (stated population increase) divided by $2.31 = 20,649$ yet the Draft Plan proposes almost 6000 houses more than this projected 'need'.

Council Response

be met in different sectors of the economy is set out in the Local Plan background evidence.

No change.

Housing mix on new developments will be determined when planning applications are received by the council. The Local Plan policy on affordable housing and housing mix will allow the council to influence developments using evidence contained in the Strategic Housing Market Assessment.

No change.

This paragraph addresses the scale of provision for new jobs and homes. Policies addressing the type and mix of new homes, design and climate change are set out in other parts of the plan.

No change.

Support noted.

No change.

The figure stated in the Draft Local Plan was the objectively assessed housing need figure at that time. This is based on wider considerations than just average household size. The figure includes many factors which influence the outcome as set out in national planning policy and national planning practice guidance. Broadly the figure is based on the latest household projections, predicted changes in the economy, migration, land prices, house prices, rents, affordability, rate of development, and overcrowding. As the plan does not set settlement or ward housing targets this information has not been set out.

Support	Conditional Support	Object 8	No Comment
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No change.

The scale of growth set out in the plan for different parts of the district reflects several factors including existing population information, level of services and facilities, the outcomes of the green belt review and the availability of land. In addition national planning policy confirms that restricting growth based on past delivery should be resisted.

No change.

Information is set out in the employment chapter of the Local Plan which sets out the employment land requirements for the plan and allocations have been made to meet this requirement. Evidence on how jobs will be met in different sectors of the economy is set out in the Local Plan background evidence.

No change.

The figure stated in the Draft Local Plan was the objectively assessed housing need figure at that time. This is based on wider considerations than just average household size. The figure includes many factors which influence the outcome as set out in national planning policy and national planning practice guidance. Broadly the figure is based on the latest household projections, predicted changes in the economy, migration, land prices, house prices, rents, affordability, rate of development, and overcrowding. As the plan does not set settlement or ward housing targets this information has not been set out.

No change.

The figure stated in the Draft Local Plan was the objectively assessed housing need figure at that time. This is based on wider considerations than just average household size. The figure includes many factors which influence the outcome as set out in national planning policy and national planning practice guidance. Broadly

Summary of comments

I am not sure as to why the number of retired persons should increase. The baby boomers are currently approaching 70 surely there should be a flattening out or reduction? Also they will cause a shift in housing stock as many live in larger houses which will enter the chain at the top, where is the housing for the entry level?

People over 60 will form increasing proportion of population increasing by 35,600 from 2013 to 2031 - where do proposed plans and policies deliver suitable housing for older people?

Many elderly people live in commuting areas, close to schools, shops, amenities, which were their homes when their families were growing up. There could be initiatives to release these properties to younger people with families. I have seen brochures for self-contained "villages" for elderly people. These are purpose designed complexes which are secure; and include all necessary facilities such as social support, a health centre, a community centre, shops, post office, pub/café/restaurant. We hear that many elderly people are lonely, isolated, even afraid to live in their homes in the community. Many find it an ordeal to shop, pay their bills, attend appointments with the GP, dentist etc..

A purpose built village is a solution to a more healthy and happy lifestyle. I am aware there are many elderly people say they are not willing to "leave their own home", but this is a fear of giving up what is "familiar". There is an understandable apprehension about leaving their own home to move into a "Residential Home", because this is a daunting route towards loss of independence and ultimately "death". However, a purpose built village could be an exciting prospect, allowing secure, supported independent living, thus releasing their houses within the community for younger families

2.6

DLP_SP1778, DLP_SP1877

I fully accept that we need to build more homes, but I think the figure the Government has imposed on us is too high and would have preferred it to be a slightly smaller. I think the allocation on industry is about right as we have to allow business to grow, to create jobs for our young people and to improve the economy of Kirklees. We must do all we can to stop Kirklees becoming little more than a suburb of Leeds. We need to ensure that we maintain our own identity and that Kirklees is the place to do business and to live.

There is an imbalance between the jobs growth and increased housing allocations.

2.7

DLP_SP129, DLP_SP182, DLP_SP226, DLP_SP661, DLP_SP682, DLP_SP698, DLP_SP882, DLP_SP1494, DLP_SP1878

We would endorse the identification of how to maximise the contribution that brownfield land makes to accommodating the needs of the Plan area as being one of the issues which the draft Local Plan needs to address. We are pleased to note that the reuse and adaptation of existing buildings is included within this Issue. However, the reuse of existing buildings should be included within the Issue 5.

Kirklees has a number of important historic buildings and numerous others in in Conservation Areas which are vacant or underused. Several of these appear on Historic England's Heritage at Risk Register. How the reuse or adaptation of these assets can help meet the need for housing, workspace etc is one of the key issues the Plan will need to address.

Suggested change:

Paragraph 2.7 (Issue 5) amend to read:-

"... contribution that brownfield land and the reuse of existing buildings make to accommodating....."

Council Response

the figure is based on the latest household projections, predicted changes in the economy, migration, land prices, house prices, rents, affordability, rate of development, and overcrowding.

No change.

The data source for this information is from the Office of National Statistics (sub-national population projections). Proposals for housing and mixed use developments in the plan will allow housing for all parts of the community to be met, including housing for older people. The Local Plan policy regarding Housing Mix and Affordability particularly supports new development proposals for older persons accommodation and the adoption of existing homes.

Support

Conditional Support

Object 2

No Comment

No Change. The Strategic Housing Market Assessment sets out the evidence base used to determine the objectively assessed needs for new homes. This has used jobs led evidence to ensure that an appropriate balance is struck in provide gland for both jobs and homes.

No Change. The Strategic Housing Market Assessment sets out the evidence base used to determine the objectively assessed needs for new homes. This has used jobs led evidence to ensure that an appropriate balance is struck in providing gland for both jobs and homes.

Support 3

Conditional Support 1

Object 5

No Comment

Proposed Change

Issue 5 specifically refers to 'conversion of buildings' in the text. Issue 5 heading amended to include:

'contribution that brownfield land and the reuse of existing buildings make to accommodating development needs'

Summary of comments

We consider that some of the rejected sites may be less detrimental than the sites allocated for housing. We also consider that insufficient consideration has been given to using land allocated for employment as mixed development sites.

Generally, I agree with the policy of preferentially targeting previously developed land for new development. This helps to avoid unnecessary loss of agricultural land and semi-natural habitats and urban expansion encroaching further upon the countryside. It helps ensure that derelict buildings are restored. However I agree that this should not apply to all sites and buildings. Some sites may be of greater value to local communities if managed as urban green spaces, especially in existing areas of high housing density where private and public green space is in short supply. Similarly, some previously developed land within the green belt or rural areas may have limited scope for redevelopment due to environmental or social sustainability considerations. Again green field or green space uses, including regeneration as woodland, may be more appropriate.

Some 'brownfield' land can also have cultural or natural heritage value and low key restoration can transform such areas for community use at low cost.

In North Kirklees, particularly in Dewsbury, Batley, Birstall, Heckmonwike, Liversedge and Cleckheaton it is very important that the policy of redeveloping brownfield sites for employment and housing FIRST is continued. Green spaces are limited and protection of the Green Belt here is vital. If more people are to come and live and work in North Kirklees then they will need to have the opportunity to experience and enjoy the remaining trees and fields and wildlife that we have here.

When planning development is proposed brownfield sites should be the first areas to be considered in an effort to maintain 'green space' of all types. 'Green spaces' have huge benefits to communities in many ways - not only preserving our countryside for farming, walking etc but providing space for community facilities such as cricket and bowling clubs and just generally improving the quality of life for people living in Kirklees.

The ability to develop on greenfield sites without using the brownfield site availability first benefits only the developers and the higher end house purchasers. Also no ground remediation costs etc for greenfield sites.

I haven't read further on but I sincerely hope the brownfield first for housing is used as part of this plan.

I believe that the nationwide departure from a 'Brownfield First' policy for new development will be viewed by future generations as a grave planning error on a similar scale to those made in the 1960's and 70's when many long serving cherished buildings were replaced with short lived concrete eyesores. This policy may be necessary in areas such as the SE of England, where there is a shortage of brownfield sites and a property price bubble, but does not appear to be appropriate in Kirklees, where there has been no comparable bubble over the past 11 years when 85% of development was confined to brownfield sites. The reclassification of brownfield land as windfall appears to me to emphasize the reduced priority applied to developing this land reflected in the Local Plan.

I feel too much brownfield land has been used to build student accommodation which has created over supply in the area. This should cease and more brownfield land should be used for building housing for residential use.

2.8
DLP_SP130, DLP_SP331, DLP_SP452, DLP_SP476, DLP_SP634, DLP_SP668, DLP_SP1729, DLP_SP1879

Green corridors between communities should be maintained to enable villages to maintain their individual identity.

Council Response

No Change

All site options have been assessed using a comprehensive methodology, the sites that are deemed suitable for certain types of allocation have been accepted according to this methodology - See Site Allocation Methodology Technical Paper.

No Change

Where a site has re-vegetated, this will be considered as a greenfield site and where a site has community, wildlife, sport or recreation value, consideration will have been had to its potential as Urban Greenspace.

No Change

Comments noted. A large proportion of land has been protected as Urban Greenspace in both in North Kirklees and South Kirklees.

Policy DLP 6 reinforces the efficient use of land and buildings at point a).

No Change

Student housing needs has been assessed as part of the Strategic Housing Market Assessment - see section 7 and DLP 11.

Support 4 Conditional Support 1 Object 3 No Comment

No Change

Comments noted Policy DLP32 specifically refers to Strategic Green Infrastructure Networks as shown on the Policies Map. This policy aims to safeguard and enhance networks, green infrastructure assets and the range

Summary of comments

Building on Bradley golf course will be totally at odds with this statement. This area is already densely populated with few opportunities for healthy outdoor activities and green spaces with a wide variety of nature to enjoy.

The provision of recreation grounds and local sports and activity clubs is vital and should be protected within the local plan.

Better quality of life etc is essential. Therefore I would urge a re-think on some of the proposals made in this LDP which run counter to this ambition. For instance lack of investment in certain rural communities with no proposed housing development what so ever and proposed industrial developments in green belt and current quiet areas within 100m of existing residential developments some as close as 5m.

We believe that insufficient consideration has been given to place shaping and despite the language used in the Local Plan there is little understanding of the distinct characteristics of the areas that fall within Kirklees' remit. The Local Plan in our view will be detrimental to the quality of the lives of existing residents. The Local Plan does not recognise how the countryside could be used more to promote leisure and healthy activities; nor does it recognise the economic benefits the countryside in and around the Holme Valley could bring to Kirklees.

Maintaining and improving footpaths should be given greater priority as they provide accessibility and appreciation of our countryside, and where possible more dog-friendly styles used to replace older types.

Apart from those living in and around Huddersfield, I suspect that the people living in North Kirklees suffer the most from poor health and well being. Parks such as Oakwell, Wilton and Crow Nest provide valuable opportunity for enjoying recreation and play, encouraging healthy lifestyles and benefiting mental well-being.

Oakwell in particular is growing in popularity for recreational activity of all kinds. Since the closure of the LNWR railway line in 1966 and Gomersal colliery in 1973 the site has become a wonderful nature reserve; a substantial number of trees have matured and wildlife has prospered. Oakwell Hall, the connection with the English Civil War and also the literary connection with the Bronte family all combine to make this a jewel in the Kirklees crown. People from all parts of Kirklees and from much farther afield come to enjoy and benefit from the experience.

People in North Kirklees have the worst health outcomes in Kirklees and some of the most limited opportunities to access outdoor space. The Kirklees Council Open Space Assessment Audit 2015 singled out Batley & Spen. It states the main deficiencies in the provision of natural and semi-natural green space are in Batley and Spen (and Dewsbury and Mirfield). In terms of amenity space, Cleckheaton is the worst, significantly below standard, with Heckmondwike also faring poorly. Batley and Spen also has the lowest number of allotments in Kirklees, with all wards deficient and below the district standard. However, on a positive note, Batley and Spen is quite well off for cemeteries. Whilst these are in a poor state due to vandalism and lack of upkeep, residents can console themselves with a walk in a graveyard.

2.9
DLP_SP14, DLP_SP77, DLP_SP317, DLP_SP477, DLP_SP646, DLP_SP811, DLP_SP1880

Natural England notes the identification of Issue 7 in para 2.9 and welcome the positive emphasis on improvement and the reference to the hierarchy of designated sites.

This section is contradictory: the Plan proposes to remove space that provides opportunities for health

Council Response

of functions they provide.

No Change

No Change

Recreation grounds and local sports clubs where there is an identified deficiency have been afforded protection as Urban Greenspace in the Local Plan.

No Change

No Change

The spatial development strategy sets out a broad spatial framework building on the spatial vision and place shaping objectives. Other policies in the plan provide the detail of when development will be acceptable for Development Management purposes. It provides a broad framework for the council to monitor delivery in urban areas. It provides a clear focus for growth on Huddersfield and Dewsbury as the two largest and most sustainable settlements. The strategy provides flexibility for growth for smaller settlements depending on the fit with the parameters set out in criterion 2. Building on the evidence documents this provides for the most appropriate development strategy as required in national planning policy.

No Change

Policy DLP24 relates to an identified Core Walking and Cycle routes, the intention to improve existing footpaths and provide additional footpaths to link development sites.

No Change

Comments noted. The area has been afforded protection in the Local Plan as Urban Greenspace.

No Change

Comments noted. Batley and Spen do have deficiencies in natural and semi-natural greenspace. Two large areas of Urban Greenspace has been retained within Batley and Spen.

Support 1	Conditional Support 1	Object 5	No Comment
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No Change

Comments of support noted.

No Change

Summary of comments

and well being.

More emphasis needs to be put on maintaining the habitat and communities of people living in Kirklees rather than focusing on wildlife habitats especially with reference to the development of large industrial sites, wind turbines and mineral extraction sites.

Kirklees should be developed as a haven for walkers and tourists, the costs of preservation would then pay for themselves. More hotels needed, sites of historical interest need to be promoted.

The Local Plan provides the opportunity to take a positive stance in the supporting the conservation management of the SAC.

The Local Plan proposes extension of urban areas and removal of some green belt land. Over all we see the increased housing stock in a semi-rural and rural area as being detrimental to wildlife - both and the environment.

The area requires an updated survey of flora, fauna and geology / geomorphology on which relevant sustainable discussions can be held. It is important that the correct skilled individuals are involved in discussions, not just the council and the usual Environment Agencies / Non Government Organisations.

2.10

DLP_SP132, DLP_SP478, DLP_SP690, DLP_SP1881

Effective measures to reduce road traffic would have the biggest impact on improving people's quality of life, health and well-being. Noise, air pollution (particulates and nitrous oxides), the run-off from roads and the land-take required for parking and high traffic volumes all have significant direct and indirect impacts on the environment, people's health and well-being as do carbon emissions. More needs to be done to provide integrated public transport and safer cycle/pedestrian routes.

LDP put forward potential developments that would increase these types of pollution e.g. new potential mineral extraction sites less than 5m and 100m from someone's home and 500m from a school - and why has it not strengthened the safeguards from potential industrial scale wind turbine development. This section appears as no more than a series of words to placate rather than definitive actions. An ambition that this plan in its current form will never realise.

It is well documented how living close to motorways suffer from air and noise pollution. Bearing in mind the health problems associated with living close to busy motorways, it is surprising how many housing sites have been identified in the Plan that are right next to the M62.

Insufficient consideration has been given to place shaping and despite the language used in the Local Plan there is little understanding of the distinct characteristics of the areas that fall within Kirklees' remit. The Local Plan in our view will be detrimental to the quality of the lives of existing residents. The Local Plan does not recognise how the countryside could be used more to promote leisure and healthy activities; nor does it recognise the economic benefits the countryside in and around the Holme Valley could bring to Kirklees.

Council Response

The Council in its site selection methodology, assessed a sites value in terms of health and well being. Where a site contributes significantly to well being and health, the site has been designated as Urban Greenspace. See Urban Greenspace and Local Greenspace Technical Paper.

No Change

Impacts in terms of air quality, contamination, noise and odour have been considered throughout the site allocation process. See the Site Allocation Methodology Technical Paper and individual site allocation in the Allocation and Designations document.

No change

Policy DLP10 - supporting the rural economy provides the opportunity to promote tourism related development.

No Change

Policy DLP31 provides the opportunity to support the conservation management of the Special Areas of Conservation.

No Change

Biodiversity issues have been considered during the site allocation assessment process. See the Site Allocations Methodology Technical Paper.

No Change

The Council works alongside West Yorkshire Ecology and provides regular updated data to the Council based on survey data.

Support	Conditional Support	Object 4	No Comment

No Change

The Council is carrying out a detailed air quality assessment of the allocations proposed and should this identify areas where air quality becomes an issue, then the requirement for mitigation will be highlighted and dealt with at detailed application stage or through other sources of funding.

No Change

All site allocations have been assessed in terms of any impacts on air pollution, noise or odour. Mitigation measures for each site allocation are specifically outlined in the Allocations and Designations document.

No Change

The Council is carrying out a detailed air quality assessment of the allocations proposed and should this identify areas where air quality becomes an issue, then the requirement for mitigation will be highlighted and dealt with at detailed application stage or through other sources of funding.

No Change

Section 5 details the Councils approach to place shaping and looks at the role and function of each of the four character areas. Further work to understand the role and function of individual settlements can be found in the Settlement Appraisal Technical Paper.

Policy DLP 10 seeks to support the rural economy such as Holmfirth.

Summary of comments	Council Response			
<p>2.11 DLP_SP78, DLP_SP318, DLP_SP391, DLP_SP663, DLP_SP696, DLP_SP1071, DLP_SP1072, DLP_SP1506, DLP_SP1882, DLP_SP1896</p>	Support	Conditional Support 4	Object 6	No Comment
<p>The infrastructure needs to be improved - lack of cycle paths and poor road quality does not encourage cycling.</p>	<p>No Change</p> <p>A detailed Core Walking and Cycling network is proposed at Policy DLP24 and is identified on the Policies Map.</p>			
<p>There is an enormous opportunity for supporting Natural Flood risk management within the fast responding upland catchments which is where a large proportion of the flood water originates from. In addition, Kirklees should support regeneration work on the relevant catchments to ensure their ability to retard run-off is maintained.</p>	<p>No Change</p> <p>The Council has a duty under the Flood and Water Management Act to manage flood risk from surface water and watercourses. The Councils Surface Water Management Plan identifies measures to manage local risk, including risk from flows from the upper catchment onto lower sites.</p>			
<p>Covering a large area with housing will only serve to increase flooding with surface water run off.</p> <p>New development should be avoided in flood plains and the Plan should seek to provide extensive areas of natural washland within the Colne and Calder Valleys. This should be supported by a programme of better, integrated land management to maximise the role of farmland and semi-natural habitat in reducing peak flows and flood risk.</p>	<p>Consideration of surface water drainage has been included within the site allocation process. See Site Allocations Methodology Paper.</p>			
<p>We believe the Local Plan will add to climate emission not reduce it. The number of houses proposed coupled with insufficient provision of jobs school places and other essential services will increase traffic volumes.</p>	<p>No Change</p> <p>The site allocations proposed have been assessed in terms of impact on schools, health services and transport. See Education and Transport Technical Papers.</p>			
<p>The Local Plan should promote low carbon developments and the use of renewable, including community heat and power schemes, use of ground source heat pumps, solar etc. Sustainable urban drainage solutions should be used as standard wherever practical.</p>	<p>No Change</p> <p>The Local Plan supports low carbon development and proposals at Policy DLP27 - Renewable and low carbon energy and supporting text in section 11.</p>			
<p>We believe that DLP needs to be revised to reflect the targets agreed by the UK Government in the Paris Agreement December 2015 and should be framed around a target of 80-100% carbon emission reductions by 2030. The Draft Local Plan does not address the scale of the urgency on this and does not reflect these type of radical cuts. We believe the Local Plan needs to be revised to reflect the targets agreed in the Paris Agreement and it needs to be evaluated against a target of 80-100% reduction in carbon emissions by 2030.</p> <p>Whilst flooding is a local and immediate issue associated with climate change, the Plan should also be noting that tackling climate change is also needed to mitigate other longer term issues e.g. increased migration, changing agriculture etc., which could have even more serious impacts on Kirklees and the rest of the UK.</p>	<p>It is considered that the policy is consistent with National Policy as set out in the NPPF. The policy is based on evidence including the Low Carbon and Renewable Energy Capacity in Yorkshire and Humber, Aecom (March 2011) and Renewable and Low Carbon Energy Study, Maslen (September 2010) which consider the potential for different types of renewable and low carbon technologies across Kirklees.</p>			
<p>2.12 DLP_SP79, DLP_SP133, DLP_SP359, DLP_SP404, DLP_SP695, DLP_SP702, DLP_SP1883, DLP_SP1897</p>	Support	Conditional Support 2	Object 6	No Comment
<p>Money and land will not be available to build new roads and junctions to cater for a potentially large increase in private car travel that greater employment and housing development will generate. Bus and train travel has to be much more attractive and available.</p>	<p>No Change</p> <p>The Council is committed to ensuring that all new developments have safe and convenient access to the West Yorkshire Key Route Network, the main arterial routes and the West Yorkshire Core bus Network that connect the region. New development is strategically placed along core networks and the developing core walking and cycle network, all of which should both be improved and maintained where possible to reduce congestion and reliance on the private car. See policies DLP 23 and 24.</p>			
<p>Increased traffic volumes will increase congestion. There are no proposals to deal with known problem junctions. The land allocations will make matters worse.</p>	<p>No Change</p> <p>All new development sites have been assessed in the district-wide transport model where potential problem junctions are identified. See Transport Technical Paper. Mitigation to address congestion problems are highlighted in the Allocations and Designations document at TS1 - TS11.</p>			
<p>Highways England supports the principle of focusing development along the core road network, improved where necessary, and core bus routes to reduce congestion and reliance on the car. The</p>	<p>Proposed Change</p>			

Summary of comments

strategic road network will continue to play a key role in connecting communities in Kirklees with towns and cities in neighbouring districts. Rather than focusing on the volume of traffic handled by the M62 at junction 24, it is suggested that reference is made to the capacity improvements beneficial to Kirklees that are to be implemented by Highways England under the government's Road Investment Strategy on both the M1 and M62.

Improve cycle paths.

All new developments should have access to good public transport routes; at least 3 buses per hour within 400 metres of large developments (20+ households) and within 600 metres of smaller developments. Public transport should be spelt out rather than implicitly covered in the sentence, i.e.: Development should be strategically placed along core public transport and vehicular routes, which should be improved and maintained to reduce congestion and reliance on the private car.

The current extent and level of 'core' public transport services is insufficient as is the cycle network - provision and priority needs to be given to both. I agree that new development should be located to reduce road traffic and maximise proximity to employment areas and other facilities.

As the draft LDF states, transport links in the south are not on a par with those in the north, yet the plan proposes 5100 new homes for Rural Kirklees. This will mean an increase in car use leading to pollution and health issues due to commuter stress.

What the issues fail to pick up on are a number of locally distinctive characteristics to the District in terms of topography (and how this affected development patterns, transport and communication linkages), the functions and roles of centres across the District and relationship to adjacent towns and cities, in particular to Leeds to the north. The latter raises concerns in respect of commuting patterns and the degree of self-containment in the District.

2.13

DLP_SP80, DLP_SP360, DLP_SP392, DLP_SP1884, DLP_SP1898

Reference is made in Issue 11 to the imbalance in Kirklees between out-commuting and in-commuting for work with daily net out-commuting of around 20,000 people. Highways England considers this to be an important issue as a significant proportion of trips to and from work make use of the strategic road network in West Yorkshire for relatively short distances. Reducing net out-commuting from Kirklees by providing more local employment opportunities will help to reduce pressure on the motorway network in West Yorkshire.

Without local jobs, people will not and given the topography of the area, cannot be expected to use alternative modes of transport. Improvements of the Penistone line and better parking provision are omitted.

What the issues fail to pick up on are a number of locally distinctive characteristics to the District in terms of topography (and how this affected development patterns, transport and communication

Council Response

Text deleted referring to junction 24 at Ainley Top. Text amended providing reference to Highways England improvements along M62 and M1.

No Change

The Council is committed along core traffic and bus networks and the developing core cycle network, all of which will be improved and maintained where possible in association with the development of site allocations. See Policy DLP24.

Proposed Change

Text amended to reflect public transport routes. It is recognised that improvements to the core bus network may be required but to provide a regular morning, daytime and evening service is a commercial decision, normally based on observed demand. The Council is committed to work with bus companies and the Combined Authority to identify the potential for improved bus service provision and look at ways of potentially funding these services until the full demand is realised.

It is recognised that the Core Cycle Network requires expansion but also that this requires funding. The Council is working locally with a cycling delivery Group and the Combined Authority to prioritise routes for development and identify sources of funding, be that from developer contributions or grants from Central Government.

No Change

The plan recognises the need to improve transport links and public transport in the plan period and where modelling has shown that congestion will occur at, for example, specific junctions, the need for mitigation measures has been identified. The Council is also carrying out an air quality assessment of the draft allocations and should this identify areas where air quality becomes an issue, then the requirement for mitigation will be highlighted and dealt with at detailed application stage or through other sources of funding.

Proposed Change

New issue 13.

The Council will continue to look at and appraise the impact of new technology in relation to development patterns, commuting and travel in general and continue to work with providers of new technology on improving, for example, the coverage of superfast broadband across the District.

Issue 12 address the variation in Kirklees economy and levels of out-commuting.

Support 1 Conditional Support Object 4 No Comment

Proposed Change

Comments noted. Text inserted to reflect a reduction in congestion on the motorway network in West Yorkshire:

'Creating more and better paid jobs in Kirklees, combined with improving public transport links to encourage out commuters to reduce car use, should help to increase income levels, maintain a range of job opportunities, achieve carbon reductions and reduce pressure on the motorway network in West Yorkshire.'

Proposed Change

Improvements to the Penistone Line and parking around the stations along the Penistone Line are being considered by West Yorkshire Combined Authority in association with the Council.

Issue 12 highlights the issues of out-commuting and self-containment in differing parts of the District. Policy

Summary of comments

linkages), the functions and roles of centres across the District and relationship to adjacent towns and cities, in particular to Leeds to the north. The latter raises concerns in respect of commuting patterns and the degree of self-containment in the District.

Many people living in the Kirkburton Ward villages, such as Highburton, work in Leeds but bus/rail services and links are poor. Developers should be contributing to their improvement.

If better broadband was available, then perhaps more people could work from home or undertake flexible working.

2.14

DLP_SP15, DLP_SP361, DLP_SP393, DLP_SP1885, DLP_SP1899

The Local Plan fails to recognise the value of the internationally known brand of Holmfirth and the economic value tourism and related visitor activities could bring to the area. The Local Plan and its associated sources documents do not sufficiently analyse the make-up of the local business population to recognise the importance of self-employment. Insufficient attention is given to how the potential of home based working, and micro and small businesses could contribute to economic growth.

One of the factors which appears to be missing from the issues set out but will be of (increasing) importance is regarding technology and communications. Much of the narrative within the Issues is with regards to the (traditional) development needs; the development and/or protection of land and resources; and transport of goods and people. However little appears to be referred to in terms of technology and communications and the effects that this may affect future development patterns. For example, the availability of on-line shopping may have consequences upon retail spending and the future of shopping and retail patterns.

Issue 12 relates to the continued dependence of towns in North Kirklees on Leeds and other centres for some types of employment and shopping and leisure facilities. It is suggested that out-commuting from North Kirklees is less problematic than in South Kirklees because of the shorter distances involved and because public transport is potentially more practical for the trips involved.

Out-commuting from North Kirklees to Leeds increases the pressure on already congested parts of the strategic road network – the M62 between junctions 25 and 28 and the M621. The government's Road Investment Strategy (RIS) includes schemes on the M621 and at the M1/M62 Lofthouse Interchange.

The 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 at M62 junctions 26, 27, 28 and 29 to cater for demand generated by development in Kirklees and neighbouring districts during the period to 2030.

There is a real prospect that sites near the M62 such as those at Cooper Bridge or Bradley golf course will increase out-commuting. Unless a good public transport offer can be developed these sites should not be developed.

This will depend on the type of housing proposed. If there is an abundance of 'executive' housing near to

Council Response

DLP 9 supports local employment and a flexible workforce.

Proposed Change

New Issue 11 inserted relating to improving technology and communications.

The Council will continue to look at and appraise the impact of new technology in relation to development patterns, commuting and travel in general and continue to work with providers of new technology on improving, for example, the coverage of superfast broadband across the District

Support

Conditional Support 1

Object 4

No Comment

No Change

Policy DLP10 - Supporting the rural economy supports tourism related development in Kirklees.

Issue 13 relates to the increasing use of technology and communications throughout the District and how future development patterns may be affected by this.

Proposed Change

New Issue 13 inserted into section 2:

Issue 13 - How will the increasing use of technology and communications affect future development patterns within Kirklees?

It is recognised that the increasing use of technology and communications may inevitably affect development patterns in the area. The locations of high-speed broadband connections, the increasing trend and ability of employees to work from home and flexible working practices can all influence decisions on living, working and travel throughout the district. Sites need to be made available throughout the District to accommodate a range and mix of uses that will complement each other and enhance the productivity and sustain the local economy and workforce.

Proposed Change

Comments noted re. schemes on the M1/M62 and M621. Issues text amended to re-enforce north Kirklees towns location close to motorway network. Specific detail of SRN schemes outside of Kirklees boundary are provided in section 9 - Transport justification text.

No Change

Summary of comments

motorway corridors which encourage executives to commute to cities such as Leeds and Manchester this will increase traffic congestion. There must be a pledge to build 'affordable' housing to enable 'low paid' workers to enjoy quality living conditions close to their place of work.

2.15

DLP_SP394, DLP_SP458, DLP_SP883, DLP_SP927, DLP_SP1495, DLP_SP1886, DLP_SP1900

Assessment forgets the influence of Sheffield Meadowhall and Barnsley as major shopping destinations for those in Kirklees Rural, particular in SE Kirklees.

Local employment is essential to footfall in small towns and village centres. The Local Plan will not achieve a better mix until more control is exercised over the type of housing available for local people. More should be done to protect the distinct characteristics of centres and exploit the heritage of the area.

Spen Valley Civic Society is pleased that the strategy document acknowledges the harder task facing North Kirklees towns, compared with Huddersfield and Holmfirth. SVCS would add to this Bradford's Broadway Centre opened in Nov 2015. Spen Valley is closer to this than it is to Huddersfield; in addition there is a frequent direct bus service from Spen Valley into Bradford's transport interchange next to the Broadway Centre.

Batley's main street gives the appearance of a ghost town.

Huddersfield Town Centre would benefit from a major draw such as a Hepworth or a Eureka; easy to say, harder to identify. It is a nice town but for many there is no reason to visit.

It is clear that from the experiences of other towns and cities around the country that retailing, on its own, is not likely to be enough to deliver a successful, vibrant town centres. In the future, it seems likely that there will be a need for these areas to provide for an increasing amount of leisure based developments and other activities so that town centres become a destination rather than simply a shopping area. Issue 13 should be amended to reflect this change.

Paragraph 2.15 amend to read:-

"How can the vitality and viability of Kirklees town centres be improved?"

One of the factors which appears to be missing from the issues set out but will be of (increasing) importance is regarding technology and communications. Little appears to be referred to in terms of technology and communications and the effects that this may affect future development patterns. For example, the availability of on-line shopping may have consequences upon retail spending and the future of shopping and retail patterns.

2.16

DLP_SP81, DLP_SP884, DLP_SP951, DLP_SP952, DLP_SP1211, DLP_SP1887

Do not just focus on manufacturing.

Kirklees is ideally placed as a service provider to Leeds, Manchester, Sheffield, Bradford. Huddersfield University, is doing a great job in training and developing the younger generation, Kirklees needs to do

Council Response

All site allocations have been tested through a transport model which assesses any congestion impacts throughout the district. Appropriate mitigation to combat congestion are listed in TS1-13 in the Allocations and Designations document.

Policy DLP11 specifically relates to housing mix and affordability and the provision of affordable units within developments.

Support 1 Conditional Support 1 Object 3 No Comment 2

Proposed Change

Text inserted to include Meadowhall, Sheffield.

No Change

Policy DLP11 specifically refers to housing mix and that development must cater for different housing types based on need in the area.

Policy DLP25 specifically relates to the design of new developments and DLP17 and 18 specifically refer to protecting Huddersfield and Dewsbury's cultural and architectural heritage.

Proposed Change

Text inserted to issue to include Bradford Broadway centre.

No Change

Comments noted. Policy DLP17 Huddersfield Town Centre supports leisure and tourism uses within the town centre.

Proposed Change

Issue amended to read:

'How can the vitality and viability of Kirklees town centres be improved?'

Proposed Change

Issue 13 inserted to address advances in technology and communications.

Support Conditional Support 1 Object 4 No Comment 1

No Change

Manufacturing has been and continues to be key component to the Kirklees economy. Although there has been a forecast for the decline in the broad sector of manufacturing the sub-sectors of precision engineering

Summary of comments

more to encourage them to stay after University and apply their learned skills to either their own entrepreneurial pursuits or existing businesses in the area.

The emphasis on manufacturing takes attention away from some of the other economic strengths of the area, particularly the visitor economy.

What about new industries making a vital contribution to Kirklees economy e.g. tourism, media and film which brings in £Ms? The focus on manufacturing smacks of old, outdated thinking.

Many manufacturing sites in the Batley area (e.g. the industrial estates off Bradford Road) are dirty, untidy, with buildings and roads in a poor state of repair. They are not attractive places to visit and work. They are not places to invite investment.

The emphasis placed on stimulating the growth of a high value manufacturing and engineering sector may be admirable from a purely aspirational perspective, and it reflects recent government rhetoric regarding the need to 'rebalance' the economy. But this is just rhetoric; it certainly does not correspond with the objectively assessed evidence base regarding potential growth scenarios for the borough. as detailed in the Employment Needs Assessment technical paper).

2.17

DLP_SP319, DLP_SP479, DLP_SP1496, DLP_SP1888

The NPPF also states that in considering these issues local authorities should ensure that there are no adverse impacts on ... human health ... and take into account cumulative effects. In some of the proposals put forward through the sustainability assessment these criteria have not been applied and if they had certain options would not have been advanced to this stage. The result has been considerable stress in some communities that need not have occurred

Land currently set aside for mineral extraction in the Kirkbuton and Shelly area is entirely unsuitable. The road network is unable to carry HGV traffic to the extent required and the proposal is contradictory to previous comments in the draft plan where protection of the rural area between settlements is proposed.

Mineral extraction should take account of the visual amenity of the area and any adverse impact it would have on residents and the nature of the place.

As an area which is a major supplier of quality building stone, we endorse the identification of how much provision should be made for further mineral extraction in the plan area as one of the Issues that the plan should address.

2.18

DLP_SP395, DLP_SP1889

The main waste that causes us concern is foul water. We have significant concerns regarding the drainage system's ability to cope with the increased load that will be placed upon it if all the proposed houses are built

Social enterprises could be set up at each of the recycling centres to re-use good things being thrown in skips thus creating jobs and reducing waste.

Council Response

and advanced manufacturing are performing well and have a strong presence in Kirklees.

It is a key objective to stimulate this part of the economy at both the Leeds City Region (LCR) and the local level. Therefore precision engineering and advanced manufacturing are priority objectives for the LCR Strategic Economic Plan (SEP) and Kirklees Economic Strategy (KES). Successfully implementing these objectives have been modelled and built in to the jobs forecast for Kirklees. Consequently part of the land requirement reflects this and also includes the identified expansion / relocation needs of manufacturing business within Kirklees. The total land requirement does not however solely focus on these industries and does take into account the projected growth in other sectors of the economy.

The plan also responds to the needs of other sectors within the district through a positive policy approach. In particular policies DLP 8 seeks to safeguard established employment land that will help to promote the employment areas modernisation, expansion and allow for the continued churn of premises which will support the opportunity for new enterprises to start up and complement existing business stock. The geographical spread of PEAs also reflects their importance to the immediate area they serve.

Policy DLP 9 intends to support economic growth through the development of skilled and flexible communities and workforce. This will require the council supporting specific training and apprenticeship schemes, and the development needs of higher education establishments to achieve this. Policy DLP 10 supports the growth of SME's, sustainable business clusters, business incubation, business start-ups which can often help capture and retain the graduate workforce. Support for the growth of the tourism industry is also provided in policy DLP 10.

Support	1	Conditional Support	Object	3	No Comment
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No Change

All site allocation have been assessed in terms of impact on air quality, noise, dust and odour. See Site Allocation Methodology Technical Paper.

No Change

All site allocations have been assessed regarding their impact on the local highway network. See Site Allocations Methodology Technical Paper.

Policies DLP37 specifically refers to proposals should not have a detriment to landscape or local visual amenity. Policy DLP38 refers to the requirement for mineral extractors to provide full details of site restoration and aftercare before, during and after working.

No Change

Comments of support noted.

Support		Conditional Support	Object	1	No Comment	1
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No Change

Drainage issues regarding new developments are dealt with under Policies DLP29 - Drainage and DLP21 - Highways and Access.

No Change

Comments noted. The establishment of social enterprises is un related to land use planning and the re-mit of the Local Plan.

Summary of comments	Council Response			
Vision and strategic objectives	Support	Conditional Support	Object	No Comment
No comments have been received on this part of the plan.	No Change			
What is driving the vision for Kirklees	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No Change			
3.1	Support 1	Conditional Support 2	Object 6	No Comment 1
DLP_SP480, DLP_SP617, DLP_SP928, DLP_SP960, DLP_SP1213, DLP_SP1218, DLP_SP1221, DLP_SP1505, DLP_SP1704, DLP_SP1802				
<p>Vision and Strategic Objectives We welcome the direction of the Vision and particularly specific Strategic Objectives on climate change, waste and resources, and environmental enhancement. We support the intention that development will have taken place in a sustainable way [...] with minimal effect on the environment, and the focus on the maintenance and enhancement of the natural environment as outlined in the Visions final paragraph. We are pleased to see that development which addresses both climate change adaptation and mitigation issues is promoted in the Strategic Objectives. In order to strengthen the Vision and Strategic Objectives, we would like to see more explicit commitments to maximising all options for sustainable resource use (including driving water, energy and materials efficiency, and minimising waste). We would also recommend inclusion of a specific commitment to protecting the natural environment through the promotion of pollution prevention techniques and messages.</p>	<p>Change</p> <p>Agree to amend the vision to include reference to minimisation of waste however consider that the objective on facilitating the sustainable use and management of minerals and waste addresses minimising waste and the objective on promoting development to mitigate climate change addresses energy efficient design.</p> <p>The objectives and vision are supported by the design policy which considers energy efficient design through the following:</p> <ul style="list-style-type: none"> - The re-use and adaptation of existing buildings, where practicable - design that promotes behavioural change, promoting walkable neighbourhoods and making walking and cycling more attractive; - using innovative construction materials and techniques, including reclaimed and recycled materials - minimising resource use in the building by orientating buildings to utilise passive solar design, incorporating vegetation and tree planting to assist heating and cooling and providing for the use of renewable energy; - encouraging the use of electric and low emission vehicles by providing charging points; - incorporating adequate facilities to allow occupiers to separate and store waste for recycling and recovery that are well designed and visually unobtrusive and allows for the convenient collection of waste; - designing buildings that are resilient and resistant to flood risk, where such buildings are acceptable in accordance with flood risk policies and through incorporation of multi-functional green infrastructure where appropriate; - designing places that are adaptable and able to respond to change, with consideration given to accommodating services and infrastructure, access to high quality public transport facilities and offer flexibility to meet changing requirements of the resident / user. <p>It is considered that this addresses the points raised in the representation.</p> <p>Proposed Change Amend vision to include reference to minimisation of waste.</p> <p>Reason: to set the context for the strategic objectives.</p> <p>The support for the vision and strategic objectives on climate change, waste and environmental resources is noted. Support that development will take place in a sustainable way is noted.</p>			
<p>Vision and Strategic Objectives 8. This section of the document is essentially about improving Kirklees making it a great place to live, work and invest in. Two factors are identified as being major factors in making Kirklees a better place in the future: a. Healthy people enjoying quality of life; and A strong and growing economy 9. I disagree with the initial part of the first of these statements as being a major factor that can be influenced by a local plan. Health is a product of many factors and therefore the amount to which a Local Plan can contribute towards health is in my view not a major factor. Personal circumstances and lifestyle choices will be much greater factors in terms of the health of the people of Kirklees. 10. The plan can most definitely impact on the environment and quality of life though. 11. For example if a major mineral extraction site is placed in close proximity to housing and up wind of a village then, once operational, it is inevitable that such a facility will not only have a significantly detrimental impact on the quality of life of those immediately adjacent the facility but also further afield and in</p>	<p>No Change</p> <p>Planning Practice Guide is clear on the role of health and well-being in planning and states: "Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making. Public health organisations, health service organisations, commissioners and providers, and local communities should use this guidance to help them work effectively with local planning authorities in order to promote healthy communities and support appropriate health infrastructure.</p> <p>"The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. Further links to planning and health are found throughout the</p>			

Summary of comments

particular down wind of prevailing winds. 12. If substantial residential development is permitted in areas where infrastructure such as roads, schools and so forth are already fully utilised, then the increased pressure on that infrastructure will invariably impact detrimentally the quality of life of those residents. 13. If a village cricket club ceases to exist because the land upon which it has operated for many years is lost to development then the quality of life for those who are members of the club will be impacted significantly. 14. In terms of a strong and growing economy this is indeed an important factor. A stronger local economy means greater wealth, greater revenue for the Council and therefore greater resources to commit to the delivery of local services. The economy in Kirklees though is made up of many different elements of economic activity. In the Denby Dale ward agriculture is important and, throughout the Kirklees Rural area, tourism and leisure are important economic activities and generators of revenue. Any local plan should therefore seek to protect and indeed develop these elements of economic activity. 15. In the Vision, two paragraphs address economic activity: 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 Cooper Bridge and Chidswell and safeguarded employment land which, as a whole, provide the opportunities to grow businesses, improve economic resilience and increase the district ability to compete with other areas. There will be a focus on regenerating our towns whilst safeguarding and reinforcing those elements which make them distinctive. Huddersfield Town Centre will be revitalised through an enhanced independent retail, cultural and leisure offer; mixed use development of the Waterfront and St Georges Quarters and other key sites; and next generation digital connectivity. Dewsbury will be transformed by building on its strategic location, driven by integrated housing and economic development in the town centre and connected to communities. Supporting the rural economy will be encouraged and opportunities facilitated by provision of high speed broadband. 16. In these two paragraphs much is said about the town centre areas and the north of Kirklees. There will be a focus on the towns. Huddersfield Town Centre will be revitalised. Dewsbury will be transformed. 17. The rural areas form a very large part of Kirklees but yet out of these two whole paragraphs warrant just one sentence. Supporting the rural economy will be encouraged. 18. The only firm commitment to the rural economy encapsulated in the vision is the provision of high speed broadband. 19. While parts of the rural areas are indeed crying out for high speed broadband the delivery of it will not be as a product of the Local Plan. 20. The draft plan seems to envisage that economic activity will involve predominantly manufacturing. Kirklees potentially finds itself at the heart of the Northern Powerhouse and therefore sandwiched between Leeds and Manchester – both cities with developed and expanding high tech industries and sectors. The impression given by the plan is that Kirklees needs to focus on traditional manufacturing industry in respect of which Britain (let alone Kirklees) is often not competitive. There must be more that can be done to inspire innovative companies and technology businesses to come and locate in a beautiful part of the world. Those businesses need a certain level of infrastructure and accommodation and these are issues the council should be seeking to drive, through the plan. Real economic power nowadays lies with the innovation, design and intellectual property that is associated with the products and services we consume. Rather than trying to compete with manufacturing and engineering activity from other countries around the world, which operate from a lower cost base, Kirklees should be seeking to encourage and develop opportunities for innovative technology businesses which can be very flexible in their way of working, do not need a great deal of real estate and which can employ staff in locations which do not need to be urban conurbations. The tenor of the vision, in terms of what it purports to achieve in terms of business and industry, is therefore disappointing and lacking ambition. 21. The Vision for Kirklees is too much focussed on the town centres and barely pays lip service to the rural areas. This is a theme that is reflected in other aspects of the council work; for example the provision of library services. If the rural economy (comprising both traditional rural economic activities and the potential for new technology based activity) is to be overlooked by the vision for Kirklees it is important that the Local Plan does nothing that is detrimental to the rural economy, for example, by way of inappropriate development which adversely impacts on the aesthetic appeal of the areas to which visitors are attracted. 22. In short the draft Local Plan is very much focussed on the areas of north Kirklees and the towns of Huddersfield and Dewsbury. There are cogent reasons for development in these areas. It may indeed be difficult at this strategic level to identify specific proposals which will develop the rural areas and economy (though see comments below on section 6.4 Supporting the Rural economy). It is important though that the distinctive character of the rural areas is maintained and nothing done which will adversely affect the economy in those areas. Rural Kirklees is in fact already a great place to live and work. 23. Given the

Council Response

whole of the National Planning Policy Framework. Key areas include the core planning principles (see National Planning Policy Framework paragraph 17) and the policies on transport (see National Planning Policy Framework chapter 4), high quality homes (see National Planning Policy Framework chapter 6), good design (see National Planning Policy Framework chapter 7), climate change (see National Planning Policy Framework chapter 10) and the natural environment (see National Planning Policy Framework chapter 11).

The council considers that its vision, strategic objectives and policies are compliant with NPPF on the links between planning and health. Further the vision is shaped by the council's health and well-being strategy".

Allocations and designations within the Local Plan have been considered by a range of technical consultees including public health, environmental health, and transportation colleagues and where required mitigation measures considered to address any adverse impacts of development.

Summary of comments

stated vision of the Plan then, when adopted, it should do nothing to impact detrimentally on the rural areas.

A vision is a statement that we all aiming to achieve. Something we aspire to have or be. The Vision incorporates statements that the LDP and its policies should aim to achieve such as the need to protect what makes Kirklees attractive and distinctive. Certain proposals made in this LDF are contrary to this vision - which then means the vision in this case is only a set of words without meaning rather than a reference from which those making decisions can take direction.

The University of Huddersfield Students Union exists to represent students at the University. Our mission is to make student life better. The 20,000 Students at the University of Huddersfield make a significant impact in Kirklees. It is important that the needs of students are considered in the long term spatial, community and business planning for the district. However it is also important to note the diversity within the student population, by way of summary: 45% of students live in their family home and are commuter students 67% of students are aged 18-24, 10% of students are aged over 40 57% of students are female 2800 join and are active in clubs and societies Circa 3500 are International students from over 150 countries We have considered the size and scope of the consultation, and have chosen not to respond to specific proposals or designations of space, but offer some general comments related to students needs which should be considered within the following themes and detailed in the attached document: Economy Homes Retailing and town centres Transport and infrastructure Environmental protection and climate change Health and supporting communities Green belt and open space Our contribution concentrates on the town rather than the wider Kirklees area, whilst many students live in other parts of Kirklees, the principal place where they exist as students with particular needs in Huddersfield.

Some of the problems which need to be corrected are: (a) Road congestion, the network canal, buses are unreliable because of that congestion, (b) Too few trains stop at Batley Station and there is not enough car parking space at Batley Station for rail network users © Poor integration between cultures, with enclaves of people using their own services and facilities independently of other cultures (d) Some people fear for their safety walking some streets or using some of the Green Spaces € Empty high streets because individual character shops cant compete with the supermarkets (f) Worn out fabric, broken pavements, potholed roads, gutters stuffed with vegetation leaving rain water to trickle down moss encrusted walls into roadways where the drains don't work because drain covers are stuffed solid with years of grime and debris and (g) No public toilets. Why do shops lie empty? Why is the fabric of the town in such poor repair? Why didn't the Enterprise Zones made a difference to the prosperity of the town? Towns in South Yorkshire such as Barnsley and Doncaster have attracted investment and have smart, modern, industrial and retail developments. Those towns have also invested in attracting visitors. Dewsbury and Batley have some wonderful assets: fine architecture, interesting history, good open views, a network of footpaths and bridleways, mature trees, magnificent churches, one time impressive parks, also water courses in the form of beck, river and canal. Such assets need to be showcased, to bring investment, not hidden away, uncared for, or allowed to deteriorate. Vision for the future? Some public toilets! Tour boards around the town to showcase the heritage and history. Could there be a water bus on the canal, for tourists and to relieve congestion on the roads.

We support the vision for Kirklees and agree that for Kirklees to be a great place to live, work, and invest in, an integrated approach to housing and employment will need to be delivered. For Kirklees to encourage inward investment and stimulate economic growth we agree that this will be achieved through the provision of new prime employment land, and sites of strategic importance for employment with a focus on manufacturing and engineering. We support the reference to Chidswell in the vision which will provide the opportunities to grow businesses, improve economic resilience and increase the districts ability to compete with other areas. We also support the vision for a mix of high quality housing which offers choice and meets the needs of all communities including affordable housing.

The aspirations for manufacturing and engineering in the vision and objectives are not realistic and are placed at a higher priority than other parts of the vision.

Council Response

No Change

The plan policies seek to support sustainable development and balance environmental, economic and social aims.

No Change

Focus of comments noted.

No Change

It is considered that the vision and strategic objectives reflect the issues raised and form a context from which the plan policies sit to work towards addressing these issues.

No Change

Support for vision noted.

No Change

The council has two strategies which support the Local Plan and its vision. These are the Kirklees Economic Strategy and the Kirklees Joint Health and Well-being. The focus of these strategies is to support healthy people enjoying quality of life and a strong and growing economy. Aspects of the vision focus on a range of economic, social and environmental goals to achieve this and while supporting the economy is a key element

Summary of comments

The draft Local Plans general strategic approach, which follows the NPPF with regard to the policy requirements, is very comprehensive and sits within the additional evidence materials, policy guidance and consultation documents.

My only suggestion would be when all the feedback has been looked at and decisions made about policies, with regard to the new Local Plan, that an Alternative Strategy Group should be established immediately that looks at short term, intermediate and long term time phased planning in order to develop new ideas and more connectivity as advanced technology comes on line and social trends and social behaviour changes.

The draft Plan aims to reduce the number of empty houses in Kirklees. It should be given more immediate priority and be a central strategy.

The draft Local Plans general notion of putting industrial units near to motorway networks works relatively well in the draft Local Plan. even more business friendly and specific in the future! Â The Kirklees Joint Health and Wellbeing Strategy Does the Masterplan take into account the changes being made by the NHS England with regard to The Strategic Review€“ A Case for Change which is moving towards a community serve - assets model and the direction being promoted by NHS England in the document Â 5 Year Forward View - 2014? Â Are the NHS policy planners working with the Kirklees policy group? Â I realise that a Scrutiny Committee is looking at this but does there need to be more public involvement? After viewing the Kirklees Webcast I noticed that several councillors on the committee are raising many concerns about clarity and the need for more public consultation with regard to the new community-serve model being promoted by Calderdale and Greater Huddersfield CCGs Will the suggested Right Care Right Place Right Time model be dovetailed to the individual, local care and health requirements in each of the character areas set out in the draft Local Plan and will they inter-link? Rural Kirklees could, now that more freedom has been given to Health Trusts, develop its own ideas and produce a prototype to suite its own specific health and care requirements. The HEALTH-Interserve and Interserve Healthcare models, used in Australia are up and running. They are also being used to some degree in the UK and they could be more fully expanded to create a better health-social care model in Kirklees. Â Are our councillors and local policy planners aware of these models and aware of how they could be adapted and developed in our region? The recent controversy over the suggested closure of the A&E Department in Huddersfield Royal Infirmary is showing the real need for coordinated planning in conjunction with the Kirklees Local Plan. Are we really to accept that a town with a population of approximately 130,000 people and 25,000 students can really exist without a local hospital? Â WE NEED A BETTER LOCAL INTER-SERVE HEALTH and CARE MODEL IN GREATER KIRKLEES. Â The Hospice Movement and Palliative Care The great debate taking place throughout Britain with regard to creating better palliative care packages for patients reaching the end of their natural lives needs to be more fully engaged in. After being involved with the complexities of this with the recent death of my own parents I am aware the solution to the problem is not easy. The amount of research being done in this area of medicine and social care that I have looked at is immense and on-going. However, with regard to this planning paper, one suggestion would be to use the expertise of the Hospice Movement to promote and run smaller units linked to the new and existing Care Homes that are being built and developed at this moment in time throughout Kirklees. After watching my own parents die in the present system I realise that a busy hospital ward is not the best place for this to happen. Â A Hospice Unit could be a half way house between hospital/Care Home and home care for people who are in the very last stages of life. Access to hospice help needs to be more accessible and available when needed. The funding arrangements need to be looked into and new combined funding options are needed in the future. New funding arrangements could link NHS, charitable and private funding to overcome the complexities of gaining access into Hospice Care and the present financial hurdles need to be overcome. We need to give people more choice over how they want to live at the end of their lives and families need to be actively involved in the process. I suggest that the idea could be explored by the Calderdale and Greater Huddersfield CCGs in relationship to the Kirklees Masterplan. Â How does this present situation with the HRI relate to the Kirklees Masterplan? Do councillors on the Scrutiny Committee and Kirklees General Council really know what the bigger picture is for future developments with regard to local long term hospital provision in the Huddersfield and Calderdale NHS Trust with regard to these new shared health and care ideas being advocated? Â The Calderdale PFI Finance

Council Response

of the spatial strategy, it is not considered that this is as the expense of the other aspects of the vision.

No Change

Support for the Local Plan is noted. Comments on the alternative strategy group are noted.

Summary of comments

Model was obviously not initially scrutinised carefully enough at the outset of the project€ look at the finance figures! The very fact that MPs Barry Sheerman, Jason McCartney and Paula Sheriff are working together in Westminster to find a way to maintain a full hospital service in Huddersfield suggests that they were not involved in the strategic planning process. Lindley councillors were also, apparently, not aware of the proposals. HUDDERSFIELD: We need a New Northern Town for the Future We need to see our northern towns as places to live in and enjoy and not just as lockup retail outlets. We deserve and need better quality environments to live and work in. The cheap and nasty buildings that were built in the late 70s and 80s in Huddersfield need to be taken out and a new town developed incorporating and enhancing many of the stunning architectural gems that exist already in Huddersfield. Good, well designed contemporary buildings built in quality materials should be kept. I talked to councillors and officers and wrote about this last time in my response and I think things are beginning to happen in terms of re-development but there is still a lot to do. York is going through a similar transformation. Historical buildings are being conserved and restored. New buildings are taking on contemporary styles and using good quality local building materials and clear design decisions are obviously being made very successfully. A new town look with gardens and quality landscaping could completely change Huddersfield into a place where residents can enjoy their town space and walk to all the facilities€ library, theatre, cinema, restaurants and also the bus and railway stations. More Town Yards could be opened up and new residential hubs could be created. The Victorian Open Market could be used more fully as a food market and this would enhance the healthier life styles being advocated by the Kirklees Joint Health and Wellbeing Strategy. Evidence now shows clearly that daily shopping, buying and eating fresh cheaper locally sourced food in forums where people meet and socialise lead to happier, healthier and longer lives. My suggestion would be to have an open completion with architects and landscape designers/architects from throughout the UK competing for: HUDDERSFIELD€ DESIGN A NEW NORTHERN TOWN COMPETITION

The Spatial Vision is a fundamental element of the DPD, which should reflect local ambitions and aspirations, and provide the basis for the subsequent objectives and policies. It considered that there should be clearer elaboration on the links to the Leeds City Region and Northern Powerhouse initiatives.

Consider that there are three major factors that are important in making Kirklees a better place in the future. An additional point should be added to include reference to sustainable low-carbon future, leading to Zero Carbon Kirklees by 2030.

3.2
DLP_SP17, DLP_SP320, DLP_SP481, DLP_SP635, DLP_SP703, DLP_SP861, DLP_SP1510

Amend paragraph to add further bullet point sustainable low-carbon future leading to zero carbon Kirklees by 2030.

The inclusion of this third factor also reinforces the commitments given at the recent conference in

Council Response

Change

Insert additional text to make reference to the Leeds City Region and Northern Powerhouse.

Proposed Change

Insert additional text in the introductory text to the vision to refer to the Leeds City Region and Northern Powerhouse to read as follows:

"The vision has also been written in the context of the Leeds City Region Strategic Economic Plan which sets out a clear vision to promote change and growth in the region. There is a commitment to partnership working and a call for the devolution of powers to enable the region to shape its economic future. From the position of Leeds City Region, at the heart of the Northern Powerhouse, the SEP seeks to capitalise on the region's unique strengths and assets and support collaborate with other local authorities to achieve more than it could alone. The SEP contains aims to ensure Leeds excels as an outward looking City Region, at home and internationally".

Reason

To reflect the wider context of the vision and strategic objectives.

No Change

No change is proposed as it is considered that Policy DLP1 presumption in favour of sustainable development that underpins all Plan policies covers this issue

Support Conditional Support 4 Object 3 No Comment

No Change

It is considered that the vision and the strategic objectives already make reference to climate change and energy efficiency. Changes have been made to the design policy justification to be more explicit about energy

Summary of comments

November 2015 'Towards a Low Carbon Kirklees' where council leaders and officers spoke about the importance of a sustainable low carbon future within the district.

These are underpinned by vibrant, viable local communities and a healthy and sustainable natural environment. Both deserve explicit mention.

Some proposals run counter to this, e.g. mineral extraction sites

This 2 point vision says nothing about the vision for the place itself but only for economy and people both of which rely to an extent on the place itself

3.3

DLP_SP82

Huddersfield needs to have a really positive image, and be known for its vision, and facilities. If I was being harsh I could say that at the moment entering Huddersfield from the M62 is anything but inspirational - Cooper Bridge known for the car breakers, the water treatment plant, traffic jams and when it rains the flood under the railway bridge!

Given the commitments above, HoTT considers the over-arching statement in the vision for Kirklees in Chapter 3.2 should be qualified by adding a third important factor for making Kirklees a better place in the future. The paragraph could read:

We consider that there are three major factors that are important in making Kirklees a better place in the future:

healthy people enjoying quality of life; and a strong and growing economy.

a sustainable low-carbon future, leading to Zero Carbon Kirklees by 2030.

This would strengthen the importance of Chapter 3.3 Strategic Objective 3.6 (7) 'Promote development that helps to mitigate climate change, and development which is adapted so that the potential impact from climate change is reduced', amongst the other strategic objectives, when influencing the spatial development

strategies and policies that follow from the vision e.g. Policy DLP1 Presumption of Sustainable Development, Chapter 4 Environment role of the planning system in mitigating and adapting to climate change including moving to a low carbon economy.

The inclusion of this third factor also reinforces the commitments given at the recent conference in November 2015 'Towards a Low Carbon Kirklees' where council leaders and officers spoke about the importance of a sustainable low carbon future within the district.

HoTT would like to see these commitments translated in a practical way in strategy, policy and site specific proposals.

Another example of how the strategic commitment to climate change can be strengthened appears in the background Sustainability Assessment. Table 2.2 sets out the Sustainability Assessment Framework, and includes the Objective to 'Reduce the contribution that the District makes to climate

Council Response

standards.

No Change

The full vision makes reference to building thriving communities, healthy communities and protecting the natural and historic environment.

Paragraph 3.2 references how the vision has been prepared in the context of the council's wider strategies and does not exclude these important elements.

No Change

It is considered that the vision, strategic objectives and mineral policies allow consideration of mineral extraction where the harm does not outweigh the benefit of the proposal.

No Change

The vision itself makes reference to: The diverse character of the district as a whole and within its different character areas will be retained and enhanced while creating opportunities to build thriving communities which respond to local needs.

It also states that the local distinctiveness of the area will be protected.

Paragraph 3.2 sets the context of local plan within the wider council strategies and is not intended to exclude a focus on place.

Support

Conditional Support

Object 1

No Comment

No Change

The vision set out in chapter 3 and associated strategic objectives is focussed on making Huddersfield a place people want to live, work and invest in. Master plans have been prepared for strategic sites to promote high standards of design and to plan for integrated developments. No further changes are considered necessary.

No Change

Paragraph 3.2 references how the vision has been prepared in the context of the council's wider strategies. The vision and the strategic objectives make reference to climate change and energy efficiency and DLP1 presumption in favour of sustainable development underpins the plan's policies. No further changes are considered necessary.

Summary of comments

change'. This would be strengthened by references to the essential action to bring this about in other objectives. For example, Objective 9 could read 'Ensure all people are able to live in decent homes that meet their needs in a sustainable way, reducing the reliance on carbon based energy'.

Strategic Objective 10 - The plan area is a major supplier of quality building stone. Therefore, we support this Strategic Objective.

3.3 Strategic Objectives

3.6.3. We believe that Sustainable transport (public transport, walking and cycling) should be prioritised above all other transport options. There should be efforts to reduce commercial traffic and supporting local sustainable economies

3.6.7. The Local Plan aims to 'promote development that helps to mitigate climate change and development which is adapted so that the potential impact from climate change is reduced'. However, the scale of the challenge to meet a zero carbon target in the 2030s requires this objective to be more ambitious A changed from 'promote development' to 'require development' would be preferable.

3.6.10. Strategic Objective 'Facilitate the sustainable use and management of minerals and waste' is commendable. However, we do not believe the current proposals meet the objectives as stated

Issue 5 identifies how to secure the reuse of Kirklees vacant buildings as being one of the issues the Plan will need to address. This is especially important for those which contribute to the distinct identity of the plan area. The sustainability benefits of re-using existing buildings should also be included within this Strategic Objective. Paragraph 3.3 Strategic Objective 9 amend to read:- Promote the reuse of existing buildings and the use of brownfield land to meet development needs and support the regeneration of areas.

We support this Strategic Objective. The environmental assets of Kirklees make an important contribution towards its sense of place, the quality of life of its communities, and to the economic well-being of the area. It is wholly appropriate that their protection and enhancement is identified as one of the Plans Strategic Objectives.

3.4
DLP_SP776

Comments submitted relate to other parts of the plan

3.5
DLP_SP666, DLP_SP707

Public engagement has been very poor during this process. Information and questionnaires should have been sent to individual households and regular meetings held in local communities to provide discussion and feedback.

Figure 2

No comments were received on this part of the Plan

Council Response

No Change

Support for strategic objective 10 is noted.

No Change

The Plan does not have sufficient viability information to justify required over promote.

Change

Support proposed wording to strategic objective 9.

Proposed change:
Reword strategic objective 9 to read: Promote the re-use of existing buildings and the use of brownfield land to meet development needs and support the regeneration of areas.

Reason:
Consistency with DLP6

No Change

Support for environmental assets in strategic objectives noted.

Support	Conditional Support	Object	No Comment	1
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No Change

Support	Conditional Support	Object 2	No Comment
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No Change

The comments on the consultation are noted. The council's consultation processes are set out in its Statement of Consultation. A wide range of processes were used to inform stakeholders of the Local Plan, including letters/emails to everyone on the database, advertisements/press releases in the local press, information provided to local councillors to undertake consultation in their own areas, focus groups, drop in sessions and a summary booklet in key locations. It is considered that the consultation was in keeping with the council's Statement of Community Involvement and regulatory requirements.

Support	Conditional Support	Object	No Comment
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No Change

Summary of comments	Council Response			
Vision	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Vision for Kirklees	Support 10	Conditional Support 7	Object 6	No Comment
DLP_SP109, DLP_SP222, DLP_SP267, DLP_SP321, DLP_SP362, DLP_SP482, DLP_SP691, DLP_SP704, DLP_SP812, DLP_SP874, DLP_SP885, DLP_SP999, DLP_SP1015, DLP_SP1096, DLP_SP1298, DLP_SP1341, DLP_SP1395, DLP_SP1426, DLP_SP1497, DLP_SP1571, DLP_SP1650, DLP_SP1823, DLP_SP1842				
The references to 'encouraging inward investment and stimulate economic growth' and '..high quality housing which offers choice and meets the needs of all our communities including affordable housing' are particularly welcomed.	No Change			
				Support for the references to 'encouraging inward investment and stimulate economic growth' and '..high quality housing which offers choice and meets the needs of all our communities including affordable housing' are noted and welcomed.
No evidence of how retaining and enhancing the diverse character of the district will be delivered. Policies need to be more specific.	No Change			
				Each of the policies is followed by a delivery and implementation section which sets out how the policy will be delivered.
We support the Vision especially:- those aspects which relate to retaining and enhancing the characteristics that make Kirklees such an attractive and distinctive place, and the intention that the legacy of historic buildings will have been safeguarded and enhanced. (Historic England)	No Change			
				Support from Historic England for the vision noted.
Vision supported but might be strengthened through direct statements which state that the Local Plan will meet the objectively assessed development and infrastructure requirements needs of the District in full	No Change			
				Details of how the housing will meet its housing requirement are set out in the housing and employment sections of the plan.
Reference to strategic growth programmes and the opportunities they provide should form part of the vision and objectives, reflecting and demonstrating a coherent approach to transboundary issues.				
There is no mention of climate change targets or goals in the vision	No Change			
				It is not considered appropriate to include specific targets or goals within the vision. The policy justification for the design policy has however been amended to refer to The Passivhaus Standard and the EnerPHit Standard.
The Vision is rather verbose, which makes it difficult to understand, remember, support and flow through in to other Council strategies & more detailed aspects of the plan	No Change			
				As a result of the issues outlined in section 2, and the council's economic plan and health and well-being plan, there are a number of facets to be included in the vision that will shape how the district needs to respond to meet its objectively assessed needs requirements and to grow and flourish as a place that people want to live, work and invest in.
The recognition in Kirklees' Vision of the need to protect and enhance the District's heritage assets & the need to retain and enhance the distinct character of different parts of Kirklees is supported	No Change			
				Support for vision noted and welcomed.
If Kirklees is to be great place to work in why is it then that some of the proposals in this LDP will actually make life worse in some communities rather than better, e.g. minerals extraction	No Change			
				Minerals operations have been and continue to be an important component to the economy locally, regionally and nationally through the provision of jobs and materials to the wider economy. Although it is acknowledged that mineral extraction can have a negative impact upon the environment, such operations are and will continue to be subject to conditions which will help mitigate these impacts. Minerals sites will also be required to be restored at the earliest opportunity to a beneficial after-use that will at least be equal in value to what was originally there before
If the Local Plan is to truly meet the test of sustainability appraisal, it must ensure social, environmental and economic aspects are all met, rather than simply facilitating a prioritised trade-off between them.	No Change			
				The process of sustainability appraisal is designed to ensure that the plan preparation process maximises the

Summary of comments

The vision should make a stronger connection between people and the ecosystem services provided by Kirklees green space. Particular the upland landscape of Kirklees, a considerable amount of carbon is sequestered by the active blanket bog of the moors which also supply a considerable drinking water and flood risk management function in addition to the obvious biodiversity asset. The reference to this in the plan is currently very lightweight and feels to be added in as an afterthought rather than with any serious intention.

References to protection and enhancement of green infrastructure, landscape, agriculture, biodiversity and geodiversity in the vision are welcomed (Natural England)

An employment strategy should have as its starting point an employment strategy agreed with other neighbouring authorities. There does not appear to be an over arching employment strategy for West Yorkshire. The Strategy & Policy document tends to confirm the council is doing its own thing. There is nothing about carving out a vision unique to Kirklees. Employment sites within one district intended to provide mainly or only for that district are not truly strategic when people are commenting on a large scale from one district to another.

The Vision should be revised in order to specifically highlight housing development as a driver to stimulate economic growth, the creation of jobs, and as a means to enhance the District's natural and built environment. Though it is acknowledged the vision makes reference to the need to deliver new homes, the importance of housing delivery as a means of facilitating the sustainable growth of the District needs to be given further weight.

There is no reference to reducing the level of out-commuting. This was an important element of the transport vision in the withdrawn Core Strategy, and one which Highways England supported. (Highways England)

The vision is good but the actual details within the KLP often contradict or ignore the vision and objectives as set out by Kirklees

We acknowledge our responsibility to support the implementation of the vision, and will ensure that the Local Plan is considered when developing policies and strategies. (Greater Huddersfield Clinical Commissioning Group)

Council Response

contribution that a plan makes to sustainable development and minimises any potential adverse impact.

No Change

The important relationship between the Peak District National Park and where it borders the Upper Holme and Colne valleys is fully recognised in the Kirklees Rural section of the local plan. Full consideration has been given to the constraints on growth as land is protected by habitats and species of European importance as set out in the sustainability appraisal and habitats assessment.

The south Pennine Moors and the special protection area and SAC are also recognised as important parts of the strategic green and blue infrastructure network, recognising the landscape value and their role as biodiversity assets.

No Change

Support from Natural England for the vision is noted and welcomed.

No Change

The Leeds City Region Strategic Economic Plan sets out a framework and strategies for growth led by the Leeds City Region Enterprise Partnership and the West Yorkshire Authority (Combined Authority) which provides an over arching context for the Local plan.

In addition it contains a section on Kirklees making reference to Kirklees priorities to regenerate Huddersfield and North Kirklees, the University of Huddersfield as driving ongoing regeneration of the town centre, Key mixed use developments including HD One, the Waterfront Quarter and St Georges Quarter and major employment opportunities at Cooper Bridge, Chidswell and the M62 Enterprise Zone Sites at Lindley Moor and Mirfield. It also recognises the transform plans for Dewsbury through the North Kirklees Growth Zone.

Huddersfield, Cooper Bridge and Chidswell are outlined as spatial priority areas.

The Kirklees Economy Strategy has been written in the context of the Leeds City Region SEP and carries these priorities forward which in turn are reflected in the Local Plan.

It is therefore considered that there is a co-ordinated approach to the promotion of economic development across the wider region and district with linked aims and objectives.

Change

Agree to include a reference to the economic benefits of housing delivery

Proposed Change

Amend the vision to include a reference to the economic benefits of housing delivery.

Reason

To clarify the ways that economic growth can be stimulated in the district.

Change

Amend vision to include reference to and the potential to reduce out-commuting.

No Change

Support for the vision is noted. It is considered that the policies are compliant with NPPF and enable the delivery of the vision.

No Change

Support the acknowledgement from Greater Huddersfield Clinical Commissioning Group to support the

Summary of comments

Council Response

The draft plan sets out a vision for Kirklees until 2031. The plan forms a complete suite of local policies therefore it directly addresses many aspects of the strategies laid out in the SEP. The following SEP strategic priorities are addressed:
Supporting growing businesses
Developing a skilled and flexible workforce
Building a resource smart city region
Delivering the infrastructure for growth
(West Yorkshire Combined Authority)

implementation of the vision and to ensuring that the local plan is considered when developing policies and strategies.

No Change

Support from West Yorkshire Combined Authority that the vision addresses SEP strategies is noted and welcomed.

Delivering the Joint Health and Wellbeing Strategy and the Local Plan vision are long term projects that can only be achieved through a collaborative approach between the Council's planning department and Kirklees Health and Wellbeing board.

No Change

Agree and support that a collaborative approach is required.

The vision should be amended to commence with the wording in 2033.

No Change

The period of time covered by the Kirklees local plan is consistent with the requirements of national planning policy.

Vision is supported but some of the proposals set out in the Draft Plan do seem at odds with that Vision, e.g. development in the green belt and its impact on local character.

No Change

The support for the vision is noted. Some release of green belt is required to meet objectively assessed needs and to promote economic growth which forms part of the vision. The vision and plan policies seek to protect green belt and the quality of the landscape.

The vision is supported as it specifically references the role that Cooper Bridge is expected to play in the economic growth of the District, as set out in the City Region Strategic Employment Plan (SEP) and the Kirklees Economic Strategy (KES)

No Change

Support for the vision noted and in particular the reference to Cooper Bridge.

Strategic Objectives

Support	Conditional Support	Object	No Comment
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No comments received on this part of the Plan.

3.6

Support	9	Conditional Support	12	Object	5	No Comment	2
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DLP_SP64, DLP_SP110, DLP_SP134, DLP_SP225, DLP_SP322, DLP_SP363, DLP_SP396, DLP_SP398, DLP_SP483, DLP_SP636, DLP_SP705, DLP_SP860, DLP_SP862, DLP_SP875, DLP_SP911, DLP_SP1018, DLP_SP1097, DLP_SP1167, DLP_SP1223, DLP_SP1299, DLP_SP1427, DLP_SP1477, DLP_SP1498, DLP_SP1499, DLP_SP1500, DLP_SP1511, DLP_SP1572, DLP_SP1661

The Plan as drafted does not make it clear how it will deliver the Strategic Objectives set out in para 3.6 of the Draft Plan, for example for Objective 8:

No change.

The design policy and historic environment policies support this objective.

It is not evident in the Plan how the objective to "protect and enhance the characteristics of the built, natural and historic environment and local distinctiveness" will be achieved. There is no provision in the Plan which will prevent developers continuing to build inappropriate homes, based on standard building designs, with little regard for local distinctiveness.

Highways England fully supports two of the key strategic objectives supporting the Local Plan Vision:
Objective 1: Support the growth and diversification of the economy, to increase skill levels and employment opportunities including the provision of a high quality communication infrastructure.
Objective 3: Improve transport links within and between Kirklees towns and with neighbouring towns and cities, giving priority to public transport, commercial traffic, and to cycling and walking.

No change.

Support welcomed.

Specific reference should be identified in respect of the ability of new housing developments to deliver a number of other economic, social and environmental objectives, such as those listed above in Paragraph 2.2 above. Amend Strategic Objectives to state the following in respect of the delivery of new homes:-

No change.

It is considered that by seeking to meet the needs of community - this implies meeting OAN. Other objectives relate to access to employment, public transport, shops and services and green infrastructure.

Fully meet the objectively identified market and affordable housing needs of the District in order to deliver the needs of the community, offering a range of size, tenure and affordability, with good access

Summary of comments

to employment, public transport, shops and services and as a driver to stimulate economic growth facilitating the creation of jobs and the provision of the District's infrastructure requirements, including social and green infrastructure.

Objectives are broadly welcomed especially the importance given to supporting the growth and diversification of the local economy and providing the homes that the community needs. However, it is considered that there should be specific reference to the Local Plan meeting the full objectively assessed development needs of the Borough.

Any new hydrocarbon exploration and extraction within Kirklees is totally incompatible with Kirklees strategic objectives regarding climate change ('promote development that helps to mitigate climate change and development which is adapted so that the potential impact from climate change is reduced'). All proposals for hydrocarbon exploration and extraction should be rejected on the grounds of climate change and the precautionary principle.

The Strategic Objectives are incomplete and in some cases a little unclear. They should include a reference to:

Urban regeneration. The plan does mention urban regeneration in Huddersfield and Dewsbury, but it is not currently a strategic objective and there is a general lack of practical commitment to urban regeneration throughout the plan. In essence the Plan only pays lip-service to urban regeneration.

The Strategic Objectives are incomplete and in some cases a little unclear. They should include a reference to: Protection of the South Pennine moorland plateau and moorland fringe areas, which are key defining characteristics of Kirklees as a whole and are a uniquely valuable leisure, tourism, economic and environmental resource for Councils on both sides of the Pennines.

The Strategic Objectives are incomplete and in some cases a little unclear. They should include a reference to:

Community building. The plan hardly mentions the negative impact that aspects of the plan, such as strategic development or green field urban extensions, will have on local communities. Reinforcing and building communities should be at the heart of any successful wellbeing strategy. It is a serious omission.

The Strategic Objectives are incomplete and in some cases a little unclear. They should include a reference to:

Place shaping. As the physical alter-ego of community building place shaping is a key role for Local Authorities (see 5.1). Yet place shaping is not a strategic objective(s) in the plan

It is unclear if these objectives are listed in priority order and the relative importance given to them. I would support a different order of priority to reflect better what the Local Plan and local authority can and should achieve through the land use planning process.

Should be some specific areas about sustaining and improving rural communities. These objectives if agreed must then form the bedrock for decision making and the certain proposals in this plan must be revisited as some proposals are in conflict with the proposed objectives, e.g. mineral extraction in the green belt

Objective 10: Strategic Objective 'Facilitate the sustainable use and management of minerals and waste' is commendable. However, the current proposals do not meet the objectives as stated

A further review of all the proposals in the Plan should be undertaken to ensure that they are consistent

Council Response

No change.

However, this objective has been slightly reworded to refer to the 'housing needs' of the community - which when supported by other policies and proposals in the plan is to meet the OAN.

No change.

This is inconsistent with national policy.

No change.

Strategic objective 9 identifies regeneration as an objective. Strategic objective 2 considers the role of Huddersfield and Dewsbury. Strategic objective 5 seeks to tackle inequality, which would be dependent on regeneration.

Change

Strategic Objective 8 will be expanded to refer to the South Pennine Moors and moorland fringe, as well as the district's industrial heritage - which contributes to the distinctiveness of the district..

8.Protect and enhance the characteristics of the built, natural and historic environment, and local distinctiveness which contribute to the character of Kirklees, including the South Pennine Moors, Moorland fringe and the area's industrial heritage.

Change

Objective 4 has been reworded seeking for new homes to support existing communities, and access to employment, public transport, shops and services.

Change.

Objective 4 has been reworded to refer to new homes supporting existing communities.

No change.

The options are not in any particular order.

Change.

Objective 4 has been amended to refer to new homes supporting existing communities and access to employment, public transport, shops and services - which are relevant issues across the district. Mineral extraction is considered against the Minerals policies, which considers the impact on local residents in terms of amenity, highway safety and local heritage assets, as well as impact on human health and cumulative impacts from the working of multiple sites.

No change.

This objective is supported by the Minerals and Waste policies.

No change.

Summary of comments

with at least four of these aims and objectives. To aim to meet just one seems undemanding and unambitious.

Objective 3:

Sustainable transport (public transport, walking and cycling) should be prioritised above all other transport options. There should be efforts to reduce commercial traffic and supporting local sustainable economies

Strategic Objective 4 sets out the aim to provide new homes which meet the needs of the community and references the delivery of affordable housing. It is suggested that this objective is expanded to include elderly housing in order to reflect the need identified within the evidence base and to ensure the interests of Kirklees residents are clear within the Local Plan.

The Plan as drafted does not make it clear how it will deliver the Strategic Objectives set out in para 3.6 of the Draft Plan, for example for Objective 4 Developers will deliver the homes that suit their marketing policies. The Plan does not make it clear how in Kirklees Rural the plan will ensure the provision of new homes which will "meet the needs of the community".

6: in particular you need to protect the green infrastructure around Dewsbury and Batley as they have less greenfield sites than the rest of Kirklees

Strategic Objective 10 -

The plan area is a major supplier of quality building stone. Therefore, we support this Strategic Objective. (Historic England)

Adding "a sustainable low-carbon future, leading to Zero Carbon Kirklees by 2030." Would strengthen the importance of Chapter 3.3 Strategic Objective 3.6 (7) 'Promote development that helps to mitigate climate change, and development which is adapted so that the potential impact from climate change is reduced', amongst the other strategic objectives, when influencing the spatial development

Objective 7:

The Local Plan aims to 'promote development that helps to mitigate climate change and development which is adapted so that the potential impact from climate change is reduced'. However, the scale of the challenge to meet a zero carbon target in the 2030s requires this objective to be more ambitious A changed from 'promote development' to 'require development' would be preferable

Objective 7 could read: "Promote development that helps to reduce and mitigate climate change and development which is adapted so that the potential impact from climate change is reduced

The Plan as drafted does not make it clear how it will deliver the Strategic Objectives set out in para 3.6 of the Draft Plan, for example for Objective 7:

The provision of more than 5000 new homes in Kirklees Rural will promote significant levels of private car usage.

Under 6 add "to maximise the enormous benefit offered by the range of ecosystem services to human health and well being"

Council Response

It is acknowledged that some of the objectives may be incompatible, as they consider often competing social, economic and environmental factors. It is the role of the policies and proposals set out in the plan to manage these competing interests.

Change

This objective and the policies seek to prioritise public transport and active travel, which is reinforced by the highways and access policy. However the emphasis on commercial traffic will be reduced.

"Improve transport links within and between Kirklees towns and with neighbouring towns and cities, by giving priority to public transport, cycling and walking and providing an efficient highway network which supports the district's economy"

No change.

It is considered that the objective encompasses this by stating needs of the community. These needs includes housing for older people in the Housing Mix and Affordable Housing policy

No change.

These are set out in the relevant policies, in this instance the Housing Mix and Affordable Housing policy.

No change.

This is supported by the strategic green infrastructure policy, that is identified on the policies map.

No change.

Support welcomed.

No change.

This comment has been responded to in paragraph 3.2.

Change.

This objective has been changed to add 'reduce' as well as 'mitigate' climate change. It is considered 'promote' is an appropriate word as this is consistent with national standards. The objective also now makes reference to low carbon economy.

Change.

Objective wording changed to:
"Promote development that helps to reduce and mitigate climate change and development which is adapted so that the potential impact from climate change is reduced and to help the transition to a low carbon economy"
This change is in line with national policy.

No change.

Objective 3 seeks to promote public transport and active travel links between the towns, which is supported by the transport policies.

Change.

Add reference to health and wellbeing to this objective:

"Protect and improve green infrastructure to support health and wellbeing, giving residents access to good

Summary of comments

Strategic objective 8: We support this Strategic Objective. The environmental assets of Kirklees make an important contribution towards its sense of place, the quality of life of its communities, and to the economic well-being of the area. It is wholly appropriate that their protection and enhancement is identified as one of the Plan's Strategic Objectives. (Historic England)

Issue 5 identifies how to secure the reuse of Kirklees' vacant buildings as being one of the issues the Plan will need to address. This is especially important for those which contribute to the distinct identity of the plan area. The sustainability benefits of re-using existing buildings should also be included within this Strategic Objective.

Paragraph 3.3

Strategic Objective 9

amend to read:-

"Promote the reuse of existing buildings and the use of brownfield land to meet development needs and support the regeneration of areas"

(Historic England)

Delivering growth and sustainable development

No general comments on Chapter 4 have been received.

4.1

DLP_SP221, DLP_SP364, DLP_SP433, DLP_SP484, DLP_SP637, DLP_SP765, DLP_SP873, DLP_SP910,

Conditional support.

Should include all sustainable transport routes for walkers cyclists and horse riders. There are counters along the Trans Pennine Trail from Barnsley to Kirklees that monitor the number of users and the visitor spend - so there is an economic benefit to producing these routes also.

Housing and Employment sites should include sustainable transport links provided by the developers to encourage greener modes of transport which will work well the remit of climate change and promoting green sustainable jobs as well as transport.

Object. It is considered that this strategy is unsound as it is not justified and is not the most appropriate strategy when assessed against the reasonable alternatives and furthermore, will not be effective.

The Spatial Development Strategy section should include a detailed analysis and explanation as to how the four sub-areas and their boundaries were identified and also set out how the distribution of housing and employment development between these four sub-areas is directly derived and related to the size, character and role of sub-areas and their settlements. This may require the adoption of some of the alternatives considered or a combination of both. This being either allocating development based on the size of settlements or allocating development based on an area's character, its constraints and opportunities.

The Spatial Development Strategy should give further clarity as to how open spaces in urban areas will be assessed and the relative merit and weight to be accorded to open space based on the functions it carries out. It should clearly identify that lower grade open spaces that provide no recreational opportunity will be considered for development purposes.

The Spatial Development Strategy should recognise the significant growth requirement for Kirklees over the plan period, the inability of the district to address this through brownfield and urban land and identify the need for a Green Belt review to accommodate this growth.

In terms of the hierarchy for identifying land for development, the reference to 'where exceptional circumstances can be demonstrated' should be deleted as the requirement for housing within the district over the plan period and the need for significant new allocations is very special or an exceptional circumstance in its own right to warrant a Green Belt review and release of sites. Change. Explanatory text for how the sub-areas are derived and their role in the spatial development strategy will be amended.

Conditional support, subject to the following issues being addressed in the plan:

Much of the Holme Valley is at least 30 minutes from the site of economic activity and, therefore, less

Council Response

quality open spaces, sport and recreation opportunities, and to support habitats allowing wildlife to flourish

No change.

Support welcomed.

Change.

This supports the change made to the efficient and effective use of land policy and supports other council priorities to reduce the number of empty buildings in the district.

Support

Conditional Support

Object

No Comment

No Change

Support 2

Conditional Support 3

Object 6

No Comment 3

DLP_SP929, DLP_SP1019, DLP_SP1198, DLP_SP1238, DLP_SP1514, DLP_SP1626

Change. Additional bullet added to spatial development strategy:

Support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

Change. Reference to urban greenspace amended to read: The importance of open spaces within urban areas where these meet identified local needs, where their retention is justified

Change. Amend bullet to the spatial development strategy:

Assisting the delivery of new homes and jobs on brownfield land, whilst recognising that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield sites and land currently in the green belt need to play a role in meeting these needs.

No change. Exceptional and very special circumstances words are needed to ensure green belt releases are fully justified.

No change. Comments noted.

Summary of comments

suitable for sustainable housing development than other parts of Kirklees. North Kirklees is where the housing is needed because it has a young population and a close proximity to employment in Leeds. This is where housing can be used to regenerate the area. Demand for additional housing has not been demonstrated in Honley in recent years.

Object. Pleased that the Spatial Strategy emphasises the importance of green spaces within the urban areas but also extremely concerned that it does not attach the same strategic importance to the role of the Green Belt around and between our villages, towns and urban areas. The Green Belt is actually of more critical importance in Kirklees than most local authority areas, because the green space between settlements is already very small and the degree of urban sprawl is reaching a tipping point where, if the green belt is further eroded, even by small amounts, many hitherto discrete communities will cease to exist. Instead the Spatial Strategy, very mistakenly, chooses to prioritise the need for "urban extension locations to enable housing delivery..

Object. It will benefit those who are socially marginalised and will be an asset to the local community

Support. Support the priorities for development. However, how it is proposed to facilitate and enable the development of those brownfield sites which have had planning permission granted several years ago, but have remained unused and undeveloped, or partially developed and then abandoned? There is no apparent, current developer interest in these sites. Many are sustainably located and will contribute to meeting housing need. In their present condition they maybe an eyesore, attracting vandalism and anti social behaviour.

Concerns about infrastructure planning including community facilities, empty shops, maximising the existing assets of Dewsbury and Batley, public convenience provision and the use of waterways as sustainable transport.

No comment. If sustainable means better lives - why then would some proposals if approved make people's lives worse.

Condition support. The proposed spatial development strategy refers to the need to give proper consideration to infrastructure opportunities and constraints relating to land allocations particularly where crucial infrastructure is needed to deliver growth. Paragraph 4.6 indicates that urban extensions are required to provide sufficient land to accommodate needs and refers to the need for detailed master plans and the benefits of proximity to the M62 and the M1.

Urban extensions and large housing developments have the greatest traffic impact on the strategic road network (SRN). That impact needs to be considered in the context of the overall traffic impact resulting from the overall scale of development proposed in the Kirklees Draft Local Plan and the combined impact of land use development proposals for Kirklees in combination with those of neighbouring local planning authorities.

Where sites have a severe impact on the SRN measures will be required to reduce and mitigate that impact. Highways England has a number of planned improvements to the SRN funded as part of the government's Road Investment Strategy (RIS). These schemes will provide additional capacity at congested locations. Sites which have the greatest individual impact will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site.

The 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 in the period to 2030. The draft version of the WYIS was completed in November 2015 and is now under consideration by Highways England. It will be shared with the Council in the near future. Additional schemes identified in the WYIS that are relevant to Kirklees will need to be added to the schedule in the Infrastructure Delivery Plan.

Where committed schemes will not provide sufficient capacity, where Highways England does not have committed investment or where schemes are not funded from other sources, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan or other appropriate schemes.

Council Response

The constraints affecting growth in Kirklees Rural are set out in the Place Shaping part of the Local Plan. The distribution of housing overall in the Local Plan indicates a significant supply in North Kirklees.

No change. Comment noted. The Local Plan must be in general conformity with all parts of the National Planning Policy Framework, including meeting the objectively assessed needs for jobs and homes which requires the council to consider land currently in the green belt and greenfield sites in addition to previously developed land.

.No change. The plan is subject to a separate equalities impact assessment and the spatial development strategy aims to provide for all parts of the community, in terms of jobs, homes, accessibility, protection of the environment and health.

No change. Support noted.

Measures to be used to try to assist bringing forward this are set out in the Delivery and Implementation text associated with policy DLP2.

No change. Issues raised in these comments are not appropriate for the spatial development strategy but are recognised in other parts of the Draft Local Plan in relation to place shaping, infrastructure planning and sustainable transport.

No change. Sustainable development is defined in the National Planning Policy Framework.

No change. Comments noted

The spatial development strategy acknowledges the need for critical infrastructure to support growth as set out bullet point Proper consideration of infrastructure opportunities and constraints relating to land allocations particularly where crucial infrastructure is needed to deliver growth and in policy DLP3 providing new infrastructure.

Highways England modelling evidence and other advice have been taken into account in the Infrastructure Delivery Plan and been considered as part of the site allocation process.

Summary of comments

Construction of large sites and urban extensions should be phased to take place following completion of committed schemes in the RIS.

Object. No mention of climate change targets or goals, which we feel is an important omission.

4.2

DLP_SP397, DLP_SP407, DLP_SP485, DLP_SP638, DLP_SP930, DLP_SP1507

Conditional support. In the Holme Valley, there is considerable home working and fast efficient broadband services are essential along with small office provision to allow small firms to network and share office services. This should be encouraged as small high-value businesses particularly in the creative sector offer opportunities to grow the economy and built environment in a more sustainable way than establishing large business parks and encouraging commuting..

Support. The Plan also states in Chapter 4.2 that 'achievement of sustainable development is a golden thread running through the local plan'. This is to be welcomed.

Support. All three points can be addressed by including Farnley Country Park, and the means to fund it, in the Local Plan.

Object. Seems like a very urban centric approach with rural issues very much an after-thought.

Object. The environmental role would be improved by the addition of the word reduce as in and reduce, mitigate and adapt to climate change including moving to a low carbon economy.

Object. In view of the increasing risk of flooding from the warmer, wetter climate, the statement about environment and mitigating and adapting to climate change should probably include a reference to management of water run-off and drainage.

Spatial development strategy

No comments received on this part of the Plan.

Spatial Development Strategy

DLP_SP193, DLP_SP229, DLP_SP247, DLP_SP261, DLP_SP277, DLP_SP417, DLP_SP448, DLP_SP486, DLP_SP553, DLP_SP629, DLP_SP674, DLP_SP706, DLP_SP728, DLP_SP959, DLP_SP1023, DLP_SP1139, DLP_SP1150, DLP_SP1212, DLP_SP1224, DLP_SP1253, DLP_SP1314, DLP_SP1329, DLP_SP1342, DLP_SP1346, DLP_SP1359, DLP_SP1361, DLP_SP1369, DLP_SP1372, DLP_SP1381, DLP_SP1383, DLP_SP1385, DLP_SP1388, DLP_SP1396, DLP_SP1428, DLP_SP1463, DLP_SP1464, DLP_SP1519, DLP_SP1662, DLP_SP1726, DLP_SP1741, DLP_SP1766, DLP_SP1820

Conditional support. Support of the Draft Local Plan as of January, 2016 and accept the need for very carefully controlled but limited measures to improve the local housing and light commercial development situation. However, I totally oppose any measures to release land currently 'protected' as Green Belt or similar for development. .

Conditional support. Opposed to greenfield development. Supports brownfield development.

Conditional support. It is important that any new development has as small an impact as possible at the same time as retaining the local distinctiveness of the Town. This is especially the case in Meltham which, as an edge of Pennine hill town with a strong identity, retains its distinctiveness through the close association of the Pennine landscape, steep sided wooded valleys, small scale farming and the historic settlements, with all the heritage and tourism connections that brings.

Object. We consider that the rejected options at 4.1.1, i.e. a strategy based on a clear understanding of the settlement hierarchy, would provide a transparent and more succinct approach which would be easily understood by all of those parties reading the document. We recommend that the Council adopt this approach.

Object. We are disappointed to see a clear lack of any strategy to support sustainable communities in Rural Kirklees. Whilst there is housing allocations, there is no anticipated growth of employment

Council Response

Change. Add additional criteria to spatial development strategy:

Planning for new development in locations and ways which reduce greenhouse gas emissions.

Support 2 Conditional Support 1 Object 3 No Comment

No change. Comment noted and changes to rural economy policy seek to meet these objectives

No change. Support comments noted.

No change. Comments on site specific proposals are assessed under the site option.

No change. Definition of the three dimensions of sustainable development is taken from the national planning policy framework.

No change. Definition of the three dimensions of sustainable development is taken from the national planning policy framework.

No change. These issues are set out in the drainage and flooding policies.

Support Conditional Support Object No Comment

Support 6 Conditional Support 10 Object 25 No Comment 1

No change. The strategy acknowledges that both brownfield and greenfield land will be needed

No change. The strategy acknowledges that both brownfield and greenfield land will be needed.

No change. Place shaping policies and approach seeks to ensure that local distinctiveness is taken into account for new development.

No change. Settlement hierarchy option is not consider to be the most appropriate strategy for the plan.

No change. Changes have been made to the rural economy policy to address some of these issues. Transport investment decisions are partly dependent on traffic modelling evidence but changes are suggested

Summary of comments

opportunities or sites in the plan & there is a need for some provision for SME businesses in the area that are looking to expand. This would create employment opportunities locally; it appears that the current plan expects all of the new residents in this area to be commuting out of it to find work which is contrary to Kirklees stated aims about creating sustainable communities. This is further exacerbated by the failure to invest in any significant road, rail or other public transport provision again to cater for the increase in residents in the locality.

Object. Object to point 'd' as worded as it makes no reference to the sustainable development of such sites. The potential challenge of satisfying all aspects of sustainable development for detached sites in green belt locations means the development of such sites requires particular attention and scrutiny.

Object. Re-word the 12 the bullet point of the Spatial Development Strategy to "encourage" the re-use of previously developed land insert a sentence into paragraph 4.6 to cross refer to the Green Belt Review in order to provide that document with justification and status.

Review and address the approach towards regeneration and renewal throughout Dewsbury and Ravensthorpe in terms of policy and designation.

Object. Opinion on the merits of the strategic overview will vary depending on where you live in Kirklees. If you live in South Kirklees, people are likely to be generally pleased as the strategy can be defined as "protect and preserve". People living in North Kirklees are unlikely to be so enthusiastic, as the strategic message is "build over as much as possible".

There is currently much less accessible open space and green belt land in North Kirklees than in other parts of Kirklees. Population density is higher in North Kirklees; residents' quality of life of is poorer; and their health needs are greater. Kirklees Council has produced a number of reports over recent years which confirm these facts and demonstrate that inequalities continue to persist. This situation should require the Local Plan to give priority to retaining open space and green belt in North Kirklees, however quite the opposite is proposed. North Kirklees faces a massive, disproportionately larger use of such land for housing and industry. For example, in the proposed prioritisation of land identified to meet development needs, low priority is given to extensions of settlements (except where exceptional circumstances can be demonstrated). No attempt is made to define "exceptional circumstances". This effectively rules out any significant development of the small towns and villages in South Kirklees. Consequently, with the exception of one proposal to develop the site of the former Storthes Hall hospital no areas of green belt land are allocated for development in South Kirklees. The Council takes a completely different approach in North Kirklees, where there is relatively little green belt to start with, and where the spaces between existing settlements are smaller. Here, hundreds of hectares of green belt land are proposed for housing and industrial development. This is contrary to the NPPF, which clearly states that the fundamental aim of green belt is to protect urban sprawl by keeping land permanently open, thereby checking the unrestricted spread of large built-up areas, and preventing neighbouring towns from merging into one another. The existing green belt in North Kirklees is fulfilling precisely this function, yet a significant percentage of it is to be sacrificed.

The strategic justification for the Council's approach can be summed up as "if you have a lot of housing and industry already, you are in the best position to take more development", which is supported by a flawed sustainability argument. The "sustainability" argument is flawed because it wrongly assumes that existing larger communities are better able to meet the infrastructure needs of an expanding population and as a consequence are more "sustainable". In some cases this may be correct, but there is no evidence to show that smaller communities cannot also grow and adjust. There is a need to understand that even large communities have a maximum capacity for development. The draft Local Plan assumes that the communities of North Kirklees have an infinite capacity for expansion and there appears to have been no attempt to undertake impact assessments to establish how communities will manage to develop the infrastructure to meet increased demand, particularly in terms of school places, health care and transport.

Object. Re-word the 12 the bullet point of the Spatial Development Strategy to "encourage" the re-use of previously developed land insert a sentence into paragraph 4.6 to cross refer to the Green Belt Review in order to provide that document with justification and status.

Support. The broad thrust of this section of the Strategy and Policies document is supported, including

Council Response

to address some of these issues in the transport policies.

No change. The principles of sustainable development are set out in text preceding the statement box.

Change. 12th bullet point amended to state: "encouraging previously developed land....." but it is not considered that reference needs to be made in the plan to the green belt review which is a background evidence document and will not be relevant after the adoption of the Local Plan. Issues regarding the regeneration and renewal of Dewsbury are addressed in the place shaping policies and statements.

No change. The plan aims to build on the place shaping principles set out in the plan but to also consider the available evidence regarding settlements, services and facilities. The plan is also based on the outcomes of a comprehensive green belt review and the availability of existing and planned infrastructure including schools and roads. The proposed strategy is flexible enough to allow some of the smaller settlements to grow to meet local housing needs. Evidence in terms of market demand for employment and the council's Economic Strategy mean that the M62 and land closer to Leeds is the preferred location for new strategic employment opportunities.

Change. 12th bullet point amended to state: "encouraging previously developed land....." but it is not considered that reference needs to be made in the plan to the green belt review which is a background evidence document and will not be relevant after the adoption of the Local Plan.

.No change. Support noted.

Summary of comments

the cascade system of priority relating to the identification of land for development purposes.

Object.

Lack of clarity with regard to how jobs and homes will be distributed across the four sub-areas

Lack of clarity and justification for retaining open spaces

Strategy should recognise the need for green belt release and exceptional circumstances text should be removed

Object. Comments on Green Belt and what constitutes exceptional circumstances for development and comments relating to Urban renaissance - focusing investment in urban centres.

Object. Wish to highlight the flaws in the new Kirklees Local Plan which I believe, if implemented would have a huge detrimental effect on residents well-being and environment.

Conditional support. The document should also detail how the monitoring and phased release of site allocations will be used to implement the settlement hierarchy, and thereby deliver the spatial objectives.

Object. As a development plan for the next 15 years for the whole of the Borough of Kirklees, the Plan fails in that development is concentrated to Huddersfield and North Kirklees, looking north to Leeds. Rural South Kirklees, from Marsden through the Holme Valley to Clayton West, is very much an afterthought. Here there is no vision for the economic development of the area and no recognition of the link to places of work and markets west to Manchester, south to Barnsley and Sheffield and east to Wakefield and the M1 connecting to towns and cities north and south.

Rural south Kirklees comprises towns and villages where retail, tourism, agriculture and textiles are important sources of employment and wealth, but other businesses flourish and there is a potential for growth. That growth can only be achieved if existing employment land is protected and new land is made available. However the focus of the Draft Local Plan is to build homes in the rural south. In Holme Valley South, the Draft Plan will see more new homes, no transport infrastructure improvements, some employment land protected with most employment land left unprotected, and some employment land lost to housing. Over the period of the Plan there will be a net loss in employment land and a large increase in the number of new homes built. That means employment opportunities locally will reduce and commuting will rise. Given there will be no transport infrastructure improvements in this area during the life time of the plan, the proposals are simply not sustainable and therefore contravene the NPPF. There will be no new road improvements, no junction improvements and no improvement in public transport. Bus services have been declining for a number of years. Rural south Kirklees is dependent on car journeys.

Object. We applaud the recognition of "character" as a defining cornerstone of the Local Plan. However we are extremely concerned that the four defined "character areas" or "Planning Districts" (the terms are not used consistently in the documents) do not go far enough and bear no relation to the "National Character Areas" defined by Natural England. This discrepancy / relationship needs to be explained and it may be more appropriate to use different terminology OR in some instances to create sub-divisions of those districts for planning purposes. In other words, if the planning "Districts" are to be described as "character Areas" (and we believe they could be) the Council needs to make sure that the description and composition of the planning area is accurate and homogeneous – not just an arbitrary administrative area. We strongly advocate that the relatively small areas of the South Pennines National Character Area (NCA36) in the Upper Colne Valley and the Dark Peak National Character Area (NCA

Council Response

Change. Explanatory text for how the sub-areas are derived and their role in the spatial development strategy will be amended.

Change. Reference to urban greenspace amended to read: "The importance of open spaces within urban areas where these meet identified local needs, where their retention is justified"

Change. Amend bullet to the spatial development strategy:

"Assisting the delivery of new homes and jobs on brownfield land, whilst recognising that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield sites and land currently in the green belt need to play a role in meeting these needs."

No change. Exceptional and very special circumstances words are needed to ensure green belt releases are fully justified.

No change. The strategy acknowledges that both brownfield and greenfield land will be needed, which is supported the site specific evidence base. A very significant proportion of Kirklees will still be Green Belt of which one of its roles is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

No change. Plan has been subject to a sustainability appraisal (including potential impacts on human health and the environment) and found to no significant effects which cannot be mitigated.

No change. Measures to assist the delivery of sustainable brownfield sites are set out under the policy regarding the location of new development.

No change. The plan aims to build on the place shaping principles set out in the plan but to also consider the available evidence regarding settlements, services and facilities. The plan is also based on the outcomes of a comprehensive green belt review and the availability of existing and planned infrastructure including schools and roads. The proposed strategy is flexible enough to allow some of the smaller settlements to grow to meet local housing needs. Evidence in terms of market demand for employment and the council's Economic Strategy mean that the M62 and land closer to Leeds is the preferred location for new strategic employment opportunities but policies allow for local employment opportunities to come forward on new land as well as maximising job opportunities within town and local centres, supporting sustainable business clusters, business incubation, business start-up proposals and home working.

No change. The National Character Areas provide landscape character evidence which the council have used to develop its own landscape character evidence. On their own they are not an appropriate basis to determine the spatial development strategy.

Summary of comments

51), around Holmbridge should be recognised as discrete planning areas within the Local Plan, because of their distinctive planning requirements and strong relationship with the South Pennines & Peak Park Special Protection Areas.

Conditional support. Using the term "better chance" suggests that Kirklees hopes for the best rather than demanding it. Too open for interpretation.

Object. We consider that if the Council were to look properly at the available brownfield sites they would find that the brownfield first approach could be achieved. Furthermore, even if green field sites were found to be required they should be allocated for later in the plan period to make it clear that brownfield allocations should be exhausted before any green field sites are considered. It is not appropriate to have all the allocations set out from the start of the plan period as this will allow development of the green field sites ahead of the brownfield sites.

Object. Despite the fine aspiration (" land use mix can be more flexible, viable and allow for more sustainable development and place shaping "), the evidence of history is that mixed use designation does not work. What additional measures can be incorporated to prevent yet another cycle of failure?

Support for the sub-area principles advocated in the Spatial Development Strategy.

We support the recognition that there is a need for urban extensions to enable housing delivery which offer an increased chance of new infrastructure being provided (including new schools and roads as part of site development) and masterplanned sites (offering better chance of quality layouts, design, green infrastructure and higher building specifications). This is consistent with paragraph 52 of the National Planning Policy Framework (NPPF) which states that the supply of new homes can sometimes be best achieved through planning for larger scale new development.

We support the inclusion of 'meeting employment needs including the aspirations of the Leeds City Region Strategic Economic Plan and Kirklees Economic Strategy' in the Spatial Development Strategy however we consider that the Site should be specifically referred to, to ensure consistency and clarity.

We support the recognition of the need for prime strategic employment sites and consider that the Site should be specifically referred to, so that the Spatial Development Strategy is consistent with the Local Plan vision which refers to the Site as of strategic importance for employment.

We support the regeneration focus on Huddersfield and Dewsbury and consider that these should be the areas with the highest level of housing and economic development. However, we consider that this focus should not exclusively be on the existing town centres, rather a holistic approach which supports the surrounding areas of Huddersfield and Dewsbury to capitalise on market opportunities and the district's transport connections. This will support the nearby town centres by their wider regenerative benefits from job creation, increased spend into the local economy and raising the profile and attractiveness of the area to investment.

We do not consider that the priority provided, for the identification of land to meet development needs, reflects the Local Plan vision and policies. As stated earlier in the Spatial Development Strategy, there is a need for prime strategic employment locations. The Site is not previously developed land and is not a greenfield site within a settlement. The strategy as currently worded gives third priority for 'sustainable extensions to settlements where exceptional circumstances can be demonstrated' and fourth priority to ' detached Green Belt sites (where these are previously developed or where exceptional circumstances can be demonstrated)'. This part of the Spatial Development Strategy should be amended to specifically refer to the identified strategic housing and employment sites which are necessary to deliver the development needs over the Plan period.

We support the focus on mixed use sites where land use can be more flexible, viable and allow for sustainable development and place shaping, and consider that the Site represents an opportunity to secure a range and mix of employment units and housing in a sustainable location.

Object. Local residents and local communities are key stakeholders. It is very clear from the very poor approach to consultation with individuals and local communities that are affected by this LDP that

Council Response

No change. A detailed planning policy on infrastructure planning is included in the plan.

No change. The strategy acknowledges that both brownfield and greenfield land will be needed, which is supported by the site specific evidence base.

No change. Mixed use developments are specifically promoted in the national planning policy framework

No change. Support comments noted. The strategy contains a separate bullet supporting the need for prime strategic employment locations.

No change. Consultation on the Local Plan is consistent with the Statement of Community Involvement and with appropriate regulations.

Summary of comments

Council Response

consultation with these groups of key stakeholders is very low on the consultation agenda.

Support. The following paragraph is supported as it specifically refers to the need to allocate new employment sites in order to aid the economic growth of the District, as set out in the City Region Strategic Employment Plan and the Kirklees Economic Strategy:

No change. Support noted.

Conditional support. We consider that housing sites should be allocated in proximity to settlements which have the appropriate infrastructure to support sustainable development in areas of strong housing demand.

No change. The strategy aims to achieve growth in or on the edge of settlements which are capable of supporting growth

We also note that the NPPF places great emphasis on the need for sites which form part of the housing land supply to be deliverable..

4.3

Support Conditional Support Object 1 No Comment

DLP_SP151

Object. Strongly object to the Kirklees local plan. Green belt land is a precious and limited resource, vital for environmental and heritage preservation.

No change. Comment noted. The Local Plan must be in general conformity with all parts of the National Planning Policy Framework, including meeting the objectively assessed needs for jobs and homes which requires the council to consider land currently in the green belt and greenfield sites in addition to previously developed land.

4.4

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

4.5

Support Conditional Support Object 5 No Comment

DLP_SP135, DLP_SP973, DLP_SP1030, DLP_SP1845, DLP_SP1846

Objection to the prioritisation and sequential approach alluded to in the 12th bullet point of the Spatial Development Strategy which is reinforced in the supporting text through paragraph 4.5. Framework only refers to the need to "encourage" the re-use of previously developed sites (paragraph 17) and that the Framework encourages the use of sustainable greenfield sites to meet housing growth and to "boost significantly the supply of housing" (paragraph 47). Furthermore, appropriate and sustainable greenfield sites should not be overlooked in favour of unsustainable brownfield sites. The policy should therefore be reviewed to focus on encouragement rather than prioritisation and a sequential approach in order to accord with the Framework.

No change.

The Spatial Development Strategy has changed to refer to 'encourage' - but it is not necessary to make a change to this paragraph

Disparity in the take up of green belt land in north Kirklees compared to south of the district. Green belt in place to separate conurbations but North Kirklees abuts Leeds and Wakefield.

No change.

The Strategic Green Belt review recognises this role of the Green Belt across the district, particularly in the north.

A lot of changes made to accommodate house buildings where gardens are in the green belt. What reassurances are there that this isn't going to carry on with the loss of more green belt in the future?

No change.

Comment noted.

Within the life of the Local Plan how will residents of Kirklees get to know about, and comment on, which sites will be "released" from the Green Belt if brownfield sites cannot supply the demand?

No change.

The process set out in paragraph 4.5 is the process of identifying housing supply in the Local Plan. A partial review of the Local Plan may take place, which would be subject to the same consultation regulations as the Local Plan itself.

The statement in paragraph 4.5 that "there is not sufficient deliverable and/or developable brownfield supply to meet needs throughout the plan period" may ultimately prove to be true or false, depending on the actual amount of brownfield land that comes forward over the lifetime of the plan and the actual market demand for housing over the plan period. The statement is not and never can be a statement of fact.

No change.

This statement is based on the development options that have been assessed for allocation.

4.6

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

Summary of comments	Council Response			
4.7	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
4.8	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
4.9	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option Spatial Strategy 4.1.1 DLP_SP669, DLP_SP673, DLP_SP829, DLP_SP1397, DLP_SP1462	Support	Conditional Support	Object 5	No Comment
We believe that the optimum option for considering the spatial strategy in terms of a hierarchy of settlements and the distribution of development and growth should be based on a 'hybrid' of the two options outlined.	No change. The policy sets out a "broad spatial framework" building on the spatial vision and objectives. Other policies in the plan provide the detail of when development will be acceptable for Development Management purposes. It provides a broad framework for the council to monitor delivery in urban areas. It provides a clear focus for growth on Huddersfield and Dewsbury as the two largest and most sustainable settlements. The policy provides flexibility for growth for smaller settlements depending on the fit with the parameters set out in criterion 2. Building on the evidence documents set out in the text for this policy provides for the most appropriate development strategy as required in national planning policy. The council's site selection methodology has been applied to all site options to determine their fit against this policy and other policy considerations such as place shaping and the spatial development strategy.			
The methodology used to characterise towns and villages is flawed as it simply aggregates together small settlements such as Bradley and Deighton into one mass called Huddersfield. This fails to recognise their distinctiveness and the adverse impact large scale development will have. It means disproportionately large numbers of houses can be allocated to an area which is already overdeveloped and under served by suitable infrastructure.	Change. Explanatory text for how the sub-areas are derived and their role in the spatial development strategy will be amended.			
Option Spatial Strategy 4.1.2 DLP_SP323, DLP_SP1225	Support	Conditional Support	Object 2	No Comment
It also important that the Local Plan acknowledges and builds upon the unique opportunities within the northern part of the district, specifically the Batley and Spen sub area. The former strategy of concentrating development simply on the basis of the size of the settlements has categorically failed to deliver the housing or employment growth needed within the district and a continuation of this approach would only serve to maintain the status quo. The M62 corridor has been a driver of economic growth within the Borough over the past 10 years and it is clear that its importance will continue to grow for the foreseeable future especially with the creation of the Leeds City Region and the Northern Powerhouse. It is important that the Local Plan provides the new housing and employment needed in proximity to the M62 to capitalise on these initiatives, which can ultimately drive the economy of the whole district. Therefore it is considered that Option Spatial Strategy 4.1.2 is the most appropriate.	No change. The policy sets out a broad spatial framework building on the spatial vision and objectives. Other policies in the plan provide the detail of when development will be acceptable for Development Management purposes. It provides a broad framework for the council to monitor delivery in urban areas. It provides a clear focus for growth on Huddersfield and Dewsbury as the two largest and most sustainable settlements. The policy provides flexibility for growth for smaller settlements depending on the fit with the parameters set out in criterion 2. Building on the evidence documents set out in the text for this policy provides for the most appropriate development strategy as required in national planning policy. The council's site selection methodology has been applied to all site options to determine their fit against this policy and other policy considerations such as place shaping and the spatial development strategy.			
This approach is open to misuse of interpretation and would give a steer to develop almost anywhere providing a clever argument could be made. It would endanger the character of many of the village communities and I am opposed to this strategy approach.	No change. This option is rejected.			
Achieving sustainable development	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 1 DLP_SP246, DLP_SP276, DLP_SP488, DLP_SP710, DLP_SP961, DLP_SP1199, DLP_SP1242, DLP_SP1260, DLP_SP1284, DLP_SP1315, DLP_SP1330, DLP_SP1347, DLP_SP1398, DLP_SP1465, DLP_SP1513, DLP_SP1663, DLP_SP1705, DLP_SP1735, DLP_SP1755, DLP_SP1781, DLP_SP1857	Support 5	Conditional Support	Object 16	No Comment
The council should include a reference in the vision to sustainable low carbon future leading to zero	No Change			

Summary of comments

carbon Kirklees by 2013 which would strengthen DLP1.

It is good to see that areas within the local communities have been identified for industry and commercial development on a scale that was suitable for each locality and that also made use of land that has previously been exploited.

It should be made clear that there is no presumption in favour of planning permission being granted without the proper planning process being adopted.

The plan is not sustainable - there is no economic evidence for the level of housing proposed in Dearne Valley. 20% of the housing should be for elderly people, the spatial strategy and the level of development fails to protect the local environment.

Support inclusion of this policy and that the presumption of sustainable development including environmental considerations underpins all future planning decisions (Environment Agency).

The policy reflects the golden thread running through the NPPF and is supported and encouraged.

Support the positive approach stated by the Council and the commitment to always working pro-actively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Environment Agency is pleased to see that this is the first policy in the Plan, and that a presumption in favour of sustainable development including environmental considerations will underpin all future planning decisions taken by the Council.

This policy reconfirms the guidance found within the Framework and the positive tone of this policy is supported, particularly the objective of seeking to work proactively with applicants and secure development that improves the economic, social and environmental conditions of the area.

Object to the Draft Plan in that for Kirklees Rural as there is no evidence of objectively assessed need, or of any process for identifying such need for housing or light industry in the amounts proposed.

The Local Plan and its allocations fail to represent sustainable development in accordance with NPPF.

The policy repeats National Planning Policy Framework and should be deleted.

Council Response

It is considered that the reference in the vision to development taking place in a sustainable way addresses the representation and no further changes are considered necessary.

No Change

Support for spatial strategy noted.

No Change

Reference to National Planning Policy Framework in the introduction to the local plan states that "Proposed development that accords with an up-to-date plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise".

Applications for development will be tested against all relevant policies in the Local Plan.

It is considered that this addresses the representation.

No Change

The Local Plan is supported by a range of evidence to demonstrate objectively assessed needs and the viability of development. This is available to view as part of the supporting documents. It is considered that the spatial strategy is fully justified.

No Change

Support for the policy and that it underpins all plan policies from the Environment Agency is noted.

No Change

The support for the policy is noted.

No Change

The Local Plan is supported by a range of evidence to demonstrate objectively assessed needs and the viability of development. This is available to view as part of the supporting documents. It is considered that the spatial strategy is fully justified.

No Change

The Local Plan has been prepared in the context of national, regional and local strategies and policies. It is also supported by a wide range of evidence which can be viewed as part of the supporting documents. It is considered that the Plan is fully justified and meets the tests of soundness.

It has also been subject to an independent sustainability appraisal to test the plan and alternatives and it is considered that the spatial strategy and its policies for sustainable development.

No change

The NPPF outlines its position with regard to the presumption in favour of sustainable development at paragraphs 11 - 16 and in particular on policies at paragraph 15 where it states that "Local Plans should follow

Summary of comments

Council Response

The policy needs to be strengthened to reflect the need to ensure that local communities and affected individuals are not just notified but are consulted. This policy reads as if once approved then all proposals in this LDP will be given the green light - a foregone conclusion. With proposals surrounding mineral extraction even if they make it through to the final LDP it should be made clear that there is no presumption in favour of planning permission being granted without the proper planning process being adopted. I feel that this should be made clear for all developments..

the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally". This message is reinforced in the PINs Soundness Self-assessment checklist which identifies the PINs model policy as evidence that the plan has undertaken this.

The policy supports sustainable development where it accords with other plan policies and the NPPF and all proposals will need to be assessed against these frameworks in order to prevent inappropriate development.

For these reasons, it is considered necessary and appropriate to retain Policy DLP1 Presumption in favour of sustainable development.

No Change

Reference to National Planning Policy Framework in the introduction to the local plan states that "Proposed development that accords with an up-to-date plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise".

Applications for development will be tested against all relevant policies in the Local Plan.

It is considered that this addresses the representation.

4.10

DLP_SP709

Support Policy DLP1 but there is an inconsistency between the text in 3.2 and 4.10. Do not support 3.2.

Support

Conditional Support

Object 1

No Comment

No Change

It is considered that there is no inconsistency between 3.2 and 4.10 as supporting healthy people enjoying quality of life and a strong economy all contribute to economic, environmental and social roles of sustainable development.

4.11

DLP_SP487, DLP_SP670

Paragraph 4.11 makes reference to objectively assessed needs - Objectively assessed needs and advantages must be made by independent agents rather than depending on the reports from developers. In the past, Kirklees has been too lax about accepting the word of the developer who hires the agent.

Support

Conditional Support

Object 2

No Comment

No Change

The council has prepared a robust evidence base to support the preparation of the local plan, based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

Having read this document there seems to be a lot of subjectively assessed need rather than objectively assessed need. There needs to be considerably more work put in to assessing the proposed development options to demonstrate their objectivity rather than subjectivity. In certain areas such as mineral extraction identification assurance needs to be given that a detailed analysis of need and location of mineral deposits has been carried out and that that the proposals are not based simply around extending existing extraction sites based on information supplied by developers.

No Change

The council has prepared a robust evidence base to support the preparation of the local plan, based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

4.12

No comments have been received on this part of the Plan.

Support

Conditional Support

Object

No Comment

4.13

DLP_SP489

There are parts of the plan which support the aims of the Kirklees Economic Strategy and the Kirklees Joint Health and Well-being Strategy, the vision and strategic objectives but also parts of the plan which conflict with them (no specific parts of the Plan identified).

Support

Conditional Support

Object 1

No Comment

No change

The comment is noted. It is considered that the plan policies comply with NPPF and seek to balance environmental, economic and social aims and support the aims of the council's strategic plans. Comments on the vision and strategic objectives will be addressed under the specific headings.

Summary of comments	Council Response			
4.14	Support	Conditional Support	Object	No Comment
No comments have been received on this section of the plan.	No Change			
	Paragraph 4.14 refers to delivery and implementation of Policy DLP 1. It is considered that no changes are required.			
4.15	Support	Conditional Support	Object	No Comment
No comments have been received on this part of the Plan.	No Change			
	Paragraph 4.15 refers to the links with strategic objectives and Policy DLP1. It is considered that no changes are required.			
Option DLP1 4.2.1 DLP_SP490	Support	Conditional Support	Object 1	No Comment
Consider that it would be better to rely on the NPPF unless the proposals have been through a robust consultation process and the views of the community have been taken into account.	No Change			
	Policy DLP1 supports the presumption in favour of sustainable development where proposals comply with the NPPF, local plan policies and where relevant neighbourhood plan policies. Policy DLP1 has been subject to consultation and when adopted, development management will use this policy together with other plan policies to assess the merits of individual planning applications submitted. These proposals will also be subject to public consultation.			
	The council's approach to community engagement is set out in its Statement of Community Involvement and Development Management Charter. The specific actions undertaken to involve the community and how it has shaped the preparation of the Local Plan are outlined in the Statement of Consultation.			
Location of new development	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 2	Support 11	Conditional Support 15	Object 15	No Comment 14
DLP_SP152, DLP_SP269, DLP_SP278, DLP_SP365, DLP_SP385, DLP_SP432, DLP_SP491, DLP_SP561, DLP_SP567, DLP_SP568, DLP_SP573, DLP_SP578, DLP_SP583, DLP_SP588, DLP_SP599, DLP_SP627, DLP_SP738, DLP_SP745, DLP_SP750, DLP_SP755, DLP_SP760, DLP_SP766, DLP_SP914, DLP_SP963, DLP_SP979, DLP_SP989, DLP_SP992, DLP_SP995, DLP_SP1098, DLP_SP1200, DLP_SP1229, DLP_SP1243, DLP_SP1261, DLP_SP1316, DLP_SP1325, DLP_SP1331, DLP_SP1349, DLP_SP1362, DLP_SP1373, DLP_SP1389, DLP_SP1399, DLP_SP1429, DLP_SP1466, DLP_SP1501, DLP_SP1525, DLP_SP1573, DLP_SP1664, DLP_SP1736, DLP_SP1746, DLP_SP1756, DLP_SP1767, DLP_SP1782, DLP_SP1821, DLP_SP1824, DLP_SP1858				
This policy does not set out a framework for the settlement hierarchy, nor does it seek to explain the various spatial priorities of urban renaissance and regeneration and the locations to which these apply. We would suggest that DLP 2 should identify the development needs of the District and that these should be distributed in accordance with the settlement hierarchy informed by the differing spatial priorities across the District. For Provision 1 a focus upon existing settlements is supported. However, other parts are unclear. It would be appropriate to consider proposals on the edge of urban areas, not just within them; particularly where green field extensions are put forward such as in the subsequent allocations document. A specific reference to employment sites outside urban areas may better refer to allocations more generally.	No change. The policy sets out a broad spatial framework building on the spatial vision and objectives. Other policies in the plan provide the detail of when development will be acceptable for Development Management purposes. It provides a broad framework for the council to monitor delivery in urban areas. It provides a clear focus for growth on Huddersfield and Dewsbury as the two largest and most sustainable settlements. The policy provides flexibility for growth for smaller settlements depending on the fit with the parameters set out in criterion 2. Building on the evidence documents set out in the text for this policy provides for the most appropriate development strategy as required in national planning policy. The council's site selection methodology has been applied to all site options to determine their fit against this policy and other policy considerations such as place shaping and the spatial development strategy.			
Within Provision 2 it may be that point c be prioritised and reflect the Framework (and Government policy) which is to meet the objectively assessed needs for homes and jobs in full which is the fundamental purpose of the Plan.	It would not be appropriate to include text in the policy regarding greenfield urban extensions. Part 2 of the No change. The policy has been amended to make it explicit that this policy is to ensure that development delivers the Spatial Development Strategy and place shaping policy.			
For Provision 3 the role of town centres should be boosted to provide a mix of uses including residential to ensure they remain viable.	Other policies in the plan provide the detail of when development will be acceptable for Development Management purposes. The strategy provides a broad framework for the council to monitor delivery in urban areas. It provides a clear focus for growth on Huddersfield and Dewsbury as the two largest and most sustainable settlements. The policy provides flexibility for growth for smaller settlements. Building on the evidence documents set out in the text for this policy provides for the most appropriate development strategy			
There is no need to repeat green belt in Provision 4.				

Summary of comments

Giving consideration to alternatives considered it is not appropriate to set brownfield targets. It may be appropriate where a smaller centre presently fails to adequately serve the local community or where significant growth may be targeted.

No comment for policy but concerned about consistency of policy in relation to proposed allocation H8 and H38.No change.

Objection to the policy. Not positively prepared, in that it fails to provide clear and unambiguous guidance and therefore it is not capable of directing growth. Not justified and will not be effective and is therefore inconsistent with national policy.

Object. Traffic congestion, insufficient school infrastructure and flood risk issues.

Object. Seeks less development in the north Huddersfield area.

Support. Highways England particularly supports criterion 1, 3 in the first part of the policy and criterion 5 in the second part.

Conditional support. Policy DLP 2 should include reference to economic viability and deliverability.

There is little in this Policy which refers to ensuring that the location of new development is delivered on a manner which safeguards those elements which make the area distinctive.

Generally agrees with and supports with this prioritisation of land and spatial framework, we do not consider that the spatial prioritisation has been carried forward into the allocation of sites as proposed in the Allocations and Designations Document.

Conditional support for locations of new development, but seeks to retain green belt and maximise previously developed sites.

Conditional support. Policy should be amended to ensure a five year housing supply will be maintained.

Council Response

as required in national planning policy. The council's site selection methodology has been applied to all site options to determine their fit against this policy and other policy considerations such as place shaping and the spatial development strategy.

Text referring to proposals on the edge of urban areas is considered in the Spatial Development Strategy instead of within this policy.

Residential development in town centres is supported in the plan in other policies.

Criterion 4 has been deleted.

Agree no justification for brownfield target.

Noted. Site specific concerns addressed under H8 and H38 representation summary.

No change. This policy is a Development Management policy which requires development proposals to reflect the spatial strategy. The spatial strategy sets out priorities in the plan for directing growth. Whilst most of the development in the plan is set out in allocations that are determined by the council's site selection methodology has been applied to all site options to determine their fit against this policy and other policy considerations such as place shaping and the spatial development strategy. The policy additional guidance for windfall sites and development on smaller sites.

No change.Criteria in this policy require new housing and employment land delivery should be co-ordinated with the provision of new infrastructure. The policy now refers to providing access to a range of transport choices and access to local services. Flood risk issues are also considered in the relevant policies in the Local Plan and in national planning policy.

No change. The policy seek for development to deliver the spatialdevelopment strategy, which looks to direct most new development to Huddersfield and its connected suburbs as a whole, as the most sustainable and accessible settlement in the district. Evidence is set out in the Settlement Technical Paper. Individual site allocations have been considered in accordance with the council's site allocation methodology, which allows consideration of the impact on smaller localities to be considered. It would be unjustified to determine specific localities within each of the settlements which might accommodate more or less development than others.

No change.

Support noted, however the content of criterion 1 and 3 are now covered in the spatial development strategy

No change. The second part of the policy confirms the need to maintain a supply of specific deliverable sites, in accordance with national policy. As set out in national planning policy, to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

No change. Comment noted. The polic requires development to reflect the Spatial Development Strategy and the Place Shaping policies, which considers the character of the settlements / sub-areas

No change. Site allocations have been reviewed in the light of representations and new evidence received. These changes are set out under the site specific changes, however the broad distribution of growth set out in the Draft Local Plan does focus on Huddersfield and Dewsbury and provides land for strategic employment purposes along the M62 corridor.

No change. Comment noted. The Local Plan must be in general conformity with all parts of the National Planning Policy Framework, including meeting the objectively assessed needs for jobs and homes which requires the council to consider land currently in the green belt and greenfield sites in addition to previously developed land.

No change. The policy requires development to take into account the need to maintain a supply of specific deliverable sites, in accordance with national policy.

Summary of comments

Point 3 ensuring that opportunities for development on brownfield (previously developed) sites are realised early in the plan' is an excellent ambition. However we would question how the Council can achieve this in practise and ensure that development on brownfield sites is realised early?

Object. The sub areas do not list the settlements nor the amounts per settlement. We cannot see a settlement hierarchy for these areas and are unsure of the quantum per area based on the sustainability of the settlement.

Object. Comments seek to suggest Mirfield should have lower growth than other urban areas.

We support the focus for new development, including housing and employment, to take place within the urban areas taking advantage of existing services and high levels of accessibility, with the largest amount of development located in Huddersfield and Dewsbury or on land specifically identified for employment outside of the urban area where it contributes to meeting economic objectives. We agree that development should be permitted where it supports the delivery of housing and employment growth in a sustainable way, taking account of the delivery of the housing and job requirements set out in the Local Plan; the need to maintain a supply of specific deliverable sites; and coordinating the housing and employment land delivery with the provision of new infrastructure. However we consider that the Council should not place too much reliance on brownfield sites coming forward early in the Plan due to viability and deliverability challenges with a number of previously- developed sites across the district.

KMC throughout this report speaks of equality but when it comes to treating urban areas and rural areas as places that should be maintained and enhanced there is far from an equal application of investment with urban areas clearly being favoured over rural. Some of our smaller rural communities are crying out for investment if small scale development of housing is not allowed many of their current facilities such as schools and village halls etc will become unviable.

Support. Encouraged by the approach towards the Spatial Development Strategy and locations for growth. The focus of development will understandably be towards Huddersfield and Dewsbury but in relation to Part 2, allow for flexibility.

Furthermore, the final part of the policy emphasises that development will be permitted where it supports the delivery of housing and employment growth in sustainable way taking account of ensuring delivery of housing and jobs in smaller settlements to meet local housing and employment needs. These sets of principles enshrined in Policy DLP2 create an agenda that the Plan should follow.

Support. Support the Council in their promotion and encouragement of the re-use of Brownfield land, the recognition of this type of land should be included within the plan in accordance with paragraph 111 of the Framework. It is agreed that not including a target for this type of development is important and allows for an appropriate balance between the desirability of re-using such land but also the need to deliver the housing needs of the area.

Settlement appraisal and range and types of facilities should be a key factor in deciding where new development is focused. General distribution between four sub areas is too vague and imprecise. Settlements should be identified that are of a size, function and character that can achieve the delivery of housing and employment growth in a sustainable manner including Roberttown.

Support. The focus of most new development will take place within the urban areas taking advantage of existing services and high levels of accessibility. This is consistent with the SEP aspiration to attract

Council Response

No change. However, this element of the policy is now in the Efficient and Effective Use of Land policy and in the Spatial Development Strategy.

No change. The policy requires development to deliver the Spatial Development Strategy. The strategy sets out a broad spatial framework building on the spatial vision and objectives. Other policies in the plan provide the detail of when development will be acceptable for Development Management purposes. It provides a broad framework for the council to monitor delivery in urban areas. It provides a clear focus for growth on Huddersfield and Dewsbury as the two largest and most sustainable settlements. The policy provides flexibility for growth for smaller settlements.

No change. The policy requires development to reflect the Spatial Development Strategy. The strategy does not determine the actual amount of growth to be distributed to Mirfield or other settlements, but does recognise that the district's larger settlements are more sustainable locations for growth. The actual amount of planned growth is set out in the proposed allocations and has taken into account infrastructure planning evidence as well as other considerations as set out in the site selection methodology.

No change. Support noted.

In relation to final point, this issue is now dealt with in the efficient and effective use of land and buildings policy and in the Spatial Development Strategy.

No change. Policy allows for local housing and job needs to still be met whilst still focussing most new development on the most sustainable urban areas in the district. Where sustainable, small scale development can continue to come forward, subject to national and local planning policy considerations.

No change. Support noted.

No change. Support noted.

No change. The policy sets out a "broad spatial framework" building on the spatial vision and objectives. Other policies in the plan provide the detail of when development will be acceptable for Development Management purposes. It provides a broad framework for the council to monitor delivery in urban areas. It provides a clear focus for growth on Huddersfield and Dewsbury as the two largest and most sustainable settlements. The policy provides flexibility for growth for smaller settlements. Building on the evidence documents set out in the text for this policy provides for the most appropriate development strategy as required in national planning policy. The council's site selection methodology has been applied to all site options to determine their fit against this policy and other policy considerations such as place shaping and the spatial development strategy.

No change. Support noted.

Summary of comments

inward investment into the City Region and LTP/STP objectives to promote sustainable accessible development.

Kirklees rural is expected to absorb 5148 new homes (ex SL). 1650 new homes are proposed in Holme Valley South (inc SL). That is a high proportion of the total in Kirklees and it comes with no transport infrastructure improvements and much less employment growth than other parts of Kirklees. So it represents a shift of employment opportunities to north of Huddersfield and potentially increases the number of commuters living in the rural south. The rural south is simply looked upon as a sink for more houses without any strategic thinking and as such is not sustainable and does not accord with the NPPF.

Support. Full support to policy DLP2 "Location of New Development" and to spatial development option paragraph 4.1 set out within the Strategy & Policies section of the Draft Local Plan. We also support paragraph 7.6 and Table 5 which sets a target of 29,340 new homes within the plan period and the allocation of 19,933 homes in the Local Plan itself; including around 5,148 in the Kirklees Rural area.

Conditional support. The policy should be amended to include reference to housing where the policy identifies or on land specifically identified for employment outside of the urban areas. This is due to the fact that urban extensions/new settlements proposed within the Draft Local Plan include both housing and employment and thus the policy should reflect the Council's acceptance of this.

Criterion 2 is supported specifically where the policy identifies that the scale of development should reflect the need to provide new homes.

Supports the flexibility identified within criterion 4.

Supports the reference to the Council supporting the delivery of housing where it meets national and local policies and that planning decisions will also take into account the need to deliver the housing requirements set out in the Local Plan and the need to maintain a supply of specific deliverable sites in accordance with national policy.

4.16

DLP_SP675, DLP_SP1032

Conditional support. Windfall opportunities and land already banked by developers must also be taken into account, based on historic patterns. This would reduce the amount of green belt land needed to meet targets.

Object. We are not convinced by the statement that a brownfield only approach will not meet the district's housing and employment land requirements alone. In our view, if the Council were to place a proper strategic focus on urban regeneration and brownfield development, whilst also taking a pragmatic approach to plan management, housing numbers and land allocations, it is more than likely that the District's housing and employment land requirements will be met, without any significant urban extensions in to the Green Belt certainly for many years to come.

Over 90% of the housing built in Kirklees over the last 15 years has been built on brown field land and there is no evidence whatsoever to suggest that the supply of brown field land will not continue at or about that level in to the future. We completely reject the unjustified statement in section 7.11 that it is unlikely that past levels of windfall completions will be sustained throughout the Local Plan period. We strongly believe that the number of windfall completions would even increase (as a total number of dwellings, if not a percentage of the total housing need) if the Council placed a proper strategic, robust and practical focus on master-planned urban regeneration of the older and larger urban areas.

We accept that most brown field land comes forward in the form of windfalls and it is not possible for the Council to identify every specific brown field site at the commencement of the plan. However this problem of timing can be resolved quite easily by a) Adopting a flexible plan structure which will allow specific brown field sites to be incorporated in to the plan, as and when they become available, and/or b) Making an appropriate and realistic % allowance for brownfield windfalls at the start of the plan. We

Council Response

No change. The policy sets out a broad framework for considering development in line with the spatial development strategy. Other policies in the plan provide the detail of when development will be acceptable for Development Management purposes. The strategy provides a clear focus for growth on Huddersfield and Dewsbury as the two largest and most sustainable settlements. The policy provides flexibility for growth for smaller settlements. Building on the evidence documents set out in the text for this policy provides for the most appropriate development strategy as required in national planning policy. The council's site selection methodology has been applied to all site options to determine their fit against this policy and other policy considerations such as place shaping and the spatial development strategy.

No change. Support noted.

No change. The policy has removed reference to land outside the urban area, as this issue is now covered wholly in the Spatial Development Strategy.

Support	Conditional Support	1	Object	1	No Comment
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No change. It is agreed that windfall development and land already with planning permission should be factored in to the housing and employment land requirements.

No change. This paragraph outlines the approach the plan needs to take to assess housing and job needs. Comments regarding the brownfield windfall assumptions and need for greenfield and green belt land are addressed under other comment responses.

Summary of comments

Council Response

consider that it would be practical and realistic, based on the evidence of historic brown field land supply, to make a minimum windfall allowance of zero in year 1 (when the vast majority of brown field sites are already known), rising linearly to 900 dwellings in year 5 and 900 dwellings per annum thereafter (the historic norm quoted in section 7.10). That would mean brownfield windfalls would contribute a minimum total of 11,500 dwellings to the land supply over the 15 year plan period, compared with the extremely conservative figure of 4,500 dwellings that has currently been included in the plan. NB: We note that clause 48 of the NPPF specifically allows Council's to include a windfall allowance in 5 year land supply assessments but the Council have failed to do so in this plan. KCAN works in alliance with CPRE on many planning issues across West Yorkshire and we have endorsed CPRE's "Alternative Approach to Housing Numbers" in an Appendix to our own submission. CPRE suggest a total windfall allowance of 6750 properties but that figure has to be seen in the context of their wider housing number calculations and other allowances. We (KCAN) remain of the opinion that the plan should contain a minimum windfall allowance of 11,500 properties instead of the Plan allowance of 4,500 properties.

4.17

Support

Conditional Support

Object

No Comment

No comments received on this part of the Plan.

4.18

Support

Conditional Support

Object 2

No Comment

DLP_SP887, DLP_SP1033

Object. You say 'windfall' will make an 'important contribution - Why have you ignored windfall for first 5 years of plan – the reason given in Section 7.9 is totally illogical assumption given historical evidence of 'windfall' sites coming on stream (Section 7.10).

No change. This paragraph outlines the approach the plan needs to take to assess housing and job needs. Comments regarding the brownfield windfall assumptions and need for greenfield and green belt land are addressed under other comment responses.

Object.

We are not convinced by the statement that "a brownfield only approach will not meet the district's housing and employment land requirements alone". In our view, if the Council were to place a proper strategic focus on urban regeneration and brownfield development, whilst also taking a pragmatic approach to plan management, housing numbers and land allocations, it is more than likely that the District's housing and employment land requirements will be met, without any significant urban extensions in to the Green Belt – certainly for many years to come.

Over 90% of the housing built in Kirklees over the last 15 years has been built on brown field land and there is no evidence whatsoever to suggest that the supply of brown field land will not continue at or about that level in to the future. We completely reject the unjustified statement in section 7.11 that "it is unlikely that past levels of windfall completions will be sustained throughout the Local Plan period". We strongly believe that the number of windfall completions would even increase (as a total number of dwellings, if not a percentage of the total housing need) if the Council placed a proper strategic, robust and practical focus on master-planned urban regeneration of the older and larger urban areas.

We accept that most brown field land comes forward in the form of windfalls and it is not possible for the Council to identify every specific brown field site at the commencement of the plan. However this problem of timing can be resolved quite easily by a) Adopting a flexible plan structure which will allow specific brown field sites to be incorporated in to the plan, as and when they become available, and/or b) Making an appropriate and realistic % allowance for brownfield windfalls at the start of the plan.

We consider that it would be practical and realistic, based on the evidence of historic brown field land supply, to make a minimum windfall allowance of zero in year 1 (when the vast majority of brown field sites are already known), rising linearly to 900 dwellings in year 5 and 900 dwellings per annum thereafter (the historic norm quoted in section 7.10). That would mean brownfield windfalls would contribute a minimum total of 11,500 dwellings to the land supply over the 15 year plan period, compared with the extremely conservative figure of 4,500 dwellings that has currently been included in the plan. NB: We note that clause 48 of the NPPF specifically allows Council's to include a windfall allowance in 5 year land supply assessments but the Council have failed to do so in this plan.

KCAN works in alliance with CPRE on many planning issues across West Yorkshire and we have endorsed CPRE's "Alternative Approach to Housing Numbers" in an Appendix to our own submission. CPRE suggest a total windfall allowance of 6750 properties but that figure has to be seen in the context of their wider housing number calculations and other allowances. We (KCAN) remain of the opinion that the plan should contain a minimum windfall allowance of 11,500 properties instead of the Plan

No change. This paragraph outlines the approach the plan needs to take to assess housing and job needs. Comments regarding the brownfield windfall assumptions and need for greenfield and green belt land are addressed under other comment responses.

Summary of comments	Council Response			
allowance of 4,500 properties.				
4.19 DLP_SP140	Support 1	Conditional Support	Object	No Comment
Support.	No change. Support noted.			
4.20 DLP_SP148, DLP_SP740, DLP_SP888, DLP_SP1034	Support 1	Conditional Support 1	Object 2	No Comment
<p>Object. We are not convinced by the statement that “a brownfield only approach will not meet the district’s housing and employment land requirements alone” . In our view, if the Council were to place a proper strategic focus on urban regeneration and brownfield development, whilst also taking a pragmatic approach to plan management, housing numbers and land allocations, it is more than likely that the District’s housing and employment land requirements will be met, without any significant urban extensions in to the Green Belt – certainly for many years to come.</p> <p>Over 90% of the housing built in Kirklees over the last 15 years has been built on brown field land and there is no evidence whatsoever to suggest that the supply of brown field land will not continue at or about that level in to the future. We completely reject the unjustified statement in section 7.11 that “it is unlikely that past levels of windfall completions will be sustained throughout the Local Plan period” . We strongly believe that the number of windfall completions would even increase (as a total number of dwellings, if not a percentage of the total housing need) if the Council placed a proper strategic, robust and practical focus on master-planned urban regeneration of the older and larger urban areas.</p> <p>We accept that most brown field land comes forward in the form of windfalls and it is not possible for the Council to identify every specific brown field site at the commencement of the plan. However this problem of timing can be resolved quite easily by a) Adopting a flexible plan structure which will allow specific brown field sites to be incorporated in to the plan, as and when they become available, and/or b) Making an appropriate and realistic % allowance for brownfield windfalls at the start of the plan. We consider that it would be practical and realistic, based on the evidence of historic brown field land supply, to make a minimum windfall allowance of zero in year 1 (when the vast majority of brown field sites are already known), rising linearly to 900 dwellings in year 5 and 900 dwellings per annum thereafter (the historic norm quoted in section 7.10). That would mean brownfield windfalls would contribute a minimum total of 11,500 dwellings to the land supply over the 15 year plan period, compared with the extremely conservative figure of 4,500 dwellings that has currently been included in the plan. NB: We note that clause 48 of the NPPF specifically allows Council’s to include a windfall allowance in 5 year land supply assessments but the Council have failed to do so in this plan. KCAN works in alliance with CPRE on many planning issues across West Yorkshire and we have endorsed CPRE’s “Alternative Approach to Housing Numbers” in an Appendix to our own submission. CPRE suggest a total windfall allowance of 6750 properties but that figure has to be seen in the context of their wider housing number calculations and other allowances. We (KCAN) remain of the opinion that the plan should contain a minimum windfall allowance of 11,500 properties instead of the Plan allowance of 4,500 properties.</p>	<p>No change. This paragraph outlines the approach the plan needs to take to help bring forward brownfield sites. Comments regarding the brownfield windfall assumptions and need for greenfield and green belt land are addressed under other comment responses.</p>			
Object. Objection to Kirklees Rural losing greenbelt and greenfields to subsidise brownfield development in North Kirklees.	No change. The way in which financial funds are distributed by areas within the council and other public bodies is outside the remit of the Local Plan.			
Conditional support. Suggested change to 3 rd bullet point - insert ‘the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land, where appropriate.’ Although it may be possible and appropriate to relax S106 contributions through negotiations, CIL is a fixed charge, so any relaxation to a CIL charging schedule can only be introduced through a review thereof.	Change. Bullet three amended to: the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land, where appropriate;			
Support. The actions, listed in this policy statement that the council is willing to take to maintain a reasonable supply of brownfield land for new jobs and homes are very positive and comprehensive.	No change. Support noted.			
Option DLP2 4.3.1	Support	Conditional Support	Object	No Comment

Summary of comments	Council Response			
No comments received on this part of the Plan.				
Option DLP2 4.3.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP2 4.3.3 DLP_SP1300	Support	Conditional Support	Object 1	No Comment
Object. Supports the Council in promoting and encouraging the re-use of brownfield land but not setting a specific target for its re-use within the draft local plan. This is considered to provide an appropriate balance between the desirability of re-using such land but also the need to deliver the housing needs of the area.	No change. This option is rejected.			
Option DLP2 4.3.4 DLP_SP678, DLP_SP1400	Support	Conditional Support 1	Object 1	No Comment
Object. Large tracts of housing in Rural Kirklees would certainly not be sustainable and would be contrary to national policies.	No change. This option is rejected			
Conditional support. We would suggest that Option 7 maybe appropriate where a smaller centre presently fails to adequately serve the local community or where significant growth may be targeted.	No change. Sufficient flexibility in policies to allow small scale growth in smaller settlements under criterion 2.			
Infrastructure planning	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
Policy DLP 3 DLP_SP141, DLP_SP155, DLP_SP171, DLP_SP255, DLP_SP294, DLP_SP354, DLP_SP366, DLP_SP449, DLP_SP555, DLP_SP563, DLP_SP569, DLP_SP574, DLP_SP579, DLP_SP584, DLP_SP589, DLP_SP600, DLP_SP662, DLP_SP739, DLP_SP746, DLP_SP751, DLP_SP756, DLP_SP761, DLP_SP767, DLP_SP889, DLP_SP916, DLP_SP964, DLP_SP1000, DLP_SP1006, DLP_SP1053, DLP_SP1063, DLP_SP1066, DLP_SP1201, DLP_SP1227, DLP_SP1240, DLP_SP1244, DLP_SP1262, DLP_SP1293, DLP_SP1317, DLP_SP1332, DLP_SP1350, DLP_SP1364, DLP_SP1401, DLP_SP1430, DLP_SP1467, DLP_SP1522, DLP_SP1527, DLP_SP1706, DLP_SP1724, DLP_SP1733, DLP_SP1737, DLP_SP1757, DLP_SP1783, DLP_SP1822, DLP_SP1843, DLP_SP1859	Support 15	Conditional Support 8	Object 32	No Comment
Other representations submitted by Wakefield Council indicate it is possible the developments proposed in the Kirklees Local Plan may have impacts on infrastructure beyond the Kirklees boundary which may require financial contributions to enable them to be acceptably mitigated. Wakefield considers this should be recognised in policy and DLP3 should be amended to make it explicit the policy requires developers to contribute to essential infrastructure provision beyond Kirklees, where it can be shown development within Kirklees is causing an impact requiring mitigation.	No change. The assessment of infrastructure, including transport and education has involved on-going discussions about future cross border impacts with bordering authorities including Wakefield. The duty to cooperate process has also established an on-going dialogue about cross border issues including infrastructure. The policy wording does not preclude the consideration or investment in cross border infrastructure where the need arises.			
There is no specific plan to meet infrastructure needs as is required in National Planning Policy Framework.	No change. The Local Plan is supported by an Infrastructure Delivery Plan and Infrastructure Technical Paper. Every development item in the local plan has been considered by infrastructure providers to ensure that it has no significant constraints. The Local Plan includes policies to ensure that appropriate infrastructure is delivered alongside development including: Providing infrastructure Masterplanning sites Strategic transport infrastructure Highways and access Drainage Educational and health care needs New open space			
The proposed Infrastructure Delivery Plan is a significant improvement over the IDP associated with the former LDF core strategy. It has improved detail and a more comprehensive list of infrastructure requirements in many functional and geographic areas.	No change. Comment noted.			
There are infrastructure issues in Mirfield relating to school, health care provision and the local road	No change.			

Summary of comments

network and railway station and sewerage treatment.

The scale of the development proposed is far too large for the small rural village of Brockholes. There is a lack of local amenities and problems with drainage, sewerage and the local highway network.

The Shepley Village Association notes the absence of detail about how the additional housing would be supported by investment in the infrastructure including drainage, schools and roads.

The recent proposals by the two Hospital Trusts to downgrade the Huddersfield & Dewsbury hospitals and transfer a wide range of critical hospital services to Halifax and Wakefield respectively are a topical case in point. We find it totally inappropriate that Kirklees Council should be putting forward highly aspirational plans for housing and industrial development, at the same time that Kirklees, the 11th largest local authority in the country, is being stripped of its acute hospital services.

There are no plans in the lifetime of the Local Plan to do anything in the rural south including Holme Valley South.

The roads are congested, the junctions are over capacity and there are no plans to improve them. New Mill junction where the A635 meets the A616, is over capacity. That is well documented and it will cost in excess of £200,000 to correct it. Sovereign junction where the A635 meets the A629, is an accident blackspot, is over capacity and will cost over £450,000 to fix it.

Using developer contributions via CIL or S106 moneys will take far too long to raise the money to carry out these improvements and there can be no guarantee that money raised will be collected or not used elsewhere.

Road and road junction improvements, extensions to schools and a new GP surgery are required to support new housing.

Council Response

The Local Plan is supported by a district wide transport assessment that considers the impact of the future traffic growth across the district, considered that housing and employment growth promoted in the Local Plan. The results of this assessment identify the priority routes and junctions that will require investment to ensure that the Local Plan is deliverable. These have been fed into the Infrastructure Delivery Plan, and will be updated when new information is available. This is not a comprehensive list of infrastructure to cover the plan period, and other schemes can be developed based on future needs.

The Infrastructure Delivery Plan (IDP) and Infrastructure Technical Paper explain the on-going process to establish health and education infrastructure needs. Waste water infrastructure has been assessed in the IDP and as part of the assessment of each development site in the Local Plan.

No change.

The flood risk and drainage infrastructure across Kirklees has been assessed in the Infrastructure Delivery Plan (IDP) and as part of the assessment of each development site in the Local Plan to ensure there are no overriding site specific or cumulative constraints.

No change.

The flood risk and drainage infrastructure across Kirklees has been assessed in the Infrastructure Delivery Plan (IDP) and as part of the assessment of each development site in the Local Plan to ensure there are no overriding site specific or cumulative constraints.

The detailed assessment of the need for future school places considering the growth proposed in the Local Plan has been on-going. This is outlined in the Infrastructure Technical Paper. The council's School Organisation and Planning Team are working with school providers to ensure future places are delivered to support future growth.

The Local Plan is supported by a district wide transport assessment that considers the impact of the future traffic growth across the district, considering the housing and employment growth promoted in the Local Plan. The results of this assessment identify the priority routes and junctions that will require investment to ensure that the Local Plan is deliverable. These have been fed into the Infrastructure Delivery Plan, and will be updated when new information is available. This is not a comprehensive list of infrastructure to cover the plan period, and other schemes can be developed based on future needs.

No change.

The infrastructure planning process has involved discussion with North Kirklees and Greater Huddersfield Clinical Commissioning Groups who have a role in planning health care services across Kirklees. Their on-going consultation and future plans for provision of health infrastructure can therefore consider the growth in the Local Plan.

No change.

The Local Plan is supported by an Infrastructure Delivery Plan and Infrastructure Technical Paper. Every development site in the local plan has been considered by infrastructure providers to ensure that it has no significant constraints.

The Local Plan is supported by a district wide transport assessment that considers the impact of the future traffic growth across the district, considered that housing and employment growth promoted in the Local Plan. The results of this assessment identify the priority routes and junctions that will require investment to ensure that the Local Plan is deliverable. These have been fed into the Infrastructure Delivery Plan, and will be updated when new information is available. This is not a comprehensive list of infrastructure to cover the plan period, and other schemes can be developed based on future needs.

Infrastructure to support the Local Plan can be delivered in a number of ways. Directly by infrastructure providers, by developers, and through developer contribution such as Section 106 agreements and the

Summary of comments

Policy DLP3 Providing infrastructure & the Community Infrastructure Levy (CIL) should be used to maintain and improve leisure facilities considering the Kirklees Leisure and Built Facility Strategy regarding demand for future built facility provision, where increased water space is recommended, with the planned replacement facility at Spenborough hopefully addressing some of this need.

Local schools and GPs are over subscribed.

The plan does not include many local infrastructure requirements that are of critical importance to neighbourhoods and local communities. The Infrastructure Delivery Plan and hence the Local Plan are utterly dependent on the infrastructure investment decisions of various independent public and private sector bodies, over which Kirklees Council has no direct control or influence. These bodies are not bound by the Council's Local Plan and will undoubtedly make their own internalised investment decisions, which are not necessarily consistent with the plan.

The typical time gap between the need for infrastructure improvement (i.e. before the development actually takes place) and the collection of monies owed. The NPPF has further undermined the Council's ability to negotiate infrastructure contributions, which developers claim would threaten the economic viability of a specific development.

The plan relies on an expectation about the level of funding that will come from CIL and section 106 contributions. We have absolutely no faith that there will be sufficient funding from this source, given the council's failure to collect the monies owed.

Identified transport investment tends to focus too strongly on large, regional impact schemes, closest to the hub of the Leeds City Region. This means that the Kirklees Rural area (in particular) is starved of badly needed investment (e.g. in commercial vehicle routes and commuter links to the M62 from the Holme and Colne Valleys: new industrial area access routes / river crossings in Slaithwaite & Milnsbridge; major junction improvements at the New Mill & Sovereign crossroads; commuter routes to the M1 (via the A636) from the Holme and Dearne valleys).

Support for intent of Draft Policy DLP3 of the Draft Local Plan but object to the wording presented in the 2nd paragraph of the policy. A further sentence should be included to ensure that the Council will assess development against the policy in a flexible manner, especially in respect of larger development schemes which include major infrastructure. We propose the following further sentence:- The Council will work proactively alongside developers to ensure that the appropriate infrastructure is in place at the time it is required.

The villages of rural Kirklees all have similar infrastructure problems including: Roads, parking, bus services, doctors, dentists, schools, waste treatment, sewerage and flooding and broadband.

Council Response

Community Infrastructure Levy (CIL). The infrastructure planning process allows for schemes and methods of delivery to be considered in advance of development coming forward to ensure that it is in place and the appropriate time.

No change.

Comment noted.

No change.

The Infrastructure Delivery Plan (IDP) and Infrastructure Technical Paper explain the on-going process to establish health and education infrastructure needs. The Local Plan and accepted sites within it have been assessed to ensure that no overriding infrastructure constraints exist.

No change.

The infrastructure planning process supporting the Local Plan involves the on-going discussion with both council based and external infrastructure providers to ensure that appropriate infrastructure will be in place at the appropriate time. By having access to information about the Local Plan at an early stage, infrastructure providers have the opportunity to plan their own services and investment with this knowledge to ensure they fulfil their requirements in an efficient and effective manner. Where neighbourhoods and local communities have their own, priorities these can be shared with the council. Neighbourhood planning provides the opportunity for neighbourhoods to establish their own infrastructure needs through a formal planning process.

No change.

The IDP and Local Plan policies set out a process to ensure that the necessary infrastructure is in place for development at the appropriate time.

Comments noted.

No change.

Infrastructure to support the Local Plan can be delivered in a number of ways. Directly by infrastructure providers, by developers, and through developer contribution such as Section 106 agreements and the Community Infrastructure Levy (CIL). The infrastructure planning process allows for schemes and methods of delivery to be considered in advance of development coming forward to ensure that it is in place and the appropriate time.

No change.

The Local Plan is supported by a district wide transport assessment that considers the impact of the future traffic growth across the district, considered that housing and employment growth promoted in the Local Plan. The results of this assessment identify the priority routes and junctions that will require investment to ensure that the Local Plan is deliverable. These have been fed into the Infrastructure Delivery Plan, and will be updated when new information is available. This is not a comprehensive list of infrastructure to cover the plan period, and other schemes can be developed based on future needs.

No change.

Comments noted.

The additional sentence is considered to repeat elements of the policy which states that the council will work with partners to bring forward necessary and proportionate essential infrastructure.

No change.

The Local Plan is supported by an Infrastructure Delivery Plan and Infrastructure Technical Paper. Every development site in the local plan has been considered by infrastructure providers to ensure that it has no

Summary of comments

Re: Scholes, Holmfirth:

The plans appear to remove the only children's playground in the village (NPPF74 / DLP3) They add nothing to local amenities, in circumstances where the village has recently lost the local working men's club and parking area to development (NPPF 28 / DLP3). The village school is already full and over-subscribed (NPPF72 / DLP3) There are no proposals to improve the highways or increase school places south of Huddersfield over the next 15 years. (NPPF32 / DLP3).'

Support for the Providing infrastructure policy and the accompanying text. It is considered that the strategy is sound as it has been positively prepared, is justified, effective and consistent with National Policy.

Support for the reference to financial viability in the proposed policy.

Policy DLP 3 states that the Council will work with partners to bring forward the necessary and proportionate essential infrastructure that is required in order to deliver the spatial strategy as set out in the Local Plan. 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. New development should contribute to the provision of infrastructure, taking account of local and strategic needs and financial viability. This statement is generally acceptable to Highways England with one key difference. Where investment in additional capacity is needed on the strategic road network, the timing of development should be phased so that capacity enhancements are in place before a critical mass of development takes place on new sites.

The policy should emphasise particular issues faced by rural communities relating to schools, health care, narrow roads and broadband.

Developers in the rural areas should be contributing to high speed broadband as well as those utilities set out in the Preliminary draft CIL. Include a policy which recognises the need to restrict development near well-known difficult roads, rather than just taking congestion as the only road factor to be considered.

Given the complexity of developing in rural areas with small schools, difficult roads and scattered health provision, we would like to see the principles of site based masterplanning (as set out in Policy DLP4) applying to all rural sites over one hectare.

Many of the noted schemes still have vague, extended timescales Many of the noted schemes are still unfunded and uncommitted In most cases, there is no obvious correlation between the IDP commitments and the location, scale or timing of development within the Local Plan.

Council Response

significant constraints. The Local Plan includes policies to ensure that appropriate infrastructure is delivered alongside development including:

Providing infrastructure
Masterplanning sites
Strategic transport infrastructure
Highways and access
Drainage
Educational and health care needs
New open space

No change.

Policy DLP3 requires developments in the future to contribute to the delivery of infrastructure where there is a need identified.

The detailed assessment of the need for future school places considering the growth proposed in the Local Plan has been on-going. This is outlined in the Infrastructure Technical Paper. The council's School Organisation and Planning Team are working with school providers to ensure future places are delivered to support future growth.

The Local Plan is supported by a district wide transport assessment that considers the impact of the future traffic growth across the district, considered that housing and employment growth promoted in the Local Plan. The results of this assessment identify the priority routes and junctions that will require investment to ensure that the Local Plan is deliverable. These have been fed into the Infrastructure Delivery Plan, and will be updated when new information is available. This is not a comprehensive list of infrastructure to cover the plan period, and other schemes can be developed based on future needs.

No change.

Comments noted.

No change.

Comment noted.

No change.

The different areas of Kirklees have been assessed to identify existing infrastructure and future needs.

High speed broadband infrastructure is considered in the Telecoms section of the IDP. The inclusion of high speed broadband as a CIL spending priority can be considered as part of the CIL process.

Policy DLP4: Masterplanning sites do not set a threshold for the size of site that it should apply to. If the character of an area and nature of development requires elements of DLP4 to be considered this could be done as part of the development process.

No change.

The infrastructure planning feeding into the IDP is an on-going process that involves the sharing of information

Summary of comments

Council Response

	about Local Plan growth with infrastructure providers. The infrastructure evidence is therefore likely to be updated at each stage of the plan and throughout the plan process, as infrastructure schemes develop from these discussions, and because different infrastructure providers work to different timescales. The IDP and Infrastructure Technical Paper have assessed the quality and capacity of infrastructure across Kirklees to ensure that the Local Plan is deliverable. The outcomes identify schemes at 5, 10 and 15 year time frames to demonstrate when infrastructure will be delivered in line with the phasing of development in the Local Plan.			
<p>4.21 DLP_SP492</p>	Support	Conditional Support	Object 1	No Comment
<p>It would be nice to see broadband and whatever succeeds it extended from the towns to rural communities.</p>	<p>No change.</p> <p>Comment noted.</p>			
<p>4.22</p> <p>No comments were received on this part of the Plan.</p>	Support	Conditional Support	Object	No Comment
<p>4.23 DLP_SP136</p>	Support	Conditional Support	Object 1	No Comment
<p>When considering demands on "green" infrastructure, such as areas for wildlife, sport and recreation, it is difficult to see how development proposals can contribute to improvements in infrastructure capacity to cater for the additional needs they generate. Such new developments usually destroy what wildlife exists already and new sapling trees are substituted for grand old mature trees. Established wildlife is usually quite happy with its existing habitat; it doesn't need any developer to encourage it to have to do something different.</p>	<p>No change.</p> <p>Comments noted.</p>			
<p>4.24 DLP_SP744</p>	Support	Conditional Support 1	Object	No Comment
<p>At end of first sentence, insert new sentence: In addition to seeking improvements in infrastructure capacity through the planning system, Kirklees Council will also pursue other funding sources to contribute towards meeting either strategic or local infrastructure needs. Reason / Further information: Infrastructure requirements may be such that other funding in addition to that secured through S106 contributions and CIL will be required to deliver the necessary infrastructure.</p>	<p>No change.</p> <p>The main aim of the policy is to ensure that new development contributes to the provision of infrastructure needed to support new development. Reference is made to the Infrastructure Delivery Plan in paragraph 4.26. The IDP outlines infrastructure schemes and explains how other funding sources can be used to help deliver necessary infrastructure.</p>			
<p>4.25</p> <p>No comments were received on this part of the Plan.</p>	Support	Conditional Support	Object	No Comment
<p>4.26 DLP_SP368, DLP_SP1668, DLP_SP1669</p>	Support	Conditional Support 1	Object 2	No Comment
<p>There is no analysis of the allocation of new house on the provision of local services in the Holme Valley. Unfortunately, because the Holme Valley has been amalgamated into Kirklees Rural it has been assumed that because there may be spare provision of services within Kirklees Rural then that spare capacity must occur evenly throughout Kirklees Rural. This isn't the case. Local schools within the Holme Valley, for example, are at capacity and large residential proposals such as the one at Scholes make no reference to expanding provision, despite this clearly being essential if such a development is to be viable. It will be no comfort to new residents to learn that although there are school vacancies within Kirklees Rural, there are none in the Holme Valley.</p>	<p>No change.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan and Infrastructure Technical Paper. Every development site in the local plan has also been considered by infrastructure providers to ensure that it has no significant constraints.</p> <p>The Infrastructure Technical Paper outlines how the school infrastructure has been considered in relation to the Local Plan. Every accepted housing site has been considered by the School Organisation and Planning Team factoring in existing school capacity and pupil number trends. This assessment was done based on existing primary and secondary school place planning areas, also considering the predicted phasing of when the development is likely to come forward. This work is on-going, and will be revised periodically to ensure that future school provision meets the needs of new housing growth in specific geographical areas.</p>			
<p>HIGHWAYS ENGLAND REVISED COMMENT - ADDITIONAL DETAIL PROVIDED Paragraph 4.26,</p>	<p>No change.</p>			

Summary of comments

Infrastructure Delivery Plan Paragraph 4.26 refers to the role of the Infrastructure Delivery Plan (IDP) as supporting evidence for the Local Plan, identifying funding sources and spending priorities. The IDP will need to identify all committed investment by Highways England and any additional schemes that are not funded but that are essential to enable the strategic road network to function efficiently taking account of development proposals identified in Local Plans. The IDP should include the following schemes funded as part of the government's Road Investment Strategy (RIS): M1 junctions 35A to 39: Smart motorway scheme to be developed in the current roads period with the objective of commencing construction in the period 2020/21-2024/25. M1 junctions 39 to 42: Smart motorway scheme that is under construction. M1/M62 Lofthouse Interchange. Scheme to enhance the capacity of the interchange to be developed in the current roads period with the objective of commencing construction in the period 2020/21-2024/25. M62 junctions 20 to 25: Smart motorway scheme intended to start in the current roads period 2015/16-2019/20. M62/M606 Chain Bar: Scheme to provide an M62 westbound to M606 northbound link intended to start in the current roads period 2015/16-2019/20. M621 junctions 1-7 improvements: Scheme intended to start in the current roads period 2015/16-2019/20. The 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 is now under consideration by Highways England. It will be shared with the Council in the near future. The additional schemes that are relevant to Kirklees and that need to be included in the IDP are listed below: Needed by 2022: M1 junction 40: Widen local road network approaches and small improvements to the junction circulatory. M62 junction 24: Three lanes approach from M62 westbound off slip on A629 provides improved stacking capacity. M62 new junction 24a: The WYIS tests the addition of a new junction at 24a to the network. 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. 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. M62 junction 27: Widen slip roads on west side of junction on approach to the junction to give benefits through improved stacking capacity. M62 junction 27: Scheme of capacity improvements to the northern dumbbell roundabout giving enhanced junction operating capacity. Needed by 2030: 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. M62 junction 26: Opening up of the HOV lane to all traffic and signalisation of the approach to Chain Bar roundabout. Upgrade of the M62 westbound diverge to type D1 ghost island (or D2 parallel diverge) to give enhanced junction operating capacity. M62 junction 27: New link road from M621 to M62 south, new link road between M62 westbound and M621 westbound slip road and associated segregated left turning lane on A62 south. 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. M62 junction 29 (Lofthouse): Increase current two lanes eastbound and westbound on M62 through Lofthouse Interchange to three lanes in each direction. This is intended to provide capacity additional to the M1/M62 Lofthouse Interchange RIS scheme. M62 new junction 24a is identified as a Core Project by Kirklees to be funded by the West Yorkshire Plus Transport Fund (WY+TF). None of the other schemes identified in the WYIS are funded. It is possible that the WYIS may underestimate the overall impact of Local Plan development in Kirklees and, depending on the eventual mix of sites and land uses, the list of additional schemes to be included in the IDP may well change if any further capacity enhancement schemes are found to be necessary. This will become clear when the final list of sites proposed for development is published in the Draft Local Plan.

4.27 Support Conditional Support Object No Comment

No comments were received on this part of the Plan.

4.28 Support Conditional Support Object No Comment

No comments were received on this part of the Plan.

Council Response

The IDP already contains a number of the schemes identified as consultation has been on-going between Highways England and Kirklees relating to the Local Plan. This on-going process will feed into the update of the IDP.

No change.

No change.

Summary of comments	Council Response			
Option DLP3 4.4.1 DLP_SP1402	Support 1	Conditional Support	Object	No Comment
Options 8 and 9 are not appropriate.	No change.			
	Comments noted.			
Option DLP3 4.4.2 DLP_SP1403	Support 1	Conditional Support	Object	No Comment
Options 8 and 9 are not appropriate.	No change.			
	Comments noted.			
Masterplanning sites	Support	Conditional Support	Object	No Comment
No comments have been received on this part of the Plan.	No Change			
	See proposed changes to Policy DLP4 Masterplanning			
Policy DLP 4 DLP_SP122, DLP_SP248, DLP_SP279, DLP_SP369, DLP_SP454, DLP_SP493, DLP_SP654, DLP_SP712, DLP_SP839, DLP_SP890, DLP_SP915, DLP_SP920, DLP_SP965, DLP_SP1073, DLP_SP1095, DLP_SP1099, DLP_SP1140, DLP_SP1202, DLP_SP1236, DLP_SP1245, DLP_SP1301, DLP_SP1318, DLP_SP1333, DLP_SP1351, DLP_SP1374, DLP_SP1404, DLP_SP1431, DLP_SP1468, DLP_SP1478, DLP_SP1502, DLP_SP1523, DLP_SP1529, DLP_SP1574, DLP_SP1629, DLP_SP1654, DLP_SP1691, DLP_SP1707, DLP_SP1727, DLP_SP1738, DLP_SP1758, DLP_SP1784, DLP_SP1860	Support 6	Conditional Support 3	Object 33	No Comment
Sustainable transport elements of developments should be strengthened at every opportunity.	No Change			
	Support the emphasis on sustainable transport. The plan contains a range of policies which seek to support sustainable transport in addition to the focus of the spatial strategy.			
Masterplans should also indicate the density, or mix of densities, that are considered appropriate to the locality.	No Change			
	Criteria c of the policy makes reference to making the effective use of the site through the application of appropriate densities. No further changes are considered necessary.			
We commend the following elements of the policy : m appropriate measures to mitigate flood risk and ensure that the development is resilient to the potential impacts of climate change	No change			
	Support noted			
For all proposed industrial developments in the green belt, Spen Valley Civic Society considers essential planning conditions are: i) Development must be bordered by tree belts ii) Industrial buildings must be painted green to reduce visual impact on landscape	No Change			
	The purpose of the masterplan is to create a strategic framework to set out the overall development concept and development principles, as well as phasing and other key delivery issues.			
	The early involvement of stakeholders will assist in identifying and agreeing issues to be addressed by the masterplan.			
	Conditions can be attached to development proposals at the planning application stage.			
The wording proportionate to the scale of development is hugely ambiguous and has the potential for wide interpretation. The costs for smaller developers trying simply to address this policy and its fifteen different criteria would be wholly uneconomic and burdensome.	No Change			
	The wording "proportionate" is consistent with the wording used for Design and Access statements in national planning practice guidance.			
It seems pointless to produce a masterplan if an applicant is submitting a full application.	No Change			
	The masterplan will help inform the planning application process. It will be particularly useful to set the context of the whole scheme if it is subject to a number of planning applications. This will ensure that phasing and delivery is properly considered.			

Summary of comments

Reword Point f to: reduce the need for car use and expected to encourage sustainable modes of transport, including provision for public transport, cycle routes, footpaths, bridleways and electric charging points.

Part b - It is unclear how the 'urban to rural transition' should be interpreted. Would this require a buffer zone? If so, how wide? Etc. etc.

Part a - Object to the reference in Part a) of the draft policy for the submission of a phasing and implementation plan. We consider this informational requirement to be made too early in the planning process, especially in respect of outline planning applications. Such matters are usually dealt with by planning condition or are attached to Section 106 Agreements. An applicant may also choose to provide the information within their Design & Access statement by choice.

Commend parts f, m, n and o with some amendments to develop a more robust policy with regard to climate change.

Support and policy particularly b, d and o which will assist in delivering the Plan's Vision regarding local distinctiveness and the appropriate protection and enhancement of its heritage assets (Historic England).

Some of the information stipulated as being required within the policy might not be known even for a full planning application e.g. the timing of the connections to infrastructure. For an outline application, with all matters reserved, other than the submission of an indicative layout plan much of the information would not be available.

A number of the requirements for the Masterplan would not be necessary if the planning application is in outline with matters such as appearance, landscaping, layout and scale reserved for future determination. Therefore the requirement to provide the level of detail set out in Policy LP4 is unnecessary.

References to green infrastructure, flood risk, the natural environment and infrastructure within this policy are welcomed (Environment Agency).

Support masterplanning where it is proportionate to the scale of development.

Paragraph 4.5.1 refers to large sites but this is not repeated in the policy.

The policy could be misinterpreted by Council Officer's to read that masterplans needs to be agreed with the Council prior to the submission of planning application which would in reality be unrealistic and

Council Response

Proposed Change

Amend point f to: reduce the need for car use and expected to encourage sustainable modes of transport, including provision for public transport, cycle routes, footpaths, bridleways and electric charging points.

Reason: To clarify sustainable provision.

No Change

Part b may include a buffer zone. The size would depend on the nature of the proposal. Therefore, no changes are considered necessary.

No Change

The aim of the masterplan is to create a strategic framework to set out the overall development concept and development principles, as well as phasing and other key delivery issues. It cases where planning applications come forward at different stages, having an agreed masterplan will help understand proposals in their context, including the relationship with adjoining uses and proposals. Much of the master planning work will help inform a design and access statement.

No Change

Support for the policy and particularly criterion f, m, n, and o is noted. It is considered that climate change issues are addressed through other parts of the plan and no further changes are required.

No Change

Support for the policy particularly criterion b, d, and o by Historic England is noted.

No Change

It is considered appropriate to consider the outlined masterplan criteria to prepare a masterplan. However, the masterplan process is subject to flexibility and the early involvement of relevant stakeholders will assist in agreeing information requirements.

No Change

Support by Environment Agency noted.

No Change

Support noted.

Change

Proposed Change

Delete this paragraph from the Publication Draft as it refers to alternatives.

Reason:

The paragraph is no longer required within the Publication draft as alternatives have previously been consulted on and the Publication draft represents the council's preferred option.

Clarification on the sites that masterplans will apply to is outlined in another change.

No Change

Summary of comments

would delay the planning process by unnecessary delays caused by a prolonged pre-application process.

Concerned that the policy seeks to replicate many of the informational requirements of a Design and Access Statement and thus large elements of the policy are unnecessary.

What material weight or status will masterplans have.

A size threshold should be introduced for the requirement for the masterplanning of sites and the preparation of a management plan based on either the number of dwellings and/or commercial square footage or site area.

It is unclear whether the policy refers to all sites.

The policy infers that a masterplan will be required to support all development regardless of size or type. This is not reasonable.

The overall approach of this policy is supported however, it does not set a size threshold of a site for masterplans or management plans. The policy should only relate to sites of a significant size and a threshold included to add clarity to the policy based on the number of dwellings and/or commercial square footage or site area.

Huddersfield Civic Society warn of the dropping of the policy that would ensure new buildings in conservation areas and the town centre should be built from stone. Whilst many of our most beautiful modern buildings are not made of that material, it should be part of a 'fallback' position that local sand stone should be used over artificial stone as development that depends on using the cheapest materials brings a whole centre down.

The refurbishment or rebuilding of over 2500 empty properties in the borough would contribute to the housing targets and take the pressure off green field sites if included.

Support masterplanning as it will ensure that development layout, implementation and phasing are dealt with. The policy will ensure the timely provision of water and waste water infrastructure and part i) and the reference to sewerage connections are supported. Part m is also welcomed and supported. The policy is compliant with NPPF and NPPG. (Yorkshire Water Services Ltd).

Details of how infrastructure and community assets will be maintained and managed following

Council Response

The delivery and implementation section of DLP4 clarifies the requirement and timing of a masterplan.

No Change

The Masterplan will be a material consideration in the consideration of a planning application. Indeed, much of the information now required as part of an outline planning application, including design parameters and principles and supporting Design & Access Statements, is likely to be a direct outcome of the masterplanning process.

The masterplan would create a strategic framework to set out the overall development concept and development principles, as well as phasing and other key delivery issues. It cases where planning applications come forward at different stages, having an agreed masterplan will help understand proposals in their context, including the relationship with adjoining uses.

No Change

The Masterplan will be a material consideration in the consideration of a planning application. Indeed, much of the information now required as part of an outline planning application, including design parameters and principles and supporting Design & Access Statements, is likely to be a direct outcome of the masterplanning process.

The masterplan would create a strategic framework to set out the overall development concept and development principles, as well as phasing and other key delivery issues. It cases where planning applications come forward at different stages, having an agreed masterplan will help understand proposals in their context, including the relationship with adjoining uses and proposals and as such will be given considerable weight.

Additionally, the requirement of Policy DLP4 for the masterplan to involve all relevant stakeholders and the council will add weight to the masterplan.

Change

Proposed Change

Amend policy justification to read: "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"

Reason: To clarify the sites that masterplanning will apply to.

No Change

It is considered that this more appropriately addressed under the design policy.

No Change

The policy justification to Policy DLP6 sets out a reference to the Kirklees Empty Homes Strategy and its contribution to the spatial strategy. No further changes are considered necessary.

No Change

Support for the policy particularly criterion m by Yorkshire Water is noted.

No Change

Summary of comments

completion of development may not be known at pre-application stage and therefore this policy is onerous and should be amended accordingly.

Welcome Part O of the policy and support the need for management plans to be produced as part of the master planning stages. Ecological management plans should be included within this, which should include details of habitat management for a minimum period of 5 years after the construction phase of the development (Yorkshire Wildlife Trust).

'o' , 'demonstration of a good understanding and respect for the natural environment' is inadequate. Masterplans should require full environmental impact assessments including ecological and visual landscape impact assessments. Measures for conserving, enhancing and maintaining biodiversity, landscape and other heritage assets should be required as part of the masterplanning for sites.

While there is reference to community facilities to serve the new development (e.g. health facilities), it would be very useful and appropriate to identify community sport and fitness provision as being a further element required to be considered in order that suitable preventative health infrastructure could be properly considered, linking to/ supporting existing provision and/or developing new proposals as appropriate.

Furthermore, direct reference to following active design principles would also be positive within the Policy itself rather than only in the Supporting evidence final section

If housing delivery is to be achieved, the policy is unrealistic.

The policy should be amended to read as follows:

Masterplans should encourage engagement with relevant stakeholders and seek to address the following matters where and when appropriate dependant on site location, development scale and relationship with surrounding uses.

Part n assessment of the potential for energy efficient design including renewable energy schemes. Again, thresholds are needed; viability needs to be considered; and in particular the relationship with the relevant clauses in the Deregulation Act 2015.

Change point n to: require energy efficiency levels to Passivhaus international energy efficiency standard for new build developments and EnerPHit for building refurbishments'.

Part 'n' of the policy requires an assessment of '...the potential for energy efficient design including renewable energy schemes'. The Council will be aware that in terms of housing development the government was clear through its Housing Standards Review that the issue of energy efficiency is solely a matter for the Building Regulations. In this regard, whilst the Council may wish to encourage developments to exceed the Building Regulations, it would be inappropriate to place a mandatory requirement upon housing developments to consider how they can exceed the statutory requirements.

Council Response

It is considered necessary to consider these issues as part of the masterplanning process. While all the information may not be available, it is important to demonstrate that these issues have been considered at an early stage.

No Change

Support for criterion o of the policy from the Yorkshire Wildlife Trust.

Full environmental impact assessments, landscape impact assessments etc will be required where appropriate at the planning application stage.

Change

Proposed Change

Amend criteria j to include reference to community port and fitness provision.

No Change

Good design will ensure the proper planning for the provision of new homes.

Change

Proposed Change

Amend policy justification to read: "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"

Reason: To clarify the sites that masterplanning will apply to.

Proposed Change

Amend Policy DLP4 to read: "Masterplans must involve all relevant stakeholders"

Reason:

To correct typographical error.

No Change

National Planning Practice Guidance supports that viability is a key consideration but that good planning involves consideration of design at an early stage. The requirement for early consultation between stakeholders will assist in agreeing the potential of energy efficient design.

Summary of comments

The refurbishment or rebuilding of over 2500 empty properties in the borough would contribute to the housing targets and take the pressure off green field sites if included.

A requirement for a Management Plan for infrastructure and community facilities is onerous at the masterplanning stage and should be removed.

Given the complexity of developing in rural areas with small schools, difficult roads and scattered health provision, the principles of site based masterplanning should apply to all rural sites over one hectare.

ALL allocated sites in Kirklees Rural should be the subject of 'Masterplanning' because of intra-structure, landscape, heritage and transition issues.

Given the complexity of developing in rural areas with small schools, difficult roads and scattered health provision, we would like to see the principles of site based masterplanning (as set out in Policy DLP4) applying to all rural sites over one hectare.

Object to Part j) of the policy which references the need to include appropriate employment and community facilities. Not all development will include these facilities and thus the policy should be amended to include the wording where relevant at the start of the sentence.

There is no requirement to consult all stakeholders. This goes beyond what is reasonable.

Part j appropriate employment provision and community facilities to serve the new development (e.g. local shops, community halls, schools and health facilities). This has the potential to be widely interpreted. It is ambiguous in terms of what should be provided; in what circumstances it should be provided; at what scale the employment provision / community facilities should be provided; why they should be provided at all i.e. obligations tests, overlap / conflict with CIL; and where the provision of such facilities sits with other material planning considerations e.g. town centre first policies; use class compatibility (e.g. housing vs. employment). The list of issues with part j is potentially endless it simply does not work.

Point h 'measures to mitigate the traffic impacts of the proposed development on the strategic and local road networks'

Part h measures to mitigate the traffic impacts of the proposed development on the strategic and local road networks. In line with NPPF paragraph 32, such mitigation needs to be cost effective and if involving planning obligations, the statutory tests are met. Paragraph 32 also states that developments should only be refused on transport grounds where the residual cumulative impacts of development are severe.

Section 'h' should also include assessment of traffic impacts on existing communities

Criterion are too extensive.

Highway England - One of the essential requirements identified for master plans is the provision of measures to mitigate the traffic impacts of the proposed development on the strategic and local road

Council Response

No Change

The range of sites that the masterplan policy applies to has been clarified in the proposed change to the reasoned justification.

No Change

The type of provision required will be justified by evidence. By working closely with the council, requirements and evidence to support provision can be agreed at an early stage.

Change

The comment is accepted in part. The use of will is consistent with other policy text.

Proposed Change
Amend Policy DLP4 to read: "Masterplans must involve all relevant stakeholders"

Reason:
To correct typographical error.

No Change

The type of provision required will be justified by evidence. By working closely with the council, requirements and evidence to support provision can be agreed at an early stage.

No Change

Comments noted.

No Change

Comment noted. It is considered that the range of issues covered with provide the context to produce a masterplan.

No Change

Summary of comments

networks. Where a master plan is required for a major development site or an urban extension and there is potential for significant adverse traffic impact on the strategic road network, Highways England will need to be consulted about the need for physical mitigation measures, opportunities for travel plans and the timing of development in addition to consultation on Transport assessments.

The use of will throughout the policy is inappropriate and is not consistent with national guidance.

4.29

No comments were received on this part of the Plan.

4.30

No comments were received on this part of the Plan.

4.31

No comments were received on this part of the Plan.

4.32

No comments were received on this part of the Plan.

Option DLP4 4.5.1

DLP_SP1302

The draft policy is unclear whether the requirement for masterplans will relate to all developments or apply above a threshold. It is noted that 'Option DLP4 4.5.1' refers to the development of large sites this is not replicated within the policy, nor is there any reference to a threshold size. Whilst the benefits to utilising masterplans are noted and elements of the policy will be applicable to most development the imposition of a requirement for all applications to provide masterplans is considered inappropriate.

Safeguarded land

No comments received on this part of the Plan.

Policy DLP 5

DLP_SP249, DLP_SP280, DLP_SP370, DLP_SP917, DLP_SP931, DLP_SP990, DLP_SP993, DLP_SP996, DLP_SP1038, DLP_SP1141, DLP_SP1203, DLP_SP1246, DLP_SP1263, DLP_SP1303, DLP_SP1334, DLP_SP1352, DLP_SP1365, DLP_SP1375, DLP_SP1390, DLP_SP1405, DLP_SP1432, DLP_SP1469, DLP_SP1503, DLP_SP1665, DLP_SP1739, DLP_SP1747, DLP_SP1759, DLP_SP1768, DLP_SP1785, DLP_SP1861

Object. The rather threadbare justification for policy DLP5, set out in paragraph 4.33, is that "identification of safeguarded land ensures that green belt boundaries will last beyond the end of the local plan period. This is in accordance with national planning policies, which state the intention for green belt boundaries to have permanence in the long term". This is a self-defeating, circular and patently false argument because it means that the Council is planning to ravage the Green belt

Council Response

Acknowledge and support the role of Highways England in the preparation of a masterplan.

No Change

The use of will is consistent with other policies within the plan.

Support Conditional Support Object No Comment

No Change

No comments were received on this part of the plan. However, a change has been made due to comments on DLP4. See DLP responses.

Support Conditional Support Object No Comment

No Change

Support Conditional Support Object No Comment

No Change

Paragraph 4.31 sets out how Policy DLP4 Masterplanning will be delivered and implementation. It is not considered that any changes are required.

Support Conditional Support Object No Comment

No Change

Paragraph 4.32 sets out the links with strategic objectives and Policy DLP4. It is not considered that any changes are required.

Support Conditional Support Object 1 No Comment

Change

Proposed Change
Delete Option DLP4 4.5.1 from the Publication Draft as the plan represents the council's preferred option.

Additional text is proposed to be inserted into the policy justification to clarify the types of sites the policy refers to. See responses to DLP4.

Support Conditional Support Object No Comment

Support 2 Conditional Support 19 Object 8 No Comment 1

.No change. Draft policy is required for the plan to be consistent with national planning policy.

Summary of comments

boundaries today, so that they can theoretically be maintained, in their ravaged form, at the next plan review in 15 years' time. Yet we have no idea and cannot predict what the world or Government policy will actually look like in 15 to 30 years' time. In our view there is absolutely no evidence to justify allocation of any "safeguarded" land at this moment in time, let alone the removal of land from the Green Belt to do so. In our view green belt boundaries should be maintained in their present form, in order to encourage brown field development and urban regeneration.

Object.

Safeguarded sites are generally considered to be the next pool of sites as they are excluded from the Green Belt. As such they can also be considered reserve sites, if allocations do not proceed as expected, as they have already been considered through a Green Belt Review and Site Assessment. Safeguarded sites therefore need to accord with the Framework criteria for allocation and be available, suitable, achievable and therefore deliverable.

Safeguarded sites also need to accord with the Spatial Development Strategy.

in relation to the quantum of safeguarded land therefore should be at least 5 to 10 years' worth of housing provision to ensure the Green Belt boundary endures beyond the plan period.

Object. It is agreed that safeguarded land should only be brought forward through a 'review' of the local plan. However, such a review should not mean a formal review requiring extensive consultation and examination or the preparation and adoption of a new local plan. To ensure a 5 year deliverable housing land supply, policy DLP 5 should allow the release of safeguarded land prior to the adoption of the next plan, if monitoring indicates this is necessary. It is not agreed that such an approach would undermine the delivery of allocated sites.

Conditional support. We recommend that the Local Plan sets out the quantum of safeguarded land to be provided and explains how this has been calculated and how this relates to the spatial development strategy.

Whilst there have been numerous interpretations of the above requirements the HBF consider that a 15 year time horizon post plan period should be adopted. This would accord with the NPPF preference for Local Plans to be drawn up over a 15 year time horizon (paragraph 157). To ensure that Green Belt boundaries within Kirklees are not required to be altered at the end of the plan period sufficient safeguarded land to meet development needs until at least 2046 should be identified. Change. The justification text for this policy will be amended to set out the approximate quantum of safeguarded land for jobs and homes.

We support the clarity of this policy in making clear that safeguarded sites should not be brought forward for development during the plan period. Given that a number of existing safeguarded sites have recently been given planning permission for development, it is important to ensure that development control policies are strong enough to avoid that risk.

Considering that sites chosen for safeguarding are generally more peripheral – and therefore less sustainable – as development locations compared to allocated housing sites, the policy justification should also make clear that development of safeguarded sites while existing allocated sites remain available should be considered to be unsustainable and not consistent with Policy DLP1.

Conditional support. We recommend that the Local Plan sets out the quantum of safeguarded land to be provided and explains how this has been calculated and how this relates to the spatial development strategy.

Object. The draft Local Plan will be a new development plan and will be a whole new plan period. It is therefore necessary for the Council to review all allocations within the UDP to see if the sites allocated within the UDP should remain allocated or have their allocations changed.

The NPPF requires the Council to base all land allocations on "objectively assessed needs". However, we can see no evidence to show that the Council has done this in relation to "safeguarded land". There is no evidence to show that this site will be required for development in the next plan period. No change. All UDP safeguarded land allocations (Provisional Open Land in the UDP) has been re-

Council Response

No change. National planning policy confirms that the council should make clear that the safeguarded land is not allocated for development at the present time and that planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development.

Change. The justification text for this policy will be amended to set out the approximate quantum of safeguarded land for jobs and homes.

No change. Policy as drafted is consistent with national planning policy.

No change. National planning policy does not specify the number of years/homes/jobs for which safeguarded land should be required. The council considers that there is considerable flexibility already assumed in the figures for new jobs and homes and sufficient flexibility with identified safeguarded land to allow for a development plan review to come forward towards the end of the plan period.

No change. Support noted.

Change. The justification text for this policy will be amended to set out the approximate quantum of safeguarded land for jobs and homes.

No change. Although there are limitations to projecting forward demographic and economic forecasts beyond the plan period the council has published evidence regarding the potential need for new homes beyond 2031. This evidence can be used to determine a level of safeguarded land for new homes up to 2036.

Summary of comments

assessed as part of the Local Plan site selection assessment.

Object. It is agreed that safeguarded land should only be brought forward through a 'review' of the local plan. However, such a review should not mean a formal review requiring extensive consultation and examination or the preparation and adoption of a new local plan. To ensure a 5 year deliverable housing land supply, policy DLP 5 should allow the release of safeguarded land prior to the adoption of the next plan, if monitoring indicates this is necessary. It is not agreed that such an approach would undermine the delivery of allocated sites.

Conditional support. Several of the proposed safeguarded sites are likely to have an adverse traffic impact on the operation of the strategic road network in Kirklees and surrounding areas of West Yorkshire if and when implemented. However, as the Highways England West Yorkshire Infrastructure Study only considers allocated sites, the impact of the proposed safeguarded sites was not taken into account when developing mitigation schemes. If these sites are brought forward for development before 2030 there may be a need for investment in highway capacity in addition to schemes included in the Infrastructure Development Plan.

Conditional support. We recommend that the Local Plan sets out the quantum of safeguarded land to be provided and explains how this has been calculated and how this relates to the spatial development strategy.

Conditional 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, the development of several of the sites identified could impact upon the significance of one or more of the District's heritage assets.

4.33

DLP_SP1039

Object. The rather threadbare justification for policy DLP5, set out in paragraph 4.33, is that "identification of safeguarded land ensures that green belt boundaries will last beyond the end of the local plan period. This is in accordance with national planning policies, which state the intention for green belt boundaries to have permanence in the long term". This is a self-defeating, circular and patently false argument because it means that the Council is planning to ravage the Green belt boundaries today, so that they can theoretically be maintained, in their ravaged form, at the next plan review in 15 years' time. Yet we have no idea and cannot predict what the world or Government policy will actually look like in 15 to 30 years' time. In our view there is absolutely no evidence to justify allocation of any "safeguarded" land at this moment in time, let alone the removal of land from the Green Belt to do so. In our view green belt boundaries should be maintained in their present form, in order to encourage brown field development and urban regeneration.

4.34

DLP_SP137, DLP_SP680

No comment. "Safeguarded land is identified as land to be protected from development during the local plan period but to be considered for development through a review of the local plan." This sentence contradicts itself. Does this mean that safeguarded land can still be used during that local plan period through special review? Then it isn't safeguarded! None of our greenbelt would be safe.

No comment. If green belt boundaries are supposed to last beyond the end of the local plan period - because it is safeguarded - how can it be considered for development "through a review of the local plan? When does a "review" take place? Who does it? Who is consulted on it? How can you "safeguard" land and then permit development on it?

4.35

DLP_SP138, DLP_SP190

No comment. Safeguarded land should remain safeguarded unless there is a transparent review process where members of the local community are actively engaged with and consulted and where the

Council Response

No change. Policy as drafted is consistent with national planning policy.

No change. Safeguarded land is not intended to come forward before 2031. Such land should not automatically be considered for development in accordance with national planning policy and the draft Local plan policy wording.

Change. The justification text for this policy will be amended to set out the approximate quantum of safeguarded land for jobs and homes.

No change. The council will assess the potential impact of safeguarded land options on heritage assets as part of the site selection process.

Support	Conditional Support	Object 1	No Comment
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.No change. Draft policy is required for the plan to be consistent with national planning policy.

Support	Conditional Support	Object	No Comment 2
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No change. Guidance is set out in national planning policy. Safeguarded land will be reviewed when the next development plan for the district is prepared in accordance with national planning policy.

No change. Guidance is set out in national planning policy. Safeguarded land will be reviewed when the next development plan for the district is prepared in accordance with national planning policy.

Support	Conditional Support	Object	No Comment 2
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No change. Guidance is set out in national planning policy. Safeguarded land will be reviewed when the next development plan for the district is prepared in accordance with national planning policy.

Summary of comments	Council Response			
decision-makers actually make themselves available in person to support, justify and direct their decisions in the community.				
If green belt boundaries are supposed to last beyond the end of the local plan period - because it is safeguarded - how can it be considered for development "through a review of the local plan? When does a "review" take place? Who does it? Who is consulted on it? How can you "safeguard" land and then permit development on it?	No change. Guidance is set out in national planning policy. Safeguarded land will be reviewed when the next development plan for the district is prepared in accordance with national planning policy.			
4.36 DLP_SP864	Support	Conditional Support	Object	No Comment 1
These comments relate to site option.	No change to paragraph. Comments assessed under site option response.			
Option DLP5 4.6.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP5 4.6.2 DLP_SP1304, DLP_SP1470	Support 1	Conditional Support 1	Object	No Comment
Support for this option. This alternative would allow some safeguarded land to be brought forward within plan period as a contingency if allocated sites do not deliver sufficient development. This is considered to be a sensible approach to adopt particularly as the plan should be sufficiently flexible to meet changing and unforeseen circumstances.	No change. Guidance is set out in national planning policy. Safeguarded land will be reviewed when the next development plan for the district is prepared in accordance with national planning policy.			
Conditional support for rejecting this option. Whilst the Council's reasoning for not taking this option forward is understood it is important that the plan is sufficiently flexible to meet changing and unforeseen circumstances. In this regard it is considered that a buffer of housing site allocations be provided to account for any under-delivery from allocations or other sources of supply, this is discussed in greater detail against paragraph 45 below.	No change. Comments noted. This option is rejected.			
It is also important that the plan provides adequate triggers to enact a full or partial plan review, where the plan is deemed to be failing. In terms of housing provision this could be the failure to maintain a five year supply of deliverable housing sites, or a continued failure to meet the annual housing requirements of the plan.				
Efficient and effective use of land and buildings	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 6 DLP_SP66, DLP_SP111, DLP_SP173, DLP_SP191, DLP_SP241, DLP_SP244, DLP_SP245, DLP_SP250, DLP_SP265, DLP_SP266, DLP_SP270, DLP_SP281, DLP_SP284, DLP_SP288, DLP_SP289, DLP_SP298, DLP_SP300, DLP_SP301, DLP_SP303, DLP_SP304, DLP_SP305, DLP_SP306, DLP_SP309, DLP_SP339, DLP_SP340, DLP_SP341, DLP_SP342, DLP_SP343, DLP_SP346, DLP_SP347, DLP_SP358, DLP_SP380, DLP_SP384, DLP_SP386, DLP_SP418, DLP_SP456, DLP_SP630, DLP_SP729, DLP_SP813, DLP_SP866, DLP_SP966, DLP_SP1001, DLP_SP1005, DLP_SP1051, DLP_SP1076, DLP_SP1100, DLP_SP1143, DLP_SP1204, DLP_SP1226, DLP_SP1241, DLP_SP1247, DLP_SP1264, DLP_SP1282, DLP_SP1294, DLP_SP1305, DLP_SP1307, DLP_SP1319, DLP_SP1327, DLP_SP1335, DLP_SP1353, DLP_SP1406, DLP_SP1433, DLP_SP1479, DLP_SP1504, DLP_SP1575, DLP_SP1666, DLP_SP1708, DLP_SP1732, DLP_SP1740, DLP_SP1752, DLP_SP1760, DLP_SP1773, DLP_SP1786, DLP_SP1862	Support 15	Conditional Support 13	Object 46	No Comment
The West Yorkshire Archaeology Advisory Service welcomes the recognition of the potential high environmental value of previously developed land and buildings, including derelict land. Environmental value, of course, including historic value (as recognised in Kirklees' definition of sustainable development taken from the NPPF).	No change. Support welcomed.			
Kirklees has an excellent record in the re-use of previously developed land but there is insufficient emphasis on this in the DLP. Sites adjacent to Huddersfield town centre which previously housed the technical college and the sports centre should be allocated for high density housing.	No change. These particular sites are allocated for housing in the Local Plan.			
The policy is an effective reiteration of national policy and the spatial development strategy and could be deleted.	Change. Criterion D has been deleted as above. The spatial development strategy is concerned with the identification			

Summary of comments

Provision 4 does not make sense and should be deleted. New development should make efficient use of land whether it is greenfield or brownfield

As worded, Criterion a would only encourage the reuse of existing buildings in the most sustainable locations. In addition, it would only allow the reuse of existing buildings which are not of "high environmental value". Since a Listed Building is clearly of "high environmental value" by reason of the fact that such assets are recognised as being of national importance, their reuse would be contrary to the provisions of this Criterion.

This could mean that proposals for the reuse of some of Kirklees' heritage assets which are at risk or under threat might actually not be supported.

In order to ensure that there is no confusion about the intentions of this part of the Policy, it would benefit from a slight amendment.

Policy DLP 6, first section amend as follows:-

(a) Criterion a amend to read:-

"the efficient use of previously developed land in the most sustainable locations provided that it is not of high environmental value

(b) Criterion b amend

to read:-

"the reuse or adaptation of vacant or underused properties"

(Historic England)

Pleased to note that the environmental value of brownfield land has been acknowledged in DLP6. Brownfield land can often be of high ecological value, especially with regards to invertebrates. Wildlife and Countryside Link recently produced guidelines on the ecological value of brownfield land, and how such land should be assessed for ecological impacts prior to determining planning applications. The NPPF also recognises the ecological value of brownfield land.

The housing density requirement should be applied flexibly as a net density of at least 30 dwellings per hectare may not be appropriate in all areas.

The Local Plan should adopt a more appropriate, demonstrated target density for future housing of 36 dwellings/hectare. (2009-14 average)

criterion d) broadly welcomed with regards to NPPF para 112 however, exceptional circumstances would only occur where other sustainability concerns outweigh the protection of the agricultural land resources. (Natural England)

The policy sets 30dpha as a minimum, and the vast majority of the sites to which we have objected are at 30dpha.

The absence of a brownfield development target is welcomed on the basis that the Council acknowledge that there are very few development opportunities for site allocations on Brownfield Land.

Households will get smaller, due to ageing population, so higher density developments will be easier to achieve.

Why develop green belt sites when there are many brownfield sites and derelict properties that can be developed for housing.

Council Response

of site allocations in terms of plan making

Change. Make the amendments as suggested to criterion (a) and (b) to make the policy clearer about listed buildings.

No change. Comment noted.

No Change

The policy has changed to 35 per hectare but allows for flexibility in densities to reflect local circumstances.

Change.

The density figure has changed to 35 per hectare and this has been applied as an indicative capacity to all sites.

Change.

Criterion D and the supporting text in 4.43 will be deleted and considered in the Spatial development strategy with suggested amendments.

No change.

The policy has changed to 35 dph and this has been reflected in the site allocations. The site allocations have 35 as indicative capacity. As the policy identifies, higher densities will be sought in town centres and close to transport interchanges and lower densities may be necessary to accommodate flood risk or heritage concerns. 35 per hectare is therefore a reasonable estimate for indicative capacities of what quantum of housing can be delivered over the plan period.

No change.

Comment noted.

No change.

The policy does not preclude higher densities coming forward and states that higher densities will be sought in town centres or close to public transport interchanges.

No change. The policy aims to encourage the re-use of brownfield sites in line with NPPF. The assessment of site options and previous SHLAAs so that there is insufficient brownfield land available to meet development requirements.

Summary of comments

The Local Plan fails to make sufficient allowance for brownfield sites and empty properties. Refurbishing / redeveloping empty properties noted in para 4.42 would take some of the pressure off newbuild developments on green belt land

Housing should be developed in derelict shops / shopping centres as more shopping is done online / out of town. Spaces above shops should also be encouraged to be used for flats.

Natural England note criteria a) and c) which are in line with para 17 of the National Planning Policy Framework (NPPF)

Objection to the policy not containing any mechanism for the assessment of previously development sites that are not located within sustainable areas.

It is unclear what criteria e) relates to; 'proposals should give priority to ensuring that development does not sterilise other land for potential development.' The NPPF only makes reference to sterilising land in relation to mineral resources of local and national importance. Therefore part e) of policy DLP6 needs to be clarified to explain what this policy means; whether it relates to minerals developments, or sites allocated for a specific use for example.

Kirklees should strongly enforce the policy of utilising brown field sites before green field or green belt sites

The Local Plan should not encroach on Kirklees farmland

The council should designate further green belt to compensate for any green belt taken away

There are many brownfield sites within the Kirklees area which would seem more appropriate due to their proximity to local infrastructure and services.

The council is not doing enough to encourage developers to put Brownfield first.

The policy is consistent with the approach outlined at Paragraph 111 of the NPPF

Support the inclusion of "where appropriate" at the end of Part a) of the second section of the policy.

Council Response

No change. The council have reduced the number of empty homes in the district through the provisions set out in the Empty Homes strategy. Any further reductions will be a 'contingency' in meeting the housing requirement. Further measures have been undertaken to use more brownfield sites; and the windfall allowance is predicated on further brownfield sites coming forward.

No change.

It is considered that such developments may make up part of the windfall allowance that has been factored into assumptions for housing coming forward on brownfield sites. Policy DLP15 considers residential uses in centres.

No change. Comment noted.

No change.

This issue is dealt with in national policy. Such sites are typically within the Green Belt and would be dealt with accordingly at planning application stage, although isolated brownfield sites in the Green Belt have not been allocated.

Change.

The policy will be amended:
"allow the opportunity for access to adjoining undeveloped land so it may subsequently be developed"

This is to provide more clarity about what the policy is seeking to achieve and reflects NPPF Para 58, optimising the potential of the site. This amendment will also be made in the design policy.

No change.

The policy seeks to prioritise brownfield sites for development.

No change.

Some of the agricultural land identified for development is currently Provisional Open Land and that in the Green Belt has been identified following assessment into extent to which it meets purposes of Green Belt set out in national policy. Furthermore Policy DLP6 requires only exceptional use of best and most versatile agricultural land. All development should meet the presumption in favour of sustainable development set out in national policy.

No change.

The removal of Green Belt does not need to have compensatory Green Belt designated elsewhere. The majority of the district is covered by the Green Belt designation which is a planning tool which must meet the purposes set out in Para 80 of NPPF.

No change.

Comment noted.

No change.

The policy seeks to give priority to the use of brownfield land which is over and above the national policy requirement.

No change.

Comment noted.

No change.

Summary of comments

They believe that the flexibility provided by this wording will enable development to be designed to reflect the character of the location in which they are situated.

The second paragraph provides weak and unsustainable position on housing density. There is ample evidence that net densities of 45-60dpha are the minimum that will sustain viable public transport services and other amenities, and create walkable neighbourhoods that contribute to good public health.

There are five public buildings in the centre of Holmfirth with uncertain futures. These could be converted to multi purpose units that includes bedsits, flats and sheltered accommodation. Why not challenge and encourage the local residents to raise funds to help with the costs of such conversions.

Support for 30 dwellings per hectare and acknowledgement that densities need to be flexible to allow for consideration of local character, site abnormalities and development viability.

In the context of many sites, particularly those located in the Kirklees Rural Area, a density of 30 units per hectare is too high. Based upon schemes being proposed and supported by quality housing developers in the sub-region a much lower density of development is appropriate. A density as low as 20 dwellings per hectare might be more appropriate.

additional wording needs to be included in Part a) of the policy:

Our amended wording is as follows:-

"The efficient use of previously developed land and buildings with priority given to the most sustainable locations provided that they are not of high environmental value"

Support for exclusion of a specific target for the development of land on previously developed sites. Such targets can restrict the release of land for development and hamper the delivery of the Council's aspirations in respect of housing growth.

The first part of the policy is effectively a duplication of the Spatial Development Strategy and does not add anything to the plan making or decision making process. It therefore should be deleted.

Support for bringing empty properties back into re-use, making only exceptional use of best and most versatile agricultural land and seeking higher densities in principal town centres and close to public transport interchanges.

The Council does not appear to have conducted a survey of brownfield sites that will be available for future development. Since NPPF prefers, and indeed incentivises, the use of the brownfield sites, this would appear to be a material omission from the Allocations and Designations document.

Density figure in the policy should not be treated as mandatory as there are many factors that may arise in relation to a site that could require assessment of what density of development is appropriate. The flexibility contained within the wording should be maintained.

Consideration could be given to the desirability of allowing lower densities within a site where this is needed to ensure that flood risk sequential approach to layout can be achieved. (Environment Agency)

Objection to greenbelt and green fields in rural South Kirklees being designated for housing to subsidise brownfield development in North Kirklees or any area for that matter.

The draft Local Plan fails to mention that in appropriate situations, particularly in and around town centres, even higher density levels can be achieved, so long as design quality is not sacrificed.

Council Response

Support welcomed.

No change.

The densities are based on the average delivered in recent years and therefore are a reasonable assessment of what the development industry can be expected to achieve.

No change.

This is not a matter for the Local Plan, rather the owners of the building and the local community.

No change.

Support welcomed.

No change.

The density in the policy has now been changed to 35 to better reflect the average delivered in the district. The policy allows for lower densities where appropriate.

Change.

The wording will be changed to "the efficient use of previously developed land in sustainable locations provided that it is not of high environmental value " to provide more flexibility

No change.

Support welcomed

No change.

Spatial Development Strategy sets out plan making policy, whereas this is for decision making process

No change.

Support welcomed

No change.

Sites have been identified in SHLAA and through options sent to us. These have included additional brownfield sites identified between the Draft and Publication Stages of the Local Plan. Central government are currently piloting brownfield registers as identified in the Housing and Planning bill.

No change.

Comment noted.

Change.

Whilst it is considered that the policy wording makes allowance for this, the supporting text will be amended to consider planning for flood risk.

No change.

Brownfield and greenfield sites have been identified throughout the district and on the in nearly all cases are owned and will be developed independently of each other by the private sector.

No change.

The policy states that higher densities will be sought in town centres or close to public transport interchanges.

Summary of comments	Council Response			
The aim to prioritise brownfield land not wholly representative of the NPPF. It is suggested that this policy is amended to 'encourage' the re-use of previously developed land. The approach in suggests that planning applications should be taking a sequential approach to decision making, which is not consistent with national policy. The policy is not positively prepared as it may constrain development on greenfield sites which are necessary for the Plan to meet its development requirements.	Change. In the first sentence delete 'give priority to' and replace with 'encourage'.			
Brownfield sites should be used instead of green belt sites in every case	No change. The Local Plan evidence states that there is not enough brownfield land to meet these requirements.			
4.37	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
4.38	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
Table 1 DLP_SP719	Support	Conditional Support	Object 1	No Comment
A clear downward trend in the use of brownfield sites - this needs addressing by encouraging more development on brownfield sites.	No change. The policy aims to prioritise development on brownfield sites.			
4.39	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
4.40	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
4.41 DLP_SP891	Support	Conditional Support	Object 1	No Comment
More clarity needed about how the council will remain committed to a brownfield first approach as set out in the policy.	No change. The steps set out in the policy and also in the housing strategy section set out how brownfield land is prioritised.			
4.42	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
4.43	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
4.44	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
4.45	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change			
4.46	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
4.47	Support	Conditional Support	Object	No Comment

Summary of comments	Council Response			
No comments were received on this part of the plan.	No change.			
Option DLP6 4.7.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP6 4.7.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP6 4.7.3	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Place shaping	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
5.1	Support	Conditional Support 3	Object 3	No Comment
DLP_SP227, DLP_SP435, DLP_SP1042, DLP_SP1491, DLP_SP1518, DLP_SP1803				
It states access from Dearne Valley to M1 is 'relatively good' - It is not clear as to what this is relative to. There appears to be no reference to volume of traffic to A637-A636 roundabout which backs up to Clayton West	No change. Access to the M1 is good relative to the majority of the district, to the west of the Dearne Valley.			
Signage from tourism routes such as the National Cycle Network and the Trans Pennine Trail are essential to enable those less familiar with the area information on local facilities that they would otherwise pass by.	No change. These routes are safeguarded in the core walking and cycling network. The signage of them is not a matter for the Local Plan.			
The current Plan should be withdrawn and there should be two 'stand alone' Plans drafted for North and South of the district.	No change. The purpose of the sub-areas is to acknowledge and plan for these differences that occur across the district			
the identification of a rural 'place' sub-area within Kirklees is a sensible one and the challenges faced by such rural communities (as expressed in Chapter 5.4) are real	No change. Support welcomed.			
Imbalance in the plan between housing and employment. Affordable housing and employment opportunities for the young are required to be able to keep them in the Holme Valley. The Plan should be more ambitious in prescribing targets and requirements for these needs for our community to be sustainable in the longer term	No change. The housing numbers take account of economic assumptions for the district to ensure that the housing numbers are realistic and support the economic aspirations of the Leeds City Region SEP and the Kirklees Economic Strategy. The Place Shaping statement box for Kirklees rural notes the economic challenges and opportunities in the Holme Valley and the Location of New Development policy requires development to take account of these.			
This section is more a summary of the status quo than articulation of future direction, it fails to set out a clear vision for each district / community and seek to answer the question ' what sort of place do we want to live in?'	No change. The place shaping section should be read in conjunction with the Location of New Development policy and the Spatial Development Strategy. The statement boxes for each area have been redrafted to include more location specific strengths, opportunities and challenges to growth. The Location of New Development policy requires development to reflect these strengths, opportunities and challenges.			
Birkenshaw should be accorded a higher status in the development hierarchy and can accommodate a large, highly sustainable urban extension	No change. This matter is dealt with in Policy DLP2			
5.2	Support	Conditional Support	Object 1	No Comment
DLP_SP912				
The proposal to identify an industrial corridor through Scissett and Clayton West is not only	No change.			

Summary of comments

Council Response

inappropriate, but is in conflict with the objectives and policies of the Draft Local Plan and it should be removed from the Plan.

This is based on existing industrial uses along the A635.

5.3

DLP_SP434, DLP_SP494, DLP_SP676

Support Conditional Support 1 Object 2 No Comment

Quality of life is also affected by the decisions of planners. Whether or not they are to live next to a mineral extraction site or wind turbine for instance.

Comment noted.

Providing green transport links is essential to enable those in a lower income bracket to be able to access facilities by walking cycling and even horse riding.

Comment noted.

If Kirklees recognises that there are different needs for different areas and that smaller communities have a limited number of services, why are 5100 houses proposed for Kirklees Rural

No change.

The number of homes to be allocated in this area is proportionately less than other sub-areas.

5.4

DLP_SP230, DLP_SP1020, DLP_SP1219

Support 1 Conditional Support 1 Object 1 No Comment

Each character area needs a different planning style and approach

No change.

The local characteristics, strength/opportunities and challenges are identified for each area.

The Local Plan says nothing about Holmfirth Town Centre being listed by Historic England as a Conservation Area at Risk. Very little investment has taken place in the public realm in comparison to Honley, Meltham, Slaithwaite and Marsden. The Local Plan fails to say anything about enhancing the Holmfirth Town Centre conservation area.

Change.

In line with national policy, development proposals are required to conserve elements that contribute to significance of a conservation area. The vision and objectives seek to retain the local character and distinctiveness of the district. However, the sections for each area will identify the conservation areas at risk in the district.

Para 5.4 and the place shaping policies are supported. (Meltham Town Council)

No change. Support welcomed

Policy DLP 7

DLP_SP139, DLP_SP251, DLP_SP282, DLP_SP495, DLP_SP913, DLP_SP967, DLP_SP980, DLP_SP1086, DLP_SP1101, DLP_SP1145, DLP_SP1205, DLP_SP1248, DLP_SP1265, DLP_SP1320, DLP_SP1336, DLP_SP1354, DLP_SP1366, DLP_SP1376, DLP_SP1407, DLP_SP1434, DLP_SP1471, DLP_SP1508, DLP_SP1534, DLP_SP1576, DLP_SP1641, DLP_SP1742, DLP_SP1761, DLP_SP1787, DLP_SP1863

Support 3 Conditional Support 20 Object 5 No Comment 1

The council's approach to place shaping is sound, but for greater clarity this policy should include the distribution of growth.

No change.

The Spatial Development Strategy sets out how growth will be accommodated.

It is important that the Local Plan meets OAN and seeks to deliver development that is sensitive to and enhances local character.

No change.

Comment noted, this is the intention of the policy.

We welcome the inclusion of this Policy which will assist in delivering the Plan's vision that the distinctive character of the various parts of Kirklees will be safeguarded and reinforced. (Historic England)

No change.

Support welcomed.

The policy merely identifies existing characteristics of the sub-areas, without giving any sense of how they are to be enhanced as places through specific planning interventions. As such, this is a non-policy that will not be implemented.

No change.

This approach to five year supply is unnecessary and not required by national policy. The assessment of deliverability of the site to determine whether or not it is in the five year supply will consider local market conditions.

Supportive of concept that new development should relate appropriately to the characteristics of different places, however this shouldn't be the only consideration. Other factors in NPPF should underpin plan making, i.e. proactively driving and supporting support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that are needed. Relying on local characteristics alone does not give an indication of how a place could be enhanced and developed more sustainably in the future.

No change.

The policy is not seeking to limit the factors that new development takes into consideration. Other Local Plan policies and national policy apply. The policy and place shaping section inform the Spatial Development Strategy that seeks to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that are needed

Summary of comments

Policy DLP 7 is supported and yet again shows that the sustainability assessment has not taken account of the policies espoused by the LDP

The plan doesn't set out policies for sub-areas, just strengths and weaknesses. Example of sub-area approach in Bradford Core Strategy which covers strategic pattern of development, urban regeneration and renewal, economic development, environment, transport and investment priorities.

Sub-Area approach supported subject to five year land supply being assessed on both a district-wide and sub-area basis. If a five year supply can't be demonstrated in the district or sub-area, further land is needed to be released. Should one or a number of the larger housing allocations or mixed use strategic allocations not prove to be deliverable or the delivery of new homes within the site is not at the predicted pace, then the Council should not seek to identify replacement sites within the same Sub-Area for the sake of an arbitrary boundary, but sites within the same geographical and housing market area which can be considered deliverable and sustainable.

Sections 5.2 and 5.5 would be appropriate to the introductory parts of the plan and could form part of Section 2 as a SWOT analysis: Issues facing the sub-areas.

The draft Local Plan divides the area in to 4 sub-areas. Mirfield is placed in to the same area as Dewsbury. However, we believe that this area needs to be further sub-divided. Mirfield is very different to Dewsbury and the two areas do not share the same planning issues

Out of town developments particularly those served by motorways should be avoided unless public transport, cycling and walking are significant modes of access to services and employment

Development proposals may actually have to provide local services and sustainable transport choices and not just connect with what is already there.

A section should be added to this to encourage the growth of local and sustainable food

The proposal to identify an industrial corridor through Scissett and Clayton West is not only inappropriate, but is in conflict with the objectives and policies of the Draft Local Plan and it should be removed from the Plan.

Golcar should be part of the Huddersfield sub-area - When looking at Huddersfield from an aerial prospective Golcar clearly forms part of the main urban area of Huddersfield.

It would be better if this policy was focused on smaller geographical areas possibly describing the strengths, opportunities and how to help address the challenges facing key settlement identified through a settlement hierarchy.

The Kirklees Rural context (Section 5.4) recognises that the area has the opportunity to allocate sufficient sites in the eastern area of the Kirklees Rural sub-area. The Council should recognise that settlements in the east are sustainable settlements and that rail links exist to the south towards Sheffield.

The policy lists a number of sub areas but does not explain how they are derived, or the policy priorities

Council Response

No change.
Support welcomed.

No change.
Whilst there are no policies for the sub-areas The policy seeks to ensure proposals build on the strengths, opportunities and help address challenges identified for the four sub-areas in the local plan in order to protect and enhance the qualities which contribute to the character of these places. The Place Shaping policy / section informs the spatial development strategy.

No change.

This approach to five year supply is unnecessary and not required by national policy. The assessment of deliverability of the site to determine whether or not it is in the five year supply will consider local market conditions.

Change.

This has been changed in part to provide more clarity in how the issues, vision and objectives contribute to the place shaping chapter and how the place shaping chapter informs the spatial development strategy.

Change.

Each place shaping statement for sub-areas will be revised to include more detail on the strengths/opportunities and challenges to growth affecting different localities.

No change.

Comment noted. These issues are covered in the transport and design sections.

No change.

Comment noted. These issues are covered in the providing infrastructure and masterplanning sites policies.

No change.

Allotments and green spaces are protected in the Plan through allocation as Urban Green Space where justified. The importance of opportunities for local food growing is recognised in the Vision for Kirklees and is considered to be adequately covered in the Healthy, Active and Safe Lifestyles policy which supports initiatives that enable or improve access to healthy food, e.g. land for local food growing and allotments.

No change.

This is based on existing industrial uses along the A635.

No change.

In considering the distribution of growth Golcar is part of Huddersfield in the settlement appraisal, as set out in the settlement technical paper.

Change.

Each place shaping statement for sub-areas will be revised to include more detail on the strengths/opportunities and challenges to growth affecting different localities.

Change.

The relationship to South Yorkshire via the Penistone Line will be identified in the Kirklees Rural area

Change.

Summary of comments

within them.

No narrow green belt boundary exists between Roberttown and Heckmondwike in figure 5. This suggests Roberttown has already merged with Heckmondwike and so it's sensitivity is less than other areas that have been recognised as having narrow green belt gaps between settlements.

There is a disjointed approach towards regeneration in Dewsbury. Section 5.2 recognises Dewsbury has good rail and motorway links and that it is a priority to transform Dewsbury, creating a context to revitalise and rejuvenate Dewsbury. Regeneration aspirations for Dewsbury should be woven through the plan into all policies and allocations to remove internal conflicts in the plan.

Many of the bullet points relate to strategic matters or matters that often cannot be addressed or are of little relevance to a development.

5.5

DLP_SP436, DLP_SP671, DLP_SP683

Para should be amended to read:

"This policy will be delivered by developers, but will be directed by the council..."

The proposal to build on Bradley golf course will not tackle inequality and give all residents the opportunity of a healthy lifestyle, just the opposite.

Links to sustainable transport routes such as the TPT and NCN are vital to ensure green transport can be used which will fit in with the climate agenda and decrease carbon emissions.

Link 5 could read: "Promote development that helps to reduce and mitigate climate change and development which is adapted so that the potential impact from climate change is reduced.

Option DLP7 5.0.1

No comments received on this part of the Plan.

Huddersfield

No comments received on this part of the Plan.

5.6

DLP_SP438, DLP_SP1509

We would endorse the identification of the heritage assets of the town as being one of the strengths/opportunities of Huddersfield. (Historic England)

Links from the current NCN and TPT through to Huddersfield for walkers, cyclists and horse riders will raise the profile for visitors and encourage sustainable transport.

Place Shaping - Huddersfield

DLP_SP399, DLP_SP1730

Huddersfield could be a new look town with quality landscaping, enabling residents to walk to a range of facilities. An open competition for architects / landscape architects could seek to deliver this.

Council Response

The justification text will be amended to clarify this.

No change. Agree with the comment.

No change.

It would be unjustified to set out place-shaping issues in all policies in the development plan.

No change.

The strengths/opportunities and challenges to growth are based on land use factors and the policy seeks to ensure that these factors are taken into account in development proposals. This is supported by the Location of Development policy.

Support	Conditional Support	2	Object	No Comment	1
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No change.

This is standard wording throughout the document. The Local Plan policies and proposals themselves offer direction to developers

No change.

The strategic objectives set out in section 3 need to be considered as a whole.

No change.
Comment noted.

This comment refers to the strategic objectives and will be considered in that section

Support	Conditional Support		Object	No Comment	
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Support	Conditional Support		Object	No Comment	
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Support	1	Conditional Support	1	Object	No Comment
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No change.
The section refers to "attractive buildings and spaces of historic and architectural interest"

Change

Greenways are identified in the policy, however access to the surrounding countryside for leisure opportunities could be identified

Support		Conditional Support	1	Object	1	No Comment	
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No change. More detailed elements of planning for Huddersfield Town Centre are set out in the Huddersfield Town Centre policy. The design policy seeks to attract high quality design in the district

Summary of comments	Council Response			
Huddersfield Town Centre would benefit from a major draw such as a Hepworth or a Eureka; easy to say, harder to identify. It is a nice town but for many there is no reason to visit.	Change. Enhanced cultural offer is identified as an opportunity for growth in Huddersfield town centre, however this will be revised to make this clearer.			
Figure 3	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Dewsbury and Mirfield	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
5.7 DLP_SP932, DLP_SP1257, DLP_SP1512	Support 1	Conditional Support 1	Object 1	No Comment
Dewsbury has serious traffic congestion, the Victorian arcades are falling into disrepair and the river and canal corridor could be presented as showpieces for a town, e.g. providing a canal bus.	Change. These issues are all considered but the place shaping statement to place more emphasis on the town centre.			
We would endorse the identification of the heritage assets of the town as being one of the strengths/opportunities of Dewsbury and the challenge faced by the high vacancy levels within the town centre.	Change. A revision will be made to this section, though these issues are already considered.			
The draft Local Plan divides the area in to 4 sub-areas. Mirfield is placed in to the same area as Dewsbury. However, we believe that this area needs to be further sub-divided. Mirfield is very different to Dewsbury and the two areas do not share the same planning issues.	Change. Each place shaping statement for sub-areas will be revised to include more detail on the strengths/opportunities and challenges to growth affecting different localities.			
Place Shaping - Dewsbury and Mirfield DLP_SP551, DLP_SP619	Support 1	Conditional Support 1	Object	No Comment
Mirfield represents a highly sustainable location which benefits from comprehensive local facilities, but also provides good access to the higher order centres of Leeds and Manchester. Its strong housing market is, at least in part, a consequence of these attributes and, as such, there is a very good probability that allocated housing sites in this location would be delivered by the market in practice. In this context, we would expect Mirfield to make a meaningful contribution to Kirklees' future housing needs.	No change. Comment noted.			
We agree with the potential to enhance the river and canal corridor to help attract investment as identified as a strength and opportunity for growth within the Draft Plan. The canal corridor is currently overlooked and needs to be considered as a focal point for the communities of Dewsbury and Mirfield as the canal and towpath offer numerous benefits to the local community. (Canal and River Trust)	Change. Comments noted, the place shaping statement will be revised to deal with these issues.			
Figure 4	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Batley and Spen	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
5.8 DLP_SP554, DLP_SP933, DLP_SP1475, DLP_SP1515, DLP_SP1679, DLP_SP1699	Support 1	Conditional Support 3	Object 2	No Comment
We would endorse the attractive buildings of Batley and Birstall reflecting the area's industrial heritage and the towns' public spaces being one of the strengths/opportunities of this area.	No change.			
Batley town centre is struggling, there is traffic congestion and poor parking at the station. Ambiguous text about high quality green infrastructure. There are differences in character between Batley and Spen hence different requirements for place shaping.	Change. The text will be revised to identify opportunities / challenges specific to individual towns in this area.			
Development in Batley and Spen should be contingent on infrastructure upgrades and improvements	Change.			

Summary of comments

Jobs and homes need safe roads, good schools and effective services. Secondly, and crucially, we need a plan that protects what is unique about our towns and villages, including some of our precious urban and rural green spaces. In Kirklees we should be careful to conserve and protect the strong identities our towns and villages have, but without fear of growing and enhancing what makes them so special.

Green Belt in Gomersal / Birstall performs a more important role than elsewhere in the district.

Hunsworth and Cleckheaton should contain more parks and greenways.

Accessing greenways, where one has to negotiate busy roads, e.g. A58 is not going to encourage cycling either for leisure or as an everyday activity such as commuting

Council Response

The text will be revised to be more specific in regard to individual towns in this area.

No change.

Narrow green belt gaps are accepted.

No change.

??

No change.

The greenways locally do encourage cycling. Whilst it is acknowledged that not all areas of the sub-district currently have access, the core walking and cycling policy seeks to expand this network and the highways and access policy seeks for new development to plan for the needs of pedestrians and cyclists above other road users.

Place Shaping - Batley and Spen

DLP_SP142, DLP_SP451, DLP_SP1230

The limited green belt between settlements must be kept and better bus and rail services promoted.

Increasing risk of flooding should be added as an issue for Spen Valley.

It is welcomed that the place shaping recognises that the 'Batley and Spen' sub area has good motorway links and has strong housing and employment markets. It also welcomed that it acknowledges that there are issues high unemployment and deprivation as well as poor environmental quality.

Figure 5

No comments received on this part of the Plan.

Kirklees Rural

No comments received on this part of the Plan.

5.9

DLP_SP231, DLP_SP409, DLP_SP439, DLP_SP496, DLP_SP892, DLP_SP1016, DLP_SP1516, DLP_SP1667

The Dearne Valley no longer has 'relatively good connections' to the M1. The A636 is a highly congested road at peak commuter times. Traffic forms stationary queues along its length and on feeder roads such as the B6116. This road requires prioritization and major improvements before any more large scale development takes place.

Combining the Holme and Colne valleys along with Denby Dale and Kirkburton areas into one group, Kirklees Rural ignores individual identities and characteristics of these areas will be ignored. Each of these areas are different, being defined by their economic and social history, their topography and their geographical location within the District of Kirklees. (Holme Valley Parish Council)

Combining Holme Valley with Kirklees Rural may ignore local shortages of education / infrastructure provision (Holme Valley Parish Council)

Support 1	Conditional Support 2	Object	No Comment
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No change.

Comment noted.

Proposed change.

Risk of flooding in Batley Beck and Spen valleys added in.

No change.

Support welcomed.

Support	Conditional Support	Object	No Comment
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Support	Conditional Support	Object	No Comment
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Support 1	Conditional Support 3	Object 4	No Comment
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No change.

The Dearne Valley has good connections to the M1 relative to the rest of the Kirklees Rural area. (Highways work?)

Change.

Kirklees Rural will remain as one area, but more detailed considerations of individual settlements and areas will be added to the text.

No change.

Summary of comments

Highways infrastructure is tightly constrained by the topography of the Holme Valley and there is no recognition in the Local Plan of the narrow lanes, traffic congestion and need to improve junctions such as in the centre of New Mill or Holmfirth, if more cars are to travel through these areas. (Holme Valley Parish Council)

A Key Statement in the Local Plan Strategy relating to Holmfirth (page 38 of the Strategy & Policy Document) says that the strengths & opportunities for growth include: 'Canal and centres such as Holmfirth attract tourism.'

There is no doubt that tourism & leisure are increasingly vital to the economy of the upper Holme Valley but this is a very simplistic statement and the plan puts forward no proposals or policies to develop the appeal of Holmfirth or the surrounding countryside.

A629 is a key link between Huddersfield and Sheffield that passes through a number of villages in this region yet again it is not mentioned.

Investment into the TPT bridleway route to Kirklees will provide a better surface for less able bodied visitors and families and should be encouraged throughout this plan.

We broadly agree with the policy at Para 5.9 acknowledging the importance of local character and distinctiveness. (Meltham Town Council)

We would endorse the canal and centres such as Holmfirth and the attractive landscape character being two of this area's strengths. It is not just the landscape which is important. The towns themselves and their relationship to the landscape is also a key defining element and something which is both a strength and an opportunity.

Bullet-point amend to read:-
"Attractive towns and landscape character"

Place Shaping - Kirklees Rural

DLP_SP332, DLP_SP400, DLP_SP419, DLP_SP684, DLP_SP844, DLP_SP1288, DLP_SP1731, DLP_SP1796

This section overlooks the importance of tourism and IT industries in Rural Kirklees.

Rail links to Sheffield via the Penistone Line should be identified, particularly if there is a HS2 station at Meadowhall / Sheffield.

Holme Valley should capitalise on connections to Peak District and Yorkshire Sculpture Park.

Historical Pennine villages and farm complexes should be conserved.

Another challenge to growth is the limited frequency and coverage of bus services in the Kirkburton and Denby Dale wards especially in the evening.

The comparative high levels of income mask the distribution of household wealth and composition and the comparative high house prices is seen as a main contributor to the dysfunctional population profile.

Council Response

These are not issues that are considered in the place shaping policy.

Change.

The text will be revised to better reflect the character of highways in this area.

Change.

The text will be revised to be more specific about the area's tourism and leisure offer.

Change

The text will be amended to identify links to South Yorkshire.

Change.

The text will be amended to refer to access to the countryside and the Transpennine Trail

No change.

Support welcomed.

Change.

This amendment will be made along with other revisions to the text to draw out the positive landscape and townscape features

Support

Conditional Support 2

Object 5

No Comment 1

Change.

Tourism will be given greater emphasis in this section

Change.

Rail links to Sheffield will be added to the text.

Change.

These will be identified in the revised text.

No change.

Many of these are covered by conservation areas.

Change.

Bus services will be referred to in the revised text.

No change.

Comment noted. High property prices are noted as a challenge, as well as high levels of income as a strength

Summary of comments

The plan recognizes that the settlements in the Upper Holme Valley often join together. Distinction between settlements to should remain avoid the perception of ribbon development and urbanization

The Penistone Line is an excellent means of transport in the Dearne Valley, well-used by commuters and for leisure purposes. Better car parking areas would help ease of access for residents

Few local employment opportunities in the Dearne Valley making this a large dormitory area

Figure 6
DLP_SP324, DLP_SP681

Map is inaccurate. Park Gate, Skelmanthorpe has flooded numerous times in past years, but this is not recorded on the map

Challenges to growth make no reference to poor infrastructure, the road, sewer and school provision have already been compromised by the rapid development in places such as Highburton

Economy

No changes were received on this part of the plan.

6.1
DLP_SP442, DLP_SP1386, DLP_SP1528, DLP_SP1831, DLP_SP1867

The emphasis in the Draft Local Plan is to provide new homes without increasing the number of employment opportunities in Holme Valley. Existing local employment opportunities are being lost to housing. There is a demand from local businesses who wish to expand and grow. H50 should be protected for employment use.

The Plan should also designate new employment sites within the Holme Valley area to stimulate local business and employment opportunities. Bridge Mills in Holmfirth should be retained as an employment site rather than be designated as a housing site (H50) and allocated as a priority employment area.

There is no reference in Chapter 6, Economy, to the potential growth of small scale industry especially that needed to combat climate change, such as the green business sector. Whilst it may not be appropriate to reserve specific sites, a policy encouraging growth in this sector would be a welcome addition.

The Plan in Chapter 4 acknowledges the shortage of employment land in the Holme Valley area, and highlights this as one of the 8 challenges to growth for Kirklees Rural sub-area. Hence, the Plan should recognise the need to retain current level of businesses and should include a policy to encourage the provision of affordable office / workshp accommodation space for start-ups and SMEs.

Council Response

/ opportunity.

No change.

Comment noted. Green Belt policy seeks to ensure that settlements are separated. In area such as the Holme Valley and Colne Valley, this is part of the industrial legacy of development along the valley bottom

Change.

The Penistone line stations will be referred to in the revised text.

No change.

Limited opportunities for people to work and shop locally.

Support Conditional Support Object 2 No Comment

No change.

The map is a broadbrush view of high level constraints affecting the area as a whole. It is not the intention of the map to identify every flood risk area.

No change.

These issues are addressed by other policies in the plan.

Support Conditional Support Object No Comment

No Change

Support 1 Conditional Support Object 4 No Comment

No change.

Priority Employment Areas (PEAs) have been identified to support the continuation of established businesses and to prevent the change of use to non-employment uses such as housing. This approach will help to retain jobs within the area and provide opportunities for further job growth. The few employment options put forward in the Holme Valley have been rejected due to proximity to residential areas - which has the potential to cause conflicting neighbouring uses - and because they have been safeguarded through the PEAs policy instead. Reference to site H50 is site specific, the final decision taken on this site has been justified through the site allocations process.

No change.

Comment noted. Sites have been safeguarded through the PEAs designation to support the continuation of established businesses within the Holme Valley. Policy DLP 10 supports the needs of SME operations looking to set-up, grow and expand within Holmfirth and beyond. Reference to site H50 is site specific, the final decision taken on this site has been justified through the site allocations process.

No change.

Introductory text makes reference to the needs of business. This would be inclusive of SMEs and the green business sector. Policy DLP 10 has been amended to make specific reference to the needs of SME operations. In view of this it is considered that sufficient support for SME's has been included within the economic policies of the plan.

Summary of comments

Sustainable travel links should be key in all policy documents for employment and housing sites.

Support the approach to the allocation of new employment sites. Support Priority Employment Areas but consider it is appropriate to allocation further land to meet the aspirations of the Kirklees Economic Strategy and the Leeds Strategic Economic Plan.

The inclusion of a specific policy encouraging the growth of community / social enterprises within our local economy would be welcomed e.g. locally owned community businesses such as the Fair Trader co-operative in Holmfirth, the HoTTWind@Longley community benefit society near Hade Edge. HoTT consider that the council should support the provision of low cost office / workshop accommodation / business facilities / sites for such community enterprises, particularly where the council has access to public sector assets (e.g. land, buildings, etc.) which could be utilised by such community groups (6.12). Supported by access to cheaper council loan finance, these assets could be used by community groups for developing local schemes where the council is unable or unwilling to do so. There should be a specific policy and guidance included in the Plan on this matter, as there appears to be no specific policy or guidance on the beneficial use of council assets in the Plan.

6.2
DLP_SP232, DLP_SP440

Statistics are available for the visitors and visitor spend in the Kirklees area via the Trans Pennine Trail.

Para 6.2 deals with safeguarding employment land and premises, which is supported in particular for defending the continued use of the Meltham Mills employment area. However, there is the possibility of conflict with paragraphs 7.10 'brownfield first' and 7.11 'sites no longer suitable for employment'. Which allow employment sites to come forward for development. Can this policy be strengthened?

6.3

No comments were received on this part of the Plan.

6.4
DLP_SP453, DLP_SP726, DLP_SP1673, DLP_SP1804

There are a number of manufacturing and engineering companies located in the Holme valley but their ability to grow is limited by poor infrastructure, especially transport which impacts on and their ability to get goods to market. The economic strategy suggests an evolutionary improvement for Holmfirth, but there is no strategy to encourage any growth. The lack of industrial/office space, infrastructure and the poor transport links are not addressed. There is no focus within the economic strategy on the service sector; especially the creative industries and professional services. With its higher than average per capita income levels, a large proportion of the local population is employed in these areas. With the lack of provision for offices and smaller units within the Holme Valley the majority of these professional

Council Response

No change.

Comment noted, however the introduction to the economic policy emphasises the need to promote sustainable development - which would include sustainable travel. Paragraph 6.4 states the need to ensure economic development is read in conjunction with other policies in the Local Plan - including sustainable travel. Paragraph 6.6 of the employment strategy also makes specific reference for the need to support improvements to transport.

No change.

Support noted. Priority Employment Areas (PEAs) have been reviewed and employment sites not designated as a PEA have been justified in the PEAs technical paper. This is in accordance with NPPF paragraph 22 and 157 (bullet 6) where sites allocated for or last used for employment should not be unnecessarily retained.

No change.

Comment noted. The issues identified have been covered in revised policy DLP 10 which provides a supportive approach towards community led enterprises and SME operations. In view of this no change proposed to the introductory text.

Support 1	Conditional Support 1	Object	No Comment
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No change

Comment noted.

No change

The policy is applied to established business and industrial areas that have been given a PEA designation. The purpose of which is to prevent the unnecessary change of use, however, a degree of flexibility is required to ensure certain sites do not become derelict with little prospect of being brought back in to use for their original purpose. Where it can be demonstrated a site is no longer suitable allows for the opportunity to deliver alternative uses to meet identified needs.

Support	Conditional Support	Object	No Comment
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No Change

Paragraph 6.3 sets out the role of regional objectives through the Leeds City Region. It is not considered that any changes are required.

Support 1	Conditional Support	Object 3	No Comment
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No change

Paragraph 6.4 provides sufficient context to provide clarity on the approach towards employment growth within the Local Plan. It acknowledges the importance of the Local Plan to meet the objectives of the LCR's economic strategy and both the Council's own economic and health and well-being strategies. Within these there is a stated need to meet the business needs of the community which will include tourism, micro and SME operations which are all key components of the Holme Valley economy. Manufacturing and engineering operations are critical to Kirklees and are afforded a positive approach to support their growth aspirations

Summary of comments

workers will end up commuting to the regional powerhouses of Leeds, Manchester and Sheffield for work; the danger being that the Holme Valley just becomes part of a commuter belt rather than becoming a dynamic economic area in its own right. Holmfirth itself is a honey pot in Kirklees with its range of cultural attractions and beautiful Pennine scenery; the importance to growing the tourist economy and the service sector is not recognised in the Local Plan. It should also be noted that Historic England recently identified the condition of the Holmfirth Conservation Area as being at risk and it lacks a Conservation Area Appraisal to guide and control future development to protect and enhance our built heritage. As you will be aware, the Parish Council is starting to develop its Neighbourhood Plan and this gap is an area we wish to see addressed

The distribution of employment land is unfairly located in the Spenn Valley and sites in the Green belt. Over 100ha of Green Belt land will be lost in the Spenn Valley if these proposed allocations are accepted, of which 50% is decent agricultural land. By comparison, all the remainder of Kirklees Council area will only lose approximately 20 ha of Green Belt across the whole district.

Too much employment development has been located on the M62/M606. Dewsbury and Lindley should be considered as alternatives.

It should also be noted that Historic England recently identified the condition of the Holmfirth Conservation Area as being at risk and it lacks a Conservation Area Appraisal to guide and control future development to protect and enhance our built heritage. As you will be aware, the Parish Council is starting to develop its Neighbourhood Plan.

Economy 26. Section 6.4 makes specific reference to supporting the rural economy. This is a positive section in support of the rural economy and makes perfect sense in terms of the proposals for conversion or re-use of existing buildings. Whilst large scale development in the green belt such as the allocation of large areas for employment land may add some employment, it could also be damaging. However, small scale development supporting high value activities such as professional and technical / technological services, could be considered in green belt in line with other policies. This is a positive section of the plan from the rural perspective.

Holmfirth itself is a honey pot in Kirklees with its range of cultural attractions and beautiful Pennine scenery; the importance to growing the tourist economy and the service sector is not recognised in the Local Plan. It should also be noted that Historic England recently identified the condition of the Holmfirth Conservation Area as being at risk^{€™} and it lacks a Conservation Area Appraisal to guide and control future development to protect and enhance our built heritage. As you will be aware, the Parish Council is starting to develop its Neighbourhood Plan and this gap is an area we wish to see addressed

Employment strategy

No comments received on this part of the Plan.

6.5

DLP_SP344, DLP_SP345, DLP_SP855, DLP_SP968, DLP_SP1343, DLP_SP1345, DLP_SP1651, DLP_SP1728

The need for the protection of priority employment sites is supported together with the identified allocations for new prime employment allocations

The identified housing and employment needs are not based on objectively assessed development requirements. The draft Local plan is aspirational but not realistic as required by the NPPF. Question whether it is deliverable over the plan period. The plan states that the green belt should only be used in

Council Response

within the plan.

Policy DLP 3 supports the needs to improve infrastructure to support the objectives of the Local Plan spatial strategy.

No change.

Comment noted. The distribution of employment land has taken into account the objectives set out in the Leeds City Region SEP and the Kirklees Economic Strategy which reflect the needs of expanding businesses within the district. There are no appropriate sites within the existing urban area to accommodate the needs of the manufacturing sector in particular, both in terms of scale and location. In view of this the release of land from green belt will be required if the Council is to positively respond to the needs of the industry and accommodate the forecasted number of jobs that need to be planned for.

No change.

The M62/M606 is a key employment corridor and provides both the manufacturing and logistic industries with key site characteristics required to maximise efficiencies in their operations - both in terms of transportation of goods and proximity to supply chains and the wider workforce.

No change.

Although heritage assets do and will continue to play an important role in supporting the economy in the Holme Valley the issues raised will be addressed through policy DPL 36.

No change.

Support comments have been noted.

No change.

Paragraph 6.4 provides sufficient context to provide clarity on the approach towards employment growth within the Local Plan. Policy DLP 10 provides a supportive framework to encourage the growth of key sectors in the Holme Valley - including tourism.

Support	Conditional Support	Object	No Comment

Support	Conditional Support	Object	No Comment
4		4	

No Change

The support for priority employment areas and the employment land requirement is noted.

No Change

The objectively assessed housing/employment needs have been reviewed and revised following the

Summary of comments

exceptional circumstances yet proposes the use of green belt without showing that the need is exceptional and where there are brownfield sites nearby. This is against the stated policy of the NPPF.

There is no justification for employment numbers.

The council has not effectively discharged their duty to cooperate with neighbouring authorities

The Health and Well being Board note the key place of the Kirklees Economic Strategy alongside JHWS, and is very supportive of this. A successful economy that offers good jobs and incomes for all of our communities makes a huge contribution to prosperity, health and wellbeing of all age groups. Likewise, confident, healthy, resilient people are better able to secure a job and are more productive in the workplace. Ambitions for personal prosperity and health, together with ambitions for jobs and business growth need to affect how we plan for new development.

We support the draft Local Plan spatial strategy which seeks to develop a strong and thriving economy, combining great quality of life and a strong and sustainable economy leading to thriving communities, growing businesses, high prosperity and low inequality and where people enjoy better health throughout their lives. This reflects the draft Local Plan vision and the main priorities identified in the Leeds City Region Strategic Economic Plan (LCR SEP) and the Kirklees Economic Strategy (KES).

Paragraph 6.8 states that the draft Local Plan seeks to deliver 32,200 jobs over the plan period from 2013-31 to meet the objectively assessed jobs need. This equates to a total employment land requirement of 265 hectares. Paragraph 6.13 states that the council's overarching objectives for the economy places significant emphasis on the need to support the growth aspirations of the districts indigenous businesses, as well as securing the inward investment opportunities which are likely to occur during the course of the plan period. Much of this emphasis has been placed on taking advantage of the districts key manufacturing assets with focus being placed on the precision engineering and advanced manufacturing sectors. In order to accommodate this, prime employment sites need to be made available to accommodate these growth aspirations. Such sites do not currently exist within the existing urban area and therefore the majority of the existing supply does not meet the site criteria or locational requirements to deliver on these economic objectives for Kirklees. Consequently it has been important to identify prime sites that provide large areas of undeveloped land, that are well placed to take advantage of established business corridors, with good access to the workforce and motorway junctions (underlining our emphasis). Paragraph 6.14 states 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 LCR SEP identifies land at Chidswell and land at Cooper Bridge as strategic priorities of sub-regional significance. We support the recognition at paragraph 6.14 that the LCR SEP identifies land in the Chidswell area as a strategic priority of sub-regional significance. This is one of only two strategic priorities of sub-regional significance (the other being land at Cooper Bridge proposed allocation E1832) and it is therefore crucial to deliver the aspirations and economic needs of the Plan. This approach is consistent with paragraph 21 of the NPPF which states that local planning authorities should: set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the Plan period; and identify and plan for new or emerging sectors likely to locate in their area. A

It is considered that a more flexible and realistic approach to employment land would be appropriate. A policy that protects the loss of employment land from non-employment development (e.g.. housing) while also allowing employment generating uses which fall outside of Class B uses, would both protect

Council Response

consultation on the draft local plan due to new population forecasts and evidence. It is considered that the figures set out in the Publication Plan are justified and meet the tests of soundness.

The Plan has been subject to viability testing and the deliverability of site allocations has been tested through the site assessment methodology. Further the Plan is supported by the Infrastructure Delivery Plan. No changes are therefore considered necessary.

Policy DLP 1 Spatial Development Strategy sets out the identification of land to meet development needs in the order or priority which includes previously developed land and buildings within settlements and green belt land. The Plan contains justification for housing and employment allocations. No further changes are considered necessary.

No Change

The council's Duty to Co-operate Statement sets out how it has worked with neighbouring authorities and other duty to co-operate bodies and the outcomes of the actions.

No Change

Support noted.

No Change

Support for the employment strategy is noted.

No Change

Support for Chidswell and Cooper Bridge allocations as part of the wider employment strategy is noted.

No Change

It is considered that Policy DLP8 Safeguarding employment land and premises achieves what the

Summary of comments

and encourage a wider range of employment uses within Kirklees.

Support the employment strategy and the allocation of prime new land for employment development together with the supply from priority employment sites.

The Kirklees Local Plan needs to be more business friendly and specific.

The plan should contain a definition of employment

Council Response

representation is seeking as it allows for the protection of employment land but has the flexibility to consider alternative uses if employment uses cannot be justified.

No Change

Support noted.

No Change

Consider that the employment spatial strategy and the provision of new prime land for development, the protection of priority employment areas, town centre policies and support for the rural economy shows a clear commitment to employment development throughout the plan period.

Change

Agree with the representation to include a definition of economic development.

Proposed Change

Amend the Glossary to include a definition of economic development to read:

"Economic development

Development, including those within the B use Classes, public and community uses and the main town centre uses (but excluding housing development)".

6.6

DLP_SP401, DLP_SP420

The development of land at Cooper Bridge is in conflict with the last sentence of 6.6, i.e. It also seeks to maintain an attractive environment through the protection of the landscape and heritage assets which will encourage tourism and inward investment from businesses that wish to locate here.

Support

Conditional Support

Object 2

No Comment

No Change

The Leeds City Region Strategic Economic Plan identifies Cooper Bridge as a strategic priority of sub-regional significance. There are few sites in the district of the size required to meet objectively assessed needs, close to the motorway and to plan for economic growth. Cooper Bridge is therefore a key site for the economic strategy. Landscape and historic assets have been considered as part of the masterplanning of the site and technical consultees have been involved in the site methodology to ensure satisfactory mitigation measures are put in place.

Do not understand why Kirklees has not promoted the area as part of its tourism strategy. Neither the Economic Strategy nor the Employment Market Strength Assessment Final Report pay any attention to this key sector, which is surprisingly short-sighted given the Local Plan is intended to endure until 2030. The failure to include the countryside and tourism as an economic asset is of great concern and we ask that this omission is remedied. We believe that there are also opportunities for new enterprises to start up to complement the existing business stock, fill gaps in the tourism offer and develop into new areas of economic activity to meet changes in socio-economic trends. Some businesses are located in areas that would be better suited now to housing and or mixed use, for example the transport company in the middle of Honley. Consideration should be given to ways of encouraging relocation to more appropriate locations.

No Change

Policy DLP10 Supporting the rural economy considers proposals to support the rural economy including tourism. Policy DLP 10 has also been amended to make specific reference to the needs of SME operations. In view of this it is considered that sufficient support for SME's has been included within the economic policies of the plan.

Consideration of the suitability of existing employment sites for continued employment use has been assessed as part of the review of the priority employment areas. Where sites were considered more appropriate for alternative uses, they have not been retained for employment.

While Policy DLP8 Safeguarding employment land and premises seeks to protect land for employment, it recognises that circumstances can change and provides flexibility to consider other uses. No further changes are therefore considered necessary.

6.7

No comments were received on this part of the Plan.

Support

Conditional Support

Object

No Comment

No Change

6.8

DLP_SP371, DLP_SP1408

Paragraph 6.8 in the section on employment strategy Paragraph 6.8 in the section on employment strategy indicates that the draft Local Plan seeks to deliver 32,200 jobs over the plan period from 2013-

Support

Conditional Support

Object 2

No Comment

Change

Summary of comments

31 to meet the objectively assessed jobs need. There is no reference to the extent of out-commuting and whether it has been taken into account in determining the land requirement for employment (Highways England)

Within the justification at Section 6 it suggests that over the Plan period some 265 hectares of employment land is required should be allocated. In our view it is appropriate that the Plan seeks to allocate sufficient land for the Plan period and beyond in a mix of appropriate locations across the District. However the policy lists a number of sub areas but does not explain how they are derived, or the policy priorities within them. Some, if not all, of the matters set out in the subsequent pages 33 to 39 provide a range of general and factual considerations which are informative but provide no clarity or assistance to the decision maker or developer. We consider that this material to be appropriate to the introductory parts of the plan and could form part of Section 2 as a SWOT analysis: Issues facing the sub-areas. As discussed elsewhere a settlement hierarchy should be used. Policy DLP 7 should then seek to relate to smaller geographical locations (than the broad sub areas) identify the problems, opportunities and challenges facing the key settlements and how these will be addressed.

Council Response

Out-commenting has been factored into the REM evidence which has been used to inform the land requirements. Agree that this should be referenced in the Local Plan.

Proposed Change
Amend paragraph 6.8 to include reference to outcommuting.

Change

The Publication Plan will contain a revised figure of 175ha of employment land. Support for allocating sufficient employment land is noted.

DLP2 sets out a broad spatial framework building on the spatial vision and objectives. Other policies in the plan provide the detail of when development will be acceptable for Development Management purposes. It provides a broad framework for the council to monitor delivery in urban areas. It provides a clear focus for growth on Huddersfield and Dewsbury as the two largest and most sustainable settlements. The policy provides flexibility for growth for smaller settlements depending on the fit with the parameters set out in criterion 2. Building on the evidence documents set out in the text for this policy provides for the most appropriate development strategy as required in national planning policy. The council's site selection methodology has been applied to all site options to determine their fit against this policy and other policy considerations such as place shaping and the spatial development strategy. It is considered that this is the most appropriate strategy rather than a settlement hierarchy approach.

Proposed Change
Explanatory text for how the sub-areas are derived and their role in the spatial development strategy will be amended.

6.9	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
6.10	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
6.11	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
6.12 DLP_SP778, DLP_SP854	Support	Conditional Support	Object 2	No Comment
Flexibility in the allocation of any land for employment is necessary to ensure that sites does not become sterilised by a restrictive allocation where employment development is not a realistic option.	No Change			
	Consideration of the suitability of existing employment sites for continued employment use has been assessed as part of the review of the priority employment areas. Where sites were considered more appropriate for alternative uses, they have not been retained for employment.			
	While Policy DLP8 Safeguarding employment land and premises seeks to protect land for employment, it recognises that circumstances can change and provides flexibility to consider other uses. No further changes are therefore considered necessary.			
	No Change			
Land allocations need tweaking in some of the rural areas where there is an imbalance between proposed new housing numbers and job estimates, particularly in Kirkburton ward where no new jobs or employment land are proposed. An adequate range of alternative sites and premises should be available to facilitate the relocation of businesses from unsuitable sites.	All site allocations and designations have been reviewed as part of the response to the consultation on the draft Local Plan.			
	DLP2 sets out a broad spatial framework building on the spatial vision and objectives. Other policies in the plan provide the detail of when development will be acceptable for Development Management purposes. It provides			

Summary of comments

Council Response

One point that does require clarification is the definition of 'employment', which is not set out within the Local Plan. It is considered that a more flexible and realistic approach to 'employment land' would be appropriate.

a broad framework for the council to monitor delivery in urban areas. It provides a clear focus for growth on Huddersfield and Dewsbury as the two largest and most sustainable settlements. The policy provides flexibility for growth for smaller settlements depending on the fit with the parameters set out in criterion 2. Building on the evidence documents set out in the text for this policy provides for the most appropriate development strategy as required in national planning policy. The council's site selection methodology has been applied to all site options to determine their fit against this policy and other policy considerations such as place shaping and the spatial development strategy.

Consideration of the suitability of existing employment sites for continued employment use has been assessed as part of the review of the priority employment areas. Where sites were considered more appropriate for alternative uses, they have not been retained for employment.

While Policy DLP8 Safeguarding employment land and premises seeks to protect land for employment, it recognises that circumstances can change and provides flexibility to consider other uses. No further changes are therefore considered necessary.

6.13

DLP_SP402, DLP_SP934, DLP_SP1007, DLP_SP1208

Change

Proposed Change

Amend the glossary to contain a definition of economic development to read:

Economic development: Development, including those within the B use Classes, public and community uses and the main town centre uses (but excluding housing development).

Support	Conditional Support	Object 4	No Comment
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Large undeveloped land whilst there are large numbers of manufacturing units on rundown business estates bordering the Bradford Road from Dewsbury, through Batley to Birstall. Is Kirklees Council proud of a decision to take prime undeveloped land for businesses, whilst allowing these unsightly industrial estates to continue to operate in this way? Is this a morally acceptable strategy which meets the Strategic Objectives?

No Change

Evidence is outlined in the Leeds City Region Strategic Economic Plan, Kirklees Economic Plan and the local plan for the need for sites such as Chidwell and Cooper Bridge to meet the need for key strategic employment sites to meet both Kirklees and wider Leeds City Regions objectives for delivering economic growth.

A review of existing employment sites has been undertaken as part of the site assessment to see if they should be used for an alternative use. Where sites are considered to be important to protect to meet local employment needs, they have been allocated as a priority employment area.

The proposed development sites are really inappropriate. The small number of firms wanting to come here has been grossly exaggerated and there are many units to let all around the area

No Change

The council has undertaken independent evidence to assess objectively assessed needs for both employment and housing. It has also undertaken evidence on the market demand for employment which forms part of its evidence base.

The whole focus on high value manufacturing and engineering is completely misguided

No Change

Evidence to support focus on manufacturing and engineering is set out in the Leeds City Region Strategic Economic Plan, The Kirklees Strategic Economic Plan and the council's employment Technical Plan. These all form part of the evidence to support the Local Plan.

The Council must accept the reality of economic change, embrace real opportunities for more sustainable, urban centric growth which is far more in keeping with the stipulations of the NPPF, and not sacrifice important green belt landscape.

No Change

The Leeds City Region SEP and Kirklees Economic Strategy identify Chidwell and Cooper Bridge as strategic priorities not only for Kirklees but for the region as well. There is a lack of sites of their size, in flat locations, close to the motorway to attract new businesses to the area and support growth. The council considers that its employment strategy is fully evidenced and justified. No changes are proposed.

The Council's economic strategy and associated land use forecast completely ignores the objectively assessed evidence about how the economy is most likely to grow and develop over the plan period.

No Change

The council was commissioned evidence on objectively assessed needs for both housing and employment

Summary of comments

The importance of public transport needs to be stressed here unless we are to see all new developments as car based. The sentence could read: "Consequently it has been important to identify prime sites that provide large areas of undeveloped land, that are well placed to take advantage of established business corridors, with good access to the workforce , public transport and motorway junctions"?

6.14

DLP_SP408, DLP_SP893, DLP_SP1210

The Council has ignored the objectively assessed evidence and has arbitrarily 'amended' the resulting forecast figures because the evidence doesn't support its vision. If the evidence shows that the Council's vision and strategy are wrong and unachievable, then amendments should be made to that vision and strategy, not to the objectively assessed evidence. Such an approach should be unacceptable as a matter of course, however it is all the more unjustifiable because green belt allocations, e.g. Cooper Bridge.

The council suggests that the manufacturing sector is becoming less labour intensive and that more land will be required to support sustained gains in Gross Value Added for the sector. There is no evidence provided to support this assertion beyond anecdotal evidence from business/development sector.

The amount of land allocated (262 hectares) appears to be a 66 hectare unjustified over-allocation, given that a 23 ha flexibility allowance has already been included.

The Local Plan does not seem to reflect the importance of Holmfirth and the Holme Valley as a tourist destination. It is important that the area is not seen as a commuter source for the Leeds City Region as many local jobs are based around the service economy.

Council Response

which forms part of its evidence base.

Change

Agree to proposed amendment to include reference to public transport.

Proposed Change:

Amend sentence to read:

"Consequently it has been important to identify prime sites that provide large areas of undeveloped land, that are well placed to take advantage of established business corridors, with good access to the workforce , public transport and motorway junctions".

Support

Conditional Support

Object 3

No Comment

No Change

The economic forecasting – through the use of the Combined Authorities Regional Econometric Model (REM) - has provided a range of outputs. This included a baseline which suggests a more modest growth, however this does not model the potential impact of successfully implementing the Council's economic objectives. Baseline forecasts are therefore a projection of historic trends. If the Council is to successfully boost the economy and improve on previous performance then various interventions will be required to address the identified barriers to economic growth in Kirklees.

Various scenarios have been run through REM to forecast the impact a successful economic strategy will have upon employment growth within the district. Doing so has enabled the Council to understand the level employment land required – by sector – to ensure the Local Plan positively responds to these aspirational yet realistic growth objectives. This approach remains in conformity with the National Planning Policy Framework .

The Council acknowledges the less labour intensive nature of the modern operational processes of manufacturing, however, these industries remain a key component to the Kirklees economy. The economic objectives - set out in the Kirklees Economic Strategy (KES) - has identified the precision engineering and advanced manufacturing sub-sectors as key priorities for Kirklees. The Council also holds information on the growth plans for many of the indigenous businesses and takes account of their land / relocation requirements. Although the overall broad sector of manufacturing has been forecast for a decline in jobs, the key sub-sectors of precision engineering and advanced manufacturing are targeted growth areas for the districts economy. Consequently land will be required to accommodate this aspect of growth. This will not only support the expansion of existing businesses but will also accommodate the relocation requirements of businesses who's requirements include the need for more modern premises that are strategically well placed geographically to help achieve efficiencies in their operations.

No Change

The 66 hectare over-allocation is predominantly derived from the potential windfall that could occur from within established business and industrial areas that have been safeguarded as Priority Employment Areas (PEAs). Consequently this land is not allocated or subject to planning permission for business and industry and cannot be relied upon as coming forward through the plan period. It should also be noted that the nature of the potential windfall from within PEAs are only small and would accommodate minor new build / expansion opportunities. This is likely to only meet the needs of SME operations. The land identified is not therefore prime new land and would make no contribution to meeting the needs of the larger indigenous business and inwards investment opportunities. These must be accommodated if the Council is to successfully deliver on its own economic objectives.

No Change

Policy DLP10 Supporting the rural economy allows for consideration of tourism activities. New text has also been added to the Plan to support the role of small and medium enterprises. No further changes are considered necessary.

Summary of comments	Council Response			
<p>Table 2 DLP_SP421, DLP_SP1209</p> <p>The allocation of land as being suitable for employment purposes is predicated on the notion of people working in business premises. A large proportion of working age population in Holme Valley is self-employed relative to Kirklees and nationally.</p> <hr/> <p>There are opportunities for new enterprises to start up to complement the existing business stock, fill gaps in the tourism offer and develop into new areas of economic activity to meet changes in socioeconomic trends. Consideration should be given to ways of encouraging relocation to more appropriate locations. Key to grasping these opportunities are improvements to broadband services, collaborative approaches between businesses, the local authority and residents, creative problem solving and innovation.</p> <hr/> <p>The Council has claimed an additional employment land use requirement of 265.1 hectares, 44.5 hectares of which are claimed for employment in manufacturing. However, in all the growth scenarios tested in the Employment Needs Assessment, the manufacturing sector is shown to be a sector in long term employment decline, not employment growth.</p>	Support	Conditional Support	Object 2	No Comment
	No Change			
	The OAN for jobs uses the Roger Tym job density assumptions (2010) to calculate the land requirement for Kirklees. However following revisions to policy DLP 10 recognition is given to the needs of small business enterprises that may operate from home etc.			
	No Change			
	The Council has identified established business and industrial areas that perform an important role in the Kirklees economy at the local level, district wide and beyond. These sites have been designated as Priority Employment Areas (PEAs) and are subsequently protected from the change of use to non-employment generating uses. Such an approach will help to promote the employment areas modernisation, expansion and allow for the continued churn of premises which will support the opportunity for new enterprises to start up and complement existing business stock. The geographical spread of PEAs also reflects their importance to the immediate area they serve. Support for tourism is provided in the rural economy policy DLP 10, however greater consideration needs to be given to acknowledge the changes in socioeconomic trends. The policy has therefore been amended to provide support for the rural digital economy, the needs of SME's, increasing local employment opportunities, supporting business clusters, business incubation, start-ups and home working.			
	No Change			
	The Council acknowledges the less labour intensive nature of the modern operational processes of manufacturing, however, these industries remain a key component to the Kirklees economy. The economic objectives - set out in the Kirklees Economic Strategy (KES) - has identified the precision engineering and advanced manufacturing sub-sectors as key priorities for Kirklees. The Council also holds information on the growth plans for many of the indigenous businesses and takes account of their land / relocation requirements. Although the overall broad sector of manufacturing has been forecast for a decline in jobs, the key sub-sectors of precision engineering and advanced manufacturing are targeted growth areas for the districts economy. Consequently land will be required to accommodate this aspect of growth. This will not only support the expansion of existing businesses but will also accommodate the relocation requirements of businesses who's requirements include the need for more modern premises that are strategically well placed geographically to help achieve efficiencies in their operations.			
<p>Option Employment Strategy 6.1.1 DLP_SP336</p> <p>It would have been helpful to explain why (Table 2) it is planned to allocate 262 ha when the table itself says that 196 ha is required. Therefore it would appear your options are designed to secure the same outcome. In the UDP the Council said a certain amount of land was needed, leading to the allocation of Mirfield Moor and Lindley Moor - neither of which have been developed to date. The lower option for the amount of land is preferred and will be sufficient if it is not used for the myriad of other developments - ones which could be tucked in elsewhere in a more dispersed manner.</p>	Support	Conditional Support	Object 1	No Comment
	No Change			
	The 66 hectare over-allocation is predominantly derived from the potential windfall that could occur from within established business and industrial areas that have been safeguarded as Priority Employment Areas (PEAs). Consequently this land is not allocated or subject to planning permission for business and industry and cannot be relied upon as coming forward through the plan period. It should also be noted that the nature of the potential windfall from within PEAs are only small and would accommodate minor new build / expansion opportunities. This is likely to only meet the needs of SME operations. The land identified is not therefore prime new land and would make no contribution to meeting the needs of the larger indigenous business and inwards investment opportunities. These must be accommodated if the Council is to successfully deliver on its own economic objectives.			
<p>Option Employment Strategy 6.1.2</p> <p>No comments were received on this part of the Plan.</p>	Support	Conditional Support	Object	No Comment
<p>Safeguarding employment land and premises</p> <p>No comments received on this part of the Plan.</p>	Support	Conditional Support	Object	No Comment

Summary of comments	Council Response			
Policy DLP 8 DLP_SP127, DLP_SP856, DLP_SP1409, DLP_SP1435, DLP_SP1531, DLP_SP1536, DLP_SP1577, DLP_SP1793, DLP_SP1825	Support 2	Conditional Support 1	Object 6	No Comment
<p>Policy DLP 8 is consistent with the SEP aspiration to attract inward investment into the region and promote sustainable accessible development.</p>	<p>No change.</p>			
<p>The following area should be added to adjacent Priority Employment Areas or designated as additional:</p>	<p>Supporting comments noted.</p>			
<p>Land north of Miry Lane, Thongsbridge SL2186 Huddersfield Road, Meltham H50 Bridge Mills, New Road, Netherthong Park Mill Business Park, Meltham Road, Huddersfield Steps Industrial Park, Magdale H32 Lepton</p>	<p>Proposed change</p> <p>The following PEA suggestions have been considered and rejected on the basis that they are either not established business and industrial areas and are not directly related to such operations, and / or they have been accepted for an alternative use:</p> <p>SL21686, Huddersfield Road, Meltham; H50, Bridge Mills, New Road, Netherthong; H32, Lepton.</p> <p>Consideration has been given to the following sites and it is proposed to amend the PEA designations to include these sites as it is recognised they perform a key role to either the immediate local economy and / or the wider Kirklees economy:</p> <p>Land north of Miry Lane, Thongsbridge; Park Mill Business Park, Meltham Road, Huddersfield (assumed to be Park Valley Business Park) and Steps Industrial Park.</p>			
<p>Agree with the principle of the policy but current wording is unduly negative. The phrase, "inappropriate unless" should be replaced with "will be supported where" to be more consistent with Government guidance.</p>	<p>Proposed change</p> <p>Amend policy wording to read more positively but need to maintain a firm stance to ensure sites are not unduly lost through a weakened policy approach. Suggested amendment; delete "inappropriate unless" and replace with "will only be supported where:"</p>			
<p>HoTT are disappointed to see Bridge Mills in Holmfirth designated as a housing site (H50), as this is one of the few employment sites offering locations for SMEs currently over 40 small businesses. If we plan to be more sustainable and reduce reliance on commuting by car, then employment possibilities close to our communities will need to be protected. HoTT would therefore prefer to see this as a protected employment site, with Policy DLP8 applying.</p>	<p>No change.</p> <p>Rep refers to the safeguarding of a specific site and is not a comment on the policy itself.</p>			
<p>The current proposals provide for all HVN sites to be developed over the plan period, and do not provide for any sites to be listed as safeguarded land. I reject this and call for the development sites to be reviewed and sites for Safeguarded land to be identified for them.</p>	<p>No change.</p> <p>Sites in the Holme Valley have been identified and safeguarded which provides protection of employment sites in areas of local significance.</p>			
<p>Kirklees Council needs to adopt a vision of an economic future that embraces a role in pioneering change locally towards a low carbon future.</p>	<p>No change.</p> <p>Established employment sites have been safeguarded as priority employment areas across the district. This approach will assist with and support the growth aspirations of existing businesses and allow for the churn of stock which will meet the changing needs of businesses - including those within the low carbon sector.</p>			
<p>Miller Homes objects to the approach towards safeguarding employment land. The Draft Local Plan is unsound on the basis that the approach towards identifying and safeguarding Priority Employment Areas lacks evidence and is inconsistent with the aims and objectives of the plan towards regenerating and rejuvenating Dewsbury and Ravensthorpe and its riverside areas.</p>	<p>No change.</p> <p>Comments noted. Other policies in the Local Plan will allow for an appropriate planning balance to be undertaken between the need to retain employment land and sustainable development. Priority Employment Areas (PEAs) have been robustly assessed. The findings and justification for their inclusion are set out in the PEAs technical paper.</p>			
<p>The proposals maps shows the designation of vast swathes of Priority Employment Areas where strategic inward investment will be secured to deliver the wider regeneration of Dewsbury and Ravensthorpe. The concept of retaining and safeguarding all this land as Priority Employment Area is incompatible with such a Vision and as such the Plan is unsound.</p>				
<p>Miller Homes supports the concept of employment retained within this area; however there must be flexibility to the policy. Some areas safeguarded are of poor quality and the tests to be applied in securing a change of use is both onerous and nonsensical.</p>				

Summary of comments

Miller Homes considers that the areas of Dewsbury and Ravensthorpe - which are subject to the Councils regeneration aspirations - are covered by a more flexible and positive policy approach which supports schemes and alternative uses which reflect the aims and objectives of the Vision for Dewsbury.

To overcome the objection and address soundness matters, the Council should:

- Review the approach to towards safeguarding employment sites in Dewsbury and Ravensthorpe
- Remove the allocation of D&M1, D&M11, D&M12 and D&M15 as Priority Employment Areas and replace with a positive allocation encouraging regeneration and alternative uses in accordance with the Vision for Dewsbury.

Support the principle of policy DLP 8, however, policy needs to remain flexible and not unnecessarily hold on to employment land as per paragraph 22 of NPPF. Paragraph 22 specifically states that "Land allocations should be regularly reviewed." Neither policy DLP 8 nor its justification text put in place any requirement or assurance that regular reviews will be carried out. It is requested reference to this be included within the text accompanying the proposed policy.

The principle of the policy is supported; however, policy wording is restrictive and does not allow for other employment generating uses (non B use class operations) to be located within a PEA. The current wording is not consistent with the positive and market responsive emphasis of national policy.

The opening sentence should be amended to read, "resulting in a non-employment generating end use...". Text should be added to the end of the policy and should read, "...or, the benefits of alternative proposals have been clearly demonstrated to outweigh the loss of employment use."

Our client supports the wording within this policy which allows for the re-use of existing employment sites that are no longer needed or suitable.

The plan allocates or protects 262 hectares

6.15

No comments were received on this part of the Plan.

6.16

No comments were received on this part of the Plan.

6.17

No comments were received on this part of the Plan

Table 3

DLP_SP857

Serious concerns are raised with proposed Priority Employment Area B&S3 and the realistic contribution this land makes, and will make in the future, to Kirklees employment needs. The office accommodation does not meet needs of current occupiers, low rents being secured at the Centre 27, along with short leaseholds, give very little confidence in the business park and will not enable the much needed renovation works required, the business park competes against numerous existing business parks to the south of Leeds and close to the motorways, number of long term leases at Centre 27 at the site are about to come to an end, The proposed nearby traveler site is causing concerns for potential occupiers, The existing buildings at Centre 27 are experiencing some structural issues and The undeveloped land included in the allocation has failed to come forward for development even given its employment

Council Response

No change

The need to regularly review the priority employment areas has been noted. It is recognised in the policy that over time non-employment development can occur within a PEA subject to meeting the relevant policy tests. The council will monitor the take-up and loss of employment land in priority employment areas during the course of the plan period.

Proposed change.

Although the policy intention was not to preclude other employment generating uses, it is acknowledged that the proposed wording would provide greater clarity of this fact. Proposed to add as the first sentence, "Proposals for development or re-development for employment uses in Priority Employment Areas will generally be supported." With regards to the second point, other policies in the Local Plan will allow for an appropriate planning balance to be undertaken between the need to retain employment land and sustainable development.

No change.

Supporting comments have been noted.

No change.

Comment noted.

Support	Conditional Support	Object	No Comment
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No Change

Support	Conditional Support	Object	No Comment
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Support	Conditional Support	Object	No Comment
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No Change

Support	Conditional Support	Object 1	No Comment
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No Change

PEA designation would not preclude the site being brought forward for an alternative employment generating use. Therefore leisure and retail would be acceptable subject to town centre policies set out in national policy and the Local Plan

Summary of comments	Council Response			
allocation first put in place in 1999. In light of the above it is considered that the only viable future for the site would involve a change of use from office accommodation. The most appropriate alternative uses would be for leisure or retail.				
6.18	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan	No Change			
6.19	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Option DLP8 6.2.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Option DLP8 6.2.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No Change			
Supporting skilled communities	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 9	Support 2	Conditional Support 3	Object 2	No Comment
DLP_SP969, DLP_SP1102, DLP_SP1306, DLP_SP1410, DLP_SP1436, DLP_SP1578, DLP_SP1826				
The legacy of Warm Zone Plus brought training and employment opportunities . In view of the strategic importance of local government working in partnership with business, higher education and communities in delivering a low carbon economy, we suggest that Kirklees can prosper by striving to regain its past role as a pioneer on energy conservation and extend that to renewable energy and other low carbon economic initiatives.	No change			
All developments should be required to employ a percentage of local apprentices/workers. As well as creating local jobs, this would reduce the need for transport and commuting.	Policy would support the principle of working in partnership with business, higher education and communities.			
Support the creation of local employment opportunities but object to the requirement forming part of a planning obligation as can be interpreted through the use of the word "agreement". It is recommended that a cautious policy approach be adopted and that this policy, if justified, should not be a mandatory requirement upon all developments.	No change.			
Ethos of the policy is supported, however, it is not clear the first part of the policy wording is relevant. It is more of a statement than a policy and could be deleted without affecting the policy. Paragraph 2 is equally aspirational, but again is not clear that this is a policy. It is more a statement which is already reflected in the Local Plan objectives - achieving better higher paid jobs.	Comment noted. The policy as worded promotes the creation of local employment opportunities. However, applying a percentage would impose a potentially restrictive requirement that may not be reasonable to apply. The policy as worded retains a degree of flexibility where it can be negotiated to the satisfaction of both the Council and the applicant.			
	Proposed change			
	Comment noted. Policy has been amended to provide clarity that the requirements of policy DLP 9 will only apply where it is reasonable to do so. Paragraph 2 of the policy has now been amended to include the words: "Wherever possible," and removes the word "major". The term "agreement" has been retained as, if it is reasonable to do so, the policy requirements will be secured through a condition.			
	Reason for change:			
	To clarify the policy will only be applied to new developments, whether they are major or not, where it is reasonable to do so.			
	No change.			
	Although paragraph 1 does not provide any policy guidance its context is important and remains consistent with other policies in the document. Paragraph 2 is policy and sets out the requirements which new developments will need to contribute towards in terms of increasing job opportunities, increasing wage levels and education/training opportunities. Policy is not mandatory on all development and will only be negotiated where it is reasonable to do so.			

Summary of comments

Policy DLP 9 is consistent with the SEP aspiration to create more jobs and encourage job creation. The plan also recognises the strategic role of educational facilities across the district, including Kirklees College and Huddersfield University. This is consistent with the SEP aspiration to align skills and training investment with growth opportunities and sectors.

It is essential that new prime employment land is allocated which is attractive to the market. Sites such as land at Chidswell are of sub-regional significance and it is therefore of a scale that can deliver the significant new employment opportunities to increase wage levels and support growth in the overall proportion of local residents in education or training.

The CCfE are keen to engage with local education institutions in the future to develop training links and where possible accommodate business hub opportunities generated by spin-off opportunities from Kirklees College and the University of Huddersfield.

Council Response

No change.

Support for policy DLP 9 has been noted.

No change.

Support for the policy has been noted.

6.20	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
6.21	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan	No Change			
6.22	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
6.23	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
6.24	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Option DLP9 6.3.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No Change			
Supporting the rural economy	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No Change			
Policy DLP 10	Support	Conditional Support 4	Object 10	No Comment 15
DLP_SP242, DLP_SP262, DLP_SP422, DLP_SP497, DLP_SP556, DLP_SP564, DLP_SP570, DLP_SP575, DLP_SP580, DLP_SP585, DLP_SP590, DLP_SP601, DLP_SP741, DLP_SP747, DLP_SP752, DLP_SP757, DLP_SP762, DLP_SP768, DLP_SP1025, DLP_SP1087, DLP_SP1103, DLP_SP1135, DLP_SP1215, DLP_SP1273, DLP_SP1411, DLP_SP1642, DLP_SP1655, DLP_SP1656, DLP_SP1797				

Policy DLP 10 is supported but needs expanding. No reason why diversification of the rural economy should be limited to those uses listed in DLP 10. There is much more to the rural economy and acknowledgment needs to be given to the operational mills and home working etc. The green belt should not be sacrificed for unnecessary and inappropriate developments. Economic development and diversification should be encouraged where it is appropriate to do so, subject to environmental and amenity considerations

The Council needs to set out how it intended to accommodate innovative, sustainable new rural economic development in the light of NPPF paragraph 28.

Proposed change.

Policy DLP 10 has been expanded to cover a broader range of employment uses associated with the smaller settlements, including SME's, supporting sustainable business clusters and home working. Criteria 3 of policy DLP 10 ensures that any new development proposed in the green belt takes account of both national and local green belt policies. Any proposals adversely impacting on environmentally sensitive areas - including the Peak Park - will not be accepted. This approach will support economic development in a sustainable manner whilst preserving the character of the districts smaller settlements and surrounding countryside. It is considered that this revised policy is in conformity with paragraph 28.

Reason for change:

To recognise and support the wider economy of the smaller settlements whilst maintaining the character of

Summary of comments

We note the absence of any clear policies or strategy to encourage the development of the Rural Digital Economy. The inclusion of such a policy would benefit all residents and businesses in rural areas. The provision of next generation broadband provision, coupled with a commitment to the development of digital hubs and support for training SMEs to maximise the benefits to their business of the new digital economy could lead to increased employment opportunities and also a reduction in commutes.

Tourism is a very important component of the Holme Valley economy. Kirklees' visitor economy was reported to be worth an estimated £300 million supporting 8,000 jobs annually. Tourism is a particularly important economic driver to The Valleys, with Holmfirth being the lead destination and key driver for tourist footfall across Kirklees. Proposals are required to take advantage of gaps in accommodation, use of the outdoors for leisure and recreation - such as forest centres, mountain bike forest tracks - and support the growth of the Valley's traditions, growing programme of events and festivals, the night time economy and arts and crafts.

The countryside and tourism should be identified as an economic asset. Without a cohesive tourism strategy the tourism potential of the Valley will be severely limited. The lack of beds is a weakness in the Valley's tourism offer. Greater emphasis on the use of agricultural land for camping and caravanning sites needs to be given. The identification of a site for hotel use would also be welcomed.

Holme Valley Vision has bought data for the Valley's area which reports there to be 900 businesses that collectively employ 6,000. A significant proportion of these companies (nearly three quarters) are micro or small businesses. The data also indicates that 100 businesses are classed as professional services, with a similar number in construction and retail. Other key sectors are hotels, restaurants, hairdressing, the motor trade wholesale, education, health and social care. There is scope for growth given the right levels of support.

There are also opportunities for new enterprise start-ups to complement existing business stock, fill gaps in the tourism offer and develop into new areas of the economy to meet changes in the socio-economic trends.

Business relocation should be supported where their location is better suited to housing.

Improvements to the broadband services, collaboration with businesses, the local authority and residents is critical to grasping the opportunities in the Valleys. The Market Strength Assessment ignores the business in the Holme Valley that already trade nationally as well as internationally. Study fails to recognise the potential for improved world trade through e-commerce or the importance of home working. The provision of quality fast broadband and the availability of appropriate office space is key to developing these modes of work. Mixed use sites may also encourage developers to build smaller and lower cost dwellings.

A section should be added to this to encourage the growth of local and sustainable food, for example supporting the construction of polytunnels for growing food.

Local allotment land should be protected through safeguarding mechanisms within the Plan to support local food growing. In addition, land that is maintained by councils, such as verges and roundabouts, could be made available to local food growing groups.

Out of town developments particularly those served by motorways should be avoided unless public

Council Response

these areas.

Proposed change

Comments noted. The policy has been amended to reflect the importance of improved digital infrastructure to the rural economy. Criteria 1 (a) has been added to ensure a positive approach towards supporting the growth of the rural digital economy. The relevant text added reads:

"1. The economic performance of the rural economy will be improved by:

- a. Supporting the rural digital economy;"

Reason for change:

Policy has been expanded to provide a positive approach towards the potential for growth in the rural digital economy.

Proposed change

Policy DLP 10 has been amended to acknowledge the important role the rural areas, and its communities, play in the wider Kirklees economy. A positive policy approach has been taken to support and enhance the rural economy with specific reference made to key areas, including the rural digital economy, the needs of SME's, employment needs in smaller settlements, encouraging the development of the tourism offer through new facilities and accommodation for tourists, support for sustainable business clusters, incubation opportunities, start-up proposals and home working. The new text added reads;

"The economic performance of the rural economy will be improved by:

- supporting the rural digital economy;
- supporting the needs of small and medium sized enterprises;
- increasing local employment opportunities in smaller settlements and rural areas;
- supporting and increasing tourist/tourism related development, including encouraging new facilities and accommodation for tourists;
- supporting sustainable business clusters, business incubation, business start-up proposals and home working"

Reason for change:

To ensure the needs of the rural economy are recognised and supported through a positive policy approach..

No change.

Comment noted however the issue is considered more appropriately addressed through policies DLP 62 'urban greenspace' and DLP 64 'new open space'.

No change.

Summary of comments

transport, cycling and walking are available as a significant mode of access to services and employment.

The plan fails to recognise the Kirklees Rural region lies at the very heart of the Northern Powerhouse area, between the Greater Manchester, West Yorkshire and South Yorkshire conurbations. Imagine the opportunities this advantage can bring to new and existing local industries, businesses services, our rural towns and villages!

Concern that the policy could encourage dwellings for Agricultural and Forestry workers that ultimately end up on the open market as a dwelling with no restriction on the type of occupancy. Is it possible to strengthen the policy in this area?

Development of housing sites H8 and H38 would destroy local businesses by taking away grazing land and detract from the local landscape which attracts tourism - a vital part of the local economy. This does not accord with the intentions of policy DLP 10.

6.25
DLP_SP935

A Craft Village showcasing local skills and enterprises; along the lines of the mill conversions in Hebden Bridge, or the adapted ironworks at Elsecar; would be a tasteful contribution, providing employment, prospective tourism and a boost to the local economy.

6.26
DLP_SP498

Care needs to be taken over developments that impact negatively upon the green belt making it less desirable and which rather than enhancing its appearance weaken it. This is particularly the case with large scale industrial developments such as mineral extraction sites and wind turbines.

6.27

No comments were received on this part of the plan.

6.28

No comments were received on this part of the Plan

6.29

No comments were received on this part of the plan

Option DLP10 6.4.1

No comments were received on this part of the Plan

Council Response

Policy puts in place appropriate measures to ensure any new development is appropriately located. As the policy focus is on the rural elements of the economy their locations are likely to be within small towns (Holmfirth), out of town and within / on the edge of small settlements. Motorway proximity is unlikely to be a key requirement. Connectivity to the public transport, cycling and walking would be addressed through policies DLP 20 'sustainable travel', DLP 23 'core road and bus routes' and policy DLP 24 'core walking and cycling network'

No change.

Comment noted, however the role of the policy is to support the needs of businesses in the rural economy by putting in place a positive approach towards dealing with the need to accommodate new business ventures, assist with the growth aspirations of established businesses and provide a supportive framework to improve the infrastructure needs of rural enterprises. Providing recognition of the position of Kirklees between three city regions is considered to be contextual and not policy.

No change

Policy DLP 10 is focused on providing a supportive framework towards the growth and diversification of the rural economy. Should an application be pursued for an agricultural / forestry workers dwelling then consideration would also need to be given to policy DLP 56 - Agricultural and forestry workers' dwellings. It is considered that the policies - when considered together - provide a sufficiently robust approach to determine applications for such uses.

No change.

Comment noted but no reference made either in support or objection to policy DLP 10.

Support	Conditional Support	1	Object	No Comment
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No change.

Comment noted, however paragraph 6.25 as worded provides sufficient scope not to exclude the opportunities for bringing into use former industrial premises as tourist destinations.

Support	Conditional Support	Object	1	No Comment
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Proposed change

Paragraph 2.26 has been amended to be more explicit about the need to apply the green belt policies to ensure any impact upon the green belt is fully considered in the determination of a planning application.

Support	Conditional Support	Object	No Comment
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No Change

Support	Conditional Support	Object	No Comment
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No Change

Support	Conditional Support	Object	No Comment
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No Change

Support	Conditional Support	Object	No Comment
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No Change

Summary of comments	Council Response			
Option DLP10 6.4.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Homes	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
7.1	Support	Conditional Support 1	Object 4	No Comment 4
DLP_SP175, DLP_SP185, DLP_SP220, DLP_SP659, DLP_SP677, DLP_SP723, DLP_SP724, DLP_SP781, DLP_SP1040				
Site specific comments.	No change.			
	Site specific comments have been addressed within the site allocations responses.			
Need to ensure plan doesn't encroach into countryside, protects wildlife and promotes healthy lifestyles.	No change.			
	The local plan site allocations methodology has been used to assess the potential allocation of land for development and protection from development, taking into account the factors listed. Policies in the Local Plan also seek to ensure that development considers these factors.			
Housing sites should make allowance for smaller developers / self-build rather than just major developers	No change.			
	The local plan process allows for any landowner or developer to propose potential allocations for development or protection from development in Kirklees. The local plan site size threshold is 0.4 hectares. Some of these sites have been proposed by smaller developers through the local plan process and the local plan also includes a windfall allowance to take account of development on smaller sites. In addition, the Council, as required by national policy, have a self-build register to gauge interest in developments on small sites.			
As well as housing, plans needs to consider schools, shops, medical services, leisure facilities, transport, local employment, drainage and sewerage.	No change.			
	Infrastructure provision is considered in the Infrastructure Delivery Plan which supports the production of the plan. These issues are also addressed by local plan policies and the consideration of development options has been supported by colleagues from education, transport, drainage and external bodies.			
If OAN includes need for National Park part of district, should refer to paragraph 14 and 115 of NPPF to temper any expectation that housing delivery in line with need in National Park part of district (PDNPA)	No change.			
	Although the Objectively Assessed Need calculation is for Kirklees, the area of the district within the National Park is not within the Kirklees planning authority area. As such, the Kirklees local plan will meet the housing requirement for the whole of Kirklees within the Kirklees planning authority area.			
Land safeguarded for 15 years time, but unable to anticipate Government Policy and Housing Need in 15 years time.	No change.			
	Paragraph 85 of NPPF states that Local Authorities should identify areas of safeguarded land to meet longer-term development needs stretching well beyond the plan period.			
Potential for conflict of interest if consultants who have prepared SHMA also work for developers	No change.			
	The consultants that have prepared the SHMA work for a range of public and private sector clients as well as social housing providers. The consultants have worked closely with the local authority in the preparation of the SHMA.			
7.2	Support	Conditional Support	Object	No Comment 2
DLP_SP443, DLP_SP936				
Self-contained purpose-built 'villages' for older people would provide a secure, self-contained location, so releasing housing in the community for families who need access to shops, schools, bus routes etc.	No change.			
	The Housing Mix policy seeks to provide a mix of housing in developments that meets needs and uses evidence set out in the Strategic Housing Market Assessment (SHMA).			

Summary of comments

Accommodation for younger /single people could take form of single occupancy flats with shared social areas close to town centres.

Housing development should include sustainable transport links for all users to enable residents to reach their local facilities.

7.3

DLP_SP92

Site specific issues raised in relation to H323, H758 and H1938.

Housing strategy

No comments received on this part of the Plan.

7.4

DLP_SP1043, DLP_SP1148, DLP_SP1231, DLP_SP1308, DLP_SP1413

The recent examinations of Eastleigh and Uttlesford suggest in such cases a 10% uplift in housing requirement may be appropriate. This will, however, be dependent upon the individual circumstances of each area.

Affordable need is 64% of proposed housing target. PPG advises an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.

Overcrowding is above the national average.

The housing target is not deliverable and sets up a land supply scenario that will simply shift development away from areas in need of regeneration, towards greenfield and Green Belt sites. Suggested requirement: 24,678

Rents have risen considerably quicker than any comparator area and the national average. Whilst the 2015 SHMA assumes this is a factor of the student market (paragraph 4.26) there is no analysis to justify this assumption or the stress this is placing upon the overall market.

The SHMA assessment of rates of development is considered to lack a thorough analysis. Development in Kirklees is below national average. Table 2 of the Council's 2015 Housing Technical Paper Council identifies under-delivered against the former RSS targets by 1,385 dwellings or approximately 11% of the requirement.

The data analysis of market signals in SHMA is considered to be over too short a timescale, only stretching back 4 years to 2010. Longer term analysis would be more useful to identify stress in the market, again it is recommended that this be rectified.

The SHMA does not consider land prices. This indicator is useful for identifying stress within the market

Council Response

No change.

The Housing Mix policy seeks to provide a mix of housing in developments that meets needs and uses evidence set out in the Strategic Housing Market Assessment (SHMA).

No change.

This issue is covered in the Design policy and in the Transport policies.

Support	Conditional Support	Object	No Comment	1
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No change.

Site specific comments have been addressed within the site allocations responses.

Support	Conditional Support	Object	No Comment	
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Support	Conditional Support	3	Object	2	No Comment
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No change.

The draft Local Plan and Strategic Housing Market Assessment are based on local evidence and show that no uplift in housing requirement is required as a result of market signals.

No change.

The SHMA has been updated and uses the latest household projections as a starting point in calculating the need for new homes in Kirklees and considers the affordable housing shortfall. The local plan policy aims to achieve 20% affordable units on sites over 10 dwellings.

No change to document.

Comment noted. The SHMA explores this issue and shows that the decrease in overcrowded households is higher than the regional and national average.

No change.

The housing requirement is based on the national policy requirement to meet full objectively assessed housing needs in full. The housing requirement has now been updated based on the 2014 based household projections and revised economic assumptions.

No change to document.

The 'Private Rented Market in Kirklees' report explores this issue in more detail and has been used to inform the SHMA.

No change to document.

The SHMA and housing technical paper consider past rates of development and the implications for the housing requirement in terms of past under-delivery.

No change to document.

The revised SHMA considers a longer time period.

No change to document.

Summary of comments

and as such its omission is considered a flaw in the evidence base which should be rectified.

Housing requirement is average of all housing targets, but considered that not all of these are appropriate and should not be provided equal weight, for example removing the four that rank below the baseline requirement of 1,520 dpa. Removing these would result in housing requirement of 1,842 dpa.

Realism and justification for reducing the unemployment rate to 4% in the scenarios questioned and would be challenging.. PAS guidance advises against over-optimistic assumptions.

Further consideration should be given to increasing the household formation rates across all age cohorts but particularly the 25 to 34 age group, who were particularly hard-hit by the recession and as such the household representation rates are likely to have been significantly depressed.

A sensitivity test which considers a full or partial catch-up to the 2008 headship could be utilised to consider this issue in greater detail. Such an approach has been considered in numerous other OAN studies.

The modelling work undertaken by Edge Analytics has not considered whether the headship rates within the 2012 SNHP should be modified. It is widely recognised that headship rates may have been depressed in 2012 SNHP due to the effects of the recession and consequent lower rates of development and finance availability. This view is supported in 2015 PAS guidance: Objectively Assessed Need and Housing Targets: Technical advice note. National Planning Practice Guidance recognises suppression of household formation rates because of under-supply and affordability.

NPPF requires Local Plans to meet OAN unless environmental (and other) considerations indicate otherwise.

Evidence of delivery rates that can be realistically achieved has not been given adequate consideration, and a numerical pursuit of objectively assessed need will compromise the genuine delivery of sustainable housing

Based upon SEP / KES evidence, the plan seeks to deliver 32,200 jobs over the plan period. An analysis of the rate of job creation aligned to the various housing strategies (paragraph 3.12) of the 2014 Edge Analytics paper indicates that the highest tested level of additional jobs created over the plan period is 27,651 (Jobs-led scenario D), this is somewhat short of the ambition for 32,200 jobs. There is a potential mismatch between employment and housing growth.

The proposed housing requirement lacks aspirations and is unlikely to create the levels of growth set out within SEP.

Officer change

Most appropriate housing market area is not considered, as Kirklees is two distinct housing market areas, East and West. The pattern and type of settlement, estate agents, economic structures and

Council Response

The revised SHMA considers land prices.

Proposed change.

The housing requirement has now been updated based on the 2014 based household projections and revised economic assumptions. This includes a revised approach to the calculation of the housing requirement which is set out in SHMA.

No change.

The employment assumptions are realistic and have utilised Kirklees-specific information. The April 2015-March 2016 Nomis Labour Supply information shows that the unemployment rate in Kirklees is 6.1% showing that progress has already been made towards achieving a 4% rate by 2020.

Proposed change.

The housing requirement has now been updated based on the 2014 based household projections and revised economic assumptions. As stated in national planning guidance, the latest household projections should provide the starting point for estimating overall housing need.

Proposed change.

The housing requirement has now been updated based on the 2014 based household projections and revised economic assumptions. As stated in national planning guidance, the latest household projections should provide the starting point for estimating overall housing need.

Proposed change.

The housing requirement has now been updated based on the 2014 based household projections and revised economic assumptions. The revised SHMA considers factors including affordability and market signals.

No change.

Comment noted.

No change.

As identified by national policy, the housing requirement will meet Objectively Assessed Need rather than reflecting past trends. Build rates have been considered as part of the phasing of housing allocations.

Proposed change.

The housing requirement has now been updated based on the 2014 based household projections and revised economic assumptions.

Proposed change.

The housing requirement has now been updated based on the 2014 based household projections and revised economic assumptions.

Proposed change.

Minor change to housing market area text to add clarity.

No change.

Summary of comments

housing needs differ and few people move between the two areas.

SHMA identifies a range of scenarios between 1,069 and 2,191 dwellings per annum. A higher figure than 1,630 should be the requirement if the Council was seeking an ambitious growth strategy. It is lower than former RSS figure.

Taking into account affordable need of 1,049 per year, this leaves a net figure of 580 for market housing. This is unrealistic and unviable.

There is no specific policy relating to overall housing requirement (Wakefield Council)

Support for council in attempt to align its economic and housing strategies

Requirement should be identified as a net minimum requirement.

In 2006/7 and 2007/8 delivery exceeded highest figure set out in SHMA, indicating market can deliver these numbers when unencumbered.

7.5

DLP_SP228, DLP_SP351, DLP_SP1437, DLP_SP1458, DLP_SP1847, DLP_SP1855, DLP_SP1856

There appears to be no reference to a Monte Carlo or probability simulation which would model future population growth and housing needs, taking account of the likelihood of economically active adults choosing to live near to their place of work.

The assessment of housing need should be re-evaluated to reflect migration patterns recorded by ONS. The 2012 based SNPP have underestimated international in-migration. Adjustments to the 2012 based household projections are required to more accurately reflect changes to pattern of international in-migration.

The assessment of housing need over the 2013-31 period does not reflect the economic aspirations of the Council expressed in either the emerging Kirklees Local Plan or the Kirklees Economic Strategy. The OAN falls short of the 75% employment scenario, which is the preferred approach of the Employment Needs Assessment. The use of a jobs-led housing target that more accurately reflects the economic aspirations of the Kirklees draft Local Plan and Kirklees Economic Strategy are needed.

Wakefield Council will continue to work with Kirklees and other LCR councils to ensure a common methodology is used when assessing OAN (Wakefield Council)

Council Response

The SHMA identifies that Kirklees is one single housing market area for local plan purposes but acknowledges links to other housing market areas. This is supported by the Census Travel to Work areas. It is acknowledged that there are sub-areas within this housing market area.

Proposed change.

The figure of 1,630 was based on a range of jobs-led scenarios in the district and was higher than the 2012 based household projection. This figure has now been updated based on the 2014 based household projections and revised economic assumptions.

No change.

It is not the case that the 1,049 affordable need figure can be subtracted from the 1,630 per annum figure. These figures are calculated independently of each other with the former showing the shortfall and the latter showing overall housing need. The local plan sets out an affordable housing requirement of 20% of units based on robust viability evidence.

No change.

National Planning Policy Framework and Planning Practice Guidance do not require the inclusion of a housing requirement policy. DLP2 in the draft Local Plan supports the delivery of development to meet the district's housing requirements.

No change.

Support welcomed.

No change.

The requirement in the Local Plan is not identified as a maximum figure but is based on a robust assessment of need within Kirklees over the plan period. An assumption has been made calculating the capacity required from allocations to take account of anticipated losses during the plan period.

No change.

The housing completions for 2006/07 and 2007/08 were an exception and are in excess of the housing delivered in the district in other recent years. The requirement in the Local Plan is not identified as a maximum figure but is based on a robust assessment of need within Kirklees over the plan period. There has been no reduction in the proposed housing requirement based on market signals.

Support	Conditional Support	3	Object	4	No Comment
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No change.

The SHMA has been undertaken in accordance with national planning policy to inform the local plan.

Proposed change.

The demographic information has now been updated to reflect the latest assumptions set out in the 2014 based household projections.

Proposed change.

This work has been updated using the 2014 household projections and revised economic assumptions.

No change.

Summary of comments

The demographic evidence which informs the SHMA represents a suitable assessment of range of scenarios for Kirklees using up to date demographic and economic evidence and assumptions, and note that the OAN of 1,630 dwellings per annum represents a mid-point in the range of economic-led scenarios tested.

No clear approach in calculating OAN.

The assessment of affordable housing need in SHMA is likely to under-estimate the level of need in Kirklees by reducing the backlog and including an estimation of committed supply in the assessment of need.

Calculations appear to utilise national statistics / government requirements rather than specific needs of Kirklees.

Consideration of alternative options is inadequate.

SHMA does not express affordable housing need as part of OAN or consider an increase in overall OAN despite identifying a shortfall of 1,049 affordable homes per annum. Satnam and Oadby & Wigston High Court judgements have demonstrated need to properly consider affordable needs within overall OAN. An uplift of at least 20% (326 extra homes per annum) would be appropriate.

Potential for conflict of interest if consultants who have prepared SHMA also work for developers

A policy setting out the housing the requirement should be included (Wakefield Council and others)

Officer change.

7.6
DLP_SP372, DLP_SP549, DLP_SP970, DLP_SP1044, DLP_SP1056, DLP_SP1438, DLP_SP1891

Officer change.

The Local Plan should seek to deliver 1,956 dwellings per annum

Council Response

Comment noted.

No change.

Comment noted.

No change.

The approach to calculating OAN is set out in the Strategic Housing Market Assessment. The housing technical paper provides further explanation.

No change.

The SHMA has taken into account all relevant information to determine the affordable housing shortfall.

No change.

As stated in national planning guidance, the latest household projections should provide the starting point for estimating overall housing need with further analysis in SHMA. The calculation uses economic assumptions for Kirklees.

No change.

As stated in national planning guidance, the latest household projections should provide the starting point for estimating overall housing need with further analysis of various options set out in the SHMA.

No change.

It is not the case that the 1,049 affordable need figure is subtracted from the 1,630 per annum figure. These figures are calculated using different sources. The local plan sets out an affordable housing requirement of 20% of units based on robust viability evidence.

No change.

The consultants that have prepared the SHMA work for a range clients. The basis for the housing requirement work has been undertaken using a methodology agreed at the Leeds City Region. The consultants have worked closely with the local authority in the preparation of the SHMA.

No change.

National Planning Policy Framework and Planning Practice Guidance do not require the inclusion of such a policy. Policies in the Local Plan support the delivery of development to meet the district's housing requirements.

Proposed change.

The final sentence relating to shortfalls in delivery against previous targets has been moved to the following paragraph.

Support	Conditional Support	1	Object	5	No Comment	1
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Proposed change.

Reference to 2014 household projections added and revised housing requirement resulting from updated demographic modelling and economic scenarios. The final sentence relating to shortfalls in delivery against previous targets from the previous paragraph has been moved to this paragraph.

Proposed change.

Summary of comments

Council Response

It is important that the housing policies are flexible and that there are no restrictive phasing policies that would undermine the delivery of the Plan.

The OAN figure is unreliable, given its variance to previous Kirklees plans.

7.7

DLP_SP198

Officer change.

There are empty homes in every estate agents.

7.8

DLP_SP734

Officer change

Regardless of homes needed, developers are not coming forward to build – so why is more land being set aside?

7.9

DLP_SP1035

No windfall allowance identified in 5 year supply in this plan.

Windfall allowance stepped from 0-900 in first five years and 900 per annum from year 6 onwards is a realistic brownfield windfall allowance (11,500).

Over 90% of the housing built in Kirklees over the last 15 years has been built on brown field land and there is no evidence whatsoever to suggest that the supply of brown field land will not continue at or about that level in to the future. There should be a flexible plan structure to allow allocating brownfield windfall sites as they become available and a realistic brownfield % allowance.

As stated in national planning guidance, the latest household projections have been used as the starting point for estimating overall housing need. The housing requirement has now been updated based on the 2014 based household projections and revised economic assumptions. There is no evidence to suggest a requirement of 1,956 per annum would be appropriate for Kirklees.

No change.

There is no phasing policy in the draft local plan. The housing trajectory and phasing table are indicative.

Proposed change.

As stated in national planning guidance, the latest household projections have been used as the starting point for estimating overall housing need. Circumstances change over time and there have been revised national projections since the previous plan. The housing requirement has now been further updated based on the 2014 based household projections and revised economic assumptions.

Support	Conditional Support	Object	No Comment	1
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Proposed change.

Amendment to reflect revised calculation of the capacity required from new housing allocations.

No change.

It is expected that there will be some empty homes as part of the churn of housing markets. The Council does have an Empty Homes Strategy which has reduced the number of vacant dwellings in the district.

Support	Conditional Support	Object	No Comment	1
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Proposed change.

Change to reflect the additional housing completions since 2013 and include reference to the revised calculations for the amount of housing to be provided in the district including a contingency allowance for planning permissions.

No change.

The Local Plan must ensure that sufficient land is provided to meet objectively assessed housing needs as set out in national policy. If planning permissions are not implemented they will expire.

Support	Conditional Support	Object	1	No Comment
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No change.

Much of the capacity identified from planning applications in the five year supply is on windfall sites, so the inclusion of an allowance for local plan purposes could lead to double counting.

No change.

The windfall allowance included in the plan is based on robust evidence.

No change.

There has been a high level of housing delivery on brownfield sites in Kirklees but this has reduced in recent years as brownfield sites are developed. As the local plan will allocate land for a significant amount of new homes and many vacant industrial sites have already been redeveloped, the amount of housing delivered on

Summary of comments

No comments were received on this part of the plan.

Council Response

Proposed change.

Amendment to reflect the revised windfall allowance based on the final 11 years of the plan.

7.13

No comments were received on this part of the plan.

Support Conditional Support Object No Comment

Proposed change.

Amendment to reflect demolition allowance for the remaining 16 years of the plan.

7.14

DLP_SP1377

Officer change.

Support Conditional Support Object 1 No Comment

Proposed change.

Paragraph deleted as there will no longer be a 5% buffer applied to the allocations. The allocations have been assessed through a robust site allocations process and are therefore expected to be delivered during the plan period. A 10% buffer has instead been added to take account of planning permissions which are not proposed as allocations in the local plan. This is covered in an earlier paragraph.

A 20% buffer for first five years of the plan should be included to account for persistent under-delivery in last five years; increasing total land to be allocated to 20,633.

No change.

NPPF para 47 states that the 20% buffer as part of the five year supply calculation is land moved from later in the period, so there would be no need to increase the amount of land to be allocated over the plan period. The 20% buffer is to be taken into account in calculating the local plan five year supply.

7.15

DLP_SP1045, DLP_SP1258, DLP_SP1748, DLP_SP1769

Shortfall recorded in 2013/14 will have to be made up in subsequent years and under-delivery compounds difficulty of achieving requirement over lifetime of the plan (including addition of 20% buffer)

Support Conditional Support Object 4 No Comment

No change.

The Local Plan has to be prepared in accordance to national policy and this includes demonstrating a five year supply of deliverable sites and that the housing requirement can be met over the plan period. The housing trajectory and phasing table demonstrate that this is the case.

The housing requirement is inconsistent with market evidence, it is 60% higher than 15 year long term housing completion rate in the district. Long term completions average of 1050 per annum would be more appropriate.

No change.

As identified by national policy, the housing requirement will meet Objectively Assessed Need rather than reflecting past trends. The SHMA sets out the process and uses household projections as a starting point.

Officer change

Proposed change.

Local plan housing requirement updated.

No consideration has been given to topography in assessment of site capacity, nor has any consideration been given to providing on-site public open space. This has overestimated the likely dwelling capacity from individual sites.

No change.

The density assessment of completions to date is based on whole sites including estate roads and public open space but does exclude some areas not proposed for development. This has been used as evidence when considering site capacities. The capacities for larger urban extension sites in the plan are based on developed masterplans showing realistic capacities for sites. Each site has been subject to a technical assessment to determine whether constraints would lead to a reduction in the developable area of sites.

Request for ward-based predictions for housing growth in the district

No change.

The SHMA provides more detailed information for sub-district geographical areas but the local plan does not seek to assign a housing requirement to each ward.

The lead-in times / build rates for larger sites could result in an under delivery of 2,000 dwellings over the plan period.

No change.

Summary of comments

Council Response

Urban extension sites will need to be developed with supporting uses on site, but no consideration has been given to these.

The use of gross to net site ratios in the calculation of the capacity of allocations would provide a more consistent approach, based on 'tapping the potential'.

The revised phasing table has a base date of 2015/16 as the latest planning application information goes up to this point. This assumes all sites that are not currently designated for non-development (e.g. green belt) would start delivering development in 2017/18. Green belt sites would yield housing completions in 2018/19 as their current designation restricts housing development.

Many of the larger sites have been subject to developer-led masterplans which show that the sites are deliverable within the plan period. Strategic sites that have been masterplanned have been accompanied by robust evidence relating to infrastructure planning and suggest that these sites can start to be delivered in the first five years of the Local Plan without needing large amounts of capital expenditure for infrastructure projects.

Sites such as H1747 and H2089 currently include land that benefits from UDP allocation for housing, so would be able to start early in the plan period. The Local Plan allocates a wide range of site sizes across the district that will be able to deliver housing throughout the plan period.

The draft Local Plan sets out the approaches the council will take to bring sites forward if delivery does not meet expectations.

Urban extension sites will need to be developed with supporting uses on site, but no consideration has been given to these.

The use of gross to net site ratios in the calculation of the capacity of allocations would provide a more consistent approach, based on 'tapping the potential'.

No change.

The site allocations boxes for urban extension sites refer to on-site facilities. The capacities for larger urban extension sites in the plan are based on developer-led masterplans showing realistic capacities for sites.

No change.

Each site has been subject to a technical assessment to determine whether constraints would lead to a reduction in the developable area of sites. As such, there is no requirement for a standard gross to net ratio to be applied on sites.

Table 4	Support	Conditional Support	25	Object	13	No Comment
DLP_SP20, DLP_SP213, DLP_SP252, DLP_SP283, DLP_SP550, DLP_SP773, DLP_SP894, DLP_SP918, DLP_SP981, DLP_SP988, DLP_SP991, DLP_SP994, DLP_SP1070, DLP_SP1206, DLP_SP1232, DLP_SP1249, DLP_SP1259, DLP_SP1290, DLP_SP1309, DLP_SP1321, DLP_SP1337, DLP_SP1356, DLP_SP1367, DLP_SP1391, DLP_SP1414, DLP_SP1439, DLP_SP1459, DLP_SP1606, DLP_SP1675, DLP_SP1744, DLP_SP1749, DLP_SP1763, DLP_SP1770, DLP_SP1789, DLP_SP1839, DLP_SP1844, DLP_SP1853, DLP_SP1866						

There appears to be no reference to probability simulation which would model future population growth and housing needs

Windfall allowance needs to be increased to include a reasonable figure for the first 5 years of the Plan

No change.

The SHMA has been undertaken in accordance with national planning policy. It uses the latest household projections as a starting point for estimating overall housing need and uses information from demographic modelling and economic evidence.

Windfall allowance needs to be increased to include a reasonable figure for the first 5 years of the Plan

The housing requirement should be increased to properly provide for the housing needs of the district.

No change.

Much of the capacity identified from planning permissions in the five year supply is on windfall sites, so the inclusion of an allowance could lead to double counting

The housing requirement should be increased to properly provide for the housing needs of the district.

SHMA considers that a large proportion of the existing housing requirement, and future housing requirement, is for benefit of international migration. This does not take into account central government policies to cap immigration and the potential of a Leave vote in the forthcoming EU referendum. It is not the role of the government to ensure there is sufficient housing for international immigrants. Also not the role of Kirklees to accommodate internal migration from other districts.

No change.

The local plan housing requirement will meet the objectively assessed needs for housing in Kirklees.

SHMA considers that a large proportion of the existing housing requirement, and future housing requirement, is for benefit of international migration. This does not take into account central government policies to cap immigration and the potential of a Leave vote in the forthcoming EU referendum. It is not the role of the government to ensure there is sufficient housing for international immigrants. Also not the role of Kirklees to accommodate internal migration from other districts.

Over the ten year period (2004-14) saw an average of 1,239 homes were built per annum, excluding the

No change.

As stated in national planning guidance, the latest household projections should provide the starting point for estimating overall housing need with further analysis in SHMA. Objectively assessed needs do take account of internal and international migration. The implications of leaving the EU on European migration and wider non-EU migration are unknown at this stage. Kirklees is identified as a self-contained housing market area in the SHMA and the Travel to Work area data supports this. There are flows from different housing market areas into the district and flows from Kirklees to other housing market areas and these have been considered.

Over the ten year period (2004-14) saw an average of 1,239 homes were built per annum, excluding the

No change.

Summary of comments

two peak years the annual average is only 865 homes

The housing requirement and the distribution should be included within a policy rather than supporting text.

CPRE's alternative figures requirement of 24,678 Based on completions data from ONS, sites with permission, windfall allowance of 6750

Insufficient consideration of different options

Officer change.

The housing requirement is based on a series of jobs-led scenarios. This is based on an average of them, some as low as 1,069 and four of the scenarios would meet the basic demographic need of 1,520 dwellings per year.

The plan should seek to allocate land for 26,640 dwellings. This reflects a 10% discount on planning permissions, a 10% flexibility allowance and no windfall allowance being made.

Many local plans include a 10% buffer (flexibility rate on site allocations) and this should be considered rather than 5%.

TOTAL number of allocations should be 22,887 to reflect increased allowance for flexibility, under provision of housing in early years of plan and applying 10% discount to planning applications

The council should review and publish all evidence of windfall analysis. It is accepted these are part of the supply but must be based upon robust and compelling evidence that such sites have come forward in the past and will continue to come forward. The housing technical paper provides insufficient evidence.

Council Response

Comment noted. The Local Plan needs to be based on meeting objectively assessed needs which is based on national household projections and economic evidence rather than projecting past trends forward.

No change.

National Planning Policy Framework and Planning Practice Guidance do not require the inclusion of such a policy. Draft Local Plan policies support the delivery of development to meet the district's housing requirements.

No change.

The suggested housing requirement would fail to meet the objectively assessed needs for housing in Kirklees and would therefore not be consistent with national planning policy. The windfall allowance for the draft local plan was based on evidence but with acknowledgment of the likely decrease in windfall capacity as a result of the local plan adoption compared to past trends.

No change.

The SHMA has been undertaken in accordance with national planning policy. It uses the latest household projections as a starting point for estimating overall housing need and uses economic evidence in the consideration of options.

Proposed change.

Table amended to reflect revised figures, addition of planning permissions contingency and removal of overall 5% contingency.

Proposed change.

This work has been revised to take account of the 2014 household projections and revised economic information. The previous approach where an average of jobs-led scenarios was taken has been amended as set out in the SHMA.

No change.

The demographic modelling work and SHMA document are based on up to date information using the local plan base date (2013) to calculate the local plan housing requirement. A buffer of 10% will now be applied to planning permissions not assessed using the local plan allocations methodology but as the housing allocations have been subject to detailed and robust assessment, a flexibility allowance for land allocations is no longer deemed necessary.

Proposed change.

A buffer of 10% will now be applied to planning permissions not assessed using the local plan allocations methodology. As the local plan housing allocations have been subject to detailed and robust assessment, a flexibility allowance for land allocations is not deemed necessary and has been removed from the draft plan.

No change.

The demographic modelling work and SHMA document are based on up to date information using the local plan base date (2013) to calculate the local plan housing requirement. A buffer of 10% will now be applied to planning permissions not assessed using the local plan allocations methodology but as the housing allocations have been subject to detailed and robust assessment, a flexibility allowance for land allocations is no longer deemed necessary. As this is the base date, the requirement addresses any backlog demand prior to 2013 as it uses a baseline figure based on the current demographic situation in Kirklees.

Proposed change.

Evidence relation to the windfall allowance in the draft local plan was published in the housing technical paper but further clarification will be considered for the publication draft local plan housing technical paper.

Summary of comments

If windfall sites have been a reliable source of supply, why are the projected numbers halved?

Delivery from windfalls will reduce in future years compared to past trends due to the effect of having an up to date plan with allocations. The windfall allowance should focus on small sites. Failure to meet the windfall allowance levels would put plan delivery under serious threat and monitoring would need to be undertaken as part of the five year land supply work. Bradford Council is not proposing to meet its requirement from windfall sites and Leeds have a lower percentage windfall than Kirklees.

The number of houses is neither sustainable nor viable.

There is no clear approach to calculating objectively assessed need of housing in the whole of Kirklees or justification for the resulting figures

Calculations based on national statistics with little or no attention to the specific needs of local people

Including capacity from planning permissions should be accompanied by a detailed assessment of deliverability on each and every site. A 10% discount should be applied to cover the margin of error for non-delivery. A reliance on unimplemented planning permissions coming forward is not justified, unrealistic and inconsistent with national policy. Lapse rates have been applied elsewhere in planning appeals.

The plan period should be extended to 2033. This would require a higher demolitions allowance. The Local Plan should seek to meet the requirement for 34,833 new homes.

Insufficient sites are being allocated to meet the objectively assessed need; the full housing capacity should be identified in the plan period.

Site capacities should take into consideration land used for on-site PS, SuDS, drainage or infrastructure – typically 65-70% of the gross site area.

The number of vacant homes in Kirklees should be considered when calculating the allocations required.

Under-delivery from 2006-2014 should be met across the plan period.

Council Response

No change.

The windfall numbers are anticipated to reduce due to having an up-to-date plan, with many more sites allocated for housing.

No change.

Evidence relation to the windfall allowance in the draft local plan was published in the housing technical paper and the approach is consistent with national planning policy which allows a windfall allowance to be included. The windfall allowance takes into account that the windfalls are likely to decrease following the adoption of the local plan. Evidence in relation to past windfall delivery is different for different local authorities.

No change.

The housing requirement seeks to meet the fully objectively assessed need for the district as required by national policy. It is considered that there are sufficient deliverable sites to meet the housing requirement. The local plan has been subject to Sustainability Appraisal.

No change.

The approach for calculating OAN is set out in the Strategic Housing Market Assessment and the housing technical paper.

No change.

As stated in national planning guidance, the latest household projections should provide the starting point for estimating overall housing need with further analysis in SHMA. Local economic evidence has been used as part of the calculation of the local plan housing requirement.

Proposed change.

It is considered that a 10% discount on unimplemented planning permissions is a pragmatic way to resolve this issue where these sites have not been assessed using approach set out in the local plan allocations methodology.

No change.

National planning policy sets out that local plan should cover an appropriate timescale (preferably 15 years). The local plan covers the period from 2013-31 and is therefore consistent with national planning policy and an appropriate allowance for losses has been included.

No change.

The local plan takes account of factors such as completions since the local plan base date, remaining planning permissions, windfall allowance, losses allowance and other factors to determine the capacity required from allocations. This process will ensure the objectively assessed needs for Kirklees can be met.

No change.

The evidence relating to average densities in Kirklees is based on analysis of full sites (including open space and other infrastructure) and is therefore achievable therefore there is no requirement to apply a plan-wide reduction of the developable area of each site.

No change.

Comment noted. The Council has an Empty Homes Strategy which has reduced the number of vacant dwellings in the district. Any additional housing capacity made available through bringing empty homes back into use will provide further flexibility in meeting the housing requirement.

No change.

Summary of comments

Council Response

<p>7.16 DLP_SP235, DLP_SP735, DLP_SP1104, DLP_SP1579</p> <p>The council's empty homes strategy is not factored into housing requirement. This could make a contribution to reducing number of new builds required.</p>	<p>The demographic modelling work and SHMA document are based on up to date information using the local plan base date (2013) to calculate the local plan housing requirement. As this is the base date, the requirement addresses any backlog demand prior to 2013 as it uses a baseline figure based on the current demographic situation in Kirklees.</p> <p>Support 1 Conditional Support Object 3 No Comment</p> <p>No change.</p> <p>Any additional housing capacity made available through bringing empty homes back into use will provide further flexibility in meeting the housing requirement.</p>
<p>7.17 DLP_SP1041</p> <p>Land safeguarded for 15 years' time, but unable to anticipate Government Policy and Housing Need in 15 years' time.</p> <p>There is no evidence to justify any safeguarded land.</p>	<p>Support Conditional Support Object 1 No Comment</p> <p>No change.</p> <p>Paragraph 85 of NPPF states that Local Authorities should identify areas of safeguarded land to meet longer-term development needs stretching well beyond the plan period.</p> <p>No change.</p> <p>Paragraph 85 of NPPF states that Local Authorities should identify areas of safeguarded land to meet longer-term development needs stretching well beyond the plan period.</p>
<p>7.18 DLP_SP1371</p> <p>There is no specific policy relating to overall housing requirement and distribution of housing across the district.</p> <p>Officer change.</p>	<p>Support Conditional Support 1 Object No Comment</p> <p>No change.</p> <p>National Planning Policy Framework and Planning Practice Guidance do not require this. DLP2 in the draft Local Plan supports the delivery of development to meet the district's housing requirements.</p> <p>Proposed change.</p> <p>Amendment to merge paragraphs explaining the allocation of land to meet the housing requirement using the site allocations methodology and to remove reference to table 5 which has now been deleted.</p>
<p>7.19</p> <p>Officer change.</p>	<p>Support Conditional Support Object No Comment</p> <p>Proposed change.</p> <p>Amendment to merge paragraphs explaining the allocation of land to meet the housing requirement using the site allocations methodology and to remove reference to table 5 which has now been deleted.</p>
<p>No comments were received on this part of the plan.</p>	<p>No change</p>
<p>Table 5 DLP_SP4, DLP_SP253, DLP_SP302, DLP_SP455, DLP_SP552, DLP_SP655, DLP_SP688, DLP_SP775, DLP_SP780, DLP_SP830, DLP_SP919, DLP_SP1046, DLP_SP1151, DLP_SP1233, DLP_SP1250, DLP_SP1322, DLP_SP1338, DLP_SP1357, DLP_SP1415, DLP_SP1440, DLP_SP1461, DLP_SP1492, DLP_SP1734, DLP_SP1745, DLP_SP1753, DLP_SP1764, DLP_SP1790, DLP_SP1851, DLP_SP1854</p> <p>- The proposed housing distribution is inconsistent with policy DLP2. The allocations in Dewsbury, Huddersfield and Mirfield account for 50.4% of allocations.</p> <p>- Too much development in Batley and Spen</p> <p>- Alternative scenario - Uplifts of 3,645 in Batley and Spen, 2,425 in Dewsbury and Mirfield, 4,947 in</p>	<p>Support Conditional Support 2 Object 25 No Comment 2</p> <p>No change.</p> <p>The table identifies where accepted options are located, it is not the intention to provide a housing requirement by each district committee area.</p> <p>For Dewsbury and Huddersfield, settlement appraisal evidence supports the fact that there are a range of</p>

Summary of comments

Huddersfield and 3,909 in Kirklees Rural.

- Huddersfield and Kirklees Rural proposed to grow more than Batley and Spen and Dewsbury and Mirfield. Reduce Kirklees Rural numbers and increase the number in Batley and Spen and Dewsbury and Mirfield, with a focus on sites that are sustainable and viable.

- The proportion of growth to Batley & Spen should be greater than the Kirklees Rural Sub Area (poor motorway access and limited accessibility to employment opportunities). Number of homes allocated to Batley and Spen should be increased by 1,000

- Number of homes proposed in the Spen Valley is too high, Cleckheaton and Heckmondwike have been amongst the top wards for new additional homes.

- New housing development should be focused on the larger urban areas of Huddersfield, Dewsbury, Batley and Spen. The amount of houses in Kirklees Rural should be reduced.

- Development in Kirklees Rural would be detrimental to quality of life for entire district, due to impact on existing services and traffic congestion, schools, negative impact on tourism

Officer change.

The Council's approach appears to be to distribute new housing based on the location of their preferred identified supply, rather than development size or relative sustainability

The housing requirement and the distribution should be included within a policy rather than supporting text. The distribution strategy should be properly explained and justified. From the spatial strategy at 4.1 there is no guidance as to how the distribution is to be split.

Higher development densities are expected in Huddersfield, Dewsbury and Batley which should reduce the allocation for Kirklees Rural

Homes should be built near town centres, e.g. Cleckheaton, particularly for older people.

The housing distribution as set out in Table 5 has not been positively prepared, in that it distributes growth away from some of the districts most sustainable locations.

7.20

No comments were received on this part of the plan.

Council Response

services in settlements to sustain development. The strategic sites will bring forward a range of services / facilities to support the homes to be developed on these sites. The allocations in each of the areas have been reviewed following consultation comments and updated evidence received which has informed revisions to the plan.

Proposed change.

Table 5 has been removed as it was not intended to set out a housing requirement by area. The intention was to show the capacity of new homes from accepted housing allocations in each of the district committee areas.

No change.

The Local Plan seeks to meet OAN in accordance with national policy and guidance taking into account the available housing land supply, which is deliverable and developable. Consideration of green belt impacts, sustainability appraisal and the availability of infrastructure have been taken into account.

No change.

The spatial strategy sets out the factors taken into account to form the spatial development strategy. The intention of Table 5 was to show the distribution of new homes, not set a requirement for each area.

No change.

The density for each site area is indicative based on the average delivered across the district. The ability to increase densities has to be considered against the accessibility / sustainability of locations, and the density policy allows for lower densities where appropriate.

No change.

Comment noted. The local plan seeks to allocate and for development in the sustainable locations where options are available. The housing mix policy seeks to meet needs including for people requiring specialist accommodation.

No change.

The table identifies where accepted options are located and does not set out a housing requirement by area. Settlement appraisal evidence supports the fact that there are a range of services in settlements to sustain development. The strategic sites will bring forward a range of services / facilities to support the homes to be developed on these sites. The site allocations have been subject to sustainability appraisal.

Support

Conditional Support

Object

No Comment

Proposed change.

Policy has been deleted as it referred to Table 5 which has also been deleted.

Summary of comments	Council Response				
7.21 DLP_SP12	Support	Conditional Support	1	Object	No Comment
Include a statement relating to use of Local Development Orders to encourage development in appropriate locations	Proposed change Local development orders are now referred to in the list of potential actions the council could consider if there is not a deliverable five year supply of housing sites towards the end of this section.				
7.22 DLP_SP736	Support	Conditional Support		Object	No Comment 1
More mixed housing should be provided in each development	No change. The local plan housing mix policy seeks to require an appropriate split of type and tenure of housing based on local housing needs.				
7.23 DLP_SP1378, DLP_SP1441	Support 1	Conditional Support	1	Object	No Comment
A 20% buffer for first five years of the plan should be included to account for persistent under-delivery in last five years; increasing total land to be allocated to 20,633.	No change. NPPF paragraph 47 states that the 20% buffer to meet the shortfall of land is land moved from later in the period, so there would be no need to increase the amount of land to be allocated during the plan period.				
Maintaining a Supply of Deliverable Housing Sites is supported as this accords with relevant planning guidance.	No change. Support noted.				
7.24 DLP_SP1152	Support	Conditional Support		Object 1	No Comment
No evidence is provided of how completions are envisaged to accelerate in order to deliver the strategy	No change. The delivery and implementations section of the housing strategy part of the local plan sets out the steps the council could consider to boost housing delivery, especially if a five year supply of deliverable housing sites cannot be demonstrated.				
Officer change.	Proposed change. Clarification added to provide links between the housing trajectory and the local plan phasing table.				
Figure 7 DLP_SP737, DLP_SP1234, DLP_SP1379, DLP_SP1416, DLP_SP1442, DLP_SP1772	Support	Conditional Support	1	Object 1	No Comment 4
Lead in times of sites without planning permission is 1.5 years. This is unrealistic. The Savills research (2014) shows that on average, construction of first stage of urban extensions (of 500 units plus) starts more than four years after submission of outline application.	No change. The larger sites have been subject to developer-led masterplans, meaning a large amount of preparatory work has been undertaken. These are based on evidence that suggests that the sites are deliverable within the plan period. Strategic sites that have been masterplanned have been accompanied by robust evidence relating to infrastructure planning and suggest that these sites can start to be delivered in the first five years of the Local Plan without needing large amounts of capital expenditure for infrastructure projects. Sites such as H1747 and H2089 currently include land that benefits from UDP allocation for housing, so would be able to start early in the plan period.				
A build rate of 65 dwellings per annum for first year of construction and 110 dwellings per annum thereafter has been applied to three strategic sites, with a four year lead-in time. This could result in shortfall of over 2000 homes in plan period. Reference to Savills research (2014), with delivery rate of 60 units in first year of construction, picking up to more than 100 units per annum in subsequent years	Proposed change. The trajectory has been amended to take account of revised evidence from site promoters and the publication draft local plan trajectory and phasing table set out a robust expectation of delivery on sites during the local				

Summary of comments

and increasing to around 120 units, in strong market areas.

Officer change.

The amount of development for the 2nd year (2014/15) is unrealistic, as it is more than double previous completions and has never been delivered previously.

Does this graph not suggest that fewer developments are going to be necessary in the future?

Figure 7, if accurate, simply demonstrates the Council's failure to allocate sufficient housing sites across the District to meet the housing requirement.

Proposed sites of over 500 homes in size won't start to delivery new homes until 2022, based on four years post the adoption of the Local Plan and the subsequent submission of an outline planning application. Using build rate of 60 homes in the first year; 100 homes for the proceeding 5 years; and 120 homes maximum over the remaining 5 years of the plan results in 1,160 homes maximum per site.

7.25
DLP_SP1251, DLP_SP1323, DLP_SP1339, DLP_SP1358, DLP_SP1765, DLP_SP1791, DLP_SP1850, DLP_SP1852, DLP_SP1864

Support the approach set out in paragraphs 7.25 – 7.30. It is considered it is positively prepared, justified, effective and consistent with national policy.

All dwellings with planning permission should not be included in trajectory and a 10% discount of these should be applied.

7.26
Support

No comments were received on this part of the plan.

7.27
DLP_SP1692

It is essential that, if the phasing of large sites are altered during the plan period, Yorkshire Water is consulted at earliest opportunity to ensure that adequate water and waste water infrastructure is provided (Yorkshire Water)

Council Response

plan period. Strategic sites that have been masterplanned have been accompanied by robust evidence relating to infrastructure planning and suggest that these sites can start to be delivered in the first five years of the Local Plan without needing large amounts of capital expenditure for infrastructure projects.

Proposed change.

The trajectory and phasing table have been updated to take account of changes to proposed site allocations and to show how such allocations meet the revised housing requirement.

Proposed change.

As drafted, the trajectory was designed to be used over a 5 year period rather than individual years. The trajectory has since been amended to take account of revised evidence from site promoters and the publication draft local plan trajectory and phasing table set out a robust expectation of delivery on sites during the local plan period.

No change.

This illustrates the phasing table, which is based on predictions of when sites come forward, rather than applying a strict phasing policy. The phasing table presented in the draft local plan set out that the housing requirement would be met over the plan period but is indicative only.

No change.

This illustrates the phasing table, which is based on predictions of when sites come forward, rather than applying a strict phasing policy. The phasing table presented in the draft local plan set out that the housing requirement would be met over the plan period.

No change.

Sites such as H1747 and H2089 currently include land that benefits from UDP allocation for housing. Parts of these sites could therefore deliver new homes earlier in the plan period than sites which are completely within the green belt at present.

Support 8 Conditional Support Object 1 No Comment

No change.

Comment noted.

Proposed change.

A buffer of 10% will now be applied to planning permissions but as the housing allocations have been subject to detailed and robust assessment, a flexibility allowance for land allocations is no longer deemed necessary.

Support Conditional Support Object No Comment

Proposed change.

Amendment to add clarification in relation to the 5% or 20% buffer required by national planning policy when calculating the five year housing land supply.

Support Conditional Support 1 Object No Comment

No change.

Comment noted. The phasing table does not restrict development but provides an indication of the timescale of development.

Summary of comments	Council Response			
7.28 DLP_SP921, DLP_SP1153, DLP_SP1443	Support	Conditional Support 2	Object 1	No Comment
These are all activities that should be taking place all the time, specifically for bringing forward previously developed land, and should not be predicated on absence of a five-year supply	No change.			
Officer change.	The local plan sets out a series of actions which could take place to improve delivery, some of which may take place even when the council can demonstrate a five year supply.			
Where the Council cannot demonstrate a five year supply, an additional mechanism should be included within the list in the relation to the release of safeguarded land and a potential subsequent review of the Local Plan	Proposed change.			
	Amendment to clarify that compulsory purchase orders or local development orders may be considered.			
	No change.			
	The text states that a review of housing allocations may be appropriate. Other potential actions are listed to improve the delivery of new homes.			
7.29 DLP_SP1047	Support	Conditional Support	Object 1	No Comment
The statement in paragraph 7.29 "If the annual housing target is met, but the number of completions on windfall is consistently lower than anticipated then this will eventually result in a shortfall of housing allocations." Together with over-allocation of greenfield sites is unacceptable.	No change.			
	If windfall is lower than expected but the target is met, it follows that there will be more houses delivered on allocations than expected, therefore leading to a need to review housing allocations. The local plan evidence base provides a robust justification for the windfall allowance therefore this paragraph is to cover unexpected circumstances during the plan period.			
7.30	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option Housing Strategy 7.1.1 DLP_SP1154	Support	Conditional Support	Object 1	No Comment
Support this option, in the sense that a lower housing requirement is provided. Taking such an approach would be beneficial in terms of increasing the potential contribution of windfall sites to the land supply. The plan should allocate sufficient sites for 6 years supply, broad locations for development in phase 2, sets out process of bringing brownfield / windfall sites forward and identifies safeguarded land where residual development needs can be met	No change.			
	This would not meet OAN as required by national policy and the preferred 15 year time horizon set out in the National Planning Policy Framework. It is considered that there is insufficient evidence to demonstrate that this would be a sound approach.			
Option Housing Strategy 7.1.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Housing mix and affordability	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Policy DLP 11 DLP_SP61, DLP_SP106, DLP_SP153, DLP_SP184, DLP_SP259, DLP_SP293, DLP_SP423, DLP_SP457, DLP_SP648, DLP_SP697, DLP_SP708, DLP_SP865, DLP_SP895, DLP_SP922, DLP_SP971, DLP_SP1009, DLP_SP1052, DLP_SP1062, DLP_SP1074, DLP_SP1105, DLP_SP1155, DLP_SP1207, DLP_SP1252, DLP_SP1281, DLP_SP1285, DLP_SP1310, DLP_SP1324, DLP_SP1326, DLP_SP1340, DLP_SP1348, DLP_SP1355, DLP_SP1363, DLP_SP1368, DLP_SP1444, DLP_SP1472, DLP_SP1520, DLP_SP1532, DLP_SP1544, DLP_SP1580, DLP_SP1630, DLP_SP1660, DLP_SP1690, DLP_SP1725, DLP_SP1743, DLP_SP1751, DLP_SP1762, DLP_SP1774, DLP_SP1779, DLP_SP1788, DLP_SP1798, DLP_SP1805, DLP_SP1841, DLP_SP1868	Support 12	Conditional Support 29	Object 10	No Comment 2
Change to base affordable housing policy on number of units rather than floor space is supported.	No change.			
	Comment noted.			
Sufficient housing offer required to attract investors to the area.	No change.			

Summary of comments

Implementation of Passivhaus standard for new build developments and EnerPHit for refurbishment for all housing and building development within Kirklees to reduce costs and improve affordability. Could apply Passivhaus standards to council owned sites.

Exceptions test would only apply to "small freestanding settlements" which is not consistent with national policy and would preclude development in many areas which are not freestanding.

Definition of affordable housing will change during local plan period. Need to ensure that homes are truly affordable. The plan does not define what is considered to be affordable.

Circumstances justifying a financial contribution not clear but off-site contribution could be more beneficial than delivery on-site in some cases.

Need to include starter homes for people to buy as first time buyers. Clear need and desire for some starter homes (areas mentioned: Kirkburton ward, Shepley)

SHMA figures are indicative only and not prescriptive. Viability, site characteristics and demand should be taken into account. Viability assessments should be public documents for transparency. Support for flexibility of negotiation where viability evidence demonstrates costs which could prejudice the implementation of proposals. Flexibility should be provided to account for local demand and importantly the aspirations of Registered Providers. Strategic sites should be expected to provide a reduced level of affordable housing provision to take account of the costs expected.

The proportion of affordable homes at 20% is far too low for local conditions and needs.

Support for housing mix policy, need to achieve a more diverse housing mix and affordable housing (Holme Valley, care home required in Denby Dale)

Too many executive homes built, need sufficient smaller housing units are required for older people (independent and assisted living needs) and to allow downsizing, could be more prescriptive with a percentage of houses could be allocated for older people (such as bungalows), more flats needed.

Designing buildings for specialist accommodation needs into later life can add significant costs. Enhanced access standards should only refer to optional requirements in building regulations. The policy should set out a proportion of new housing to meet needs of people later in life.

Council Response

The policy aims to ensure a mix of new homes are provided including larger and smaller properties.

No change.

The local plan design policy considers the design of schemes. If such design schemes could improve affordability this would assist in reducing the affordable housing shortfall but to require such standards from each dwelling would be too restrictive. To apply such standards to council owned sites would be a matter for the council as landowner and not the local plan.

No change.

If areas are within or adjoining a main urban area, it would be expected that the need for affordable homes can be addressed within the urban area. The exceptions element of this policy relates to small freestanding settlements where there is otherwise little prospect of meeting robustly evidenced local needs.

No change.

The policy refers to affordable housing and will therefore be able to accommodate changes to the definition of affordable housing during the plan period. The policy cannot specify a house price or rental price which is considered to be affordable as this may change over the plan period.

No change.

The potential justification for an off-site contribution may vary on a site by site basis but the policy allows for this.

Proposed change.

The justification text for this policy has been amended to refer to starter homes in more detail.

No change.

The information set out in the Kirklees Strategic Housing Market Assessment (SHMA) is based on the best available information and shows a shortfall in affordable housing in Kirklees. The local plan viability assessment has considered the implications of policies and determined that 20% affordable housing can be achieved on sites. The policy allows flexibility where site specific viability information demonstrates development costs which would otherwise prejudice the implementation of a scheme or where off-site provision could be justified. This would be undertaken through the planning applications process.

No change.

The affordable housing requirement has been set using local plan viability evidence. The policy encourages higher provision which could be achieved through grant funding or other funding sources.

No change.

Comment noted. The policy states that decisions should be based on the most up to date evidence in relation to housing needs.

No change.

The policy makes reference to the consideration of the latest evidence when considering the housing mix of planning applications.

No change.

The policy refers to the latest evidence which is currently set out in the Strategic Housing Market Assessment (SHMA) to be considered. There is insufficient evidence to set out a specific proportion of new housing for older people but the policy does require specific consideration to be given where schemes are of more than 10

Summary of comments

No meaningful implementation mechanism to meet the needs of most housing growth identified in SHMA (older people and those on lower incomes). Housing requirement should be broken down by type and tenure.

Granting open market housing permissions should be predicated on the rate of affordable housing completions to ensure adequate delivery of affordable homes.

Consider applying different requirements to areas of the district. A higher percentage of affordable/social housing than 20% should be prescribed in areas of the district where needed to ensure sufficient homes for the young, elderly and vulnerable.

The plan should prioritise provision of affordable student accommodation, starter homes for recent graduates, homes suitable for 'empty nesters' who wish to trade down but can't identify suitable housing choices to release family homes into the market and housing association and social landlord provision to provide affordable rental choices to recent graduates.

Officer change.

Should designate areas in line with local community need where only affordable housing is allowed to be built.

Policy considered sound (positively prepared, justified, effective, consistent with national policy). Support for securing affordable housing through the policy (young people, first time buyers, older people, key workers). Affordable housing needed (areas mentioned: Holme Valley, Denby Dale wards).

20% affordable housing requirement unlikely to be achievable as past delivery has been lower, viability issues in some areas (as stated in council viability work), may undermine CL. By imposing percentages, the value of the site may not be maximised which may impact on the delivery of affordable housing.

Market demand should be given weight as a key driver to the proposed housing mix. Flexibility is required to ensure that the developers have the opportunity to deliver mix of housing that they can sell and which are viable along with other planning obligations.

Support for district-wide affordable housing target rather than area targets.

Policy is considered to be unsound. Local plan should not dictate housing mix across the district - the plan should achieve this by identifying the level of provision and broad distribution of new housing. SHMA provides a broad indication only. Reference to reflecting the mix (size, tenure, price) set out in the SHMA in DLP11 and Paragraph 7.32 is onerous and prescriptive, particularly as it is seeking to control size of units, mix, tenure and price. The

Council Response

dwellings.

No change.

This policy aims to ensure a mix of housing types, particularly on sites of more than 10 dwellings and also 20% affordable housing on sites of more than 10 dwellings.

No change.

The policy will seek to secure 20% affordable homes but the phasing of the affordable homes on these sites will be determined through the planning applications process.

No change.

The local plan viability evidence sets out that the target of 20% affordable housing target can be achieved. The policy states that a higher proportion of affordable housing on sites will be encouraged.

No change.

The policy aims to ensure a mix of housing types and sizes is provided which should enable choice within the market. The policy covers general affordable need which may include students and graduates depending on their income but priority for graduates cannot be justified given the overall need for affordable housing in the district. A wider mix of homes will provide opportunities for people to downsize where required.

Proposed change.

Amendment to clarify that the policy applies to self-contained housing units rather than the term 'grouped housing' referred to in the draft. Also, change last paragraph of policy to refer to 'robustly evidenced local needs'

No change.

This approach would be too restrictive in relation to national planning policy. The policy does set out that exceptionally planning permission could be granted for affordable homes on land which would not normally be permitted for housing development in certain circumstances.

No change.

Comments noted.

No change.

The local plan viability assessment shows that the affordable housing target set by the policy can be achieved.

No change.

The policy allows for the developer to provide evidence showing how their proposals meets local needs in terms of the mix of properties provided by referring to the latest evidence of need for different types of housing. Meeting local needs should ensure there is demand for the properties provided.

No change.

Comment noted.

Proposed change.

The policy does not dictate housing mix but states that the mix should be based on the latest evidence. Reference to price in the policy and justification text removed as this is covered by the affordable housing element of this policy.

Summary of comments

price in particular is beyond the realm of the planning system and is not a matter for the Local Authority or the Local Plan. This aspect of the policy should be removed.

Issue with developers agreeing to provide affordable homes but later applying to reduce the number. Affordable housing percentages should be enforced from the outline planning stage.

Need to provide homes to meet the needs of those with disabilities above the current building regulations.

Increase in an ageing population needs to be accommodated in terms of appropriate housing, which will enable people to live independently in their own homes for longer and reduce the demand on the wider health and social care infrastructure (Greater Huddersfield Clinical Commissioning Group). Policy should make specific reference to provision for people over 55.

Object to the inclusion of such design requirements (suitable for those with a specialist need including Lifetime Homes) within Local Plan policies as they are now incorporated within Building Regulations following the Government's Housing Standards Review. The Local Plan should not contain any policies that infer or require the delivery of design standards above those prescribed nationally within the Building Regulations.

The local plan is silent on the type of houses that will be built.

The words "at least" should be removed from the policy as it implies 20% to be a minimum requirement.

7.31

Officer change

No comments were received on this part of the plan.

7.32

DLP_SP108, DLP_SP1311, DLP_SP1612

Greater prominence required for Passivhaus standards.

SHMA figures are indicative only and may change over time so do not prescribe mix on all schemes of 10 or more units. Viability, site characteristics and market demands should be taken into account to ensure delivery of the overall housing requirement.

To attract investment in line with economic aspirations for growth there will be the need for an element of inspirational housing.

Council Response

No change.

The local plan policy cannot prevent developers from submitting revised planning applications with refreshed viability evidence. However, the local plan viability evidence indicates that all sites can be delivered during the plan period.

No change.

The Strategic Housing Market Assessment (SHMA) and other council strategies set out information relating to extra care requirements. This policy encourages new properties to have the potential for adaptation to meet needs in line with the latest evidence but the policy cannot be too prescriptive as it needs to meet the requirements of changing needs and regulations over the plan period.

Proposed change.

The policy refers to appropriate design elements to ensure buildings are suitable for those with a specialist need or are able to be adapted to meet the needs of people into later life. Further clarification has been added in terms of adaptation of properties which could meet the needs of any age group when required.

Proposed change.

The policy does not seek to prescribe standards above those set out in building regulations but the term "appropriate" has been added and reference to adaptations added.

No change.

This policy sets out that the mix of housing should reflect the latest evidence (currently the Strategic Housing Market Assessment). The design policy sets out clarification in terms of the design of potential buildings.

Proposed change.

Policy amended to refer to a 20% affordable housing requirement to provide certainty however the policy wording encouraging a higher proportion remains.

Support	Conditional Support	Object	No Comment
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Proposed change.

Amendment to refer to other specialist evidence.

No change.

Support	Conditional Support	3	Object	No Comment
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No change.

The local plan design policy covers this issue.

No change.

The policy refers to the latest evidence therefore as the SHMA is updated, this will be considered alongside any other information available at the time of decision making on a planning application.

No change.

Summary of comments

SHMA provides recommendations in relation to housing needs.

Does the council have a register of those wishing to build their own home?

SHMA clearly sets out the need to diversify the range of older persons housing provision.

7.33

DLP_SP107, DLP_SP1652, DLP_SP1659

Significant predicted growth in young people and adults over 65 will impact on the type and number of dwellings. Different types of accommodation required to meet the needs of these key groups (Kirklees Health and Wellbeing Board).

Officer change

Need clarification that “smaller freestanding settlements, well away from the larger urban areas” does not include Batley, Birstall, Heckmondwike, Cleckheaton or Gomersal.

New homes should be capable of adaptation as people age and there should be a programme for retro-fitting older houses to make them more energy efficient.

Has there been genuine consultation with older people to come to the view that extra care housing and grouped housing is the preferred option. Many older people would like to remain in their own homes and choice is crucial to positive wellbeing.

Support for recognition that the majority of affordable housing will be delivered by commercial house builders.

7.34

No comments were received on this part of the plan.

7.35

DLP_SP1312

The policy makes no reference to the impending introduction of Starter Homes. It is recognised this is an evolving policy area and that the details of the scheme were not available at the time of publication of this consultation. It is, however, considered appropriate that the Council consider the implications and

Council Response

The policy aims to ensure a mix of new homes are provided including larger and smaller properties in line with the latest information set out in the Strategic Housing Market Assessment.

No change.

Comment noted.

Proposed change.

Text has been added to the end of this section to explain the council register.

No change.

This policy seeks to achieve a housing mix in line with the latest evidence.

Support	Conditional Support	3	Object	No Comment
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No change.

Comment noted. This policy seeks to achieve a mix of new dwellings based on the latest evidence.

Proposed change.

Clarification added to the justification text in relation to housing to meet the needs of people into later life.

No change.

The approach in smaller freestanding settlements is aimed at meeting local needs in such areas rather than the larger settlements specified in this response.

Proposed change.

Reference to adaptation has been added to the policy wording and justification text. Retro-fitting of existing properties would be a matter outside of the local plan process.

No change.

The Strategic Housing Market Assessment utilised information from a household survey as well as secondary information. This also considered outputs from the Older Persons Accommodation Strategy. The policy refers to design elements to ensure people can stay in their own home which will provide a range of options as people move into later life.

No change.

Comment noted. Affordable homes can be delivered through the planning applications process but also through other potential funding streams.

Support	Conditional Support		Object	No Comment
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Proposed change.

Text amended to reflect general comments on this section in relation to the council's self-build register.

Support	Conditional Support	1	Object	No Comment
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Proposed change.

Although Starter Homes are within the national affordable housing definition, additional explanation has been

Summary of comments	Council Response			
an appropriate policy response prior to the next stage of consultation	added to the justification text.			
Officer change.	Proposed change.			
	Reference to starter homes has been added to this paragraph and a new paragraph has been added in relation to starter homes.			
7.36	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
7.37	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	Proposed change.			
	Reference to use of council land assets added to the paragraph			
7.38	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	Proposed change.			
	Reference to alternative models of affordable housing delivery added to the policy.			
7.39	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	Proposed change.			
	Justification text amended to reflect change from "at least 20%" to "20%"			
7.40	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	Proposed change.			
	Amendment to the justification text to reflect the policy change which clarifies that the policy applies to self-contained housing units rather than the term 'grouped housing' referred to in the draft.			
7.41	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
7.42	Support	Conditional Support	1 Object	No Comment
DLP_SP143	Proposed change.			
Officer change.	Change to reflect policy amendment which now refers to 'robustly evidenced local needs' in smaller freestanding settlements.			
	No change.			
Assume that the term "smaller freestanding settlements, well away from the larger urban areas" does not include areas such as Batley, Birstall, Heckmondwike, Cleckheaton, Gomersal.	If areas are within or adjoining a main urban area, it would be expected that the need for affordable homes can be addressed within the urban area. The exceptions element of this policy relates to small freestanding settlements where there is otherwise little prospect of meeting identified local needs.			
7.43	Support	1 Conditional Support	Object	No Comment
DLP_SP1445	No change.			
Support for statement that the majority of affordable housing will be delivered by commercial house builders				

Summary of comments	Council Response			
	Comment noted. Affordable homes can be delivered through the planning applications process but also through other potential funding streams.			
Officer change.	Proposed change.			
	Reference to starter homes added and a context paragraph added in relation to the government approach to affordable housing delivery.			
7.44	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP11 7.2.1 DLP_SP618	Support	Conditional Support	1 Object	No Comment
Any major developments adjacent to the rural villages and any add on to existing estates should not be allowed until transport improvements have been made, meaningful employment and school provision.	No change. Although the affordable housing policy refers to provision in smaller freestanding settlements where justified, any proposals would still need to adhere to national planning policies and other local plan policies.			
Option DLP11 7.2.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP11 7.2.3	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP11 7.2.4	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP11 7.2.5	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP11 7.2.6	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP11 7.2.7	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP11 7.2.8	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Accommodation for travellers	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 12 DLP_SP348, DLP_SP353, DLP_SP772, DLP_SP1806	Support	1 Conditional Support	Object 3	No Comment
Wakefield supports the Local Plans provision for Gypsy and Travellers and Travelling Showpeople. It is noted the Local Plan seeks to meet the identified needs over the plan period, as laid out in the Kirklees Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2015, and includes a specific allocation to assist in this.	No Change. Comment noted			

Summary of comments

The figures set out in the policy justification section of the policy are questioned, in light of the recent alterations to the definition of gypsies and travellers. The implications of the revised definition need to be fully considered when setting out the 5 year and 6-10 year need figures. Additionally, as set out in the representations those living in bricks and mortar should be excluded from the requirements.

Draft Policy DLP 12 the proposed wording simply reflects the latest DCLG policy on traveller sites, as published in August 2015. In relation to the two policy alternatives set out for consideration in the Draft Local Plan (Option DLP12 7.3.1 and Option DLP12 7.3.2), it is agreed that neither alternative option would address national policy requirements in relation to the provision of traveller sites. As such no object is raised to the wording of proposed policy.

Delete the proposed allocation GTTS 2487. Remove the estimated shortfall requirement for permanent Gypsy and Traveller pitches and remove the long term requirement, resulting in a 1 pitch requirement to 2029. An alternative sustainable developable site for Gypsy and Travellers should be found. Provide a site for Transit Pitches in Dewsbury or Huddersfield where the need is identified. Reduce the plot requirements for travelling showpeople to 2 by removing the long term estimated requirement for 2029 and beyond.

The identified demand within the district is insubstantial. Concern raised regarding nuisance to surrounding communities and property owners. Question if authorised sites in practice offer a solution to unauthorised occupation of land.

7.45

No comments received on this part of the Plan.

7.46

DLP_SP1269

The Policy content is inconsistent with national policy, most notably through the absence of specific Gypsy and Traveller criteria based policy.

The 2015 GTTSAA complied by Arc 4 is flawed and not compliant with Government Guidance. As such it is not fit for purpose. The key concerns with regard to the 2015 GTTSAA relate to: Timescale, sample, treatment of unauthorised encampments, interpretation of the implications of the new definition, lack of effective engagement with a steering group.

Table 6

DLP_SP219, DLP_SP349, DLP_SP1268, DLP_SP1272

There are sites for Gypsy/Travellers on Geldard Road. Further sites would only add to the already congested traffic problems in this area, Huddersfield Rd cannot cope with the existing levels, any further increase in volume will only make matters worse. As would a caravan site on which is predominantly is a large retail area

Delete the proposed allocation GTTS 2487. Remove the estimated shortfall requirement for permanent Gypsy and Traveller pitches and remove the long term requirement, resulting in a 1 pitch requirement to 2029. An alternative sustainable developable site for Gypsy and Travellers should be found. Provide a site for Transit Pitches in Dewsbury or Huddersfield where the need is identified. Reduce the plot requirements for travelling showpeople to 2 by removing the long term estimated requirement for 2029 and beyond.

The Policy content is inconsistent with national policy, most notably through the absence of specific Gypsy and Traveller criteria based policy.

Council Response

No Change.

The GTAA has been undertaken in accordance with current guidance and is compliant with the Planning Policy for Travellers Sites (August 2015).

No Change

Comment noted

No Change.

The GTAA has been undertaken in accordance with current guidance and is compliant with the Planning Policy for Travellers Sites (August 2015). Alternative sites have been considered for both permanent and transit provision and have been rejected further information can be found in the rejected site options report.

No Change.

The GTAA has been undertaken in accordance with current guidance and is compliant with the Planning Policy for Travellers Sites (August 2015). Local plans should meet need through the identification of land for sites.

Support	Conditional Support	Object	No Comment
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Support	Conditional Support	Object 1	No Comment
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No Change.

The policy wording is consistent with the Planning Policy for Traveller Sites (August 2015), the criteria set out in the policy are considered to be those appropriate to the circumstances in Kirklees, with criteria 3 setting out the appropriate mechanism to consider 11, 24d and 24e. This is consistent with the approach taken to cross cutting policy themes in the local plan.

The GTAA has been undertaken in accordance with current guidance and is compliant with the Planning Policy for Travellers Sites (August 2015). Alternative sites have been considered for both permanent and transit provision and have been rejected further information can be found in the rejected site options report

Support	Conditional Support	Object 4	No Comment
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No Change

Cumulative impact on the local and neighbouring highway networks and junctions has been modelled through the district-wide transport model and appropriate mitigation (if required) has been identified.

No Change.

The GTAA has been undertaken in accordance with current guidance and is compliant with the Planning Policy for Travellers Sites (August 2015). Alternative sites have been considered for both permanent and transit provision and have been rejected further information can be found in the rejected site options report.

No Change.

The policy wording is consistent with the Planning Policy for Traveller Sites (August 2015), the criteria set out

Summary of comments

The 2015 GTTSAA complied by Arc 4 is flawed and not compliant with Government Guidance. As such it is not fit for purpose. The key concerns with regard to the 2015 GTTSAA relate to: Timescale, sample, treatment of unauthorised encampments, interpretation of the implications of the new definition, lack of effective engagement with a steering group.

Council Response

in the policy are considered to be those appropriate to the circumstances in Kirklees, with criteria 3 setting out the appropriate mechanism to consider 11, 24d and 24e. This is consistent with the approach taken to cross cutting policy themes in the local plan.

The GTAA has been undertaken in accordance with current guidance and is compliant with the Planning Policy for Travellers Sites (August 2015). Alternative sites have been considered for both permanent and transit provision and have been rejected further information can be found in the rejected site options report

7.47

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

7.48

Support Conditional Support Object 2 No Comment

DLP_SP243, DLP_SP1270

The road infrastructure in the Birstall area has not been improved especially to the south of J27, cumulative impact of the new proposals will need measures to be put in place given the current congestion issues. This also applies to schools.

No Change.

Cumulative impact on the local and neighbouring highway networks and junctions has been modelled through the district-wide transport model and appropriate mitigation (if required) has been identified.

The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

The Policy content is inconsistent with national policy, most notably through the absence of specific Gypsy and Traveller criteria based policy.

No Change.

The 2015 GTTSAA complied by Arc 4 is flawed and not compliant with Government Guidance. As such it is not fit for purpose. The key concerns with regard to the 2015 GTTSAA relate to: Timescale, sample, treatment of unauthorised encampments, interpretation of the implications of the new definition, lack of effective engagement with a steering group.

The policy wording is consistent with the Planning Policy for Traveller Sites (August 2015), the criteria set out in the policy are considered to be those appropriate to the circumstances in Kirklees, with criteria 3 setting out the appropriate mechanism to consider 11, 24d and 24e. This is consistent with the approach taken to cross cutting policy themes in the local plan.

The GTAA has been undertaken in accordance with current guidance and is compliant with the Planning Policy for Travellers Sites (August 2015). Alternative sites have been considered for both permanent and transit provision and have been rejected further information can be found in the rejected site options report

7.49

Support Conditional Support Object 1 No Comment

DLP_SP1271

The Policy content is inconsistent with national policy, most notably through the absence of specific Gypsy and Traveller criteria based policy.

No Change.

The 2015 GTTSAA complied by Arc 4 is flawed and not compliant with Government Guidance. As such it is not fit for purpose. The key concerns with regard to the 2015 GTTSAA relate to: Timescale, sample, treatment of unauthorised encampments, interpretation of the implications of the new definition, lack of effective engagement with a steering group.

The policy wording is consistent with the Planning Policy for Traveller Sites (August 2015), the criteria set out in the policy are considered to be those appropriate to the circumstances in Kirklees, with criteria 3 setting out the appropriate mechanism to consider 11, 24d and 24e. This is consistent with the approach taken to cross cutting policy themes in the local plan.

The GTAA has been undertaken in accordance with current guidance and is compliant with the Planning Policy for Travellers Sites (August 2015). Alternative sites have been considered for both permanent and transit provision and have been rejected further information can be found in the rejected site options report

7.50

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

Option DLP12 7.3.1

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

Option DLP12 7.3.2

Support Conditional Support Object No Comment

Summary of comments	Council Response			
No comments received on this part of the Plan.				
Retailing and town centres DLP_SP105, DLP_SP1869	Support 1	Conditional Support 1	Object	No Comment
How will Kirklees invest in commercial aspect of Holmfirth? Why are so many charity shops allowed to occupy buildings that could be utilised for a variety of commercial opportunities?	<p>No change</p> <p>The Kirklees Economic Strategy sets out the strategic approach to economic growth within the District.</p> <p>Charity shops are a main town centre use and support the vitality and viability of town centres. They are A1 (shops) in the use classes order and are permitted development where in accordance with the Use Classes Order in England.</p>			
Student population makes a significant contribution to town centre trading, particular night time economy. Good supply of bars and restaurants, dynamic market, strong competition makes night time economy offer vibrant. Offers and services that would improve town centre offer: Town centre cinema and leisure complex Mid-sized unseated concert venue 500-1000 Good quality town centre hotel	<p>No change</p> <p>Supporting comments and suggestions noted.</p> <p>Town Centre policy supports leisure and tourism development within Huddersfield Town Centre. The mixed use development scheme around John Smiths Stadium has an extant planning permission.</p>			
Alert to proposals to further develop retail and leisure facilities around John Smiths Stadium, investment should be concentrated within town centre closer to student population and transport hubs. (University of Huddersfield)				
8.1 DLP_SP373, DLP_SP1535	Support	Conditional Support 2	Object	No Comment
Include specific policy encouraging establishment of community/social enterprises within town centres and retail economy e.g. locally owned community businesses. Support provision of low cost shop/office/workshop accommodation for such community enterprises	<p>No change</p> <p>Town Centre policy supports development of main town centre uses within town centres which includes those which are locally owned.</p> <p>The Kirklees Economic Strategy includes priorities to help businesses including social enterprises to grow.</p>			
Town centres first approach welcomed but no reference to scale of any future development retail or office development. Quantification of future town centre additional office and retail floor space in Huddersfield and Dewsbury missing. Makes it difficult to understand potential impact of any development on level of out-commuting from Kirklees. (Highways England)	<p>No change</p> <p>The supporting technical papers set out summaries of the latest evidence on office and retail.</p>			
8.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.3	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.4	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.5 DLP_SP411, DLP_SP1581	Support	Conditional Support	Object 1	No Comment 1
Pleased to read NPPF has set out a Town Centre first approach	<p>No change</p> <p>Noted.</p>			
Holmfirth identified through High Street 2020 initiative as a 'speciality town' which needs to build on its	No change			

Summary of comments

heritage and character. Town should be supported through positive engagement over future of key council buildings. Planning policies which erode nature of conservation area in town undermine historic interest. A conservation area appraisal should be undertaken.

8.6
DLP_SP459, DLP_SP937

Officer proposed amendment to paragraph

No reference to planning for public toilet facilities which are needed in town centres. Also need secure areas to leave cycles, pleasant public areas for people to meet, pass their time. Such places must be designed to accommodate wheelchairs, buggies, mobility scooters etc...

No specific proposals for tier two towns, significant omission. Increase in local residents potential springboard for regenerating Heckmondwike and Cleckheaton. Need proactive planning input via local plan. Proposals for residential accommodation Huddersfield and Dewsbury needs to be extended to smaller towns such as Heckmondwike and Cleckheaton, both have unused accommodation. Two categories of housing could be provided in Heckmondwike and Cleckheaton:
i) Conversion of empty first/second-floor space above shops into flats
ii) Development of derelict spaces in and around town centres into high quality accommodation for older people

Cleckheaton
Memorial Park and Savoy Square well used amenities
Several car parks around periphery need recognition and protection
Spenn Valley Greenway important cycle & walking route into town centre
Geography asset
Blighted by derelict and unused brownfield sites on most sides of town centre

Heckmondwike
Busy A638 & B6117 main routes cut right through centre
Car parks around periphery need recognition and protection
Two important cycle and walking routes connecting town centre to residential areas
Little space left in town centre for housing

Town centre uses

No comments received on this part of the Plan.

Policy DLP 13

DLP_SP117, DLP_SP118, DLP_SP119, DLP_SP120, DLP_SP121, DLP_SP192, DLP_SP424, DLP_SP851, DLP_SP872, DLP_SP972, DLP_SP1094, DLP_SP1106, DLP_SP1214, DLP_SP1417, DLP_SP1517, DLP_SP1582

We support that part of the Policy which requires all proposals in the defined town centres to conserve and enhance their local character, heritage and public realm

Modern office space would encourage contribute to increasing town and village centre footfall by having more people around in the Valley during the day.

Draft policy part A misleading. First preference for locations within town centres, then other locations in

Council Response

The Town Centre Uses policy highlights that in defined centres all proposals 'shall also conserve and enhance the local character, heritage and the public realm where appropriate.'

Support	Conditional Support	1	Object	1	No Comment
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Change

Minor amendments to some wording.

Reason:
For clarity and consistency within the chapter

No change.

Local Plan design policy refers to the needs of a range of different users that should be considered in all development proposals.

No change

The Local Plan residential use in town centres policy supports the use of shop upper floors for residential.

Land that has been put forward to the Council for potential development has been assessed and where considered to be acceptable incorporated into the draft Local Plan for proposed allocation.

Support	Conditional Support	Object	No Comment
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Support	2	Conditional Support	5	Object	9	No Comment
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No change

Support noted.

No change

Offices (use class B1a) are a main town centre use and therefore subject to this policy to direct new office development to principal and town centres.

Proposed change.

Summary of comments

accordance with sequential test. Draft policy wording should be amended to read "shall be located as first preference within defined centres", and then in accordance with the sequential test" added after shopping centre hierarchy.

Part A second paragraph the word "undermine" suggests a proposal which undermines a centre to a very limited extent would not be supported, replace with "have a significant adverse impact"

Holmfirth town centre and beyond is defined a large conservation area, nearly 40 listed buildings, considered at risk by Historic England. 5 public buildings in middle of Holmfirth with uncertain future. 4 have significance from historic and functional perspectives. Granting any application for a change of use should give consideration to overall contribution these buildings could make economically as well as socially.

Junction 27 retail and leisure park is a key destination and a centre in its own right. It should be included in defined centres hierarchy and given a town centre designation. A town centre boundary is proposed which includes Centre 27 business park and adjacent offices.

Include an additional level in retail hierarchy of out of centre retail park. Amend parts B and C to require proposals within defined out of centre retail park to provide sequential and impact assessments.

Include reference to shopping and leisure facilities at Birstall and Centre 27 within paragraphs 8.1 and 8.6

More employment in town centres, less emphasis on motorway linked developments.

New centres to serve certain residential allocations should be identified in the plan. For other residential development, single shop or small cluster may be more appropriate. Needs to be explained, proper criteria set out and specific locations for centres identified.

Final sentence of part B not appropriate, should be deleted. Other material considerations must always be taken into account, sequential test in national policy not absolute where failure demands refusal. May be cases where benefits outweigh non-compliance with sequential test. Approach endorsed by High Court in Zurich Assurance Ltd trading as Threadneedle Property Investments v North Lincolnshire Council, [2012] EWHC 3708 (Admin)

Final sentence of part C not appropriate, should be deleted. Other material considerations must always be taken into account, impact test in national policy not absolute where failure demands refusal. NPPF paragraph 27 test is not adverse impact it is on "significant adverse impact"

For proposal to be unacceptable, need to be significant adverse impact on vitality and viability of town centre as a whole.

Sequential test for retail development starts with primary shopping area. This does not accord with NPPF or planning practice guide reference to primary shopping area should be removed.

Officer proposed amendment to policy

Council Response

The first paragraph in policy wording part A has been amended to include 'and then in accordance with the sequential test'.

Part A second paragraph, the word undermine has been changed to 'have a significant adverse impact'.

Reason:

For clarity and consistency with the National Planning Policy Framework

No change

Chapter 1 of the National Planning Policy Framework (NPPF) highlights the need to support economic growth

No change

Out of centre retail parks have not been included in the shopping centre hierarchy as they do not have the mix of retail and service uses of traditional town centres and generally different catchments.

A new paragraph has been added to the policy justification referring to out of centre retail parks

No change

Chapter 6 of the Local Plan sets out the employment strategy

Proposed change

The fourth paragraph in policy wording part A has been amended to

'The creation of new Local Centres in areas of significant residential growth or where there are deficiencies in the existing network of centres will be supported, where it can be demonstrated that existing centres cannot be expanded to deliver local services, and subject to the sequential test and impact assessment as set out in B and C below.'

Reason:

To clarify when new centres would be appropriate.

No change

Through the planning application process other material considerations may outweigh the policy.

Proposed Change

Through the planning application process other material considerations may outweigh the policy. The word 'Significant' has been added to the final sentence of part C policy wording.

Reason:

For consistency with the National Planning Policy Framework

No change

National Planning Policy Framework (NPPF) definition of edge of centre states that 'for retail purposes, a location that is well connected and up to 300 metres of the primary shopping area'.

Change

Summary of comments

No justification for applying a lower threshold than NPPF 2500 m² to principal town centres. Approach difficult to analyse with any degree of accuracy, principal town centres benefit from significant retail offer, vitality and viability.

Officer proposed amendment to policy

Chidswell masterplan includes a neighbourhood centre. Not clear how new centres will be allocated. Proposed threshold for retail impact assessment much lower than national threshold therefore likely that new small neighbourhood centres would be required to undertake an impact assessment, onerous for part of a new strategic development.

"All proposals in defined centres shall be inclusive for all users and where appropriate make them more attractive to pedestrians, cyclists and public transport users" Remove "where appropriate".
 "Appropriate access/ improvements to access by all travel modes, in particular by public transport, safe and convenient pedestrian and cycling routes" Add provision for cycle parking

Out of town locations/developments should be completely avoided unless fully served by walking, cycling and public transport.

Very low impact thresholds of 200 and 500 sq m are proposed which are substantially lower than NPPF with no justification, evidence not provided. Does not promote positive growth, NPPF aim, potentially restricts development. Recommend plan sets default NPPF threshold.

Holmfirth defined as a specialist town by High Street 2020. Distinctive selling point quaintness and character. Rich heritage grounded in textiles. Potential for development of a local museum and or arts and cultural centre.

Policy sets out a hierarchy of centres but does not explain how they are derived or defined. It would be useful to establish how the defined centres relate to the settlement hierarchy and through that the Council's growth strategy, and how this in turn may contribute to the continued prosperity and vitality of existing centres. It would be helpful to list the 61 other centres.

Shopping Centre Hierarchy of Settlements

No comments received on this part of the Plan.

Delivery of Services – detailing, the sale and types of services expected within each centre

No comments received on this part of the Plan.

8.7

No comments were received on this part of the plan

Council Response

Removal of part D and level 5 non urban areas in the delivery of services table. Removal of reference to Class A1 in part B.

Reason:
 Part D incorporated into Local Plan rural economy policy.
 Class A1 removed as it includes some retail service uses which are not to be specifically directed to the primary shopping area for the sequential test.

No change

The Council's Retail Capacity Study provides justification.

Change

Paragraph 5 in policy wording part A has been amended to include 'green spaces'

Reason:
 To preserve and enhance the attractiveness of town centres

No change

The scope and content of a required Impact Assessment will be reflective of the scale, role and function of the proposal.

Proposed change

Policy wording has been amended. The words 'where appropriate' has been removed from Part A paragraph 5 and 'provision for cycle parking' added to Part B bullet point 4.

Reason:
 For clarity and consistency with Local Plan parking policy

No change.

The Local Plan Sustainable Travel Policy supports forms of sustainable transport.

No change

The Council's Retail Capacity Study provides justification.

No change

Supported by town centre uses policy where town centres include the local provision of arts and culture facilities

No change

The hierarchy of centres methodology is explained in the Retailing and town centres technical paper.

Support	Conditional Support	Object	No Comment
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Support	Conditional Support	Object	No Comment
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Support	Conditional Support	Object	No Comment
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No change

Summary of comments	Council Response			
8.8	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.9	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Minor changes to wording			
	Reason: For clarity			
8.10	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.11	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Paragraph removed.			
	Reason: For consistency with changes to the Town centre uses policy			
8.12	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Minor amendments to wording and Retail Capacity Study (2016), Kirklees Town Centre Delivery Study: Huddersfield, Kirklees Town Centre Delivery Study:Dewsbury added.			
	Reason: For clarity and update			
Option DLP13 8.1.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP13 8.1.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Shopping frontages	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 14	Support 1	Conditional Support 1	Object	No Comment 1
DLP_SP237, DLP_SP852, DLP_SP1418				
Supportive of section 8 in particular protection of Meltham shopping frontages. Important for vibrancy, character and provision of sustainable local services.	No change			
	Support noted.			
Officer proposed amendment to policy	Change			
	Reason:			

Summary of comments	Council Response			
	The format of the policy and amendments to policy wording have been made for clarity and consistency with the town centre uses policy			
Any policy on retailing and shopping must take into account the effect of online shopping and other emerging trends in the retail sector and how this might affect the role of traditional shopping and retail frontages.	No change			
	The Council's Retail Capacity Study takes retail sector trends into account and has been used inter alia to inform retail policy.			
In relation to Junction 27 inclusion within defined centres hierarchy, also appropriate to define area as a primary shopping area.	No change			
	Out of town retail parks are not defined as centres in the shopping centre hierarchy			
8.13	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Minor amendments to wording			
	Reason: For consistency with policy			
8.14	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Minor amendments to wording			
	Reason: For consistency with policy			
8.15	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Minor amendments to wording			
	Reason: For consistency with policy			
8.16	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.17	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.18	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.19	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Retail Capacity Study (2016), Kirklees Town Centre Delivery Study: Huddersfield, Kirklees Town Centre Delivery Study:Dewsbury added.			
	Reason:			

Summary of comments	Council Response			
	Updated and new evidence			
Option DLP14 8.2.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP14 8.2.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Residential in town centres	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 15 DLP_SP1107, DLP_SP1521, DLP_SP1583	Support 1	Conditional Support 2	Object	No Comment
Support intention to encourage use of vacant and underused upper floors. Encourages a greater level of activity in towns, greater investment in properties, adds to vitality and viability. Will assist in helping to meet housing requirement. (Historic England)	No change			
Energy efficient construction of any town centre residential development important. Add 'require energy efficiency levels to Passivhaus international energy efficiency standard for new build developments and EnerPhit for building refurbishments'	Support noted.			
Comment "provision of space for storage of sustainable modes of transport".	No change			
Provision of space for vehicular parking in town centres with easy access to bus and rail keep to absolute minimum e.g. disabled and visitor parking only.	Passivhaus standards have been considered and referred to in the Local Plan Design policy.			
	No change.			
	Support noted.			
	No change			
	Local plan parking policy considers and refers to residential parking schemes within town centres			
8.20	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.21	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.22	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.23	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.24	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.25	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Retail Capacity Study (2016), Kirklees Town Centre Delivery Study: Huddersfield, Kirklees Town Centre Delivery Study:Dewsbury added.			

Summary of comments	Council Response			
	Reason: Updated and new evidence			
Option DLP15 8.3.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP15 8.3.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Food and drink uses and the evening economy	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 16 DLP_SP656, DLP_SP853, DLP_SP859	Support 1	Conditional Support 1	Object 1	No Comment
Risk-based approach implementing design features and systems appropriate.	No change			
	Support noted			
Kentucky Fried Chicken cannot agree with distance or arbitrary concentration criteria because no evidence of link between poor health outcomes and proximity of food and drink uses to any type of receptor. Should evidence be available of particular concentration of such uses that may be harmful to health this should be presented in a specific percentage threshold.	No change			
Importance of Junction 27 as a leisure location highlighted. Inclusion of Junction 27 as centre within retail hierarchy would mean new retail development in defined boundary would be in accordance with sequential test and impact assessment requirements of policy.	No change			
Policy offers a mechanism to limit number of change of use applications in particular area. Does it go far enough? Birmingham example on hot food takeaways maximum of 10% of units was stated. Better than woolly statements in DLP16.	No change			
Officer proposed amendment to policy	Change			
	Policy wording Use Classes A3,A4,A5,D2 and Sui generis removed.			
	Reason: For consistency within the chapter			
8.26	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.27 DLP_SP657	Support 1	Conditional Support	Object	No Comment
I fully support what is said in 8.27.	No change			
	Comment noted.			
8.28	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			

Summary of comments	Council Response			
8.29	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.30	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.31	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Minor amendments to wording and Retail Capacity Update 2016, Kirklees Town Centre Delivery Study: Huddersfield, Kirklees Town Centre Delivery Study:Dewsbury added.			
	Reason For clarity and updated supporting evidence			
Option DLP16 8.4.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP16 8.4.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Huddersfield	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 17	Support 3	Conditional Support 1	Object 1	No Comment
DLP_SP460, DLP_SP1108, DLP_SP1524, DLP_SP1526, DLP_SP1584				
Energy efficient construction of any town centre residential development important. Add 'require energy efficiency levels to Passivhaus international energy efficiency standard for new build developments and EnerPhit for building refurbishments'	No change			
	Passivhaus standards have been considered and referred to in the Local Plan Design policy.			
Policy supported subject to amendment. Town centre not only conservation area but large number of listed buildings. Criterion a and 'retain key historic features of town such as its pedestrian arcades and yards (criterion h) welcomed. (Historic England)	No change			
	Policy refers to historic listed buildings in point h. Referenced in justification.			
	Support noted.			
Commend "provision of space for storage of sustainable modes of transport..."	No change			
	Support noted.			
Criterion h is confusing. 'Redevelop' means "to develop anew (especially an urban area with new buildings)" Seems at odds with reminder of criteria which seeks to safeguard elements which make town centre distinctive. Should refer to retention and refurbishment of traditional shop fronts wherever practicable. (Historic England)	Proposed change			
	The word redevelop has been removed from criteria h. A new criteria has been added to 'retain and refurbish traditional shop fronts wherever practicable'			
	Reason: For clarity and to support retention of historic features			
Residential accommodation in and around Huddersfield town centre supported.	No change			
	Support noted.			
Officer proposed amendment to paragraph and additional paragraph to policy justification	Change			

Summary of comments	Council Response			
	<p>A new criteria has been added to policy 'where appropriate urban green infrastructure such as street trees' and additional wording in policy justification including a new paragraph to support the point.</p> <p>Reason: To enhance the attractiveness, environment and liveability of the town centre</p>			
8.32	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	<p>Change</p> <p>Addition of wording 'Part of the town centre is designated as a conservation area and it has a large number of listed buildings.'</p> <p>Reason: For consistency with policy</p>			
8.33	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	<p>Change</p> <p>Minor amendments to wording</p> <p>Reason: For clarity and consistency</p>			
8.34	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.35	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.36	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	<p>Change</p> <p>Minor amendments to policy wording</p> <p>Reason: For clarity and consistency</p>			
8.37	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	<p>Change</p> <p>Additional wording added 'Green access routes would enhance connectivity between the town centre and the University'</p> <p>Reason: For clarity and consistency with policy .</p>			
8.38	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	<p>Change</p> <p>Minor amendments to wording and Retail Capacity Update 2016 and Kirklees Town Centre Delivery Study:</p>			

Summary of comments	Council Response			
	Huddersfield added.			
	Reason For clarity and updated supporting evidence			
Option DLP17 8.5.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP17 8.5.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Dewsbury	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 18	Support 4	Conditional Support	Object	No Comment
DLP_SP461, DLP_SP1109, DLP_SP1530, DLP_SP1585				
Residential accommodation in and around Dewsbury town centre supported.	No change			
	Support noted.			
Energy efficient construction of any town centre residential development important. Add 'require energy efficiency levels to Passivhaus international energy efficiency standard for new build developments and EnerPhit for building refurbishments'	No change			
	Passivhaus standards have been considered and referred to in the Local Plan Design policy.			
Policy supported subject to amendment. Town centre not only conservation area but large number of listed buildings. Historic England)	No change			
	Criteria I in policy refers to historic listed buildings. Referenced in justification.			
Commend "provision of space for storage of sustainable modes of transport..."	No change			
	Support noted.			
Criterion b and I supported. (Historic England)	No change			
	Support noted.			
Officer proposed amendment to paragraph	Change			
	A new criteria has been added 'where appropriate urban green infrastructure such as street trees'			
	Reason: To enhance the attractiveness, environment and liveability of the town centre			
8.39	Support	Conditional Support	Object	No Comment
Officer proposed change to paragraph	Change			
	Minor amendment to policy wording.			
	Reason: For clarity			
8.40	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			

Summary of comments	Council Response			
	Minor amendments to wording			
	Reason: For clarity and consistency with policy			
8.41	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.42	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
8.43	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Minor amendments to wording			
	Reason: For clarity and consistency with policy			
8.44	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Change			
	Minor amendments to wording			
	Reason: For clarity and consistency with policy			
8.45	Support	Conditional Support	Object	No Comment
Proposed officer amendment to paragraph	Change			
	Wording added Retail Capacity Study Update 2016 and Kirklees Town Centre Study Dewsbury			
	Reason: Updated and new supporting evidence			
Option DLP18 8.6.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP18 8.6.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Transport DLP_SP99, DLP_SP1870	Support	Conditional Support 1	Object 1	No Comment
Connections to the student campus to the town centre are not available both by cycling routes and adequate public transport provision.	Bus services are market and demand led, there are currently bus services operating from Huddersfield town centre to the campus at Storthes Hall. Huddersfield is a transport hub with bus and rail regional connections available.			
Binns Lane is a rat run for people avoiding Holmfirth town centre traffic. Parking measures and speed restrictions required for Cooper Lane.	No Change			
	A scheme to improve congestion problems in and around Holmfirth is listed in TS3 in the Allocations and			

Summary of comments	Council Response			
<p>9.1 DLP_SP814, DLP_SP1110, DLP_SP1586, DLP_SP1670</p> <p>Mitigation of climate change needs to emphasised in all transport proposals.</p> <p>Consider natural environmental objectives, particularly with regards to the identification of air quality impacts in the Habitats Regulations Assessment. It may also be helpful to consider the potential green infrastructure opportunities such as roadside verges and railway embankments.</p> <p>Highways infrastructure is tightly constrained by the topography of the Holme Valley and there is no recognition in the Local Plan of the narrow lanes, traffic congestion and need to improve junctions such as in the centre of New Mill or Holmfirth, if more cars are to travel through these areas.</p>	<p>Designations document. Improvements are proposed in the area of A635/A6024.</p> <p>Support Conditional Support 4 Object No Comment</p> <p>Proposed Change</p> <p>Text amended to include references to climate change and environmental objectives:</p> <p>'As part of the draft Local Plan, it is critical there is an integrated approach to transport, climate change, environmental objectives and development across the district to facilitate sustainable communities and ensure the future economic ambitions for Kirklees.'</p> <p>The comments re. topography in the Holme Valley are noted. The distinct characteristics of the Kirklees Rural area is recognised in the Place Shaping section of the document and specific transport schemes to address the most severe congested junctions in the area are listed in the Allocations and Designations document.</p>			
<p>9.2 DLP_SP441, DLP_SP444, DLP_SP1537</p> <p>Sustainable transport links should include enhancement of the Trans Pennine Trail and NCN network. Seek extension of the route to Huddersfield. Links to Barnsley exist via these networks at present.</p> <p>Sustainable travel should include walkers, cyclists and horse riders to ensure there is no discrimination based on user type.</p> <p>Support for the commitment to support public transport and the uptake of sustainable modes of travel.</p>	<p>Support 1 Conditional Support 1 Object No Comment 1</p> <p>No change</p> <p>Comment noted re. sustainable travel. Trans Pennine Trail links - this has been addressed under Policy DLP24 - Core Walking and Cycling Network and reflected in the publication draft Policies Map.</p> <p>Supporting comments noted.</p>			
<p>9.3 DLP_SP299, DLP_SP388, DLP_SP1539</p> <p>Cuts in rural bus services have taken place despite an increase in new homes being built in the Denby Dale/Holmfirth area. Investment in the roads and public transport should be done before any further development takes place.</p> <p>The lack of decent cycle infrastructure in Kirklees is a major reason for the low numbers of cycle commuters</p> <p>Support for the West Yorkshire Local Transport Plan (WYLTP) (2011-2026) commitment to make substantial progress towards a low carbon, sustainable transport system for West Yorkshire, while recognising transport's contribution to national carbon reduction plans.</p>	<p>Support 1 Conditional Support Object 1 No Comment 1</p> <p>No change</p> <p>Comment noted re. rural bus services. Decline in demand for rural bus services in general. Many of the rural bus services are subsidised and as result the decline in demand has result in a cut in services. Kirklees will continue to work with the Combined Authority to examine the need for bus provision and explore innovative ways for funding future provision.</p> <p>The WYLTP seeks to work collaboratively to improve public transport and encourage a modal shift across the region.</p> <p>Support noted for West Yorkshire Local Transport Plan.</p>			
<p>9.4</p> <p>The Council should be insisting that all development roads and drainage systems are built to adoptable standards and that the expectation is that adoption will take place within 12 months of development completion. Developers refusing to do so should not be given planning approval.</p>	<p>Support Conditional Support Object No Comment</p> <p>No Change</p> <p>Comment not relevant to this section.</p>			
<p>9.5 DLP_SP410</p> <p>Residents in the Holme Valley do not all commute to Leeds. Some work locally and some travel across to Manchester. The A635 is not maintained properly and pricing of rail varies over the border with Lancashire so that people are encouraged to drive in their cars to get a cheaper ticket.</p>	<p>Support Conditional Support Object 1 No Comment</p> <p>No Change</p> <p>The text addresses the need to improve connections with the rest of the UK as well as within the West Yorkshire region.</p>			

Summary of comments	Council Response			
9.6 DLP_SP779, DLP_SP1540	Support	Conditional Support	Object 1	No Comment 1
This commitment should be extended into the core principles of the new West Yorkshire transport plan (STP 2016-2036), where there is no mention of low carbon or sustainable transport objectives (9.6).	No Change	Comments noted. The emerging Transport Strategy objectives includes a cross-cutting theme of environmental health well-being and inclusion.		
9.7 DLP_SP819	Support	Conditional Support	Object	No Comment 1
Kirklees should consider improve connectivity and existing motorway junctions before considering a new junction.	No Change	Specific transport improvements in the areas around M62 are listed in TS1-11 in the Allocations/Designations document.		
9.8	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.9 DLP_SP896	Support	Conditional Support	Object 1	No Comment
Plan does not account for Kirklees Rural being inaccessible and there is no identified transport scheme for A636 despite Kirklees Rural having the second highest proportion of new housing.	No Change	This part of Kirklees Rural is not considered as severely congested and transport modelling does not show it to be congested in the Plan period and therefore does not require a strategic transport proposal. Localised transport improvements will be considered at the planning application stage.		
		All strategic transport schemes are listed in the Allocations and Designations document.		
Strategic transport infrastructure	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
Policy DLP 19	Support 4	Conditional Support 6	Object 3	No Comment 9
DLP_SP258, DLP_SP350, DLP_SP383, DLP_SP425, DLP_SP783, DLP_SP974, DLP_SP1055, DLP_SP1065, DLP_SP1092, DLP_SP1111, DLP_SP1228, DLP_SP1239, DLP_SP1266, DLP_SP1274, DLP_SP1292, DLP_SP1344, DLP_SP1387, DLP_SP1393, DLP_SP1533, DLP_SP1541, DLP_SP1549, DLP_SP1828	M62 Chain Bar Interchange scheme land take up should be specifically afforded protection in the policy wording not just in the justification text. Suggested policy word change from Highways England and definitive layout of scheme for Policies map. Also to include J20-25 Smart Motorway scheme.			
	Proposed Change	The Council has stated the Chain Bar improvements as a specific transport scheme in the Allocations and Designations - TS9 Strategic Route Network improvements. Text within the Allocations/Designations document specifically refers to protecting the areas of land needed to accommodate the Chain Bar scheme.		
Carbon reduction should be emphasised in all transport developments.	Comment noted.			
Support for policy and identification of new motorway junction 24a.	Comments of support for the policy are noted.			
Policy DLP19 is supported as improvement works to J26 will improve access to the employment site.	Comments of support for the policy are noted.			
There should be no widening/increasing capacity of roads in Kirklees as this leads to increased road use. Improvements should not be at the expense of cyclists and pedestrians.	No Change	Comments noted.		
The West Yorkshire 'Plus' Transport Fund promoted by the West Yorkshire Combined Authority (WYCA) has secured funding in the region of £12.5m for multi-modal corridor improvements on the A653 Leeds to Dewsbury corridor. This funding should therefore be referred to in Policy DLP19.	No Change	Improvements on the A644/A653 Leeds to Dewsbury corridor are stated within TS5 and consist of various multi-modal corridor improvements including Dewsbury Town Centre which are not specifically limited to the		

Summary of comments

There are no details of any scheme in the Ravensthorpe/Mirfield area in relation to A644 which is the most congested. No details of any relief road in association with large Ravensthorpe development. The relief road has been identified by WYTF and the Combined Authority have a funding package of 18-20 million to provide the relief road. The corridor should therefore be safeguarded on the Policies map and referred to in DLP19 as a core project.

The allocations in Clayton West and Skelmanthorpe may impact on the local road network in Wakefield especially through Netherton, Horbury Bridge, Denby Dale Road and approach to J39 of M1. Cumulative impact on Owl Lane/Chancery Road roundabout needs to be considered and evidence provided to demonstrate any impacts can be successfully mitigated. Local Plan should acknowledge co-operation between Wakefield and Kirklees to deliver public transport improvements and cycle ways/footpaths.

Attention is needed at Sovereign junction on A629. This is not identified as a scheme.

Local Plan identifies A616, A6024 and A635 in the core road network. These roads cannot support existing capacity let alone increased capacity. Also nothing promotes alternatives to the car along these routes. Narrowness is not attractive to cyclists. The river corridor needs to be promoted for cycling use. Problems at road junctions in the centre of Holmfirth, New Mill square and Honley Bridge. IDP identifies centre of Holmfirth as top 20 most congested junctions however there is 'no funding opportunity to date'.

Lack of detail of how additional housing could be supported in rural areas without a commensurate level of investment in the road infrastructure esp. A629 and increasing levels of HGVs. A Flockton by-pass/relief road would encourage traffic travelling to the motorway to use Wakefield Road instead and avoid rural villages.

Several of transport schemes could impact on heritage assets of the plan area. Suggested text amendment from Historic England.

An experiment of express link eco buses to the Trans Pennine line, maybe with hourly fast trains making an extra stop at Marsden or Slaithwaite meeting the bus. Service priced/subsidised to encourage use/included in train ticket price. Express eco bus to connect to Sheffield line, maybe on to Wakefield improving the existing service. Maybe faster eco express bus to Huddersfield with extra bus lanes as needed.

9.10

DLP_SP700

Strategic transport infrastructure lacks depth. Needs to deal with local road problems not just on major routes.

Council Response

possibility of developing a relief road for Ravensthorpe.

No Change

Cumulative impact on the local and neighbouring highway networks and junctions has been modelled through the district-wide transport model and appropriate mitigation (if required) has been identified. See the supporting Transport Technical Paper.

The Council has identified through Policy DLP24 to link to neighbouring authority cycleway and footpaths.

No Change

The A629 is not part of the West Yorkshire Key Route Network and therefore does not carry more than 20,000 vehicles per day, in addition it does not perform a defined strategic function for West Yorkshire because it does not connect West Yorkshire core and key centres together. Neither does it connect these centres to the core district centres within the Leeds City Region and adjacent city regions. A scheme for the Sovereign junction is therefore not a priority at the present time.

No Change

Cumulative impact on the local and neighbouring highway networks and junctions has been modelled through the district-wide transport model and appropriate mitigation (if required) has been identified. See the supporting Transport Technical Paper.

No Change

The A629 is not part of the West Yorkshire Key Route Network and therefore does not carry more than 20,000 vehicles per day, in addition it does not perform a defined strategic function for West Yorkshire because it does not connect West Yorkshire core and key centres together. Neither does it connect these centres to the core district centres within the Leeds City Region and adjacent city regions.

Proposed Change

Text amended to consider impact on historic assets as detailed in the allocation and designations document:

"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 the requirement for a Heritage Impact Assessment.

No Change

The provision of bus/train services is demand/market led and is monitored by the Combined Authority in association with the Council. Should such future demand require the provision of additional bus services in this area, this would be investigated.

Support

Conditional Support

Object 1

No Comment

No Change

The district as a whole has been transport modelled and the areas where there is a severe impact have been addressed. See Transport Modelling technical paper. Local road problems are dealt with through the WYLTP and detailed planning application stage if identified.

Summary of comments	Council Response			
9.11 DLP_SP836	Support	Conditional Support	Object 1	No Comment
The existing route of the A62 Huddersfield to Junction 25 of the M62, via the A62, Cooper Bridge and the A644 is not adequate. A new dual carriageway is required.	No Change	A transport scheme is identified for this area (TS1) - see Allocations and Designations document. Feasibility design work and detailed modelling will determine whether a dual carriageway is required.		
9.12	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.13	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.14	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.15	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.16	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change			
9.17 DLP_SP374	Support	Conditional Support 1	Object	No Comment
In general, the committed RIS schemes where construction is to be commenced in the period 2015/16-2019/20 should provide sufficient capacity on the SRN in and around Kirklees to accommodate traffic generated by Local Plan development in West Yorkshire. Between 2020 and the end of the Local Plan period there will be a need to implement the capacity enhancement schemes identified in the WYIS. The RIS schemes of particular relevance to Kirklees are as follows:	Proposed Change	Justification text has been amended to reflect WYIS schemes.		
M1 junctions 35A to 39: Smart motorway scheme to be developed in the current roads period with the objective of commencing construction in the period 2020/21-2024/25.				
M1 junctions 39-42: Smart motorway scheme that is under construction (completion of the last phase expected early in 2016).				
M1/M62 Lofthouse Interchange: Scheme to enhance the capacity of the interchange to be developed in the current roads period with the objective of commencing construction in the period 2020/21-2024/25.				
M62 junctions 20-25: Smart motorway scheme between Rochdale and Brighouse intended to start in the current roads period 2015/16-2019/20.				
M62/M606 Chain Bar: Scheme to provide an M62 westbound to M606 northbound link intended to start in the current roads period 2015/16-2019/20.				
M621 junctions 1-7 improvements: Scheme intended to start in the current roads period 2015/16-2019/20.				
The overall scale of development proposed in the draft Local Plan does have a significant adverse traffic impact on the operation of the SRN in West Yorkshire and its junctions with the local primary road network. The overall impact is greater when the land use development proposals for Kirklees are assessed in combination with those of neighbouring local planning authorities.				
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				

Summary of comments

Council Response

November 2015 and is now under consideration by Highways England. It will be shared with the Council in the near future.

Additional schemes identified in the WYIS that are relevant to Kirklees will need to be added to the schedule in the Infrastructure Delivery Plan (IDP). Further modelling work will be needed to determine the traffic thresholds or triggers for the additional improvement schemes.

The additional schemes that are relevant to Kirklees are listed below:

Needed by 2022:

- M1 junction 40: Widen local road network approaches and small improvements to the junction circulatory.
- M62 junction 24: Three lanes approach from M62 westbound off slip on A629 provides improved stacking capacity.
- M62 new junction 24a: The WYIS tests the addition of a new junction at 24a to the network. 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.
- 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.
- M62 junction 27: Widen slip roads on west side of junction on approach to the junction to give benefits through improved stacking capacity.
- M62 junction 27: Scheme of capacity improvements to the northern dumbbell roundabout.

Needed by 2030:

- 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.
- 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.
- M62 junction 27: New link road from M621 to M62 south, new link road between M62 westbound and M621 westbound slip road and associated segregated left turning lane on A62 south.
- 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.
- M62 junction 29 (Lofthouse): Increase current two lanes eastbound and westbound on M62 through Lofthouse Interchange to three lanes in each direction. This is intended to provide capacity additional to the M1/M62 Lofthouse Interchange RIS scheme.
- M62 new junction 24a is identified as a Core Project by Kirklees to be funded by the West Yorkshire Plus Transport Fund (WY+TF). None of the other schemes identified in the WYIS are funded.

It is possible that the WYIS may underestimate the overall impact of Local Plan development in Kirklees and, depending on the eventual mix of sites and land uses, the list of additional schemes to be included in the IDP may well change if any further capacity enhancement schemes are found to be necessary.

In general, the committed RIS schemes where construction is to be commenced in the period 2015/16-2019/20 should provide sufficient capacity on the SRN in and around Kirklees to accommodate traffic generated by Local Plan development in West Yorkshire. Between 2020 and the end of the Local Plan period there will be a need to implement the capacity enhancement schemes identified in the WYIS.

9.18	Support	Conditional Support	1	Object	No Comment
DLP_SP375					

There are a number of RIS schemes proposed for the motorway that will directly impact on the Kirklees Proposed Change

Summary of comments	Council Response			
area.	Additional justification text providing detail of the RIS schemes and proposed period of construction.			
9.19	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.20 DLP_SP685, DLP_SP838	Support	Conditional Support 1	Object	No Comment 1
DLP makes little reference to rail improvements and is unclear whether KMC is supportive of or committed to objectives of RailPlan 7. Re-opening of Dewsbury to Low Moor Railway line could offer significant advantages for residents of Spen Valley.	No Change Kirklees are supportive of RailPlan 7 objectives. Much of rail strategy and decision making has been devolved to Rail North in partnership with DfT.			
Existing local highway network still inadequate as before, improvements to the motorway improved traffic flow only and did not make a difference to local roads.	No Change Comments noted about the local highway network. Local traffic is also accommodated on the strategic road network as well as longer distance traffic.			
9.21 DLP_SP2, DLP_SP264	Support 1	Conditional Support	Object 1	No Comment
Stronger proposals for the Penistone Line would show a bold approach to rail use. The Northern Electrification Task Force suggests electrification of the route by 2024 as a tier two priority. The comments under 9.21 of the Transport Strategy about the light rail solution is to be welcomed & we would support any plans which improved the links between Huddersfield & Sheffield as part of a wider transport strategy to link all elements of the Northern Powerhouse with Huddersfield as a central hub. Currently car parking for Shepley station is only on street parking. There is potential to develop a car park at the site of the old coal chutes area on Station Lane.	Proposed Change The electrification of the Penistone Line is now included in TS10 Public Transport Improvement Schemes. See Allocations and Designations document. Comments of support noted.			
9.22 DLP_SP835	Support	Conditional Support	Object 1	No Comment
The whole area around Mirfield station needs to become a transport hub with guided bus routes accessing it, as the A644 is gridlocked. We have the railway and the canal together all we need is sympathetic development around the station with a lot more (free) parking.	No Change Station improvements are proposed at Mifield Station with a view to improving connectivity. See TS10 in the Allocations and Designations document.			
9.23	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.24	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
Option DLP19 9.1.1	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
Sustainable travel	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change			

Summary of comments

Council Response

Policy DLP 20

Support 3 Conditional Support 6 Object 5 No Comment 15

DLP_SP103, DLP_SP291, DLP_SP292, DLP_SP376, DLP_SP437, DLP_SP557, DLP_SP565, DLP_SP571, DLP_SP576, DLP_SP581, DLP_SP586, DLP_SP591, DLP_SP602, DLP_SP699, DLP_SP743, DLP_SP748, DLP_SP753, DLP_SP758, DLP_SP763, DLP_SP769, DLP_SP938, DLP_SP975, DLP_SP1112, DLP_SP1275, DLP_SP1480, DLP_SP1542, DLP_SP1587, DLP_SP1657, DLP_SP1829

There is no indication of horse riders within the sustainable travel agenda. Horse riders are the largest of visitor spenders as you cater for the horse and rider. The upgrading of cycle routes to bridleways will also ensure that routes can be used by walkers, cyclists and horse riders without discrimination.

No Change

Bridleways are specifically mentioned at DLP24 Core Walking and Cycling Network.

The policy is supported however it should also refer to mixed use developments which can provide opportunities to undertake day to day activities on site and therefore reduce the need to travel by private car. Large mixed use sites can provide housing, employment and on site facilities such as schools and neighbourhood centres.

Proposed Change

Text amended to account for the potential of larger mixed use sites to deliver on-site facilities:

'The council will support development proposals that can be served by alternative modes of transport such as public transport, cycling and walking and in the case of new residential development is located close to local facilities or incorporates opportunities for day to day activities on site and will accept that variations in opportunity for this will vary between larger and smaller settlements in the area.

Cycling on public roads is dangerous. Kirklees needs to plan for cycle routes running independently from public roadways. Secure storage facilities for bikes are also needed.

No Change

A walking and cycling network is proposed under Policy DLP24 and is shown on the Policies Map.

Public transport improvements are required such as increased frequency in rural areas like Holmfirth. Residents don't tend to work 9-5 anymore and bus services do not reflect this so people are reliant on private cars even more so. Improvements to road surfaces are also required to encourage people to cycle on them.

No Change

Bus services are run on a commercial basis and not operated by the Council. The Council works with the Combined Authority to look at gaps in service provision where sufficient demand exists.

General support for the principle of sustainable travel however this is not possible in rural areas such as Scholes. Pedestrians do not have continuous protection of pavements and there is an abundance of parked cars.

Proposed Change

Text amended to distinguish variation between urban and rural areas to meet requirements of para. 29 NPPF. Also text amended to account for the potential of larger mixed use sites to deliver on-site facilities:

'The council will support development proposals that can be served by alternative modes of transport such as public transport, cycling and walking and in the case of new residential development is located close to local facilities or incorporates opportunities for day to day activities on site and will accept that variations in opportunity for this will vary between larger and smaller settlements in the area'.

This policy is fully supported. We wish to encourage the development of travel plans for larger sites and urban extensions where the traffic generated impacts upon the strategic road network.

No Change

Comments of support noted.

The significant volume of car availability due to large housing developments defeats the objective of achieving a modal shift reducing car usage. Vehicle use has increased year on year in Kirklees, Councils efforts have failed. Are the aims of DLP 20 appropriate given Kirklees residents lifestyles and aspirations.

No Change

The Council through new housing developments by design and location of sites can encourage a modal shift in car usage. Policy DLP21 refers to design of site layouts to encourage cycle use and priority to pedestrians, similarly the Councils Cycling City Ambition Grant 2 project seeks to link cycle routes from the town centre to surrounding areas.

The road system in Holmfirth is congested and under pressure. Local employment opportunities in Holmfirth are limited therefore the only option is to drive therefore opportunities for walking and cycling are limited.

No Change

Comments noted re. walking and cycling opportunities and the River 2015 project in Holmfirth. These comments are dealt with under Policy DLP24 as not specifically related to DLP20.

River 2015 are trying to implement an plan to create a walking and cycling network in Holmfirth this should be incorporated into the Local Plan.

Development of H8 and H38 would bring increased traffic along narrow roads.

Summary of comments	Council Response			
9.25 DLP_SP389, DLP_SP843	Support	Conditional Support	Object 2	No Comment
The development of 'quiet routes' in and around the town centre would make cycling more attractive to users. There are numerous possibilities around the Halifax Road/New Hey Road area. Not convinced new housing development will have sustainable transport links.	No Change			
	The development of specific cycle routes within the town centre is on-going within the Council as part of CCAG2 (Cycle City Ambition Grant 2) project. This project includes cycle routes and infrastructure in and out of the town centre. See https://www.kirklees.gov.uk/leisure/sportHealth/pdf/huddersfieldTownCycleRoutePlan.pdf			
9.26 DLP_SP558	Support	Conditional Support 1	Object	No Comment
It would be helpful to see these ambitions specifically identified on the plans. For example, on a redevelopment site such as the old Sports centre in Huddersfield there is an opportunity to establish cycle routes linking the town centre to the canal path. There are any number of development and redevelopment sites in Kirklees where there is an opportunity to establish projected cycle routes such as this.	No Change			
	The development of specific cycle routes within the town centre is on-going within the Council as part of CCAG2 (Cycle City Ambition Grant 2) project. This project includes cycle routes and infrastructure in and out of the town centre. See https://www.kirklees.gov.uk/leisure/sportHealth/pdf/huddersfieldTownCycleRoutePlan.pdf			
9.27	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change			
9.28 DLP_SP560, DLP_SP939	Support	Conditional Support	Object 1	No Comment 1
In order to break this vicious circle the council must start giving greater priority to cycles at the expense of the motorist. At present cycle infrastructure is only envisaged when it causes no significant difference to existing traffic. Restrictions on car use, combined with better provision for cyclists will encourage more cycling and discourage unnecessary car travel.	No Change			
Park and ride schemes may be an alternative.	The Council recognises that road space is at a premium but recent cycling plans seek to re-allocate as much road space as is practically possible whilst still ensuring efficient use of the network.			
	See http://www.kirklees.gov.uk/leisure/sportHealth/pdf/cyclingConsultationDeliveryGroupsFramework.pdf			
	The Council has given priority for pedestrians and cyclists over the private car within the design of new developments in Policy DLP21. Comments are noted re. new cycle infrastructure and routes and a route network has been established under Policy DLP24 and shown on the Policies Map. Further work to refine the details of the routes proposed will be undertaken by the Council at a later date.			
9.29	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change			
9.30	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change			
9.31 DLP_SP199, DLP_SP845, DLP_SP897, DLP_SP1113	Support 1	Conditional Support 1	Object	No Comment 2
Mirfield Station needs to be given due consideration as its Kirklees only link to London.	No Change			
	Improvement works to Mirfield Station are included in TS10 in the Allocations and Designations document.			
The proposed housing development at Scholes will necessitate a travel plan due to existing problems of road narrowness and parked cars.	No Change			
	Issues regarding Scholes are dealt with under the relevant site references in the Allocations and Designations document.			

Summary of comments	Council Response							
9.32 DLP_SP1116 The voluntary sector should be added as potential delivery agents.	Support	Conditional Support	1	Object	No Comment			
	Proposed Change							
	Amended text to include 'voluntary sector'.							
9.33 No comments received on this section of the document.	Support	Conditional Support		Object	No Comment			
	No Change							
Option DLP20 9.2.1 No comments received on this section of the document.	Support	Conditional Support		Object	No Comment			
	No Change.							
Highways and access No comments received on this section of the document.	Support	Conditional Support		Object	No Comment			
	No Change.							
Policy DLP 21 DLP_SP35, DLP_SP57, DLP_SP188, DLP_SP377, DLP_SP649, DLP_SP711, DLP_SP713, DLP_SP976, DLP_SP1115, DLP_SP1117, DLP_SP1446, DLP_SP1481, DLP_SP1543, DLP_SP1588, DLP_SP1658, DLP_SP1671, DLP_SP1693, DLP_SP1709, DLP_SP1830 Policy DLP21 is not consistent with the NPPF as it states new development will not be permitted if it materially adds to highway safety problems or in the case of development which will generate a substantial amount of trip generation that cannot be served by the existing highway network. Policy DLP21 does not take account of any mitigation measures which would make the development acceptable in transport terms. Policy DLP21 is also more restrictive than the NPPF which states at paragraph 32 that 'Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.' Transport should not be considered in isolation as it is an element of the planning balance where any adverse impacts are assessed along with the wider benefits.	Support	5	Conditional Support	5	Object	6	No Comment	3
	Proposed Change							
	Amended text to account for paragraph. 32 NPPF and any impacts on the Strategic Road Network.							
	"Proposals shall demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users. New development will not be permitted if it severely adds to highway safety problems or in the case of development which will generate a substantial amount of trip generation that cannot be adequately served by the existing local highway network. 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."							
Local Plan should defer any more developments in Lindley area until TS4 has been implemented. Congestion, grid lock and road safety are concerns in this area especially with potential closure of Huddersfield A&E.	No Change							
	The Council is working towards a speedy implementation of TS4 but if in the meantime applications come forward they will be assessed in terms of the impact they will have on the local highway network and appropriate mitigation measures proposed.							
All the sites identified in the plan - particularly in Kirklees Rural - will directly break this policy by allowing growth of trip generation which cannot be served by the existing road systems. Development of sites should develop the road network FIRST before any further building is allowed.	No Change							
	Localised highway issues to be dealt with at the planning application stage. Impacts on the local highway network have been tested through the allocation process and tested through the district-wide transport model.							
We welcome Point 1 of the Policy which prioritises sustainable modes of transport. We also support Point 3g. And advise that SuDS schemes are incorporated into all developments. We advise that SuDS are managed to support wildlife, in order to increase the biodiversity value of the area, which is supported by Paragraph 118 of the NPPF.	Proposed Change							
	Text amended to account for surface water flooding/fluvial flooding and SuDS:							
	'g. take into account surface water flooding and fluvial flooding							
Yorkshire Water welcomes taking into account SUDs however suggest that this should be better defined in that should highway drainage follow the surface water drainage hierarchy in some way.	'h. Incorporate Sustainable Urban Drainage Systems and be managed to support local wildlife in the area'							
Should this policy include for the consideration of fluvial flood risk as well as surface water flooding, to ensure that emergency access is maintained during a flood incident.								
A more realistic acceptance of the car growth and parking needs associated with any residential development should be more explicit in the Local Plan.	No Change							

Summary of comments

Council Response

	Policy DLP22 point e) specifically refers to flexible parking arrangements in new developments reflecting local car ownerships levels and the type mix and use of the development.			
H591 would contravene this policy. Cliffe Lane is a narrow road and site access cannot be achieved. All roads in the Cinderhills area are inadequate to serve the proposed developments here.	No Change			
	Localised highway issues to be dealt with at the planning application stage. Impacts on the local highway network have been tested through the allocation process and this area was considered not to have a detrimental impact.			
Adequate parking provision is required in all new housing developments, not just 2 visitor parking spaces per development.	No Change			
	It is a requirement of DLP21 that full details of the design and levels of parking provision are provided with any planning application for development.			
This policy is supported by Highways England. There is a requirement that Highways England should be consulted if any development would have a negative impact on the Strategic Road Network.	Proposed Change			
	Amended text to account for any impacts on the Strategic Road Network.			
9.34	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.35	Support	Conditional Support	Object	No Comment 1
DLP_SP37				
At peak time the roads are congested from Aspley to rural HD8 villages.	No Change			
	A transport scheme TS3 in the Allocations and Designations document addresses congestion in this area.			
9.36	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change			
9.37	Support	Conditional Support	Object 2	No Comment
DLP_SP898, DLP_SP940				
Kirklees are approving developments with no pavements thus creating unsafe environments for pedestrians.	No Change			
Inadequate planning for access for delivery vehicles. These often caused blockages in roadways. Also contractors vehicles e.g. window cleaners, shop fitters, electricians, these are often parked all day where they can cause obstruction to roadways or block pavements.	Comment noted re. pavements and delivery vehicles. This is a site specific issue and Policy DLP21 seeks to address design issues within site layouts.			
9.38	Support	Conditional Support	Object 1	No Comment
DLP_SP899				
Manual for Streets should be insisted upon not just encouraging its use.	No Change			
	Comment noted re. Manual for Streets. Decisions on planning applications are based around the guidance in this document as a material planning consideration.			
9.39	Support	Conditional Support 1	Object	No Comment
DLP_SP412				
No mention of topography of Kirklees in this policy especially in the Holme Valley.	Proposed Change			
	Policy DLP21 amended at d) to include 'topography'.			
	Amended justification text:			

Summary of comments	Council Response			
	'Site levels and topography should also be considered for cycle/pedestrian links so as not to deter from sustainable modes of travel within development schemes'.			
9.40 DLP_SP900	Support	Conditional Support	Object 1	No Comment
Council should be insisting that all development road and drainage systems are built to adoptable standards and that adoption will take place within 12 months.	No Change Developer's wait until they have completed the buildings before completing the road. This means that newly laid surfacing is less likely to be damaged by building works or the late installation of services. This is usually in the council's interests, as it reduces the likelihood of adopting a road that has already been patched. Whilst the councils standard maintenance period is 12 months, this is extended for some sites, for example, those with challenging ground conditions. The Council usually relate the duration of a section 38 agreement to the work to be undertaken. The Council will extend a section 38 agreement in agreement with the developer.			
9.41	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.42	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.43	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.44 DLP_SP941	Support	Conditional Support	Object	No Comment 1
Does Kirklees have a policy on skateboards, hover boards and roller skates?	No Change Kirklees does not have a policy on skateboards, hoverboards and roller skates.			
9.45	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.46	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.47 DLP_SP901, DLP_SP1114	Support 1	Conditional Support	Object	No Comment 1
All allocated sites in the Dearne Valley and indeed the wider Kirklees Rural Area, will materially add to existing highway problems and undermine the health and safety of existing residents	No Change All new development sites have been factored into the district-wide transport modelling exercise. The Transport Technical Paper provides further detail of congested areas and proposed mitigation measures in certain areas.			
9.48 DLP_SP200	Support	Conditional Support	Object	No Comment 1
Kirklees Council has allowed development over the years without making any material changes to the transport network. Current residents have problems with traffic queues at all times, not just at peak times.	No Change Comment noted. All new development sites have been factored into the district-wide transport modelling exercise. The Transport Technical Paper provides further detail of the model.			

Summary of comments	Council Response			
9.49 DLP_SP902	Support	Conditional Support	Object 1	No Comment
The Council should insist that Transport Assessments will be independently commissioned by the council for each planning application likely to generate more than 50 traffic movements per day.	No Change	The council has its own highway officers that assess the content of planning applications and the associated Transport Assessments.		
9.50	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.51	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
Option DLP21 9.3.1	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
Parking	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
Policy DLP 22 DLP_SP93, DLP_SP378, DLP_SP426, DLP_SP463, DLP_SP714, DLP_SP903, DLP_SP1118, DLP_SP1545, DLP_SP1591, DLP_SP1832	Support 4	Conditional Support 4	Object 2	No Comment
Support is given to the regulation of parking supply as a tool of demand management through the proposed reduction of long stay parking and the restriction of new private non-residential parking in town centres.	No Change	Comments of support are noted.		
Policy DLP22 should encourage and incentivise the use of low carbon vehicles such as all electric or hybrid cars, by supporting dedicated parking provision for such vehicles. This should apply for new developments, in addition to the provision of electric car charging points. Electric vehicle charging points have been provided in Holmfirth, the 1 or 2 parking spaces associated with the electric charging points are often taken over by ordinary vehicles, shutting out electric vehicles. A policy of dedicated spaces for low carbon vehicle parking could equally be applied to existing public car parks and parking schemes.	No Change	There is no reason why an electric vehicle should have its own dedicated parking space within new developments.		
Parking for cycles should always be provided, No-one is encouraged to cycle if there is nowhere safe to store cycles.	No Change	Point g of DLP22 refers to cycle parking.		
Section 'e' is at odds with the policy DLP 20 on sustainable travel - 'New development will be located in accordance with the spatial development strategy to ensure the need to travel is reduced and that essential travel needs can be met by forms of sustainable transport other than the private car. The council will support development proposals that can be served by alternative modes of transport such as public transport, cycling and walking and in the case of new residential development is located close to local facilities.'	No Change	Point e of DLP22 is not at odds with DLP20. It aims to minimise the level of car parking available where a site already has good public transport links thus encouraging sustainable travel.		
Point e - If areas have good public transport links, car parking should be minimised, especially as sustainable transport options develop.	No Change			
Improvements to parking at existing railway stations as follows: Brockholes - additional parking should be provided on unused land adjacent to Ridings Fields. Honley - the adjacent bus depot is allocated for housing in the Plan; as and when development takes place, land should be reserved to provide additional station parking.	No Change	The Council along with the Combined Authority has investigated the potential for new and improved parking facilities at stations across West Yorkshire. With limited budgets available, a targeted approach has been adopted which has seen stations with the greatest potential for demand have had funding allocated. Brockholes and Honley do not fall into this category.		

Summary of comments

Cleckheaton and Heckmondwike benefit from several car parks around their periphery (which will improve further when the supermarket car park in Cleckheaton is complete). These are important assets which need recognition and protection. Their presence close to all the shops persuades Spen Valley car users to shop in Cleckheaton. Without them, the town would suffer.

Parking provision in Holmfirth and Honley already causes difficulties for those wishing to use the town centre facilities. This does not help to increase footfall and can act as a deterrent to visitors. We accept that the lack of space in these two conservation areas make the allocation of more land for car parking difficult. The answer therefore is more imaginative solutions.

Adequate parking provision is needed. Roads on the estates need to be wide enough to allow parking on at least one side of the road without disrupting traffic flow and ensuring that cars do not have to be parked on pavements. It is also very important to recognise that sufficient off street parking be available on each development.

The Council continually approves developments of 4 and 5 bedroomed houses with inadequately sized garages, short driveways and too few visitor parking bays. Developments should be designed with a realistic amount of car parking. Many homes now have 3 or 4 cars, especially with so many grown up children still living at home.

The Council needs a deliberate policy creating park and ride facilities around stations and not allocating valuable parking land near stations for further housing as is currently proposed around Denby Dale Station.

9.52

No comments received on this section of the document.

9.53

No comments received on this section of the document.

9.54

No comments received on this section of the document.

9.55

No comments received on this section of the document.

9.56

No comments received on this section of the document.

9.57

DLP_SP718, DLP_SP942

Reducing parking spaces in the town centre will not encourage people to use public transport.

Long term parking provision in town centres should not be reduced until the public transport offering in out lying areas is much improved. In Huddersfield there is little integration between bus and train services for those travelling on to Leeds/ Manchester. This infrastructure requires a more frequent service to increase passenger numbers, reduce demand for long term parking in Huddersfield and reduce reliance on private cars.

Council Response

No Change

Comments noted.

No Change

The Council has no plans to provide additional public car parks in Holmfirth and Honley due to the high set up and running costs associated with these types of facilities.

No change

The design of individual site layouts and levels of parking provision are dealt with under Policy DLP21 - Highways and Access.

No Change

The Council along with the Combined Authority has investigated the potential for new and improved parking facilities at stations across West Yorkshire. With limited budgets available, a targeted approach has been adopted which has seen stations with the greatest potential for demand have had funding allocated. Denby Dale does not fall into this category.

Support

Conditional Support

Object

No Comment

No Change.

Support

Conditional Support

Object

No Comment

No Change.

Support

Conditional Support

Object

No Comment

No Change.

Support

Conditional Support

Object

No Comment

No Change.

Support

Conditional Support

Object

No Comment

No Change.

Support

Conditional Support

Object 2

No Comment

No change

Policy DLP22 at point b. states that long-stay parking will be reduced progressively in conjunction with improvements to sustainable transport opportunities, where appropriate.

Summary of comments	Council Response			
9.58 DLP_SP201	Support	Conditional Support	Object 1	No Comment
Barnsley Council gives free parking in the town centre car park at weekend. That town centre is very busy with few empty shops; unlike Huddersfield and Dewsbury. Thought should be given to this when considering the regeneration of town centres in Kirklees because people will insist on using their own cars regardless of the quality of public transport.	No Change	Kirklees has some of the lowest parking tariffs across West Yorkshire. It has held increasing its parking tariffs for almost 9 years now. In addition it provides a number of concessions to support events which promote the town and particularly at Christmas time. Free parking has to be paid for, the cost of running the car parks (e.g. rates, enforcement and maintenance). Whilst free parking can be seen as a positive to the motorist, it can also have a detrimental impact by way of shop workers parking in the free spaces limiting parking for the customer, additionally it is important that the Council supports its partners across the West Yorkshire Combined Authority in supporting and promoting bus travel and by investing in infrastructure and facilities which encourage greater public transport take up through better journey times and all round passenger experiences.		
9.59	Support	Conditional Support	Object	No Comment
No comments on this section of the document.	No Change			
9.60	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.61	Support	Conditional Support	Object	No Comment
No comments on this section of the document.	No Change.			
9.62	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
9.63	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change.			
9.64	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change.			
Option DLP22 9.4.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change.			
Option DLP22 9.4.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change.			
Option DLP22 9.4.3	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change.			
Core road and bus routes	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change			
Policy DLP 23 DLP_SP172, DLP_SP379, DLP_SP628, DLP_SP904, DLP_SP1119, DLP_SP1592, DLP_SP1833	Support 3	Conditional Support 1	Object 2	No Comment 1
The strategic road network (SRN) in West Yorkshire performs a local transport function as well as	Proposed Change			

Summary of comments

catering for long distance travel. It is used for relatively short distance trips between towns in Kirklees and other urban centres, particularly Leeds. This should be reflected by the inclusion in the policy justification of a reference to the government's Road Investment Strategy (RIS) and committed capacity enhancements on the SRN and its junctions with the local primary road network

Comments specifically relating to proposed developments in Brockholes and inability of local highway network to cope with development.

The development of Huddersfield outward through the valleys depends on what are now bottleneck junctions, Lockwood, Waterloo, Longroyd bridge, Halifax road. This linear type of development constricts traffic flow and tram services, dual carriageways new train lines unlikely, the addition of new roads again unlikely and rural bus services unpopular.

This policy ignores several existing key routes into and out of Kirklees Rural e.g. The A636 and the B6116. These roads that are already operating at or very near their capacity limits at peak times owing to the extremely variable and constricted carriageway widths when passing through settlements. The A636 is the main conduit to the M1 North for the Holme and Dearne valley traffic and the B6116 forms the main link to the M1 between the A642 and the A636.

The Kirklees Core Network needs strengthening by the inclusion of the Kirklees Rural omissions mentioned above. Without this, policy statement at 9.70 fails, as the Council is not encouraging/allocating development sites in Kirklees Rural strategically along a core route.

Support for giving priority to pedestrians and cyclists.

9.65
DLP_SP867

Scholes is not part of the Leeds City Region.

9.66

No comments received on this part of the document.

9.67

No comments received on this part of the document.

9.68
DLP_SP868, DLP_SP1017

The omission of the A635/A636 as a major link across the south of the Kirklees district between the boundary with Greater Manchester, through Holmfirth & Denby Dale towards Wakefield & the M1 (northbound) is a fundamental error

9.69
DLP_SP869

Development pressures from the Scholes development will not improve the core route situation.

Council Response

Road Investment Strategy schemes are included in the justification text and reference that the Strategic Road Network performs a local function also.

No Change

Localised highway issues will be dealt with during the planning application process.

No Change

Specific strategic transport schemes are listed for these areas under TS3 - Huddersfield Southern Gateways in the Allocations and Designations document.

No Change

The A636 is not part of the West Yorkshire Key Route Network and therefore does not carry more than 20,000 vehicles per day, in addition it does not perform a defined strategic function for West Yorkshire because it does not connect West Yorkshire core and key centres together. Neither does it connect these centres to the core district centres within the Leeds City Region and adjacent city regions.

No Change

Support noted for prioritisation for pedestrians and cyclists.

Support	Conditional Support	Object	No Comment	1
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No Change

Kirklees as a whole is identified as part of the Leeds City Region.

Support	Conditional Support	Object	No Comment
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No Change

Support	Conditional Support	Object	No Comment
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No Change

Support	Conditional Support	Object	1	No Comment	1
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No Change

The A635/A636 is not identified as part of the Key Route Network and does not meet the criteria for designation as a core road, see justification text.

Support	Conditional Support	Object	No Comment	1
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No Change

Comments noted.

Summary of comments	Council Response			
9.70 DLP_SP870	Support	Conditional Support	Object 1	No Comment
Since the proposed developments around Scholes would not be strategically placed along these routes does that mean that the Council will not need to endeavour to improve and maintain routes through the village itself. It is difficult to see how the Council would succeed with reducing congestion in Scholes.	No Change	Comments noted. All new developments have been assessed in the transport model. Congestion is not considered to be severe in this area. A transport scheme has been identified for the centre of Holmfirth and is included in TS3 - Huddersfield Southern Gateways, see the Allocations and Designations document.		
9.71	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change			
9.72	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change			
Option DLP23 9.5.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change			
Option DLP23 9.5.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change			
Core walking and cycling network	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change.			
Policy DLP 24 DLP_SP357, DLP_SP427, DLP_SP445, DLP_SP464, DLP_SP620, DLP_SP815, DLP_SP816, DLP_SP871, DLP_SP1093, DLP_SP1120, DLP_SP1546, DLP_SP1593, DLP_SP1648, DLP_SP1649, DLP_SP1672, DLP_SP1834, DLP_SP1865, DLP_SP1895, DLP_SP1901	Support 4	Conditional Support 8	Object 6	No Comment 1
The short footway from the corner of Tofts Road/Prospect Road onto the Greenway and straight into Tesco's car park should be upgraded as this is an important short cut for pedestrians visiting Cleckheaton town centre from the west.	No Change	Localised footway improvements can be negotiated as part of the planning application process.		
Lack of routes, should be link up in new housing developments within Lindley Moor developments.	No Change	The core walking and cycling network is related to the Lindley Moor developments in this part of Kirklees.		
Consideration needs to be given to differentiating between walking, cycling and riding routes. 'Quiet cycling routes' need to be shown as Core Routes. There is a need for a cycle network plan, identifying potential district and local routes. Need to reflect the increasing use of electric bikes and provide charging points etc.	No Change	The proposed core walking and cycle network is an indication of existing routes, proposed routes and indicative routes where there are gaps in the existing network of public footpaths and bridleways at the present time and provides an guide for future investment, it is not intended to provide a map of routes for differing leisure uses.		
The Spen Valley Greenway does not come right into Heckmondwike town centre. Its main access point is at the south west edge of Heckmondwike (former railway station on Station Lane). The Spen Ringway has access points at the north-west edge of the town centre (Cook Lane) and at Old Station Court, High Street at the north-east edge of the town centre. Given the notorious road traffic problems in Heckmondwike, these three entry points could be developed to link better into the shops and services.	No Change	This is something that could be investigated in the future should funding and priorities permit.		
As well as the safeguarding of the core cycling and walking network, this should also include the bridleway network.	No Change	Existing PROWs have protection via legal process outside the planning system.		
Support for the safeguarding of disused waterway routes and canals as this helps to enable that	No Change			

Summary of comments

development is prevented along their routes so that a future restoration scheme can take place.

There are no links shown on the Kirklees Policies Map between the Kirklees Core Walking, Cycling and Riding Network and Wakefield's Strategic Leisure Corridor 26: Overton/Middlestown/Netherton. Wakefield considers further assessment is needed to establish if it is possible to link this SLR across the boundary with Kirklees' equivalent designation

Ensure that the Core Walking and Cycling network includes links into wider regional and national networks. In particular links to the Pennine Way and Pennine Bridleway National Trail included in the network, in line with the NPPF which states that Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails. (NPPF Para 75). It should be noted that the positives for recreation and access of increasing access to the Pennine Moors may need to be considered against the need to protect the internationally and nationally designated sites from access and recreation pressures.

A link between the Kirklees Way and the Pennine Way is needed from the town centre. Also an extension of green corridor.

The River 2015 project has plans for opening up the River Holme to give access to the river and to create a footpath, cycle way and bridle path from the upper reaches to its junction with the Calder in Huddersfield. This includes environmental works, and infrastructural developments as well as educational, cultural and heritage projects. The Local Plan does not include this in its current form.

The topography does not encourage cycling or walking for the less fit and older members of the population. Sight of Kirklees Walking and Cycling Delivery Plan 2015 - 2026 would be appreciated.

The routes and links within the Holme Valley which are proposed should be added to the network and shown on the Policies Maps are as follows:

Existing paths

Sands Recreation ground path from Bridge lane to Huddersfield Road (part of Holme Valley riverside Way)

Path from New Mill Road opposite Banks Lane to Berry Bank Lane

Hassocks Lane Honley to Knowle Lane, Meltham Mills through Honley Old Wood

Path from Upper Hagg Road to Woodhead Road opposite Lancaster Lane

Luke Lane Brockholes to Stoney Bank Lane

Roundway to Field End lane Honley

Honley Riverside Path from Eastgate to Magdale

Dean Brook Road Armitage Bridge to Meltham Road (part shown)

Hill Lane Uppertong

Hade Edge to Scholes Longley Edge Road and High Lane

Scholes to Totties Sike Lane

Sycamore Lane and Tenterhill Road, Holmfirth

□Hepworth – New Mill

Proposed paths

Miry Lane Thongsbridge to Luke Lane (riverside path)

Magdale to Armitage Road (riverside path)

Woodhead Road to Stockwell Vale

Holmfirth Road opposite Bill Lane through Holmfirth High School site to Springwood Road and Heys Road

St Marys Mews Honley to riverside path

Marsh Platt Lane Honley through Neilley Playing Fields to New Mill Road

Kirkbridge Lane New Mill to Stoney Bank Lane (riverside path)

Council Response

Comments of support are noted.

Proposed Change

Core Walking and Cycle route amended on Policies Map to reflect link to Pennine Way through the Kirklees Way and links to Wakefield at Middlestown/Overton. An indicative route has been demonstrated along the River Holme corridor to meet with the aspirations of the River 2015 project. Other specified routes do not strategically link with the network and to proposed development sites.

Proposed Change

Reference to national trails as per NPPF paragraph. 75:

'The safeguarding of the network will also provide further opportunities for leisure uses, cycling, walking and riding in the countryside by linking to existing bridleways and national trails where appropriate.'

The core network has been expanded to link onto the Pennine Way - see Policies Map.

No Change

The Council recognises that there is a strategic gap in the core cycling network around Holmfirth and associated connections to other settlements. Where this has occurred elsewhere in the district this has been subsequently recognised on the proposals map as a dotted line joining the settlements together but not following any specific route. Due to the complexity involved in dedicating and constructing the particular route suggested by Holme Valley Vision Group, it is not practical to include it in detail. However the requirement to investigate options of providing strategic links to and from Holmfirth will be shown. The Council will endeavour to work closely with Holme Valley Vision Group to work up the detail of said link.

Summary of comments	Council Response			
<p>Holme valley Riverside Way south of Holmfirth. Sands Recreation Ground to Woodchurch View/Miry Lane Thongsbridge</p> <p>In addition, to support policy DLP 24 it is expected the safeguarding of land to enable the full development of the dedicated cycle and walking route along the River Holme currently being planned.</p> <p>There should be an additional policy in Policy DLP24 related to the walking and cycling network, along the lines of: The Council will make Creation Orders for new public rights of way where necessary to facilitate the development of new walking and cycle paths as part of a comprehensive walking and cycling network within the district.</p>	<p>No Change</p> <p>Where land is required for new public rights of way developers will be encouraged to liaise with the Council through the planning application process.</p>			
9.73	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change			
9.74	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change			
9.75	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change			
9.76	Support 1	Conditional Support 2	Object	No Comment
DLP_SP268, DLP_SP390, DLP_SP416				
Support for the disused railway line being used for Urban Greenspace and Fenay Greenway.	No Change			
This core network of routes needs to be substantially increased if it is to have any use in future planning. Separation between riding, cycle and walking routes need to be shown on the map.	Comments of support are noted.			
The proposed walking / cycling route along the Holme Valley towards Huddersfield is to be welcomed but it makes sense for it to follow the valley bottom as proposed by the River 2015 group as it will then offer an alternative to the Trans-Pennine Trail in terms of a good quality relatively flat route into / out of Huddersfield.	The walking and cycling network is intended to provide a guide for areas for future investment associated with development sites and not specifically a map to differentiate between riding, cycling and walking routes.			
	Comments noted re. River 2015 project.			
9.77	Support	Conditional Support	Object	No Comment 1
DLP_SP943				
Bridleways can be muddy, rutted and difficult to use for a large part of the year	No Change			
	Comments noted about bridleways.			
9.78	Support	Conditional Support	Object	No Comment
No comments received on this part of the document.	No Change.			
9.79	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change			
9.80	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change			
9.81	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change			

Summary of comments	Council Response			
9.82	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
Option DLP24 9.6.1	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change.			
Option DLP24 9.6.2	Support	Conditional Support	Object	No Comment
No comments received on this section of the document.	No Change			
Design	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
10.1 DLP_SP223	Support	Conditional Support	Object	No Comment 1
There is nothing greener than leaving Green Belt and Green Field sites alone, utilising all brownfield sites first.	No change. It may be the case that not building on greenfield sites will have the minimum environmental impact. Achieving Sustainable Development is the primary aim of national planning policy. This, as set out in paragraph 7 of NPPF, has a social, economic and environmental role. The planning system needs to balance all of these roles.			
10.2 DLP_SP189, DLP_SP202, DLP_SP1594	Support 1	Conditional Support	Object	No Comment 2
NPPF requires local authorities to give significant weight to outstanding or innovative designs.	No change. This is identified in the paragraph.			
The Every Child Matters agenda states that all children should have the opportunity to stay healthy and safe. Play areas are essential to help with this and would help with the growing problem of obesity. It is imperative that the need for open space is not overpowered by the need for houses.	No change. In terms of the design policy, this issue is address by considering landscaping and ensuring development is walkable. This issue is dealt with other parts of the planning policy.			
Set the restrictions/requirements and then let small developers and self-builders work with architects to create individual, architecturally interesting, sustainable housing. Focus more on eco-housing and smaller homes for over 65s or singles/couples. Stop granting permission for huge swathes of executive boxes.	No change. The Design policy promotes design codes, development briefs and masterplans which would provide scope for development sites with a range of developers / providers. The Design policy seeks to promote sustainable housing development. The Housing Mix policy seeks to ensure housing needs for different types of households are met on site			
Be more transparent about land purchasing opportunities to give individuals the opportunity to buy	No change. This is being addressed through the self-build register			
10.3	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change			
Design	Support	Conditional Support	Object	No Comment
This sets out a good summary of the wealth and significance of Kirklees' heritage assets together with the other elements which help to define the distinct identity of this part of West Yorkshire. As such, it helps to demonstrate precisely why the strategy of the plan needs to set out a robust framework to safeguard those elements which contribute to the character of the area (Historic England)	No change. Comment noted.			
We welcome the reference to the need for care for the setting of the National Park (Peak District National Park)	No change. Comment noted.			
Policy DLP 25	Support 1	Conditional Support 16	Object 8	No Comment 2
DLP_SP19, DLP_SP112, DLP_SP272, DLP_SP308, DLP_SP621, DLP_SP647, DLP_SP817, DLP_SP905, DLP_SP944, DLP_SP955, DLP_SP978, DLP_SP1002, DLP_SP1075, DLP_SP1081, DLP_SP1121, DLP_SP1158, DLP_SP1313, DLP_SP1447, DLP_SP1538, DLP_SP1547, DLP_SP1548, DLP_SP1595, DLP_SP1628, DLP_SP1631, DLP_SP1636, DLP_SP1710, DLP_SP1894				
Officer change.	Proposed change:			

Summary of comments

Officer change

Housing is likely to be delivered by volume house building of urban extensions – a format incongruous to traditional vernacular of the area. Developer should employ urban design principles to avoid 'suburban sprawl' formats of development. Clearer guidance needed to avoid this.

Support for identification of resilience of flood risk in the policy, but the policy also presents an opportunity to promote multi-functional green infrastructure as a design principle. New guidance on Green Infrastructure has been added to PPG <http://planningguidance.communities.gov.uk/blog/guidance/natural-environment/green-infrastructure> (Environment Agency).

Support for "where applicable" in association with the requirement of development briefs, design codes and masterplans to submitted with planning applications as such information would not be required to be submitted alongside all planning applications.

Table 2.1 of the CIL viability report assumes that there would be no cost implications of a result of this policy but this is not the case. The policy does not appear to be based on robust and credible evidence and does not refer to viability

Support for inclusion of reference "that new developments incorporate adequate facilities to allow occupiers to separate and store waste for recycling and recovery that are well designed and visually unobtrusive" but concerned that this isn't a strong enough statement.

The planting of trees is advocated for the mitigation of climate change and flood defences. Consideration should be given to the use of trees as flood prevention in rural areas where hillsides are covered only by ungrazed grass

Support for inclusion of passive solar design and renewable energy but good insulation should be included.

Part iii of Criterion D should be amended: "minimising resource use in the building by requiring energy efficiency levels to Passivhaus international energy efficiency standard for newbuild developments and EnerPHit for building refurbishments'. All new buildings and houses should be required to have renewable technologies, such as solar PV or solar thermal, as standard, where practicable". Reference to passive solar gain would not result in energy efficient buildings and could lead to overheating. All building on council land should be to Passivhaus standard. The plan should be more ambitious with respect to setting zero-carbon or carbon-neutral design standards for new developments, with the council supporting the use of carbon-neutral design codes in new developments, covering both private and public sector housing and buildings.

Housing developments in areas of low-medium risk of flooding should be required to install flood defences such as custom made flood barriers, flood doors, anti-flood airbricks, sewage protection, flood fencing and tanking

The Local Plan should not seek requirements which are covered by other non-planning legislation (e.g.

Council Response

Additional criterion added to cover provision of new open space in the design of development, as this was not adequately addressed in the previous policy.

Proposed change:

Wording to criterion relating to extensions - adding word subservient and also adding in further text regarding impact on amenity, to provide more clarity on residential extensions / householder applications.

No change. The policy seeks early engagement of developers in the planning application stage and the use of design tools such as development briefs, design codes and masterplans to ensure good quality design is delivered. The Building for Life 12 guidance referred to in the policy is the industry standard housing for the design of new housing developments and several volume house builders are subscribed to this.

Change. Support welcomed. Criterion G will be amended to refer to multi-functional green infrastructure (as identified in Policy DLP32) and point vi of Criterion D will be amended to include reference to multi-functional when designing flood resilient places.

No change. Support welcomed

No change. Viability report assumptions consider professional fees incurred for elements of the scheme, including for design. The viability assumptions are based on BCIS build costs. These build costs also include an allowance for design and project fees. The build costs are based on an average of construction costs, so will include a range of schemes meeting or exceeding building regulations. Issues such as materials or vehicle charging points will be given consideration on a site-by-site basis, rather than being a mandatory policy requirement, so these have not been assessed in the CIL Viability report.

No change. Support welcomed. No reason is given in the comment why this is not a strong enough statement. The type of facilities that are provided will be relative to the size of the development proposal.

No change. Criterion h of the policy supports the planting of new trees to maximise environmental benefits. The Government's countryside stewardship grants provides a financial incentive for landowners to plant trees, but this is something that is not within the remit of the Local Plan as the land is not subject to development proposals.

No change. Support welcomed. Insulation is an issue that is covered in Building Regulations. Whilst solar gain is included in part L of the Building Regulations, it is listed in this policy as a prompt for developers to consider how developments are orientated.

No change. Part L of the building regulations seeks to limit the effects of solar gains in the summer, it is listed in this policy as a prompt for developers to consider how developments are orientated – but it is acknowledged that this is an issue that has to be addressed in detailed design. The policy refers to passive solar design, not just solar gain – the supporting text will be amended to refer to reference Passivhaus and EnerPHit will be referenced in the policy justification. Supplementary planning guidance could provide further information in the future. The site allocations boxes for council owned sites currently make reference to a high standard of design and quality and this could be strengthened to refer to Passivhaus, ultimately this would be a decision that took place outside of the Local Plan process. The sustainability of a development is a wider concept than just the fabric of the buildings themselves, consideration should also be given to how design influences residents and users, for example enabling the use of electric cars and maximising opportunities for public and active transport .

No change. All development proposals are subject to a site specific flood risk assessment, which will set out mitigation measures on a case-by-case basis.

No change. Viability report assumptions consider professional fees incurred for elements of the scheme,

Summary of comments

building regs). This would provide a constraint on delivery of new homes. This includes those covered in criterion d relating to construction materials, passive solar design, incorporating vegetation and tree planting. NPPF Para 35 is clear electric vehicle charging points should only be provided where practical and by no means seeks this to be a requirement for every property. Wording policy "to encourage..." rather than "should" would be better as this would not make the criteria into requirements above national policy.

Cross reference to Sport England design guidance is welcomed (Sport England)

The DLP should be amended to include identification of sites for generation of renewable energy

Design reviews only to be carried out in agreement with the developer suggest the scrutiny of design is at discretion of developer. The words "where applicable" and "in agreement with the developer" means that the policy will be weak in its ability to be implemented.

The inclusion of building design which facilitates the separation and storage of recyclables in the policy is welcomed, but would add that ease of collection is also important in this context. (Environment Agency)

Point A should seek for development needs to respect and aim to enhance the setting of heritage assets (particularly but not exclusively) listed buildings and conservation areas.

The use of natural stone in conservation areas should be a requirement.

The policy is supported. The requirement that development should respect and enhance the character of the townscape and important views and vistas is particularly supported (Historic England).

Amend criterion D - insert the following additional sub-criterion before existing sub-criterion i: -"the reuse and adaptation of existing buildings" (Historic England)

Criterion G of the policy is welcomed (Natural England)

Particular reference should be made to design which will allow for the changing needs of residents during their life cycle, so that families with children, single adults, disabled and older people can be suitably accommodated without needing to move.

Policy should include the word 'permeable' to discourage cul-de-sac formats that are not conducive to walkable neighbourhoods.

Policy wording to change to state "proposals must promote good design"

The policy needs to be more specific, e.g. set minimum standards for housing / house sizes and specifying security features to be considered by developers

The policy should be implemented and monitored to ensure good quality design is delivered

Criterion A should be amended to include consideration of landscape character as well as townscape (Natural England)

The stipulation for the use of stone is not contrary to national policy as stated in paragraph 10.1.2

Council Response

including for design. The viability assumptions are based on BCIS build costs. These build costs also include an allowance for design and project fees. The build costs are based on an average of construction costs, so will include a range of schemes meeting or exceeding building regulations. Issues such as materials or vehicle charging points will be given consideration on a site-by-site basis, rather than being a mandatory policy requirement, so these have not been assessed in the CIL Viability report. A change to part iv of criterion D has been made "encouraging the use of electric and low emission vehicles through provision of charging points"

No change. Support welcomed.

No change. This specific site allocation is not relevant to the design policy but the design policy seeks to provide for the use of renewable energy.

No change. A Design Review is not necessary for every development. Design Review Principles and Practice (Design Council, 2013) states that design reviews are proportionate and is used on projects whose significance either at a local or national level, warrants the investment needed to provide the service. The cost of a Design Review would be incurred by the developer and they may see it as an appropriate tool to respond to any design issues identified at pre-application stage.

Change. "And allows for convenient collection of waste" added to end of part v of criterion (d).

Change. "Heritage assets" has been identified in the criterion of this policy, the supporting text gives further context to this. Policy DLP36 gives further guidance regarding proposals that affect heritage assets.

No change. The use of natural stone is likely to be appropriate in instances in conservation areas and the policy requires buildings to respect and enhance the townscape in terms of their detail. The basis of the policy is NPPF requirements to promote and reinforce local distinctiveness without being neither too prescriptive, nor stifling innovation.

No change. Support welcomed.

Change. Criterion added to the policy, but with the words 'where practicable'. The re-use and adaptation of existing buildings should always be sought but it would depend on the building, its quality, condition and scope to be brought into different uses.

No change. Support welcomed.

Change. Criterion (D) part vii will be amended to place more emphasis on the life cycle of residents: "designing places that are adaptable and able to respond to change, with consideration given to accommodating services and infrastructure, access to high quality public transport facilities and offer flexibility to meet changing requirements of the resident / user."

No change. This term is used in Policy DLP4, masterplanning sites, as it is more appropriate at a larger scale. This is already identified in criterion (i) of D, "promoting walkable neighbourhoods".

No change. "Should" is considered to be the most appropriate form of wording as the sentence precedes the policy criteria which are desirable but in some circumstances there may be material considerations why each part of the policy cannot be implemented.

No change. Minimum house sizes are set out in the Government's Nationally described space standard, so it would be unnecessary to duplicate in this policy. Reference is given to Secured by Design in the design policy which sets out detailed design considerations for minimising risk of crime

No change. The monitoring framework identifies the policy will be monitored via counting the number of permissions granted contrary to policy (target: zero).

Change. Amend to include this and remove 'important views and vistas'

No change. Whilst NPPF paragraph 58 seeks for policies and decisions to "respond to local character and

Summary of comments

(p.144). Several references in NPPF (paragraphs 58-60) regarding local character, materials and promoting and reinforcing local distinctiveness. UDP Policy BE11 should be retained.

Council Response

history and reflect the identity of local surroundings and materials” this is in the same bullet point as “whilst not preventing or discouraging appropriate innovation”. Paragraph 59 does state that “Design Policies should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access for new development in relation to neighbouring buildings and the local area more generally” however it also states that “design policies should avoid unnecessary prescription or detail”. Paragraph 60 does, as referred to in the comment, state “Planning policies and decisions should not attempt to impose architectural styles or particular tastes and shouldn’t stifle innovation through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness”. It is considered that the policy in criteria (a) and (c) requires development to ensure development respects and enhances the character of the townscape in terms of details and for extensions to development to be in keeping with the existing building in terms of materials and details. The supporting text identifies that details refers to the materials and building techniques. It is considered that the policy would require stone to be used as the building material where it was appropriate in terms of the existing townscape. This is based on national policy requirements to promote and reinforce local distinctiveness without being neither too prescriptive, nor stifling innovation. National Planning Practice Guidance gives further guidance on materials

The canal network forms a key part of the urban and rural landscape the district. Canal corridors should be fully considered as a separate policy, focusing on waterway design. Policy A6 of the Hyndburn Borough Council Core Strategy is an example of good practice. (Canal and River Trust)

Change.

The policy referred to at Hyndburn Council relates to a specific location of that district with development sites adjacent to the canal. This policy may be appropriate at an AAP / Neighbourhood Plan level. However criterion G will be amended to refer to green infrastructure (as identified in Policy DLP32) which includes canal corridors. Criterion A of Policy DLP25 seeks to ensure development located adjacent to a waterway would enhance the townscape, landscape and heritage assets. The supporting text has been amended to refer to the canal network.

Sound proofing isn’t mentioned in the policy but could be helpful to include.

No change. Resistance to the passage of the sound is covered in Building Regulations. The policy requires development to provide a high standard of amenity for future and neighbouring occupiers, this would include minimising noise levels.

The reference to Building for Life 12 is supported.

No change. Support welcomed.

Design of buildings should take account of accumulated snow and ice and the effect of wind tunnelling

National Planning Practice Guidance requires development to take account of local climatic conditions, including daylight and sunlight, wind, temperature and frost pockets.

10.4
DLP_SP176, DLP_SP1552

Support 2 Conditional Support Object No Comment

We welcome the reference to the need for care for the setting of the National Park (Peak District National Park)

No change.

This sets out a good summary of the wealth and significance of Kirklees' heritage assets together with the other elements which help to define the distinct identity of this part of West Yorkshire. As such, it helps to demonstrate precisely why the strategy of the plan needs to set out a robust framework to safeguard those elements which contribute to the character of the area. (Historic England)

No change.

10.5

Support Conditional Support Object No Comment

No comments were received on this part of the plan.

No change.

10.6

Support Conditional Support Object No Comment

No comments were received on this part of the plan.

No change.

10.7

Support Conditional Support Object No Comment

No comments were received on this part of the plan.

No change

10.8

Support Conditional Support Object No Comment

No comments were received on this part of the plan.

No change

Summary of comments	Council Response			
10.9	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
10.10	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
10.11 DLP_SP1122	Support	Conditional Support 1	Object	No Comment
Consideration should be given to use of trees as flood prevention in rural areas: covering ungrazed grass, arresting flow of water and promoting the soaking up of water at high level and preventing loss of top soil.	No change. Criterion h of the policy supports the planting of new trees to maximise environmental benefits. The Government's countryside stewardship grants provides a financial incentive for landowners to plant trees, but this is something that is not within the remit of the Local Plan as the land is not subject to development proposals.			
Trees and shrubs should only be removed for development in exceptional circumstances and in that situation should be replaced (not just trees with TPOs), if not on the development site, then on a suitable site agreed by local authority and developer.	No change. The policy seeks retention of valuable trees and the planting of new trees is encouraged. The trees policy seeks retention of important or valuable trees 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.			
10.12	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
10.13	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
10.14	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
10.15	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
10.16	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
10.17	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP25 10.1.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP25 10.1.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Advertisements and shop fronts	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				

Summary of comments	Council Response			
Policy DLP 26 DLP_SP355, DLP_SP1553, DLP_SP1838	Support 1	Conditional Support 2	Object	No Comment
We support this Policy which will help to ensure that the design of any new or replacement shop fronts or advertisements retains the distinctive character of the Plan area. We particularly welcome the requirement that traditional shop fronts should be retained and restored. The town centres of Kirklees contain a number of fine examples of traditional shop fronts which make a valuable contribution to their character. This should help to ensure that these distinctive elements of the District are not lost. (Historic England)	No change. Support welcomed.			
In Paragraph 2 of the policy “preserve and enhance” should amended to “preserve or enhance”. This would accurately reflect the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990.	Change. The policy will be amended to maintain consistency with the Planning (Listed Buildings and Conservation Areas) Act 1990.			
In Holmfirth there was always a condition on shop signs that only external lighting could be used. This has slipped in recent years to the detriment of the streetscape. The policy should be strengthened to reflect that.	No change. The policy seeks a high standard of design for signage in conservation areas, that is appropriate in style, scale and materials to the building and its setting.			
10.18	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
10.19 DLP_SP356	Support	Conditional Support	Object 1	No Comment
The last sentence of paragraph 10.19 is overly prescriptive and does what rejected option DLP26 10.2.2 sets out. Modern internally illuminated “box” signs are slimline and usually fret-cut to allow illumination only through the lettering or to give a ‘halo’ affect around certain letters. There is no reason why this should not be permitted on a listed building, particularly if it contains a modern shopfront. Neon / cold cathode tube lighting can be carefully designed and appropriately installed. Advertising Regs require each proposal to be considered on individual merit.	Change. This sentence has been deleted. It is considered that the preceding paragraph and criterion 2 of the policy require high standards of signage design in listed buildings and conservation areas, which seek to preserve or enhance these assets, without being prescriptive.			
“Retain and enhance” in paragraph 10.19 should be replaced with “preserve or enhance”. This would accurately reflect the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990.	Change. Supporting text amended to maintain consistency Planning (Listed Buildings and Conservation Areas) Act 1990.			
10.20	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP26 10.2.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP26 10.2.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change			
11 Climate change DLP_SP1871	Support	Conditional Support	Object 1	No Comment
The University of Huddersfield Student Union priorities: Provision of transport infrastructure and housing to enable them to make good sustainable choices. Setting the highest standards for environmental sustainability within building regulations to reduce both energy consumption, carbon emissions and costs. Ensuring that Student Housing has low energy consumption to address both carbon emissions and address fuel poverty. The Local plan should not permit fracking within Kirklees nor the siting of extraction sites outside but adjacent to the Peak District National Park. Provide walking and cycling infrastructure.	No change. Comments noted.			

Summary of comments	Council Response				
11.1 DLP_SP446, DLP_SP604, DLP_SP818, DLP_SP1123, DLP_SP1130, DLP_SP1596, DLP_SP1627	Support	1	Conditional Support	Object 6	No Comment
<p>The Julie Martin Landscape Study has not been considered in enough detail, particularly concerning areas around High Flatts and Birdsedge.</p>	Proposed change. The revised Local Plan includes maps developed from its evidence base considering landscape sensitivity which identify the suitability of areas for different scales of turbine. These maps are based on the findings of the South Pennines Wind Energy Landscape Study, Julie Martin Associates and LUC (October 2014).				
<p>Natural England notes the recognition of the role of green infrastructure in mitigating climate change and welcomes the emphasis on green infrastructure, ecological networks and habitat connectivity throughout the Plan. For more information on biodiversity and climate change adaptation please see the National Biodiversity Climate Change Vulnerability Model available from this archived version of our website at: http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/ourwork/climateandenergy/climatechange/vulnerability/nationalvulnerabilityassessment.aspx</p>	No change. Comments noted.				
<p>Walking, cycling and horse riding routes should be seen as an ideal opportunity to reduce carbon emissions throughout Kirklees. Green jobs should also be protected throughout this policy to ensure sustainable transport, natural environment, health agenda, etc can be successful.</p>	No change. Comments noted.				
<p>The policies in the Local Plan will not deliver significant enough carbon reduction to meet the UK's legally binding targets to reduce carbon emissions by 80% on 1990 levels by 2050, or the targets agreed at COP21 in Paris (December 2015).</p>	No change. It is considered that the policy is consistent with National Policy as set out in the NPPF.				
<p>Addressing climate change should be one of the core planning principles expected to underpin the Local Plan. In light of the targets set at the recent UN Change Climate Conference agreements in Paris December 2015, we would expect that proactive measures to mitigate and adapt to climate change, especially reduced use of fossil fuels leading to carbon reduction, will be central to the Plan.</p>	No change. Comments noted.				
11.2 DLP_SP605, DLP_SP727, DLP_SP1550	Support	1	Conditional Support	Object 2	No Comment
<p>The plan should include a programme of tree planting throughout Kirklees. It is a very simple way to counter CO2, assist flood defences and improve the environment.</p>	No change. The Local Plan does not allocate specific areas for tree planting, however where future developments are required to provide open spaces, tree planting can be considered using open space and design policies.				
<p>HoTT welcome the intention to address climate change as one of the core planning principles underpinning the Plan (11.2). In light of the recent UN Change Climate Conference agreements in Paris, with its deadline for agreed action to be set out by 2030, HoTT expect to see that proactive measures to mitigate and adapt to climate change, especially carbon reduction, will be emphasised throughout the Plan.</p>	No change. Comment noted.				
<p>Many policies in the Local Plan will not deliver sustainable development. There should be stronger enforcement on developers to use sustainable and new house building techniques and refurbishments should include new technologies such as solar panels and air/ground source heating. Encourage less reliance on local quarrying for sandstone used in building, paving stones and crushed aggregates.</p>	No change. The Local Plan taken as a whole is deemed to promote sustainable development as defined in National Planning Policy.				
11.3 DLP_SP325	Support	1	Conditional Support	Object 1	No Comment
<p>There is an opportunity for the local plan to make much more significant statements to influence the management of the green infrastructure especially the upper catchments above Marsden and the Holme Valley where bringing the moorland landscape into good ecological condition could provide good mitigation against a higher likelihood of wildfires and increasing DOC and POC levels in drinking water supply.</p>	No change. Comments noted.				

Summary of comments	Council Response			
11.4 DLP_SP1126	Support	Conditional Support	Object 1	No Comment
There are multiple and serious barriers within the draft local plan as drafted for renewable and low carbon energy.	No change.			
	It is considered that the Local Plan is consistent with National Policy as set out in the NPPF.			
11.5	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
Renewable and low carbon energy	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
Policy DLP 27 DLP_SP287, DLP_SP428, DLP_SP499, DLP_SP606, DLP_SP820, DLP_SP1085, DLP_SP1129, DLP_SP1134, DLP_SP1276, DLP_SP1482, DLP_SP1551, DLP_SP1555, DLP_SP1599, DLP_SP1640, DLP_SP1711, DLP_SP1799, DLP_SP1827, DLP_SP1837	Support 1	Conditional Support 3	Object 14	No Comment
Some landscapes are already damaged by turbines. For example, the landscape that stretches from Haddingley in Kirklees, south to towards Royd Moor in Barnsley. Cumulative impact from turbines of varying sizes and wind farms located on both sides of the boundary in Barnsley and Kirklees has caused damage to the openness of the Green Belt.	No change.			
	The South Pennines Wind Energy Landscape Study, Julie Martin Associates and LUC (October 2014) considers the cumulative cross border impact of consented and existing wind turbines in its appraisal of landscape sensitivity. Appendix 5 of the study refers to the on-going monitoring and mapping of wind turbines to consider emerging cumulative impacts for plan making and decision taking.			
The suggestion that the entire Kirklees Planning Authority boundary is suitable for some scale of wind turbine development is therefore not true. There are landscapes which should now be protected and that should be included in this policy. The policy should reflect what exists now including all approvals and not be based on landscape studies from the past when the landscape looked very different.	Proposed change.			
	The revised Local Plan includes maps developed from its evidence base considering landscape sensitivity which identify the suitability of areas for different scales of turbine.			
The criteria based policy is too restrictive. The policy provides barriers to the delivery of renewable and low carbon technologies and will not deliver NPPF requirements.	No change.			
	It is considered that the policy is consistent with National Policy as set out in the NPPF.			
The policy should include set back distances from habitable dwellings dependent on the size and height of the turbine and the number of turbines.	No change			
	It is considered that the policy is consistent with National Policy as set out in the NPPF and National Planning Practise which states: 'Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses.'			
Policy DLP 27 Yorkshire Wildlife Trust supports the proposed policy on renewable energy. Climate change is the biggest threat to wildlife and biodiversity therefore it is our opinion that we should be moving towards a lower carbon future. We are pleased to note that renewable projects will not be permitted should they impact the designation features of a statutory designated site (such as the South Pennine Moors SPA/ SAC/ SSSI). This protection should also be offered to functionally linked land outside of the SPA/SAC which supports SPA designated bird populations.	No change.			
	Comments noted.			
The policy should consider landscape impact of wind turbines in more detail.	Proposed change.			
	The revised Local Plan includes maps developed from its evidence base considering landscape sensitivity which identify the suitability of areas for different scales of turbine.			
The policy should be strengthened to consider Section 122 of the Localism Act & The Ministerial Statement from 18 Jun 2015.	The policy is supported by a comprehensive landscape assessment evidence base comprising of; South			

Summary of comments

The Local Plan should highlight areas on the Local Plan map suitable for a variety of renewable energy including wind energy, solar PV, hydro, ground source and air source energy generation, with priority given to the technologies that offer the most cost-effective energy production and reflect more ambitious climate change targets.

The landscape evidence used to support the policy is too restrictive and will not allow the delivery of significant carbon saving.

There needs to be a thorough, Kirklees-wide, comprehensive scoping studies, based on reasonable criteria, for commercial scale wind and solar to reflect an ambitious target for renewable energy capacity within Kirklees correlating to the targets set in the Paris Agreement.

Opportunity exists in the Holme Valley for further solar installation without compromising architectural heritage, on modern industrial buildings. This should be encouraged. Areas of architectural heritage should be conserved and permitted for installation only within conservation guidance.

The policy should have a methodology of assessing the impact of different scales of wind turbine size on the different landscape types, developed into a rational methodology for assessing planning applications for new wind turbine sites within the district.

The policy should be changed to 'Renewable and low carbon technologies should be incorporated effectively into building design and this is required in Local Plan Design policy.'

The Plan should give greater weight to community-led applications by creating a presumption for approval.

Council Response

Pennines Wind Energy Landscape Study, Julie Martin Associates and LUC (October 2014), Landscape Guidance for Wind Turbines up to 60m high in the South and West Pennines, Julie Martin Associates (January 2013) and the Kirklees District Landscape Character Assessment, LUC (April 2015).

It is considered that the policy is consistent with National Planning Policy. Other legislation if relevant can be considered as part of any planning application.

Proposed change.

The revised Local Plan includes maps developed from its evidence base considering landscape sensitivity which identify the suitability of areas for different scales of turbine.

Solar PV, hydro, ground source and air source energy generation types are not specifically identified on a map. Many of the schemes involving these technologies can be delivered through permitted development. It is not a requirement of national planning policy to identify specific areas for these types of energy generation. Where an application is required for schemes using these technologies, the Renewable and low carbon energy policy can be considered. The Renewable and Low Carbon Energy Study, Maslen (September 2010) provides evidence about the potential for some of these technologies to be delivered across the district.

No change.

The council's landscape evidence is produced using recognised landscape appraisal techniques. The South Pennines Wind Energy Landscape Study, Julie Martin Associates and LUC (October 2014), Landscape Guidance for Wind Turbines up to 60m high in the South and West Pennines, Julie Martin Associates (January 2013) were commissioned by a number of councils who have endorsed the approach to landscape appraisal.

No change.

It is considered that the policy is consistent with National Policy as set out in the NPPF. The policy is based on evidence including the Low Carbon and Renewable Energy Capacity in Yorkshire and Humber, Aecom (March 2011) and Renewable and Low Carbon Energy Study, Maslen (September 2010) which consider the potential for different types of renewable and low carbon technologies across Kirklees.

No change.

Many solar installations can be installed using permitted development rights. Where developments require planning permission the Local Plan Design and Historic Environment policies may need to be considered.

Proposed change.

The revised Local Plan includes maps developed from its evidence base considering landscape sensitivity which identify the suitability of areas for different scales of turbine.

The policy is supported by a comprehensive landscape assessment evidence base comprising of; South Pennines Wind Energy Landscape Study, Julie Martin Associates and LUC (October 2014), Landscape Guidance for Wind Turbines up to 60m high in the South and West Pennines, Julie Martin Associates (January 2013) and the Kirklees District Landscape Character Assessment, LUC (April 2015).

Proposed change.

The links between other local plan policies and how they can help deliver renewable and low carbon technologies will be added to the supporting text of the policy.

No change.

The policy needs to ensure that the impacts of any proposal are acceptable in planning terms though applying the criteria based assessment. The policy includes the wording: Where the above criteria are met, the council encourages dialogue with local community groups promoting community renewable and low carbon energy schemes.

Summary of comments	Council Response			
11.6 DLP_SP500, DLP_SP607	Support	Conditional Support	Object 2	No Comment
The NPPF makes it clear that when located in the green belt, elements of many renewable energy projects will compromise inappropriate development.	No change. It is considered that the policy is consistent with National Policy as set out in the NPPF.			
11.7	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
11.8 DLP_SP177, DLP_SP608	Support	Conditional Support 1	Object 1	No Comment
Wind turbines are a highly inefficient means of producing electricity. A far better approach would be for carbon reducing technologies and renewable materials to be core requirements in any new build developments that are approved in Kirklees. From a carbon reduction perspective in new developments Kirklees should ensure that all new developments in Kirklees are carbon neutral.	No change. The Renewable and low carbon energy policy states that renewable and low carbon energy proposals will be supported if the relevant criteria are assessed and adverse impacts addressed. The studies: Low Carbon and Renewable Energy Capacity in Yorkshire and Humber, Aecom (March 2011) and Renewable and Low Carbon Energy Study, Maslen (September 2010) identify different technologies and their potential to help reduce carbon across the district. Building Regulations set the minimum requirements for building materials and efficiency. The Local Plan does not provide a barrier to developers wishing to improve on these standards, with the Local Plan Design and Renewable and Low Carbon Energy Policy helping to encourage this.			
Where proposals are close to the National Park we would encourage use of the design guidance adopted by this Authority for these types of development. The guidance is at http://www.peakdistrict.gov.uk/__data/assets/pdf_file/0007/536992/3401-EF-Sustainable-Planning-Doc.pdf and the landscape sensitivity guidance is at http://www.peakdistrict.gov.uk/__data/assets/pdf_file/0010/332974/SPD-Landscape-Sensitivity-Assessment-and-Wind-Turbine-Guidance.pdf .	No change. Comments noted.			
Whilst these documents are adopted for use in the National Park, our landscape character assessment work flows across the boundary reflecting that the landscape can be high quality outside the Park as well. This strategy is at http://www.peakdistrict.gov.uk/looking-after/strategies-and-policies/landscape-strategy				
11.9	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
11.10 DLP_SP1124, DLP_SP1128, DLP_SP1597	Support	Conditional Support	Object 3	No Comment
Buildings on council owned land should be built to Passivhaus standards. Builders on private land should be encouraged to build to Passivhaus standards.	No change. The council can consider the viability of different methods of construction without them being embedded in Local Plan policy. Passivhaus standards have been considered and referred to in the Local Plan Design policy.			
We would change the wording to: "Renewable and low carbon technologies should be incorporated effectively into building design and this is required in Local Plan Design policy."	No change. The policy wording would not be justified as it would not allow flexibility to allow development viability to be taken into account.			
11.11	Support	Conditional Support	Object	No Comment

Summary of comments	Council Response			
No comments were received on this part of the Plan.	No change.			
11.12 DLP_SP1133 The policy should be supported by comprehensive scoping studies, based on reasonable criteria, for at least commercial scale wind and solar. It may be worth too looking subsequently at appropriate zoning.	Support	Conditional Support	Object 1	No Comment
The high degree of uncertainty over planning consent, and the expense whereby each application has to produce mountains of evidence to try to satisfy multiple, yet often subjective, criteria, is inevitably off-putting to potential renewable energy developers.	Proposed change. The policy is based on evidence including the Low Carbon and Renewable Energy Capacity in Yorkshire and Humber, Aecom (March 2011) and Renewable and Low Carbon Energy Study, Maslen (September 2010) which consider the potential for different types of renewable and low carbon technologies across Kirklees. The revised Local Plan includes maps developed from its evidence base considering landscape sensitivity which identify the suitability of areas for different scales of turbine.			
11.13 DLP_SP501, DLP_SP609, DLP_SP1131 As well as the commissioned reports there is also the South Pennines Wind Energy Database which shows the location and density of turbines in the South Pennines area - http://www.lucmaps.co.uk/SPWED/mainmenu.html However for database to be of use to developers, planners and communities it needs to be kept up to date. KMC need to play their part in maintaining and updating this valuable source of information.	Support	Conditional Support	Object 3	No Comment
The council's landscape evidence is not appropriate for judging renewable energy developments against.	No change. The council are members of the group of authorities who commissioned this work, and provide updates when new information has been collected. No change. The policy is supported by a comprehensive landscape assessment evidence base comprising of; South Pennines Wind Energy Landscape Study, Julie Martin Associates and LUC (October 2014), Landscape Guidance for Wind Turbines up to 60m high in the South and West Pennines, Julie Martin Associates (January 2013) and the Kirklees District Landscape Character Assessment, LUC (April 2015).			
11.14 DLP_SP1125, DLP_SP1598 We note that the potential for establishing District Heat Networks has been explored in Huddersfield, and recommend that the findings from these studies be applied in all new developments over 20 units across the district where it is proposed to build.	Support	Conditional Support	Object 2	No Comment
11.15 DLP_SP502, DLP_SP610, DLP_SP1557 This Local Plan should consider the cumulative impacts of wind turbines. There are areas of the District where development opportunities for turbines are more likely to be treated more favourably than others. The need to consult local communities and individuals who are affected by proposals has been overlooked.	Support	Conditional Support	Object 3	No Comment
	No change. The policy is supported by the South Pennines Wind Energy Landscape Study, Julie Martin Associates and LUC (October 2014) which considers the cumulative and cross border impacts of wind turbines. This assessment is on-going through the South Pennines Wind Energy Database which shows the location and density of turbines in the South Pennines area - http://www.lucmaps.co.uk/SPWED/mainmenu.html . No change. The Draft Local Plan had gone through a public consultation process which meets national policy requirement. Any future planning application for renewable and low carbon developments will be required to meet the council's Statement of Community Involvement and relevant national requirements.			

Summary of comments	Council Response			
In determining those areas where renewable energy developments might be appropriate, consideration should also be given to the Castle Hill Setting Study.	Proposed Change			
	Consideration of the Castle Hill Setting Study has been undertaken and the Study has been referenced in the policy's supporting text.			
11.16	Support	Conditional Support	Object 3	No Comment
DLP_SP503, DLP_SP611, DLP_SP1132				
The policy must be strengthened to ensure that the community is in agreement and their human rights are protected.	No change.			
	It is considered that the policy is consistent with National Policy as set out in the NPPF.			
The policy is too restrictive and unlikely to allow for significant carbon reduction.	No change.			
	It is considered that the policy is consistent with National Policy as set out in the NPPF.			
Option DLP27 11.1.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
Option DLP27 11.1.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
Water management	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 28	Support 4	Conditional Support 5	Object 3	No Comment
DLP_SP326, DLP_SP612, DLP_SP858, DLP_SP1082, DLP_SP1136, DLP_SP1289, DLP_SP1448, DLP_SP1600, DLP_SP1637, DLP_SP1712, DLP_SP1835, DLP_SP1903				
The control of two invasive plants Himalayan Balsam and Japanese Knotweed requires more robust policies.	No change.			
	Issues such as invasive plants will be covered by the local plan contaminated land policy.			
The whole of Kirklees should not be the starting point for the application of the flood risk sequential test.	No change.			
	The Kirklees district area will continue to be the starting point for the application of the flood risk sequential test but where an applicant provides evidence to justify a smaller area of search, this will be assessed by the council through the planning applications process.			
Avoid building on sites at risk of flooding altogether, especially the floodplain.	No change.			
	National planning policy sets out restrictions relating to the functional floodplain. The local plan policy aims to avoid inappropriate development in flood risk areas by applying the sequential test as set out in national planning policy and the exception test where applicable. Even proposals which pass the sequential test would still need to meet the other requirements of this policy where applicable.			
Natural flood risk management methods should be considered. There should be a robust tree planting policy that promotes tree planting on high ground to promote carbon and water absorption and also riverside planting to help deal with flooding.	Proposed change.			
	Policy amended and a paragraph added to the justification text to incorporate reference to support for targeted vegetation planting to be carried out to in upper catchments and along river banks where appropriate and consistent with other policies.			
Support for protection of culverts but do the council have sufficient records of culverts to implement the policy?	No change.			
	The Local Flood Risk Management Strategy for Kirklees sets out recording of systems as a key objective. A more detailed database has been developed, historical surveys and other information sources have been used and culvert survey work undertaken. This work is regarded as a process for continuous improvement and is therefore ongoing.			

Summary of comments

Need to reflect that flood risk does not just affect low lying areas. Risk from surface water flooding, streams, underground streams and dikes which are harder to assess. Surface water flood risk often lacks information. Building on hillsides will make the problems worse.

We have worked closely with the LPA on the drafting of this policy and we are satisfied with the contents. We particularly support the focus afforded by this policy on the sequential approach (Environment Agency).

Policy fails to take account of situations where the developer can successfully challenge the Environment Agency Flood Map.

Support for the policy.

Officer change

Difficult to assess risk over the lifetime of a development taking into account climate change. Do the council need to determine applications on the basis of these estimates?

Policy is currently inadequate. Flood risk assessments are a tick box exercise. Flood defences should also be required in medium and low risk areas. Also, change policy wording to all proposals must include flood mitigation measures.

Council Response

Proposed change.

Supporting text amended to clarify that the site specific flood risk assessment needs to take account of all sources of flooding as set out in the policy.

No change.

Comment noted.

No change.

This is part of accepted practice and any changes to the Environment Agency Flood Map would be taken into account in making decisions on planning applications and in future revisions of the Strategic Flood Risk Assessment (SFRA).

No change.

Comment noted.

Proposed change.

Minor amendment to improve the clarity of the policy wording in relation to the sequential test in the first paragraph of this policy.

No change.

The council need to assess planning applications based on the available information which includes considering climate change assumptions to assess whether developments will be safe over the lifetime of the development.

No change.

The approach taken is consistent with national planning policy and aims to direct development to the areas of lowest probability of flooding. The site specific flood risk assessment will determine the flood mitigation measures required to ensure proposals are safe for the lifetime of the development. Flood defences or mitigation measures may not be needed in many locations in Kirklees therefore a blanket approach would not be appropriate.

11.17	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
11.18	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
11.19	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
11.20	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
11.21	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
11.22	Support	Conditional Support	Object	No Comment

Summary of comments	Council Response			
No comments were received on this part of the plan.	No change.			
11.23	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Officer change.	Proposed change.			
	Amendment of wording to state that 'compensatory storage' will be required from certain sites rather than 'flood attenuation measures'			
11.24	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
11.25	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	Proposed change.			
	Clarification of justification text added in relation to surface water flood risk for lower lying areas to reflect comments made on the policy wording.			
11.26	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	Proposed change.			
	Clarification added that all sources of flooding need to be considered to reflect comments made on the policy wording.			
11.27	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
11.28	Support	Conditional Support	Object	No Comment
Officer change.	Proposed change.			
	An additional paragraph has been added to refer to wider catchment management including reference to vegetation planting.			
No comments were received on this part of the plan.	No change.			
11.29	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP28 11.2.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP28 11.2.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP28 11.2.3	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			

Summary of comments	Council Response			
Policy DLP 29	Support 5	Conditional Support 5	Object 6	No Comment
DLP_SP25, DLP_SP123, DLP_SP256, DLP_SP295, DLP_SP429, DLP_SP613, DLP_SP821, DLP_SP1083, DLP_SP1449, DLP_SP1483, DLP_SP1601, DLP_SP1638, DLP_SP1694, DLP_SP1713, DLP_SP1836, DLP_SP1904				
Policies do not seem to cover any overhaul of the drainage system.	No change.			
				The policy applies to new development proposals but ensures existing drainage issues such as critical drainage areas are considered in the management of surface water from new sites.
Criterion c) identifies the requirement for improvements in water quality to be achieved through SuDS. Dry detention storage basins used mostly by developers are the least effective at improving water quality. Difficulties in Yorkshire Water adopting other solutions. Policy should be applied flexibly until an alternative adoption solution is provided by the council.	Proposed change.			
Yorkshire Water welcomes and fully supports proposed policy. The policy promotes sustainable surface water management practice and allows Yorkshire Water and developers to align provision of additional waste water infrastructure with new development, particularly the proposed large housing sites. Yorkshire Water supports the surface water disposal hierarchy. Developers will be asked to provide evidence to demonstrate that surface water disposal via infiltration or watercourse are not reasonably practical on a site before considering disposal to public sewer. Yorkshire Water).	No change.			
We are pleased to see that the potential water quality benefits of using SuDS are referred to here, and that there is an intention to improve water quality in line with the aims and objectives of the Water Framework Directive (WFD) and the Humber River Basin Management Plan (RBMP) (Environment Agency)	No change.			
We are pleased to see that this policy promotes the use of SuDS in effectively managing surface water. We also support the intention of the policy to ensure that development will only be permitted where appropriate water supply and wastewater infrastructure demand planning has been undertaken (Environment Agency)	No change.			
Natural England notes the promotion of sustainable drainage systems in this policy and welcomes recognition of the link with strategic objectives to protect and enhance the natural environment. Need to consider reference to the potential role of sustainable drainage systems in the green infrastructure network.	Proposed change.			
The control of two invasive plants Himalayan Balsam and Japanese Knotweed requires more robust policies.	No change.			Issues such as invasive plants will be covered by the local plan contaminated land policy.
Proposed use of SUDS within developments welcomed and advise that SUDS are managed to support wildlife, which could increase the biodiversity value of the area, in accordance with NPPF (Yorkshire Wildlife Trust).	No change.			Support noted. It is acknowledged that SuDs may have benefits to biodiversity.
The final sentence of this policy is inappropriate as it ignores statutory responsibilities (outside of the planning process) and shifts responsibilities to developers for issues which are out of their control. This part of the policy should be deleted or applied flexibly in practice.	No change.			The aim of the policy is to ensure that adequate connections can be made to serve the development. The requirement is to demonstrate that such water supply and waste water connections are available but is not intended to impact on other regulatory responsibilities which may exist to provide such infrastructure.
The policy identifies general presumption against pumping surface water. Our comments above in respect of adoption are again relevant here. In addition Surface Water pumping could more easily be avoided if alternative SuDS methods were identified to ensure that adoption wasn't prejudiced.	No change.			Comment noted. As set out in the justification text for the policy, if there is mechanical failure of water pumps this could cause flooding therefore the policy intentions are reasonable.
Criterion d) identifies the requirement to ensure that proposed open spaces within sites contribute towards SuDS. In order for this policy to work in practice the Council need to clarify what would be accepted as public open space where SuDS are employed. Unaware of any identified solutions to adhere to in practice.	Proposed change.			Policy wording amended to reflect the consideration of proposed open spaces to assist with sustainable drainage of sites. There is the potential for SuDS to be maintained privately through agreements as part of the planning process.

Summary of comments

How will the criteria in the policy work in practice? Overall desire for the Council to work with developer's flexibility in respect of the drainage matters associated with future developments.

Council Response

Proposed change.

Minor changes to the wording to add clarity. Planning applications will be assessed to determine whether the policy criteria have been met.

Need reassurances and action to deal with flood risk issues and disposal of sewage from additional housing and existing issues. Run-off from green fields is considerably less than run-off from developments.

No change.

This policy sets out the acceptable run-off rates for greenfield and brownfield sites and should be read with other local plan policies relating to flood risk, water bodies and water quality. The infrastructure delivery plan also sets out current infrastructure and future requirements. Yorkshire Water have also been consulted on the proposals.

Concern that there may not be enough detailed information available on sites to make the policy work. The councils Surface Water Management Plan is incomplete and catchment area surveys are required.

No change

The drainage policy sets out acceptable run-off rates and the flood management team will undertake an assessment of planning applications on this basis.

The planting, protection and replacement of trees is advocated for the mitigation of climate change and flood prevention.

No change.

Planting of upland vegetation to reduce flood risk has been added as an amendment to the local plan flood risk policy.

11.30

Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change.

11.31

Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change.

11.32

Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change.

11.33

Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change.

11.34

Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

Proposed change.

Further clarity added to reflect comments on the policy about the role of open spaces in sustainable drainage.

11.35

Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change.

11.36

DLP_SP204

Support	Conditional Support 1	Object	No Comment
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Run-off from greenfields is less than run-off from developments, putting households in the river valley at risk.

No change.

The policy seeks to ensure that greenfield run-off rates are maintained following development of greenfield sites.

11.37

Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change.

Summary of comments	Council Response			
11.38	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP29 11.2.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP29 11.2.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Policy DLP 30 DLP_SP504, DLP_SP614, DLP_SP1695	Support	Conditional Support 3	Object	No Comment
Amend policy to include protection of existing waterways. The effects of altering such resources are hard to predict and given the cited climate change any alteration to these ancient waterways could have a serious impact on housing and businesses.	No change.			
	The local plan flood risk policy sets out the policy basis for assessing proposals affecting culverts or the canalisation watercourses.			
Policy suggests that balancing ponds between 500 - 25,000 m3 fall under the remit of the policy. Re-consult with Lead Local Flood Authority to see whether clarification to the wording is required to avoid conflict with effective surface water management particularly if smaller water bodies eventually fall under the Reservoirs Act (Yorkshire Water).	No change.			
	The policy aims to work with owners when opportunities arise through the planning process to accommodate, integrate and retain ponds in the development proposal where possible. There is no known conflict between this policy and effective surface water management.			
The policy rightly excludes reservoirs over 25,000 cubic metres because these are controlled under the Reservoirs Act 1995 (Yorkshire Water).	No change.			
	The policy recognises that there is a legal regulatory process for reservoirs over 25,000 cubic metres.			
Policy supported.	No change.			
	Noted.			
11.39	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	Proposed change.			
	Reservoir Act date added to paragraph.			
11.40	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
11.41 DLP_SP203, DLP_SP505, DLP_SP616, DLP_SP1714	Support 2	Conditional Support 1	Object 1	No Comment
Recommend insert the following text after the first sentence; Unless there is evidence to show that it is conflict with achieving progress under the Water Framework Directive (Policy DLP35 Sect 2) as there may be circumstances where the removal of an artificially created water body would provide environmental benefits under the WFD. (Environment Agency).	Proposed change.			
	The justification text has been amended to ensure that potential conflicts with the Water Framework Directive are taken into account.			
Support for policy	No change.			
	Comment noted.			
Increase in population will increase the need to supply water but no plans for a new reservoir.	No change.			
	The local plan drainage policy sets out that development will only be permitted if it can be demonstrated that			

Summary of comments	Council Response			
	the water supply and waste water infrastructure required is available or can be co-ordinated to meet the demand demonstrated by new development. The provision of new water supply infrastructure is an issue for the Infrastructure Delivery Plan.			
11.42 DLP_SP506, DLP_SP615	Support 2	Conditional Support	Object	No Comment
Policy supported.	No change.			
	Comment noted. Site specific comments to be addressed on individual sites.			
11.43	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
11.44	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP30 11.2.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Natural environment	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
12.1 DLP_SP104	Support	Conditional Support	Object 1	No Comment
Concerns that non native species in Holmfirth are not being removed.	No change.			
	The removal of non native species, assuming they are listed under schedule 9 of the Wildlife & Countryside Act 1981, is the responsibility of land owners and the removal of specific areas is outside the remit of the local plan.			
12.2 DLP_SP327, DLP_SP1014, DLP_SP1048	Support	Conditional Support	Object 3	No Comment
Habitat Regulation Assessment - Paragraph 1.27 fails to mention the Peak District National Park (South Pennines SPA Phase 1) and the cross boundary impacts between Kirklees and the Peak Park Authority in the Colne and Holme Valleys. Concerns the plan as a whole does not place sufficient emphasis on protecting the two core Pennine SPAs and the adjacent areas in the Colne and Holme Valleys, which have an impact on the landscape and habitats of the core areas. Protection of both the core and non-core areas is a central element of the IMSACAP Programme but there is no mention in the plan of the IMSACAP programme or SCOSPA.	No Change			
	However text added to former paragraph 1.27 to clarify the SPAs included within Kirklees.			
	In addition see the comments section in the HRA document.			
	A change is also proposed to the Biodiversity and Geodiversity policy wording to clarify that statutory designated sites, including the South Pennine Moors SPA/SAC, are already highly protected through existing laws and legislation and the Council will seek to ensure that harmful effects as a result of development are avoided:			
Kirklees could take a more positive role in influencing the management of its portion of the SAC rather than just recognising its existence. Adding its weight behind the work underway by Moors for the Future with a more active statement aiming for restoration of degraded moorland and an improvement of the natural capital which supports man requirements.	No change.			
	Kirklees Planning Authority has undertaken a Habitats Regulation Assessment of the Local Plan. It is considered that the on-going management of the SAC is most appropriately dealt with through specific management plans and not the local plan.			
12.3	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			

Summary of comments	Council Response			
12.4	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
12.5	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.6 DLP_SP732	Support 1	Conditional Support	Object	No Comment
Support for the approach.	No change.			
	Support welcome.			
Biodiversity & geodiversity	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 31	Support 4	Conditional Support 4	Object 7	No Comment 1
DLP_SP178, DLP_SP508, DLP_SP717, DLP_SP822, DLP_SP823, DLP_SP824, DLP_SP846, DLP_SP1008, DLP_SP1142, DLP_SP1159, DLP_SP1277, DLP_SP1450, DLP_SP1474, DLP_SP1484, DLP_SP1602, DLP_SP1715				
Concerns that changes to the Common Agricultural Policy will take away the incentive to less productive landowners and incentives for biodiversity, habitat conservation and forestry will lead to land use change in the Home Valley. Semi-natural forestry may expand in the valley , e.g. for wood fuel. Any changes, including climate, will impact on ecology and will demand care in planning, design, monitoring and conservation of critical habitats.	No change.			
	The policy seeks to ensure that the protection of biodiversity is fully considered as part of the planning process.			
May not be legally compliant in relation to Habitats Regulations	No change.			
The issue of avoidance and mitigation of impacts on the South Pennine Moors SPA/SAC has been a major reason for proposed main modifications to the Bradford Core Strategy. In particular, MM28 of that Strategy establishes an up-to-date zoning approach that is deemed to be compliant with the Habitats Regulations.	However the supporting text has been revised to clarify the HRA approach. See comments on the HRA document for further detail.			
By contrast, DLP31 is generalised and only makes passing reference to the Habitats Directive. Considering the importance of the South Pennine Moors to the biodiversity and landscape assets of Kirklees, this is not a robust approach, and a more prescriptive policy should be added along the lines of Bradford's MM28.				
Amend policy wording to include ecological compensation, as in accordance with the mitigation hierarchy and paragraph 118 of the NPPF, which states that where ecological impacts cannot be avoided or mitigated for they should be compensated. Suggested wording "Exceptionally, development will be allowed where the benefits of the development clearly outweigh the impacts on the site's special conservation features and measures are provided to mitigate and/ or compensate harmful impacts".	Change.			
	Proposed change to policy wording to incorporate the mitigation hierarchy as set out in NPPF paragraph 118.			
Amend policy wording to reflect paragraph 9 of the NPPF which states that sustainable development should seek improvements in the natural environment by moving from a net loss of bio-diversity to achieving net gains for nature.	Proposed change to policy wording to ensure development proposals avoid significant loss or harm to biodiversity in Kirklees through the mitigation hierarchy as set out in NPPF (paragraph 118) and inclusion requirement for net biodiversity gains through good design.			
Concern that the Sustainability Appraisal report found that the effect on biodiversity was uncertain but possible due to the large amount of residential and employment development (1.169). The Sustainability Appraisal also found that the DLP was considered to have a significant negative effect on the efficient use of land [1.157], as most of the allocated sites are on greenfield land and this will impact on opportunities for local food growing.	No change.			
	Comments noted. See the council's response to comments on the Sustainability Appraisal.			
Protection of local flora and fauna should be of vital importance to the Kirklees plan. Consideration of	Change.			
	Proposed change to policy wording to clarify that development proposals should minimise impact on			

Summary of comments

wildlife corridors and enhancing wild spaces should be factored into all planning decisions. All new developments should seek to minimise impact on biodiversity and provide net gains, where possible.

More careful consideration could be given to the protection of permanent surface water features, including small streams/flushes, and valuable stream corridors linking green spaces throughout Kirklees.

Welcomes the policy as broadly in line with national policy. Components of ecological networks, including international, national and locally designated sites of importance for biodiversity have been mapped in line with NPPF paragraph 117 along with the Green Infrastructure Network. The policy distinguishes between the hierarchy of designated sites and encourages the incorporation and enhancement of biodiversity and geodiversity in development. Particularly welcome the link made between planning proposals and their contribution to planning for biodiversity at the landscape-scale through the protection and enhancement of the functional Wildlife Habitat Network and the identification of Biodiversity Opportunity Zones (Natural England).

Support for the inclusion of this policy, particularly the focus on biodiversity enhancement (The Environment Agency).

Support for protection of areas recognised as the Wildlife Habitat Network and for protection given to the biodiversity and geodiversity in the district and the intentions of the policy.

The policy should explain how biodiversity and geodiversity are key components of a high quality healthy natural environment that provides a range of services to local communities and contributes to people's well-being.

The protection afforded to nationally important sites designated as SSSI under DLP 31 does not seem as strong as that afforded to Local Wildlife Sites. Explicit reference should be given to over-riding public interest as well exceptional circumstances in the reference to SSSI. The reference to protection under paragraph 12.15 does not reflect that provided in DLP 31.

Concerns that ME1965 is being supported by the Sustainability Appraisal.

Council Response

biodiversity and provide net gains in biodiversity through good design:

"Development proposals will be required to:-

- (i) avoid significant loss or harm to biodiversity in Kirklees through protection, mitigation and compensatory measures secured through the establishment of a legally binding agreement;
- (ii) minimise impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist;
- (iii) safeguard and enhance the function and connectivity of the Kirklees Wildlife Habitat Network at a local and wider landscape-scale unless the loss of the site and its functional role within the network can be fully maintained or compensated for in the long term;
- (iv) establish additional ecological links to the Kirklees Wildlife Habitat Network where opportunities exist; and
- (v) incorporate biodiversity enhancement measures to reflect the priority habitats and species identified for the relevant Kirklees Biodiversity Opportunity Zone."

No change.

Issues regarding water courses and restriction on culverting are adequately covered in the Conserving and Enhancing the Water Environment and Water Management policies.

The importance of protecting and enhancing green corridors and linkages is recognised through the identification of the Kirklees Wildlife Habitat Network and Strategic Green Infrastructure Networks in the Plan, as well as related policies concerning Biodiversity and Geodiversity, Strategic Green Infrastructure and the Core Walking and Cycling Network.

No change.

Support welcome.

No change to the policy wording. However, proposed change to justification text to recognise the importance of biodiversity and geodiversity to people and their well-being:-

"Biodiversity and geodiversity are important components of a high quality natural environment which help strengthen the connection between people and nature and contribute to health and well-being."

Proposed Change.

Proposed change to policy wording to clarify that statutory designated sites are already highly protected through existing laws and legislation and the Council will seek to ensure that harmful effects as a result of development are avoided:

"Statutory designated sites, including the South Pennine Moors Special Protection Area (SPA) and Special Area for Conservation (SAC) and Sites of Special Scientific Interest, are already highly protected through existing laws and legislation. In accordance with legislation, the Council will seek to ensure that harmful impacts to these areas as a result of development proposals are avoided.

Development proposed within or outside a designated Site of Special Scientific Interest, likely to have an adverse effect on the site's special nature conservation features, will not normally be permitted. Exceptionally development will be allowed where the benefits of the development clearly outweigh the impacts on the site's special conservation features and measures are provided to mitigate harmful impacts."

Comment noted.

Summary of comments

Concern that great numbers of flora and fauna have been disturbed far too much already and that more thought and care should be given to protected species and their habitats.

Support for strong protection given to ancient semi natural woodland and ancient/veteran trees. Would prefer the wording to read that these habitats should be protected from development other than in the most exceptional circumstances. This change was suggested to the NPPF policy 118 by the CLG Select Committee.

Concern that the Sustainability Appraisal report found that the effect on biodiversity was uncertain but possible due to the large amount of residential and employment development.

Protection of our local flora and fauna should be of vital importance to the Kirklees plan. Consideration of wildlife corridors and enhancing wild spaces should be factored into all planning decisions. All new developments should seek to minimise impact on biodiversity and provide net gains, where possible.

The council should work with the Local Nature Partnership and existing projects and programmes on the approach to habitat enhancement and connectivity in line with paragraph 117 of the NPPF . This should include the Dark Peak Nature Improvement Area (NIA) and the Twite Recovery Project (Natural England).

Local Plans should support Nature Improvement Areas (NIA) where they have been identified and would like to see support for the objectives of the Dark Peak NIA in the Plan and where appropriate specify the types of development that are appropriate in the NIA, where it overlaps with Kirklees, in line with paragraph 117 of the NPPF (Natural England).

12.7

No comments were received on this part of the Plan.

12.8

No comments were received on this part of the Plan.

12.9

DLP_SP403

Officer proposed amendment

The importance of the peat moorlands, within and without the South Pennine Moors, to maintain water quality, regulate water run-off to help reduce flooding and act as a carbon sink to help mitigate climate

Council Response

See option ME1965.

No change.

A number of species and habitats are protected in England through existing legislation, the penalties for which are set out in the same legislation. The Biodiversity and Geodiversity policy seeks to protect other species not necessarily highly protected by law when determining planning applications. The policy also protects certain habitats outside of designated sites.

No change. Support welcome.

The policy already adequately protects woodland and veteran trees in accordance with NPPF.

No change. The policy seeks to ensure that biodiversity is fully considered at all stages of the planning process. See council's response to comments on the Sustainability Appraisal.

Change.

Proposed change to policy wording to clarify that development proposals should avoid significant loss or harm to biodiversity in Kirklees and inclusion of the requirement for net biodiversity gains through good design.

The Design policy also seeks to ensure that new development proposals contribute towards the enhancement of the natural environment, supports biodiversity and connects to and enhances ecological networks.

Proposed Change.

Proposed change to policy wording to recognise the Dark Peak Nature Improvement Area:-
"The Dark Peak Nature Improvement Area

Proposals that contribute to the aims and objectives of the Dark Peak Nature Improvement Area will in principle be supported, subject to other policies in this plan. Development likely to have an adverse impact on the aims and objectives of the NIA will not be permitted."

A change is also proposed to the Delivery and Implementation section to recognise that the council will support the work of the Yorkshire West Local Nature in protecting to protect and improve the natural environment:
"The policy will be implemented through the development management process, council policies and plans and delivered through a wide range of public and private sector organisations, community groups and volunteers. The council will assist the implementation of the work of the Yorkshire West Local Nature Partnership in supporting their principles and priorities to protect and improve the natural environment in the area."

Support	Conditional Support	Object	No Comment
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No change.

Support	Conditional Support	Object	No Comment
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No change.

Support	Conditional Support	Object 1	No Comment
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Proposed Change

Additional wording added to explain HRA approach.

No change to paragraph.

Summary of comments	Council Response			
change is not mentioned.	However, the flood risk policy has been amended to be supportive of the management of upper catchments to reduce flood risk and improve water quality.			
12.10	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.11	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.12 DLP_SP1590	Support 1	Conditional Support	Object	No Comment
Support for designation of the Wildlife Habitat Network and green belt in the Grimescar Valley.	No change.			
	Support noted.			
Proposed officer change to include additional text to clarify development requirements within and adjacent to the Wildlife Habitat Network.	Proposed change. Additional text to be included in the paragraph to clarify development requirements within and adjacent to the Wildlife Habitat Network: "The Wildlife Habitat Network forms the basis for increasing the robustness and inter-connectivity of ecological corridors. Development proposals within and adjacent to the Wildlife Habitat Network should be considered as opportunities to enhance and expand its functionality."			
12.13	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.14	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.15 DLP_SP716	Support	Conditional Support	Object 1	No Comment
The protection in the paragraph does not seem consistent with the policy which refers to overriding public interest.	No change. However, proposed change to the Biodiversity and Geodiversity policy to clarify that statutory designated sites are already highly protected through existing laws and legislation:- "Statutory designated sites, including the South Pennine Moors Special Protection Area (SPA) and Special Area for Conservation (SAC) and Sites of Special Scientific Interest are already highly protected through existing laws and legislation. In accordance with legislation, the Council will seek to ensure that negative impacts to these areas as a result of development are avoided. Development proposed within or outside a designated Site of Special Scientific Interest, likely to have an adverse effect on the site's special conservation features, will not normally be permitted."			
12.16	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	Proposed change No comments were received on this part of the Plan. However, changes are required to clarify the purpose of the Kirklees Biodiversity Opportunity Zones and the type of zones Proposed Change:- "he council has identified a series of Biodiversity Opportunity Zones across Kirklees, which reflect the habitats found in these areas. These are shown on the Biodiversity Opportunity Zones Map and include the uplands; mid-altitudinal grasslands; valley slopes; floodplain and riverine corridors; the Pennine foothills and urban			

Summary of comments

Council Response

	Council Response
12.17	<p>Support Conditional Support Object No Comment</p>
<p>No comments were received on this part of the Plan.</p>	<p>proposed change.</p> <p>No comments were received on this part of the Plan. However, changes to the text are proposed to reflect changes to the Biodiversity and Geodiversity policy and set out the requirements for development proposals.</p> <p>Proposed change:- "All development in Kirklees, as set out in national policy and the policies described in this document, will be expected to avoid significant loss or harm to biodiversity through protection, mitigation and compensatory measures and seek opportunities to enhance biodiversity value and ecological links. Opportunities to achieve net gains in biodiversity within development proposals will be sought through good design, including specific habitat creation and biodiversity enhancements. Regard will need to be given to the relevant Biodiversity Opportunity Zone in which the proposed development is located and biodiversity enhancement measures will be sought which reflect the priority habitats and species identified for each zone. The purpose of the Biodiversity Opportunity Zones and associated tables of species is to guide developers in providing appropriate compensation and enhancements of maximum benefit for nature conservation. In order to safeguard and enhance the function and connectivity of the Kirklees Wildlife Habitat Network, the council will also seek to ensure that development proposals do not result in the fragmentation of the network and provide improved ecological links, particularly to the Kirklees Wildlife Habitat Network, where opportunities exist."</p>
12.18	<p>Support Conditional Support Object No Comment</p>
<p>No comments were received on this part of the Plan.</p>	<p>No change.</p>
Option DLP31 12.1.1	<p>Support Conditional Support Object No Comment</p>
<p>No comments received on this part of the Plan.</p>	
Strategic green infrastructure	<p>Support Conditional Support Object No Comment</p>
<p>No comments received on this part of the Plan.</p>	
Policy DLP 32	<p>Support 3 Conditional Support 2 Object 8 No Comment</p>
<p>DLP_SP239, DLP_SP352, DLP_SP622, DLP_SP825, DLP_SP847, DLP_SP848, DLP_SP1144, DLP_SP1160, DLP_SP1161, DLP_SP1451, DLP_SP1485, DLP_SP1554, DLP_SP1603</p> <p>The Wildlife Habitat Network in Kirklees is much less extensive along the border with Wakefield than the equivalent designation in Wakefield. The two networks do link in places but Wakefield considers further assessment is undertaken to see if more linkages and enhancements can be made across the boundary between the two WHNs (Wakefield Council).</p>	<p>No change to the policy wording.</p> <p>However, minor changes proposed to the identified Kirklees Wildlife Habitat Network to ensure better cross boundary linkages with Wakefield's Wildlife Habitat Network.</p> <p>The Kirklees Wildlife Habitat Network has been identified by West Yorkshire Ecology using a comprehensive and robust methodology which takes into account spatial data from Natural England's Priority Habitats Inventory, designated site data and other ecological data. This is a refined approach which allows the identification of specific areas of woodland, grassland, heathland, wetland and other areas, with the potential to links with designated sites.</p>
<p>Concern that the Sustainability Appraisal report found that the effect on biodiversity was uncertain but possible due to the large amount of residential and employment development (1.169).</p> <p>The Sustainability Appraisal found that the DLP was considered to have a significant negative effect on the efficient use of land [1.157], as most of the allocated sites are on greenfield land and this will impact on opportunities for local food growing.</p>	<p>No Change</p> <p>Comments noted. See the council's response to comments on the Sustainability Appraisal.</p>
<p>Protection of local flora and fauna should be of vital importance to the Kirklees plan. Consideration of</p>	<p>Proposed Change.</p>

Summary of comments

wildlife corridors and enhancing wild spaces should be factored into all planning decisions. All new developments should seek to minimise impact on biodiversity and provide net gains, where possible.

May not be legally compliant in relation to Habitats Regulations

The issue of avoidance and mitigation of impacts on the South Pennine Moors SPA/SAC has been a major reason for proposed main modifications to the Bradford Core Strategy. In particular, MM28 of that Strategy establishes an up-to-date zoning approach that is deemed to be compliant with the Habitats Regulations.

By contrast, DLP31 is generalised and only makes passing reference to the Habitats Directive. Considering the importance of the South Pennine Moors to the biodiversity and landscape assets of Kirklees, this is not a robust approach, and a more prescriptive policy should be added along the lines of Bradford's MM28.

Support for Strategic Green Infrastructure section.

Support for the inclusion of the canal network within the strategic green infrastructure network and welcomes the proposal to enhance this network (The Canal and River Trust).

Welcomes the policy, the mapping of strategic Green Infrastructure Networks and the integrated approach to green infrastructure across the plan including references to green infrastructure in the vision, DLP4 requirements for masterplans; DLP24 Access and with regards to sustainable drainage schemes in paragraph 11.34 of the plan (Natural England).

Stronger commitment required in the policy to the creation of new green infrastructure in association with new development and in particular natural greenspace, woodland and street trees. Favour the use of access standards, such as the Woodland Trust's 'Access to Woodland Standard', to help determine how much new woodland is required in an area.

Farnley Country Park is not referred to in the policy. It should not be included as Strategic Green Infrastructure proposal (SGI2115) on the proposals map, as its implementation is dependent on inappropriate housing development in the Green Belt which is in conflict with policy DLP 32 and other local plan policies.

Objection to the approach towards strategic green infrastructure designations and the Mirfield Promenade SGI2110. Concerns that the proposal has not been translated appropriately on to the Proposals Map as the boundary appears to dissect significantly the Dewsbury Riverside housing allocation H2089 and does not follow existing footpaths or bridleways. The evidence base for the proposal is not available, there is no justification for its designation and as such the allocation is unsound.

Advise that green infrastructure in Kirklees is designed and managed to support biodiversity to help

Council Response

Proposed change to policy wording to ensure that development proposals within the Strategic Green Infrastructure Network consider biodiversity and ecological links:-

"Development proposals within and adjacent to Strategic Green Infrastructure Networks should ensure:-
(i) the function and connectivity of green infrastructure networks and assets are retained or replaced;
(ii) new or enhanced green infrastructure is designed and integrated into the development scheme where appropriate, including natural greenspace, woodland and street trees;
(iii) the scheme integrates into existing and proposed cycling and walking routes, particularly the Core Walking and Cycling Network, by providing new connecting links where opportunities exist;
(iv) the protection and enhancement of biodiversity and ecological links, particularly within and connecting to the Kirklees Wildlife Habitat Network."

The protection and enhancement of biodiversity and wildlife corridors is also adequately covered in the Biodiversity and Geodiversity policy and a proposed change to this policy requires development proposals to minimise impact on biodiversity and provide net gains in biodiversity through good design.

No change.

However the supporting text for former DLP 31 has been revised to clarify the HRA approach. See comments on the HRA document for further detail.

No change.

Support welcome.

Proposed Change.

Proposed change to policy wording to ensure new and enhanced green infrastructure is incorporated into development proposals where opportunities exist.

The council has developed local quantity and accessibility standards for natural and semi-natural greenspace in Kirklees which will help determine the requirement for new provision, including woodland.

No change.

The Farnley Country Park proposal SGI2115 has been rejected in the publication draft Local Plan.

No Change

However proposed change to the boundary of the Mirfield Promenade Project (SGI2110) to more accurately reflect the promenade route around the Calder and Hebble Navigation canal and inclusion of Lady Wood.

Proposed Change

Summary of comments

achieve net gains for biodiversity, in accordance with Paragraph 9 of the NPPF. Developments within the strategic GI zones should incorporate biodiversity and green infrastructure into the design of schemes, which is in accordance with Policy DLP 31.

Council Response

Proposed change to policy wording as to include the protection and enhancement of biodiversity and ecological links, particularly within and connecting to the Kirklees Wildlife Habitat Network:
 "Development proposals within and adjacent to Strategic Green Infrastructure Networks should ensure:-
 (i) the function and connectivity of green infrastructure networks and assets are retained or replaced;
 (ii) new or enhanced green infrastructure is designed and integrated into the development scheme where appropriate, including natural greenspace, woodland and street trees;
 (iii) the scheme integrates into existing and proposed cycling and walking routes, particularly the Core Walking and Cycling Network, by providing new connecting links where opportunities exist;
 (iv) the protection and enhancement of biodiversity and ecological links, particularly within and connecting to the Kirklees Wildlife Habitat Network."

Objection to the lack of flexibility provided within the policy where the development of Strategic Green Infrastructure sites maybe appropriate in certain circumstances. Suggested policy wording:-

Proposed Change.

"Proposals will be required to protect Strategic Green Infrastructure unless:
 a) The benefits of the development clearly outweigh the importance of the specific Strategic Green Infrastructure interest; and
 b) The loss of the site and its functional role within the Strategic Green Infrastructure can be fully maintained or compensated for in the long term; and
 c) Compensatory measures will be secured through the establishment of a legally binding agreement"

Disagree with suggested policy wording. However, proposed change to policy wording to provide further clarity regarding the requirements of development within and adjacent Strategic Green Infrastructure networks.

12.19	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.20	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.21	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.22 DLP_SP205, DLP_SP840	Support	Conditional Support	Object 1	No Comment 1
Agreed that green infrastructure assets should be protected. In some areas, such as Mirfield, there is no extra space for building other than on these places.	No change.			
Note that Fenay Beck is designated as an area of strategic green infrastructure. Part of Fenay Beck (aka Thunderbridge Dyke) runs at the bottom of Storthes Hall Woods.	Comment noted.			
12.23	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.24	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.25	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
12.26	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan	No change			

Summary of comments	Council Response			
Option DLP32 12.2.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Landscape	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 33	Support 4	Conditional Support 1	Object 3	No Comment 1
DLP_SP431, DLP_SP509, DLP_SP623, DLP_SP826, DLP_SP1146, DLP_SP1278, DLP_SP1558, DLP_SP1604, DLP_SP1696				
Natural England welcome the inclusion of a policy on landscape and the emphasis on the protection and enhancement of landscape character informed by the Kirklees Local Landscape Character Assessment. We note the protection afforded to the Peak District National Park in line with NPPF paras 113 and 115 but advise that criterion a) is strengthened to include protection of the setting and special qualities of the National Park.	Proposed Change			
	Criterion a wording strengthened. Now reads:			
	the need to protect the setting and special qualities of the Peak District National park, views in and out of the park and views from surrounding viewpoints			
We support the policy which would ensure that the impacts of proposals on canals should be designed to take into account and seek to enhance the landscape character of the area. The canal network forms a key component of Kirklees historic urban and rural landscapes and such an approach will help to ensure that new development takes into account the landscape setting of the canals which include important heritage assets.	No Change			
	Policy Supported			
Some of the proposed developments supported by the Sustainability Appraisal are contrary to this policy. For instance ME1965, Is this because the SA was carried out without using the LDP objectives and policies as the reference points for assessment. Protection of local flora and fauna and enhancing wildlife should be factored into all decisions.	No Change			
	The sustainability appraisal undertakes an independent examination of the impacts of development. As part of the site selection appraisal methodology consideration was given to whether issues could be mitigated against prior to a decision being made on the acceptability of the proposal.			
A more proactive approach is required to protect the distinctive features of what is important to the Valley in terms of visual amenity and we would like to see the Local Policies strengthened and the development of strong planning development briefs, that will promote quality development for individual sites.	No Change			
	Comments noted. Approaches to individual areas are addressed under the place shaping section of the Strategies and Policies document, chapter 5, and policies within the natural environment and historic environment seek to protect distinctive features			
We note that no consideration appears to be given to the matter of light pollution that will be caused by the development of even small housing estates on sites that are visible from other parts of the Valley.				
	Consideration to light pollution is covered under DLP 52 protection and improvement of environmental quality and DLP25 Design which seeks high standards of amenity.			
We seek to retain their distinct identities and this requires that the Valley remains a functioning economic entity. We invite Kirklees to work more closely with us and other parts of the local community to deliver the vision.				
	The vision and strategic objectives seek to ensure the local character and distinctiveness of Kirklees and its places are retained.			
Support for the policy which will help ensure development proposals take account of their landscape context. As such, the Policy will assist in the delivery of that part of the Vision and the associated Strategic Objectives relating to safeguarding the distinctive character of the plan area.	No Change			
	Policy support noted.			
Yorkshire Water welcomes and fully supports Policy DLP33. We will continue to work with stakeholders to conserve and enhance our land-holdings within Kirklees and adjacent land within the Peak District National Park.	No Change			
	Policy Supported.			
12.27	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
12.28	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			

Summary of comments	Council Response			
12.29	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
12.30	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
Option DLP33 12.3.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
Trees	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
Policy DLP 34	Support 1	Conditional Support	Object 7	No Comment
DLP_SP328, DLP_SP510, DLP_SP849, DLP_SP1084, DLP_SP1147, DLP_SP1419, DLP_SP1605, DLP_SP1639				
Re proposed development H591 Gomersal- The whole of this area has protected/mature trees /mature large hedgerows which supports important wildlife habitat. They contribute greatly to the environment/public amenity. This development would result in loss of this green infrastructure, impacting on environment/climate change.	No Change These comments are related to a specific site. See allocations and designations document H591			
The DLP should be amended to include identification of sites for generation of renewable energy (wind, solar PV, hydro) and to reflect more ambitious climate change targets. We are concerned that the assumptions and criteria set out within DLP27, especially regarding the landscape studies used to assess wind energy projects, are too cautious when facing the challenge of climate change.	No change. The comment has been considered in reviewing DLP 27.			
Policies on trees and tree cover should have regard to the function of woodland, particularly where (coniferous) plantations and woodland is grown as a crop.	No change. The policy identifies a number of criteria to assess and protect trees as part of the development process and refers to British Standard BS 5837.			
By far the biggest opportunity for the plan is to indicate areas of priority for new Clough woodland planting which would give an excellent flood risk management opportunity in over the valley sides of the rapidly responding catchments above Marsden and Holmfirth	No Change Comments noted. These issues are adequately addressed in the Flood Risk policy DLP28.			
The replacement of trees is advocated for the mitigation of climate change and flood prevention. Local Plan needs to do more. Additional strategies suggested: Strategic tree planting to improve the ability of the flood plain to do its job. Consideration should be given to the use of trees as flood prevention in rural areas where hillsides are covered in ungrazed grass.	Proposed Change Change to the policy wording: Where tree loss is deemed to be acceptable, developers will be required to submit a detailed mitigation scheme.			
We would like to see this policy promote planting of new trees wherever possible both in new development and in existing housing and commercial and industrial areas. Where street trees have to be removed, we would like to see them replaced on a two for one basis, so as to ensure that over time the population of trees is maintained and increased.				
We work in partnership with the White Rose Forest and the Yorkshire West LNP in delivering new planting initiatives through projects such as Tree for Yorkshire and it might be useful to reference such projects in this policy.				
DLP34 is supported. However some of the proposed developments supported by the Sustainability Appraisal are contrary to this policy, For instance ME1965 which propose the loss of the Round Wood and impacts on Rusby Wood. Is this because the SA was carried out without using the LDP objectives and policies as the reference points for assessment. If they had been used then ME1965 would have been rejected.	No Change Policy Supported. For site specific comments see the allocations and designations document ME1965			

Summary of comments	Council Response			
12.31	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
12.32	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
12.33	Support	Conditional Support	Object	No Comment
No Comments were received on this part of the plan	No Change			
12.34	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	Officer Proposed Change			
	Insert additional paragraph to reference woodlands within the Local Plan.			
	Now reads: 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 or 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.			
Option DLP34 12.4.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
Conserving and enhancing the water environment	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 35	Support 4	Conditional Support 4	Object	No Comment
DLP_SP511, DLP_SP827, DLP_SP850, DLP_SP1149, DLP_SP1486, DLP_SP1607, DLP_SP1697, DLP_SP1716				
Need to take account of the update to the Humber River Basin Management Plan (Environment Agency)	Proposed change.			
	The detailed Water Framework Directive (WFD) information has been removed from the justification text. The text now instead refers the reader to the latest WFD document.			
Point 4 of the policy should refer to the consideration of water availability from surface water and groundwater sources. Abstraction Licensing Strategies provide information relating to this.	Proposed change.			
	Additional text added to the policy and justification refer to water availability from surface water and groundwater sources.			
Amend point 1 to refer specifically to groundwater: 'Do not result in the deterioration of watercourses or water bodies (including groundwater) and conserve and enhance:' (Environment Agency)	Proposed change.			
	Policy amended to refer specifically to groundwater			
Amend policy to state: "Manage water demand and improve water efficiency through appropriate water conservation techniques, including installation of water saving toilets and fittings, rainwater harvesting and grey-water recycling".	No change.			
	The policy refers to appropriate water conservation techniques and the provides some examples. This list is not meant to be exhaustive.			
Amend point 5 to reflect that SuDS are not always appropriate: 'Improve water quality through the incorporation of appropriately constructed and maintained Sustainable Drainage Systems and surface	Proposed change.			

Summary of comments

water management techniques taking into consideration the sensitivity of groundwater as relevant.' (Environment Agency)

- General support for policy and need to make sure site allocations adhere to the policy.
- Support for policy from Yorkshire Wildlife Trust - they advise that SuDS are managed to support biodiversity.
- Support for Criterion 1c of this policy which promotes the conservation and enhancement of ecological value of the water environment, including the functionality of habitat networks (Natural England).
- Pleased to see the commitment to protect the quality and quantity of water resources and the inclusion of a policy which connects with the WFD requirements (Environment Agency).
- Policy considered to be compliant with both NPPF and NPPG as well as the Water Framework Directive (Yorkshire Water).
- Support for water demand management and water use efficiency.

Policy could refer to the important role which trees and woods can play in both the management of water quality and alleviation of flooding if planted in appropriate locations (Woodland Trust).

Council Response

Policy amended to include the text proposed.

No change.

Support noted.

Proposed change.

Additional information added to policy justification text in relation to the role of trees.

12.35	Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change.

12.36	Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change.

12.37	Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change.

12.38	Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

Proposed change.

The Water Framework Directive tables showing the status of Kirklees watercourses have been removed from the document. This table represented a point in time and will change over the plan period. It has therefore been removed and reference made to the Humber River Basin Management Plan as the source of the most up to date information in relation to ecological and chemical quality.

Table 7 DLP_SP1848	Support	Conditional Support	1	Object	No Comment
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Tables 7/8 are out of date so need to refer to latest information (Environment Agency)

Proposed change.

The Water Framework Directive tables showing the status of Kirklees watercourses have been removed from the document. This table represented a point in time and will change over the plan period. It has therefore been removed and reference made to the Humber River Basin Management Plan as the source of the most up to date information in relation to ecological and chemical quality.

12.39	Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

Proposed change.

The Water Framework Directive tables showing the status of Kirklees watercourses have been removed from the document. This table represented a point in time and will change over the plan period. It has therefore been removed and reference made to the Humber River Basin Management Plan as the source of the most up to date information in relation to ecological and chemical quality.

Summary of comments	Council Response				
Table 8 DLP_SP1849	Support	Conditional Support	1	Object	No Comment
Tables 7/8 are out of date so need to refer to latest information (Environment Agency)	Proposed change. The Water Framework Directive tables showing the status of Kirklees watercourses have been removed from the document. This table represented a point in time and will change over the plan period. It has therefore been removed and reference made to the Humber River Basin Management Plan as the source of the most up to date information in relation to ecological and chemical quality.				
12.40 DLP_SP512	Support	Conditional Support		Object	No Comment 1
This approach should be used in assessing potential allocations such as ME1965	No change. Site specific comments are covered under the analysis of comments on sites.				
12.41	Support	Conditional Support		Object	No Comment
No comments were received on this part of the plan.	Proposed change. Reference to the role of tree planting in relation to water quality has been added following comments made on the flood risk policy.				
12.42	Support	Conditional Support		Object	No Comment
No comments were received on this part of the plan.	No change.				
12.43	Support	Conditional Support		Object	No Comment
No comments were received on this part of the plan.	Proposed change. Reference to water abstraction licences added to the justification text following consultation comments on the policy text.				
12.44 DLP_SP206, DLP_SP263	Support	Conditional Support	2	Object	No Comment
Need to ensure the design of buildings and their curtilages do not exacerbate flooding.	No change. The planning system addresses this issue in relation to the introduction of non-permeable surfaces.				
Policy very important.	No change. Comment noted.				
12.45	Support	Conditional Support		Object	No Comment
No comments were received on this part of the plan.	No change.				
Option DLP35 12.5.1	Support	Conditional Support		Object	No Comment
No comments were received on this part of the plan.	No change.				
Historic environment	Support	Conditional Support		Object	No Comment
No comments received on this part of the Plan.					

Summary of comments	Council Response			
13.1 DLP_SP9, DLP_SP71, DLP_SP513	Support 1	Conditional Support 2	Object	No Comment
Support for the policy.	No change. Support noted.			
Conditional support for heritage protection but comment seeks to extend protection to other non-designated assets.	No change. Policy applies to designated and non-designated heritage assets and the Local Plan design policies seek that all development respects and enhances the character of the townscape, heritage assets and landscape. Extending full protection to specific building types would be inconsistent with national planning policy and unjustified by specific evidence. Part c of the policy aims to secure a sustainable future for heritage assets 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.			
Conditional support for heritage protection but concerns regarding the weight to be given to this over other material planning considerations set out in the National Planning Policy Framework.	No change. Comment noted. The Local Plan must be in general conformity with all parts of the National Planning Policy Framework.			
13.2 DLP_SP26, DLP_SP514	Support	Conditional Support	Object	No Comment 2
No comment. Concerned about harm to specific heritage assets as part of proposed housing allocation H591	No change Noted. Site specific concerns addressed under H591 representation summary.			
No comment for policy but concerned about harm to specific heritage assets as part of proposed mineral proposal allocation ME1965.	No change Noted. Site specific concerns addressed under ME1965 representation summary.			
Historic Environment	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 36 DLP_SP7, DLP_SP29, DLP_SP115, DLP_SP124, DLP_SP215, DLP_SP310, DLP_SP515, DLP_SP624, DLP_SP1077, DLP_SP1156, DLP_SP1279, DLP_SP1560, DLP_SP1561, DLP_SP1674, DLP_SP1792	Support 3	Conditional Support 7	Object 5	No Comment
Conditional support. We recommend inclusion within the supporting text of the Draft Policy "the historic canal network". Such an approach would help highlight the heritage importance of canals to developers and applicants and ensure that the heritage assets are fully considered as required by section 12 of the NPPF.	Change. Justification text amended to include reference to the historic canal network			
The Society welcomes DLP 36f which seeks to preserve the setting of Castle Hill and proposals which detrimentally impact on the setting of Castle Hill will not be permitted.	No change. Noted.			
Conditional support to policy. The NPPF also sets out a requirement that the positive strategy for the historic environment should include those assets most at risk. Currently this aspect is also missing from the Policy.	Change. Policy will be amended to incorporate revised wording as far as possible alongside similar comments from WYAAS.			
(a) Delete Criterion (a) and replace with:- ensure that proposals affecting a designated heritage asset (or an archaeological site of national importance) conserve those elements which contribute to its significance. 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.				
(b) Insert the following additional Criteria following Criterion a:- ensuring that proposals affecting archaeological sites of less than national importance conserve those elements which contribute to their significance in line with the importance of the remains. In those cases where development affecting				

Summary of comments

such sites 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, the developer will be required to make adequate provision for excavation and recording before or during development and:- ensuring that 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 the harm

© Insert the following additional Criterion at the end of the Policy:- facilitate a sustainable future for those heritage assets at risk

The opening sentences of this policy should be amended to read, "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:"

WYAAS believes that the proposed Policy for the historic environment is inadequate and needs to be significantly strengthened to bring the Policy into accordance with the National Planning Policy Framework (the NPPF). WYAAS recommend policy revisions:

"Development proposals adversely affecting the significance of designated heritage assets will not normally be permitted. Exceptionally, development will be allowed where the benefits of the development clearly outweigh the impacts on the site's heritage significance and measures are taken to mitigate harmful impacts."

"Proposals having an adverse effect on a Class 2 archaeological site (details of which are held in the West Yorkshire Historic Environment Record) will not be permitted unless the development can be shown to be of an overriding public interest and there is no alternative means to deliver the proposal. In all cases, full mitigation measures would be secured by condition."

"Where development is permitted that will adversely affect a non-designated heritage asset, appropriate mitigation will be required as a condition."

Recommend the addition of the civic and institutional buildings constructed on the back of the wealth created by the textile industry as expressions of local civic pride and identity.

The inference of marking out Castle Hill for this level of protection is that other designated heritage assets (of equal value) will not be afforded such treatment by Kirklees. This would not be the case, of course, if WYAAS' earlier recommendations for re-writing the draft Policy were accepted.

Conditional support for heritage protection but comment seeks to extend protection to other non-designated assets to include buildings associated with 'social history' e.g. mechanics institutes, civic halls that are characteristic of the Victorian industrial heritage of the area.

Conditional support. Historic environment needs to encompass a safeguard for protecting some hamlets that have existed for nearly two centuries and the settings they are in. Some of our smaller cottages if they were stately homes built at the same time would be afforded protections that currently they are not.

Conditional support for heritage protection but comment expresses concerns regarding development proposals that include building on the fields. They will lose the dry stone walls and their distinctiveness.

Support for acknowledging the importance of textile heritage in the Holme Valley.

It should also be noted that Historic England recently identified the condition of the Holmfirth Conservation Area as being 'at risk' and it lacks a Conservation Area Appraisal to guide and control future development to protect and enhance our built heritage.

Where there is a conflict between climate change mitigation and heritage assets we believe that action on climate change should take precedence.

Council Response

Change. Policy will be amended to incorporate revised wording as suggested.

Change. Policy will be amended to incorporate revised wording as appropriate in conjunction with similar comments from Historic England.

No change.

Policy applies to designated and non-designated heritage assets and the Local Plan design policies seek that all development respects and enhances the character of the townscape, heritage assets and landscape. Extending full protection to specific building types would be inconsistent with national planning policy and unjustified by specific evidence. Part c of the policy aims to secure a sustainable future for heritage assets 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.

No change. Policy applies to designated and non-designated heritage assets and the Local Plan design policies seek that all development respects and enhances the character of the townscape, heritage assets and landscape.

No change.

Issues of heritage impact assessed under individual development proposal assessments.

No change. Noted

No change. Designation of Conservation Areas and their appraisals are not within the remit of the development plan.

No change. To be consistent with national planning policy, development proposals affecting a designated heritage asset (or an archaeological site of national importance) should conserve those elements which

Summary of comments	Council Response				
	contribute to its significance. Harm to such elements will be permitted only where this is outweighed by the public benefits of the proposal.				
Conservation Area boundaries and evidence supporting their status should be updated.	Comment noted. Amendments/updates to the status of a Conservation Area is dealt with by separate legislation and is not within the remit of the development plan.				
13.3 DLP_SP8, DLP_SP516	Support	Conditional Support	2	Object	No Comment
Agreed but we do need to see these words translated into action.	No change Comment noted.				
Would it be possible to include a statement along the lines of 'it be should recognised that while individual buildings may not be uniquely of architectural or historic significance, they may be integral to the context of the neighbouring historic environment'.	No change The 'setting' of designated and non-designated heritage assets is part of the assessment of development proposals and the Local Plan design policies seek that all development respects and enhances the character of the townscape, heritage assets and landscape.				
13.4 DLP_SP517	Support	Conditional Support	1	Object	No Comment
Conditional support for heritage protection but comment seeks to extend protection to other non-designated assets.	No change Policy applies to designated and non-designated heritage assets and the Local Plan design policies seek that all development respects and enhances the character of the townscape, heritage assets and landscape. Extending full protection to specific building types would be inconsistent with national planning policy and unjustified by specific evidence. Part c of the policy aims to secure a sustainable future for heritage assets 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.				
13.5 DLP_SP113	Support	Conditional Support	1	Object	No Comment
The NPPF states that "as a minimum the relevant historic environment record should have been consulted" (para. 128). It would therefore be helpful at this point if would-be developers were directed to consult the West Yorkshire Historic Environment Record held by WYAAS to help ascertain significance if they believe that their proposal may have an impact on a designated or non-designated heritage asset in Kirklees.	Change Justification text amended to include reference to the need to consult the West Yorkshire Historic Environment Record.				
13.6 DLP_SP114	Support	Conditional Support	1	Object	No Comment
WYAAS recommend that it would be helpful to would-be developers and compliant with the NPPF (para. 128) if at the end of this paragraph could be added the following: "Many of the undesignated heritage assets in Kirklees have archaeological significance (buildings as well as land). Where the impact of a planning proposal on the potential significance of a heritage asset (designated or non-designated) is not fully understood, the developer may be expected to carry out an archaeological evaluation using appropriate expertise to inform their planning application."	Change Justification text amended to include reference to archaeological evaluations.				
13.7 DLP_SP30, DLP_SP1563	Support	Conditional Support	1	Object	1 No Comment
When completed, the Castle Hill Setting Study should provide a helpful framework against which to assess the appropriateness of any development proposals in the vicinity of that monument. Consequently, the justification should make it clear that development proposals in and around Castle Hill will be guided by the advice set out in that Study.	Change Justification text amended to include reference to need to refer to Castle Hill Setting Study.				
Conditional support for heritaae protection but comment expresses concerns reardina development	No Change				

Summary of comments	Council Response			
proposals that include building on the fields.	Issues of heritage impact assessed under individual development proposal assessments.			
13.8 DLP_SP31	Support	Conditional Support 1	Object	No Comment
Conditional support for heritage protection but comment expresses concerns regarding development proposals that include building on open areas.	No change. Issues of heritage impact assessed under individual development proposal assessments and policy applies to designated and non-designated heritage assets and the Local Plan design policies seek that all development respects and enhances the character of the townscape, heritage assets and landscape.			
13.9 DLP_SP518, DLP_SP1703	Support 1	Conditional Support	Object	No Comment 1
No comment for policy but concerned about harm to specific heritage assets as part of proposed mineral proposal allocation ME1965.	No change. Noted. Site specific concerns addressed under ME1965 representation summary.			
Support for sensitive approach to historic environment.	No change. Comment noted.			
13.10	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
13.11 DLP_SP211, DLP_SP945	Support 2	Conditional Support	Object	No Comment
It is encouraging to see that the dereliction of some of our churches is a matter for concern. Many pubs and inns; also of historic value; are also threatened by closure, neglect and decay.	No Change Policy applies to designated and non-designated heritage assets and the Local Plan design policies seek that all development respects and enhances the character of the townscape, heritage assets and landscape.			
Developers should note that a detailed Historic Landscape Character assessment of Kirklees has been carried out and this shows the extent to which the visible character of the past survives in the present anywhere in Kirklees. It will be available both to guide appropriate design and to inform planning.	Change Justification text amended to make reference to the Historic Landscape Character assessment of Kirklees.			
13.12 DLP_SP10, DLP_SP32, DLP_SP1157, DLP_SP1608	Support 1	Conditional Support 1	Object 2	No Comment
There may also be compelling financial arguments for giving energy efficiency measures precedence over preserving heritage assets.	No change To be consistent with national planning policy, development proposals affecting a designated heritage asset (or an archaeological site of national importance) should conserve those elements which contribute to its significance. Harm to such elements will be permitted only where this is outweighed by the public benefits of the proposal.			
Conditional support for heritage protection but comment expresses concerns regarding development proposals that include building on open areas.	No change Issues of heritage impact assessed under individual development proposal assessments and policy applies to designated and non-designated heritage assets and the Local Plan design policies seek that all development respects and enhances the character of the townscape, heritage assets and landscape.			
13.13	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
13.14	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			

Summary of comments	Council Response				
13.15 DLP_SP116	Support	Conditional Support	1	Object	No Comment
Conditional support. There seems to be an element of a sentence missing, should this be "information on the significance of heritage assets"? It would probably be helpful to add after "Historic Environment Record, held and managed by the West Yorkshire Archaeology Advisory Service."	Change Justification text corrected and reference made to WYAAS role.				
13.16	Support	Conditional Support		Object	No Comment
No comments were received on this part of the Plan.	No Change				
13.17	Support	Conditional Support		Object	No Comment
No comments were received on this part of the plan	No Change				
13.18	Support	Conditional Support		Object	No Comment
No comments were received on this part of the plan	No Change				
13.19	Support	Conditional Support		Object	No Comment
No comments were received on this part of the plan	No Change				
13.20 DLP_SP413, DLP_SP414	Support	Conditional Support	2	Object	No Comment
Historic England recently identified the condition of the Holmfirth Conservation Area as being 'at risk' and it lacks a Conservation Area Appraisal to guide and control future development to protect and enhance our built heritage.	No change. Designation of Conservation Areas and their appraisals are not within the remit of the development plan.				
Option DLP36 13.1.1 DLP_SP33	Support	Conditional Support		Object	1 No Comment
Object to this alternative option.	No change. Objection to alternative noted. This alternative is not being pursued.				
Option DLP36 13.1.2	Support	Conditional Support		Object	No Comment
No comments were received on this part of the plan	No Change				
Minerals	Support	Conditional Support		Object	No Comment
No comments received on this part of the Plan.					
14.1 DLP_SP38, DLP_SP329, DLP_SP338, DLP_SP519, DLP_SP645, DLP_SP784, DLP_SP1632, DLP_SP1680	Support	2	Conditional Support	Object	6 No Comment
lack of consultation	No Change				
detrimental impact on Shelley village	Consultation carried out as part of local Plan Process				
detrimental to highway safety	Issues raised re impact on amenity and highway safety considered via tech appraisal and the need for appropriate mitigation acknowledged where required in the site allocations box.				
New Hydrocarbon extraction would be totally incompatible with Kirklees strategic objectives regarding climate change. All proposals for hydrocarbon exploration and extraction should be rejected on the grounds of climate change and the precautionary principle.	No change This approach would be contrary to the NPPF and current Planning Practice Guidance which indicates that the extraction of hydrocarbons is acceptable subject to it complying with the criteria stipulated				

Summary of comments	Council Response						
Support from marshalls Natural Stone - Recognition of importance of minerals to the economy	No change						
other sites available have not been satisfactorily considered	Support noted.						
	No change						
	All sites considered for inclusion are either existing mineral workings, existing allocated sites in the UDP or promoted by minerals industry.						
Detrimental to Green Belt	No change						
Detrimental to Highway Safety	Issues raised have been considered via technical appraisal Issues raised have been considered via technical appraisal and the need for appropriate mitigation acknowledged where required in the site allocations box.						
Detrimental to amenity							
14.2	Support	1	Conditional Support	Object	No Comment		
DLP_SP39							
Support from Marshalls natural Stone - The recognition of the importance of sandstone extraction is supported.	No Change						
	Support noted.						
Use of financial bonds would address the issue.	No Change						
	Current planning practice guidance (para. 48) indicates that the restoration of minerals sites should be primarily controlled using planning conditions and financial bonds should only be used in exceptional cases. Consequently their use in all circumstances would be contrary to current guidance.						
14.3	Support	1	Conditional Support	Object	2	No Comment	
DLP_SP40, DLP_SP520, DLP_SP785							
Marshalls Natural Stone support - the identification of specific areas for potential future mineral extraction is supported as it provides a degree of certainty (subject to any environmental considerations) for both industry and local residents.	No Change						
	Support noted.						
An independent assessment of the proposed allocated sites must be undertaken.	No change						
All potential sites in Kirklees should be independently assessed and then considered against the relevant criteria	It is considered that such an assessment is carried out as part of the Local Plan site allocation methodology. This includes the need to consultant statutory consultees who are independent of the Council but provide relevant expertise.						
The process is being led by the minerals operators and the need for the mineral is not being robustly examined.	Mineral operators have provided evidence to support the quality and quantity of the mineral underlying particular sites and indicated their viability. This reflects the approach advocated by NPPG which states that minerals planning authorities should use relevant evidence provided by the minerals industry and other appropriate bodies. The need for a particular mineral has been taken into account based on its importance to the market, the scarcity of the mineral and its importance to the business continuity of the mineral operators. These issues would be also be assessed as part of any future planning application.						
There also needs to be a clear statement that just because a particular area has been designated as an MSA there is no presumption that planning permission will be granted.	The mineral safeguarding areas section is clear that there is no presumption that minerals development will occur in these areas.						
14.4	Support		Conditional Support	Object	No Comment		
No comments received on this part of the Plan.							
14.5	Support	1	Conditional Support	1	Object	1	No Comment
DLP_SP41, DLP_SP521, DLP_SP786							
Marshalls Natural Stone Support the commitment to maintain a permitted reserve of planning	No Change						

Summary of comments	Council Response			
permissions for sandstone extraction is supported.	Support noted.			
Kirklees should be proactive and identify potential minerals sites that meet the local plan criteria	No change			
	The site allocations have been made in accordance with the council's own site selection methodology and in conformity with the guidance set out in NPPG.			
14.6 DLP_SP787	Support	Conditional Support 1	Object	No Comment
Concern that site restoration must be carried out to a high standard	No Change			
	It is considered DLP 38 provides a mechanism to achieve good quality restoration of minerals sites.			
14.7 DLP_SP42, DLP_SP522, DLP_SP788	Support 1	Conditional Support	Object 2	No Comment
Sandstone is not a rare mineral and could therefore be quarried elsewhere.	No change			
The use of mineral produced in Kirklees is mainly outside the district and is an architectural fashion not a need.	All sandstone site promoters currently operate at least one quarry in Kirklees. Consequently the infrastructure required to extract and process mineral is already here.			
	The use of a mineral is demand led and it is the responsibility of an MPA to plan the associated need for that mineral. An MPA cannot simply rely on other areas to meet that demand.			
Supported by Marshalls Natural Stone - demonstrates that the Council has a clear and thorough understanding of the blockstone industry and of its significance both locally and nationally.	No change			
	Support noted.			
14.8 DLP_SP43, DLP_SP523, DLP_SP789	Support 1	Conditional Support 2	Object	No Comment
Safeguarding areas to protect sensitive development from the effects of mineral development should be included .	No change			
	Current planning practice guidance indicates the creation of buffer zones may be appropriate but should be considered on a case by case basis when a planning application is being considered.			
Recognition of the national importance of the Sandstone resource is welcomed and supported.	No change			
	Support noted.			
14.9 DLP_SP524, DLP_SP790	Support	Conditional Support	Object 2	No Comment
Concern about the poor restoration of mineral sites	No change			
	Policy DLP 38 seeks to achieve an appropriate and high standard of site restoration.			
14.10	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
14.16	Support	Conditional Support	Object	No Comment
It is the council who must enforce this and on occasions that will require them to hold mineral operators to account. If necessary using all tools in their armoury	No change.			
	Comment noted. The Council - as part of planning conditions - will put in place relevant mitigation measures to off-set potential negative impacts of minerals operations. These conditions will be enforced should the			

Summary of comments	Council Response			
	applicant not comply with these requirements.			
Mineral extraction	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 37	Support 4	Conditional Support 4	Object 11	No Comment
DLP_SP44, DLP_SP159, DLP_SP212, DLP_SP525, DLP_SP693, DLP_SP791, DLP_SP828, DLP_SP983, DLP_SP1050, DLP_SP1078, DLP_SP1162, DLP_SP1171, DLP_SP1177, DLP_SP1487, DLP_SP1609, DLP_SP1633, DLP_SP1682, DLP_SP1717, DLP_SP1807				
concerns that policy DLP 37 does not detail what types of impact on residential amenity will be considered.	No change			
				It is considered policy DLP 37 provides adequate safeguards with regard to the assessment of the likely impacts of minerals development on residential amenity
Concerns that soils may be damaged by minerals development and a soils assessment should be carried out as part of the site selection process.	No change			
				It is considered that this issue is adequately addressed in policy DLP37 and would be fully considered at the planning application stage.
Coal Authority has suggested replacing the term open cast with surface in the policy justification	Proposed Change			
				Change wording as suggested
Yorks wildlife trust support this policy -	No Change			
MPA concerned that policy DLP37 has no strategic focus	No change.			
MPA suggest that a policy that commits Kirklees to seek to provide specific quantities of aggregates and building/roofing stone is required.				This suggested change would be unjustified as the policy states that the council will seek to maintain a landbank of aggregate reserves which are expected to be achieved as indicated in Section 13 of the NPPF. The NPPF also confirms that it is unnecessary to repeat national planning policy in development plan policies.
MPA also suggest that the Council should support the continuation of building/roofing stone quarries and maintain permitted reserves of at least 10 years at each site.				
Concerns that allowing the future extraction of hydrocarbons would contribute to climate change and policy DLP37 should preclude such development.	No Change			
				Current planning policy does not preclude the extraction of hydrocarbons and the Council must therefore plan for this possibility.
Support subject to policy DLP 37 to include buffer zones to protect sensitive development	No change			
				Current planning practice guidance (Para 18) indicates that the use of buffer zones may be appropriate but should be considered on a case by case basis.
				This would be considered at planning application stage based on site characteristics.
Saxonmore support for policy	No change			
				Support noted
Balanced approach proposed in the Policy & the recognition of the need to identify & mitigate potential impacts on local heritage assets including those of archaeological importance.	No change			
				Support noted
supported as it provides a balanced approach between the need for mineral extraction and the need to protect the amenity of local residents and the environment.	No change			
				Support noted
Concerns that allowing the future extraction of hydrocarbons would contribute to climate change and policy DLP37 should preclude such development.	No Change			
				Current planning practice guidance and the NPPF do not preclude the extraction of hydrocarbons and the

Summary of comments

Council Response

Concern that all areas identified as mineral safeguarded sites could be developed

Council must therefore plan for this possibility.

No Change

Existing policy justification makes it clear that safeguarding does not necessarily mean the site will be developed for mineral extraction.

No detail in the policy DPL 37 regarding timescales, phasing arrangements and programme of works

This detail would be considered as part of a subsequent planning application and is not necessary with regard to selecting potential sites for allocation.

Proposed minerals allocations should be rejected as they would conflict with policy DLP 37

No change

All proposed minerals sites have been assessed for their potential to be developed. Policy DLP 37 would be applied with regard to any future planning application.

14.12

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

14.13

Support 1 Conditional Support Object 2 No Comment

DLP_SP45, DLP_SP526, DLP_SP792

Marshalls Natural Stone Support - Recognises the importance of aggregates to the local and regional economy is welcomed and supported.

No Change

Support noted

Conditional Support

No Change

14.14

Support Conditional Support 2 Object No Comment

DLP_SP527, DLP_SP793

Agrees with assessment of potential sources of nuisance/disturbance and suggests that local plan policy should include buffer zones to protect sensitive development from mineral related development.

No change

Current planning practice guidance (Para 18) indicates that the use of buffer zones may be appropriate but should be considered on a case by case basis.

This would be considered at planning application stage based on site characteristics.

14.15

Support Conditional Support Object 4 No Comment

DLP_SP405, DLP_SP406, DLP_SP528, DLP_SP794

Agrees with issues which may be effected by mineral development and suggests this could be addressed by the inclusion of buffer zones around sensitive development.

No Change

Current planning practice guidance (Para 18) indicates that the use of buffer zones may be appropriate but should be considered on a case by case basis.

This would be considered at planning application stage based on site characteristics.

Concerns about highway safety

Highways safety is included in policy DLP 37 and would be assessed at the time of a planning application.

14.16

Support Conditional Support 2 Object No Comment

DLP_SP529, DLP_SP796

Concerns that the Council must ensure mineral development is regulated and policed.

No change

It is considered that the proposed policies would provide an adequate mechanism to regulate mineral development and the Council has powers under the Town and Country Planning Act to take enforcement action if required.

Summary of comments	Council Response			
Option DLP37 14.1.1 DLP_SP46	Support 1	Conditional Support	Object	No Comment
The reasoning against the 'do nothing' approach is sound and is supported as it is in line with NPPF guidance.	No change.			
	Support for the reasoning against the 'do nothing' approach has been noted.			
Site restoration and aftercare	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 38 DLP_SP56, DLP_SP160, DLP_SP530, DLP_SP795, DLP_SP984, DLP_SP1172, DLP_SP1488, DLP_SP1610	Support 3	Conditional Support 2	Object 3	No Comment
MPA support policy	No change			
The requirement to demonstrate financial provision to carryout restoration is contrary to current planning practice guidance.	No change			
policy DLP places a disproportionate level of importance on the environmental benefits sought through restoration	Comments noted. However, it is considered DLP 38 accords with current planning practice guidance.			
Support from Yorkshire Wildlife Trust	No change			
support the criteria for mineral site restoration to provide benefits for biodiversity and to contribute towards Biodiversity Action Plan (BAP) and priority habitat/ species targets.				
Policy does not specify how climate change will be mitigated by site restoration	No change			
	Comments noted but considered policy DLP 38 satisfactorily addresses the need to ensure site restoration includes opportunities to provide measures to deal with climate change.			
Support subject to all restoration work being tied to a financial bond	No change			
	Current planning practice guidance (paragraph. 48) indicates that the restoration of minerals sites should be primarily controlled using planning conditions and financial bonds should only be used in exceptional circumstances. Consequently their use in all cases would be contrary to current guidance.			
14.17 DLP_SP531, DLP_SP797	Support	Conditional Support	Object 2	No Comment
Mineral extraction has the potential to permanently damage the environment.	No Change			
	It is widely recognised that the restoration of minerals sites can significantly enhance local biodiversity through the provision of a wide range of habitats.			
	It is considered the policies would provide a mechanism to achieve high standards of restoration.			
14.18 DLP_SP47, DLP_SP532, DLP_SP798	Support	Conditional Support 2	Object 1	No Comment
Concern that progressive restoration cannot always be achieved due to site constraints and that this should be indicated in the text	Proposed change			
	Amend text to acknowledge that in certain circumstances progressive restoration mat not be appropriate.			
Advocates the use of financial bonds to secure site restoration.	No change			
	This does not accord with Para. 48 of current planning practice guidance which indicates bonds should only be used in exceptional cases.			

Summary of comments	Council Response			
14.19 DLP_SP533, DLP_SP799	Support	Conditional Support	Object 2	No Comment
planning permission for mineral development should not be granted as this would negate the need for site restoration	No Change The NPPF and current Planning Practice Guidance requires that Mineral Planning Authorities must plan for continued mineral extraction and the subsequent restoration of sites.			
14.20 DLP_SP534, DLP_SP800	Support	Conditional Support	Object 2	No Comment
Bonds would safeguard the site and ensure a quality approach to is taken. This would also ensure the council has the finances in the event of a mineral operator going bust.	No change. The council will ensure that planning permissions for mineral extraction include appropriate conditions that would address any concerns in relation to the funding of site restoration and after care. The use of bonds - or financial guarantees - are only appropriate in exceptional cases. The council will therefore pursue financial guarantees inline with paragraph 48 of the Minerals Planning Practice Guidance.			
14.21 DLP_SP535, DLP_SP801	Support	Conditional Support	Object 2	No Comment
This is far too important to be left to the minerals operators, Secure an appropriate bond and ensure that it is delivered.	No change This approach does not accord with Para. 48 of current planning practice guidance which indicates financial bonds should only be used in exceptional cases.			
Option DLP38 14.2.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Minerals safeguarding	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 39 DLP_SP48, DLP_SP125, DLP_SP161, DLP_SP536, DLP_SP802, DLP_SP985, DLP_SP1173, DLP_SP1564, DLP_SP1683	Support 3	Conditional Support 4	Object 2	No Comment
Saxonmoor support the policy	No Change Support for the policy is noted.			
Proposed policy DLP 39 would allow the sterilisation of coal reserves on infill sites.	Proposed change Whilst the Coal Authority suggest that coal extraction can take place and be viable on small sites, it is considered that due to the likely constraints associated with such sites it would be a rare occurrence. However, it is considered appropriate to amend the policy and include a site size threshold to clarify what is meant by infill. Policy wording has been amended to read: "2. This policy will not apply to the following classes of surface development as they are unlikely to lead to the long term sterilisation of viable mineral resources: (b) developments on sites of less than 1000 sq. metres except for proposals within 250 metres of an existing planning permission for mineral extraction"			
Historic England support the policy	No Change Historic England's support for the policy is noted.			
Support policy subject to the inclusion of buffer zones around all sensitive development	No Change			

Summary of comments

Council Response

Current policy DLP 39 would be onerous with regard to development within the curtilage of buildings within minerals safeguarded areas.

Proposed change

Re-word policy to exclude development within the curtilage of existing buildings from DLP 39. Policy now reads:

"This policy will not apply to the following classes of surface development as they are unlikely to lead to the long term sterilisation of viable mineral resources:

a. extension to existing buildings and the erection of ancillary buildings within their curtilages;"

Marshalls Natural Stone fully support the policy

No Change

The support for the policy is noted.

Advocates building on top of hydrocarbon minerals as this would sterilise those resources and prevent them from contributing to current climate change problems.

No Change

Comments noted but approach advocated is contrary to current planning practice guidance and the NPPF.

Proposed buffers to limit proximal development close to MSAs are not included within the defined MSAs. This is contrary to BGS advice.

No change.

Accept that BGS advice suggests buffers may need to be included in MSAs. However, wording to policy DLP 39 does not require amendment to reflect this. The MSAs have been extended to include urban areas - which now covers the entire district - and therefore all development not included in the exceptions criteria will need to ensure minerals are not unnecessarily sterilised. This removes the need to apply buffers.

14.22

DLP_SP49, DLP_SP52, DLP_SP537, DLP_SP803, DLP_SP1684

Support 2	Conditional Support	Object 3	No Comment
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Coal resources within urban areas are not being safeguarded which is contrary to BGS advice. Coal Authority suggest that unless urban areas are included within the MSA it will seek to have the plan declared unsound.

Proposed change

Include all mineral resources including those located in urban areas in MSAs

Marshalls Natural Stone fully support

No Change

Support noted.

It should be possible to find sites within the district which will not impact on other surface development.

No change

Mineral safeguarding is about identifying the whole of mineral resources in the district not about site selection. This is required by current planning practice guidance and the NPPF.

14.23

DLP_SP50, DLP_SP53, DLP_SP538, DLP_SP804

Support 2	Conditional Support 2	Object	No Comment
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Marshalls Natural Stone Support

No change

Support noted.

Support provided such buffer zones are created around existing developments to protect them from future mineral extraction.

No Change

Current planning practice guidance suggests that such areas should only be considered in exceptional circumstances and on a case by case basis. Consequently creating such areas as part of the local plan process would not accord with current planning guidance.

Summary of comments	Council Response			
14.24 DLP_SP539, DLP_SP805	Support	Conditional Support	Object 2	No Comment
As the mineral resource in Kirklees is widespread why have sites such as Me1965 been proposed.	No change			
	All sites considered for allocation have been assessed as to their suitability in accordance with both current planning practice guidance and the NPPF.			
14.25 DLP_SP51	Support	Conditional Support 1	Object	No Comment
The scale of the Mineral Safeguarding Plan makes it very difficult to read which could cause uncertainty.	No Change			
	It is considered that the MSA plan is at a scale which will allow identification of mineral resources.			
14.26 DLP_SP540, DLP_SP806	Support	Conditional Support	Object 2	No Comment
The council cannot continuously leave the delivery of policies to minerals operators. They need to take control.	Proposed Change			
	Change wording of supporting text to make it clear the Council will be involved in the delivery of policy aims			
Option DLP39 14.3.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP39 14.3.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP39 14.3.3	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Protecting existing and planned minerals infrastructure	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 40 DLP_SP54, DLP_SP73, DLP_SP162, DLP_SP625, DLP_SP807, DLP_SP986, DLP_SP1685	Support 7	Conditional Support	Object	No Comment
Saxonmoor support	No Change			
	Support noted.			
JWQ support	No Change			
	Support noted.			
Canal and River Trust support	No Change			
	Canal and River Trust support noted.			
Coal Authority support	No Change			
	Coal Authority support noted.			
Marshalls Natural Stone support	No Change			

Summary of comments	Council Response			
	Support noted.			
14.27	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
14.28	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP40 14.4.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Alternative development on protected minerals infrastructure sites	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 41	Support 3	Conditional Support 1	Object 1	No Comment
DLP_SP163, DLP_SP808, DLP_SP987, DLP_SP1174, DLP_SP1686				
Advocates developing above hydrocarbon reserves to sterilise the mineral.				
	No Change			
	This approach would not accord with current planning practice guidance or the NPPF which requires that Mineral Planning Authorities plan for the potential extraction of such resources.			

Saxonmoor support	No Change			
	Support noted.			

Generally support but proposed policy does not fully protect mineral infrastructure from proximal development.	Proposed Change			
	Including mineral resources in urban areas within MSAs would help to address this point.			

Coal Authority support	No Change			
	Coal Authority support noted.			

14.29	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
14.30	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP41 14.5.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Proposals for exploration and appraisal of hydrocarbons	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 42	Support 2	Conditional Support 2	Object 4	No Comment 1
DLP_SP164, DLP_SP679, DLP_SP1079, DLP_SP1175, DLP_SP1178, DLP_SP1611, DLP_SP1634, DLP_SP1687, DLP_SP1718				
Environment Agency concerned that policy does not give sufficient priority to protection groundwater and surface water regimes				
	Proposed change			
	make specific reference to ground water and surface water in DLP42			

Summary of comments

The risk assessment for any such proposal needs to be transparent and independently verified. The precautionary principle (see 16.40) should be invoked in the case of any residual doubt.

Risk Assessment and Environmental Impact Assessment should be required before exploration for hydrocarbons is allowed.

Coal Authority support

Saxonmoore Support

Exploration for hydrocarbons should not be allowed under any circumstances as it does not accord with climate change targets set in the 2015 Paris Agreement

Council Response

Policy DLP 42 would be adequate to ensure a full assessment of such proposals could be achieved.

No change

Policy DLP 42 provides an adequate mechanism to secure a full assessment of such proposal. Furthermore other legislation such as the EIA regulations 2011 would be relevant to such proposals.

No Change

No change

No change

Current planning practice guidance and the NPPF require Mineral Planning Authorities to plan for the potential exploration and extraction of such minerals. Consequently such an approach would not be in accordance with government advice.

14.31	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
14.32	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
14.33	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP42 14.6.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP42 14.6.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Proposals for production of hydrocarbons	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 43	Support 2	Conditional Support 1	Object 4	No Comment 1
DLP_SP165, DLP_SP381, DLP_SP1080, DLP_SP1176, DLP_SP1179, DLP_SP1613, DLP_SP1635, DLP_SP1688				
Coal Authority Support	No change			
Support but if road transport is proposed then a transport assessment would be required in conjunction with discussion with Highways England.	No Change			
	Consider policy DLP 43 provides a satisfactory mechanism to assess the highway implications with regard to this type of development			
Suggest adding a requirement to policy to require that a risk assessment and EIA are submitted with regard to all proposals	No change			
	It is considered that policy DLP 43 provides a sufficient mechanism to assess the full implications of a planning application to extract Hydrocarbons. Furthermore other relevant legislation such as the EIA regs 2011 would convert such projects.			
Exploration for hydrocarbons should not be allowed under any circumstances as it does not accord with climate change targets set in the 2015 Paris Agreement	No change			

Summary of comments	Council Response			
	Current planning practice guidance and the NPPF require Mineral Planning Authorities to plan for the potential exploration and extraction of such minerals. Consequently such an approach would not be in accordance with government advice.			
Saxonmoor support	No Change			
14.34	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
14.35	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
14.36	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
14.37	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
14.38	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP43 14.7.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Waste	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
15.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
15.2	Support	Conditional Support	Object	No Comment
No comments were made on this part of the Plan.	No Change			
15.3	Support	Conditional Support	Object	No Comment
No comments were made on this part of the Plan.	No Change			
15.4	Support	Conditional Support	Object	No Comment
No comments were made on this part of the Plan.	No Change			
Figure 8 DLP_SP1280	Support	Conditional Support	Object 1	No Comment
Kirklees should be more supportive of Carboot sales. The Holme Valley could support a location. A charity furniture/white goods warehouse would serve the valley well, maybe in Bottoms Mill. Forward thinking councils have furniture warehouses at recycling depots. The Dutch model of bulky household waste is commendable whereby they do monthly kerbside collections with opportunities for the community to salvage items left for collection.	No Change			
	Whilst car boot sales offer an opportunity for the re-use of materials it is not considered appropriate to develop specific policies in the Local Plan to promote their use within the district. It is considered that the proposed Local Plan policies would be sufficient to support any proposals to recycle or re-use bulky goods such as furniture.			

Summary of comments	Council Response			
15.5 DLP_SP1698	Support 1	Conditional Support	Object	No Comment
Yorkshire Water notes and supports that the Local Plan will make provision for the management of waste derived from sewage treatment works and sludge treatment plants.	No Change	The council notes Yorkshire Waters support that the Local plan will make provision for the management of waste derived from sewage treatment works and sludge treatment plants.		
15.6	Support	Conditional Support	Object	No Comment
No comments were made on this part of the Plan.	No Change			
15.7	Support	Conditional Support	Object	No Comment
No comments were made on this part of the Plan.	No Change			
Waste management hierarchy	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 44 DLP_SP166, DLP_SP382, DLP_SP946, DLP_SP1180, DLP_SP1614, DLP_SP1719	Support 4	Conditional Support	Object 2	No Comment
Windrow composting of waste requires a large area of land, but the process significantly reduces the volume of waste to about 40%; and the end product is a material which is safe to handle. It is also a useful product with a sale value.	No Change	Policy DLP 44 confirms the Council's commitment to encouraging the management of waste in sustainable ways including composting where appropriate.		
This spatial plan needs to be supported by national and regional policies to promote zero strategies and to ensure that waste is reduced and recycling maximised.	No Change	The waste element of the Local Plan has been developed with regard to national policy guidance. Whilst there is no longer extant relevant regional policy guidance, the regional waste technical advisory body acts as a forum where the impacts of waste management across the wider Yorkshire and Humber region are considered.		
Support Policy DLP44.	No Change			
Environment Agency welcome the Council's commitment to promoting the waste hierarchy in priority order.	The support for the policy is noted including support from Highways England and the Environment Agency. No Changes are proposed.			
Highways England support measures to focus the management of waste within the district and to minimise the production of waste material in order to minimise the movement of waste across West Yorkshire by road to landfill sites.				
15.8	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No Change			
15.9	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
15.10 DLP_SP207	Support	Conditional Support	Object 1	No Comment
The council needs to upgrade the recyclable waste management system. Many other councils allow much more into their green bins than Kirklees does.	No Change	The draft local Plan has identified the need for the Council to expand its own waste management capacity and has identified land adjacent to its existing Vine street and Emerald street facilities as offering an opportunity to provide such an expansion.		

Summary of comments	Council Response			
Option DLP44 15.1.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
New waste management facilities	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 45 DLP_SP167, DLP_SP1565	Support 2	Conditional Support	Object	No Comment
Historic England support the requirement that the impact of new waste management facilities upon the historic environment has been fully considered and satisfactorily addressed.	No Change			
Support policy DLP45	The support for this policy is noted particularly from Historic England. No changes are proposed.			
15.11	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
15.12	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
15.13	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Option DLP45 15.2.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Safeguarding waste management facilities and infrastructure	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 46 DLP_SP168, DLP_SP548, DLP_SP909, DLP_SP1556, DLP_SP1720	Support 2	Conditional Support	Object 3	No Comment
Environment Agency support the inclusion of policy DLP46. Encroachment on waste developments, particularly by housing, can cause serious amenity problems which are difficult to solve without reduction or curtailment of the existing waste activity.	No Change			
Support Policy DLP46	Support for the policy including from the Environment Agency is noted.			
The approach towards safeguarding waste management sites is unsound and is not based on evidence and is inconsistent with the aims and objectives of the Plan and in particular to the vision for Dewsbury Riverside. This is a major regeneration project yet there are large areas designated as waste sites which will impact on the overall delivery of the project. There must be flexibility to the policy to allow for their re-use to encourage regeneration and renewal in the area. At present the policy, seeks to retain all waste management facilities unless there is no longer a need for the facility or where capacity can be met elsewhere. This approach is onerous and restrictive but more importantly the policy places a restriction on neighbouring uses as well where proposed uses will not be allowed unless they can demonstrate they will not prevent, hinder or reasonably restrict the operation of the waste development.	No Change			
The following waste sites, which should be re-designated for mixed use including housing: WS27 Ravensthorpe Industrial Estate, Low Mill Lane, Dewsbury WS33 Thornhill Quarry, Ravensthorpe Road, Ravensthorpe	Much of the waste generated within Kirklees or from the West Yorkshire region is processed, treated or disposed of at privately operated sites. The Council therefore considers that it is crucial to ensure these sites are not lost without adequate scrutiny of the associated implications, hence the approach adopted to safeguarding operational waste sites. The local plan would not preclude such sites being used for other purposes subject to adequate justification. No changes are therefore proposed.			

Summary of comments	Council Response			
WS34 Thornhill Quarry, Ravensthorpe Road, Ravensthorpe WS36 Low Mills, Ravensthorpe Also concerns WS33, WS36 and WS27 which are on the entrance corridor to the Dewsbury Riverside urban extension.				
DLP46 would sterilise a site in perpetuity for waste purposes only (WS16). The existing business at Clayton Hall Farm is not a waste site in the conventional sense, but a renewable energy biogas plant connected to the adjoining working farm. The future needs of the business may not be in renewable energy but DLP46 would restrict future operations to waste only. This would represent a retrospective and permanent change to the existing planning permission.	No Change The site imports food waste from external sources for processing and, at present, provides the only facility of this type dealing with this waste stream within Kirklees. Consequently it is considered to be an important waste processing facility, hence its safeguarding within the Local Plan. The current local plan proposals do not preclude the development of the site for other purposes if it can be demonstrated that there is no longer a need for the facility or if capacity can be met elsewhere in the district - No changes are therefore proposed.			
The National Policy For Waste (DCLG. Oct.2014) does not require local authorities to safeguard sites, only to identify opportunities to meet identified needs for the management of waste. Therefore, the proposal 15.16 to safeguard the area is Kirklees Council's own policy not national.	No Change Whilst current planning practice guidance does not require the safeguarding of existing waste sites, it is considered that as such sites provide a significant contribution to managing waste within the Kirklees district their loss through uncontrolled development could therefore have a major adverse impact on waste treatment capacity within the district. Consequently it is considered that this policy is justified.			
15.14	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
15.15	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
15.16	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
15.17	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Option DLP46 15.3.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Option DLP46 15.3.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Waste disposal	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Policy DLP 47 DLP_SP55, DLP_SP169, DLP_SP1181, DLP_SP1721	Support 2	Conditional Support 1	Object 1	No Comment
Environment Agency - Landfill is an option of last resort. we are aware of work being carried out to establish the size and location of remaining void space in Yorkshire. Should the policy in some way identify new landfill provision as a regional or sub regional issue?	No Change Work on regional landfill capacity has been carried out by the regional waste technical advisory body which has produced a Yorkshire and Humber waste position statement to help inform local plans within the region.			
Support DLP47.	No Change			
Support DLP47 - The identification of quarry sites as potential landfill sites is supported.	Support for the policy noted.			

Summary of comments	Council Response			
We would strongly argue against the need for new landfill sites, which would be unnecessary if the waste hierarchy policy is adhered to.	No Change			
	Whilst the Council strongly supports the principles of the waste hierarchy and therefore seeking to move away from land filling waste, this can only be achieved incrementally and the need for landfill will remain in the short to medium term. It would therefore be unrealistic to ignore this need. It is considered that this approach accords with national policy guidance which recognises that landfill will continue to be necessary albeit at much reduced levels. No changes are therefore proposed.			
15.18	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No Change			
15.19	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No Change			
15.20	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No Change			
Option DLP47 15.4.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No Change			
Health and supporting communities	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
16.1 DLP_SP687, DLP_SP1653	Support	Conditional Support 1	Object 1	No Comment
The mineral extraction proposal on Seventy Acres Farm is contrary to NPPF section 8 which recognises the importance of promoting healthy communities and the role that the Local Plan can play in creating healthy, inclusive communities. It will create dust, impact on air quality and result in a loss of open space.	No Change			
	Site specific issues in relation to Seventy Acre Farm has been addressed through the allocations and designations document. No changes are considered necessary to the policy.			
Kirklees Health and Well-being Board - The JSNA and subsequent discussions at the Board have highlighted a number of key health and wellbeing challenges that are relevant to the Local Plan: 1. the significant predicted growth in the population of Kirklees, especially children and young people and adults over 65 and the impact this will have not only on the number and type of new homes that will need to be built, but also the consequent impact on key local health, care and learning services. This clearly means that there will not only need to be more homes across Kirklees, but also different types of accommodation to reflect the different needs of these key groups	No Change			
	Paragraphs 7.1 and 7.2 of the Local Plan recognise the requirement of national planning policy to identify and plan to meet full objectively assessed needs for market and affordable housing which includes an assessment of current, demographic information, market trends, affordability and other information.			
	It further acknowledges that the local plan needs to plan for a mix of size, type and tenure of housing to ensure identified needs are met including those of different groups in the community (including families with children, older people, people with disabilities, service families and people wishing to build their own homes).			
	The council worked jointly with the Leeds City Region to establish a common methodology for the objective assessment of housing requirements and a broad assessment of demographic forecasts was produced to set out a range of numbers of homes required in the Leeds City Region			
16.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
16.3 DLP_SP16	Support	Conditional Support	Object	No Comment 1
The proposal at Bradley Park may not enable individuals to afford affordable housing. It may be an executive estate. This will decrease opportunities for local low paid workers, increasing physical and	No Change			

Summary of comments	Council Response			
mental health implications.	This is a site specific proposal which is addressed through the site allocation and designation document.			
16.4	Support	Conditional Support	Object 1	No Comment
DLP_SP217				
We need to come up with a clear and credible plan to cut pollution from petrol and especially diesel vehicles. Urban Planners can choose how land is used and how pollution can be mitigated. To concentrate more housing and more roads around existing urban concentrations consumes green belt/natural land forms from capturing our pollutants. Urban concentrations increase illness and deaths as explained above. New housing developments must be in new locations to avoid urban sprawl and the loss of green belt corridors that make our air less toxic.	No Change Individual site allocations and cumulative impacts of development have been assessed by public health, environmental and transportation colleagues to assess impacts of pollution and where required mitigation measures put in place.			
Healthy, active and safe lifestyles	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 48	Support 6	Conditional Support 7	Object 3	No Comment
DLP_SP273, DLP_SP650, DLP_SP653, DLP_SP809, DLP_SP906, DLP_SP947, DLP_SP956, DLP_SP1088, DLP_SP1163, DLP_SP1182, DLP_SP1473, DLP_SP1615, DLP_SP1643, DLP_SP1775, DLP_SP1872, DLP_SP1902				
Sport England is satisfied that Kirklees has an appropriate evidence base for sport. Policy DLP 48 Healthy Active and Safe Lifestyles - Support	No Change Support from Sport England noted.			
Problems of childhood asthma continues to be a major health concern in South Huddersfield. New housing proposed for Lindley and Grimescar areas will add further traffic congestion and increase in traffic fumes. Significant negative impact on health and wellbeing of Birchencliffe community evident. A health Impact Assessment and mitigation measures (as specified in Local Plan) should be published before approval of any further large housing schemes in Lindley/Grimescar.	No Change Technical consultees including highways, environmental health and health colleagues have assessed the site allocations. Transport modelling and an air quality model have also been undertaken to assess the cumulative impacts of the spatial strategy. A health impact assessment has also been undertaken as part of the sustainability appraisal of the plan. Additionally, as outlined in the policy health impact assessments will be undertaken at the planning application stage.			
Why isn't the Council allocating land for new allotments or community food growing to support this policy? Where's the new Urban Green Space for sports and leisure activities?	No Change There are a number of areas of the Plan that address land for new allotments and community food growing. These include the vision which refers to opportunities for local food growing, Policy DLP48 Healthy, active and safe lifestyles states that the council will, with its partners, create an environment which supports healthy, active and safe communities and reduces inequality by supporting initiatives which enable or improve access to healthy food. For example, land for local food growing or allotments. Further policy DLP32 Strategic Green Infrastructure supports the protection of and creation of strategic green infrastructure which includes spaces/land for local food growing which is referenced in the policy justification. The council has commissioned evidence to support the protection of open spaces which includes information on shortfalls in provision which will assist in negotiating for further provision.			
An Equality Impact Assessment should be included.	No Change Equality is considered in the planning application process under the Council's public sector equality duty.			
Adequate street lighting - people should feel that it is safe to walk the streets. Provision of CCTV will encourage people to be out and about in their communities	No Change These issues are considered in the design policy.			
Local Plan should consider designing a sustainable and healthy environment for students. Active Travel	No change			

Summary of comments

into Huddersfield town and onto the University Campus. Create an environment that properly and well supports active travel, specific considerations should include: i· Design that prioritises pedestrians and cyclists over cars i· Car Parking or Congestion Charging i· Park and ride / stride solutions i· Increasing frequency of public transport to rural areas Access to Sports Facilities and Pitches. Students need good access to primary care, acute care and mental health support.

North Kirklees CCG appreciation for ongoing involvement in process of developing the Kirklees Local Plan. The Kirklees JSNA clearly sets out importance of the built and natural environment on the health and wellbeing of local communities. Pleased to see that JSNA and JHWS have been used as evidence sources to inform the KLP. The vision and objectives within the JHWS are clearly reflected throughout the Plan. CCG recognises that delivery of the KLP and its vision requires a long term approach, and that this can only be done collaboratively.

Proposed policy is unsound failing to meet the four tests of the Framework. It should be deleted in its entirety. The Framework provides no justification at all for using the development control system to justify the concentration of Hot Food Takeaway uses.

Criteria b, d, f and k commended. However, with exception of point b these policies are barely mentioned elsewhere in Local Plan so difficult to know how they will be achieved.

Securing land for local food growing and allotments is similarly largely ignored within the Local Plan, local food growing has health and economic benefits, should be given higher priority within the DLP, with land for allotments and green open spaces protected through the safeguarding mechanism within the plan. Land that is maintained by councils, such as verges and roundabouts, could be made available to local food growing groups..

Support but may conflict with other policies.

Concerned that dispersal of housing and employment growth towards locations that are less walkable and more likely to increase car-dependency and associated air pollution will conflict with this policy e.g. Bradley golf course. Other policies and proposed allocations must be carefully considered against delivery of policy.

Council Response

The transport policies and Huddersfield Town Centre policy within the local plan promote sustainable modes of travel and consider car parking. The Huddersfield Town Centre policy also supports green streets and the enhancement of connections between the University and the primary shopping area.

The sport and physical activity policy within the local plan protects sports and leisure facilities where they are needed to meet current and future demand. The expansion or new health facilities are also considered in local plan policy.

No change

Support for continued partnership working noted.

No change

Paragraph 171 of the NPPF states that 'Local Planning Authorities should work with public health leads and organisations to understand and take account of the health status and needs for the local population'.

Paragraph 69 of the NPPF highlights that planning policies should aim to active places which promote opportunities for members of the community to meet including through strong neighbourhood centres and active street frontages. A concentration of certain types of uses on street frontages can weaken centres and make them less attractive.

No Change

Support noted.

There are a number of areas of the Plan that address land for new allotments and community food growing. These include the vision which refers to opportunities for local food growing, Policy DLP48 Healthy, active and safe lifestyles states that the council will, with its partners, create an environment which supports healthy, active and safe communities and reduces inequality by supporting initiatives which enable or improve access to healthy food. For example, land for local food growing or allotments.

Land for food growing and allotments are considered and addressed in the open space section of the local plan. Allotments and green open spaces have been assessed and safeguarded within the local plan where they are well used and required for supply.

Energy efficient design and location of development

Policy DLP2 Location of development considers the focus of development in urban areas which have existing facilities and high levels of accessibility. This will impact on energy efficiency and the promotion of sustainable development. Energy efficient design is promoted in the design policy and through the Plan section on Climate Change. This section contains a policy on supporting renewable and low carbon energy proposals.

No Change

Support noted. The plans allocations have been assessed through a range of technical consultees including highways, environmental health and health colleagues who have assessed suitability for development and where required have highlighted relevant mitigation measures. Transport modelling and an air quality model have also considered the cumulative impacts of development to ensure that the impacts of development are properly considered.

The Bradley Masterplan also provides evidence that consideration has been given to the wider impacts and context of development.

Summary of comments

An attractive environment encourages greater investment, also benefits for air quality, health etc. Green streets doesn't appear to be included within local plan policy. Very supportive of policy.

Out of town developments particularly those served by motorways should be avoided unless public transport, cycling and walking are available as a significant mode of access to services and employment.

16.5

Support Farnley Country Park to provide good quality outdoor and indoor sport and leisure. Bradley park should be refused to retain this provision.

The inclusion of Farnley Country Park will address the outdoor element of this particular issue. By providing the means to fund the Park's development and ongoing maintenance, Kirklees could have a well-maintained, free outdoor facility that takes into account access for all, with - among other things - paths for wheelchair users and dementia friendly signage.

16.6

DLP_SP639

The inclusion of Farnley Country Park will address this issue. By providing the means to fund the Park's development and ongoing maintenance, Kirklees could have a well-maintained, free outdoor facility that takes into account access for all, with paths for wheelchair users and dementia friendly signage.

16.7

DLP_SP640

The inclusion of Farnley Country Park will address this issue. By providing the means to fund the Park's development and ongoing maintenance, Kirklees could have a well-maintained, free outdoor facility for walking and cycling that takes users to within a mile of Huddersfield town centre. With further consultation this could even extend into the town centre.

16.8

No comments were received on this part of the Plan.

16.9

No comments were received on this part of the Plan.

16.10

No comments were received on this part of the Plan.

16.11

No comments were received on this part of the Plan.

16.12

No comments were received on this part of the Plan,

Council Response

At the time of a planning application, a range of plan policies will further assess accessibility, air quality etc.

Change

Words 'and green' added to criteria h.

Support noted.

No change

The sustainable travel policy within the local plan highlights that ' New development will be located in accordance with the spatial development strategy to ensure the need to travel is reduced and that essential travel needs can be met by forms of sustainable transport other than the private car.'

Support

Conditional Support

Object

No Comment

No Change

These are site specific comments which are dealt with through the allocations and designation document.

Support

Conditional Support 1

Object

No Comment

No Change

Support for Farnley Park noted but this is a site specific comment.

Support

Conditional Support 1

Object

No Comment

No Change

Support for Farnley Country Park noted but the comment is site specific and relates to the allocation and designation document.

Support

Conditional Support

Object

No Comment

No Change

Support

Conditional Support

Object

No Comment

No Change

Support

Conditional Support

Object

No Comment

No Change

Support

Conditional Support

Object

No Comment

No Change

Support

Conditional Support

Object

No Comment

No Change

Summary of comments	Council Response			
Option DLP48 16.1.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Sustaining community facilities and services	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No Change			
Policy DLP 49	Support 2	Conditional Support 1	Object 2	No Comment
DLP_SP147, DLP_SP181, DLP_SP957, DLP_SP1183, DLP_SP1616	No Change			
Commend Kirklees on DLP49 on Community Facilities and Services . Suggested revisions the Justification section does not set out how you go about demonstrating that current use is not viable.	Consider that the proposed policy criteria are already reflected in the existing policy.			
Proposed amendments:	Change			
Any proposal which would result in the loss of a community facility will not be permitted unless:	Proposed Change:			
- an alternative community facility which meets local needs to at least the same extent is already available or will be made so as part of the proposal; and	Amend the policy justification to include the following text:			
- it can be shown that the proposal does not constitute the loss of a service of particular value to the local community nor detrimentally affect the character and vitality of the area; and	"Where the proposal involves the loss of land or premises presently or last in community use, the applicant will normally be required to provide evidence covering the results of reasonable attempts to actively market the land or premises for sale or lease, at existing use value to demonstrate that there is no longer a need for the facility.			
- in the case of commercial community facilities, it has been demonstrated that it is no longer economically viable and cannot be made so.	The following additional information will be required for licensed premises:			
Reasoned Justifications	- The last 3 years trading accounts with a breakdown of the percentages of income from food and drink			
Regarding alternative community facilities, the Council will require evidence not only that an alternative facility or facilities can be found within easy walking distance but that there is at least one such facility which offers services and an environment comparable to that of the facility subject to the proposal.	- Where a dining facility is provided, details of the market aimed at and the number of covers available			
Regarding local needs, the Council will require evidence that there has been public consultation to ascertain the value of the facility to the local community.	- Who the licence is currently held with and when it is due for renewal			
If the facility is registered as an Asset of Community Value then the Council will regard this as a material consideration in the determination of any planning application affecting the facility.	- The opening times for the premise.			
On viability, the Council will require evidence demonstrating that:	An established facility may become economically unviable, particularly where this involves a commercially run facility, for example a post office or pub. In some instances, multiple use or investigation of assistance (e.g. new technologies, grants) may significantly improve economic viability, particularly where there is active community support to retain the facility.			
- the existing or recent business is not financially viable, as evidenced by trading accounts for the last three years in which the business was operating as a full-time business;	An alternative facility of equivalent or better standard includes - in terms of size, function, adaptability and accessibility - to that existing, which meets the needs of the local community. To ensure the timely provision of a replacement facility, the Council may impose a condition on the planning permission or seek an obligation for the facility to be made available at the same time as the occupation of any associated development".			
- a range of measures were tried during this time to increase trade and diversify use;				
- the potential for the property to extend the range of facilities offered at the site has been fully explored;				
- for public houses, the CAMRA Public House Viability Test, or a similar objective evaluation method, has been employed to assess the viability of the business and the outcomes show that the public house is no longer economically viable.				
Also on viability, the Council will require evidence that all reasonable measures have been taken to market the facility to other potential operators. The facility must have been marketed for at least 24 months either as the current type of facility or as an alternative community facility, at a price agreed with the Council following an independent professional valuation (paid for by the developer). In turn there must have been no interest in purchasing either the freehold or leasehold as a community facility. The business must have been offered for sale locally, and in the region, in appropriate publications and through relevant specialised agents.				
Question the phrase 'choice of travel options'; they should be reachable by walking, cycling and public transport.	Change			
	Proposed Change			

Summary of comments	Council Response			
	Paragraph now reads "Community facilities should be provided in accessible locations where they can minimise the need to travel or they can be made accessible by walking, cycling and public transport. This will normally be in town, district or local centres."			
Very supportive of Policies DLP 48, and DLP 49, as Community Facilities and Healthy Lifestyles are highly valued by many that we have consulted.	No Change			
	Supporting comments noted.			
Support the inclusion of proposed Policy DLP 49. It provides clear guidance to safeguard and promote cultural and community infrastructure for the benefit of the local community, reflecting requirements in paragraphs 156 and 70 or the NPPF.	No Change			
	Supporting comments noted			
16.13	Support	Conditional Support	Object	No Comment
No comments have been received on this part of the Plan.	No Change			
16.14	Support	Conditional Support	Object	No Comment
No comments have been received on this part of the Plan.	No Change			
16.15 DLP_SP150	Support	Conditional Support	Object 1	No Comment
The Clinical Commissioning Group have just transferred the care closer to home physiotherapy services to Locala. New physio patients in the Holme Valley now have to travel to Moorfields (which is the other side of Huddersfield) instead of to Oaklands. Other services previously available at local surgeries have also been stopped and centralised! This seems to me to be a retrograde step and not good planning - more travel, more emissions, more congestion etc	No Change			
	The Clinical Commissioning Groups have been consulted on the local plan. The Local Plan cannot influence how services are provided.			
16.16	Support	Conditional Support	Object	No Comment
No comments have been received on this part of the plan.	No Change			
Option DLP49 16.2.1	Support	Conditional Support	Object	No Comment
No comments have been received on this part of the Plan.	No Change			
Option DLP49 16.2.2	Support	Conditional Support	Object	No Comment
No comments have been received on this part of the Plan.	No Change			
Educational and health care needs	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
Policy DLP 50 DLP_SP257, DLP_SP290, DLP_SP296, DLP_SP430, DLP_SP450, DLP_SP652, DLP_SP977, DLP_SP1184, DLP_SP1452, DLP_SP1893	Support 2	Conditional Support 1	Object 7	No Comment
There is also a concern about the adequacy of local school provision given that all of the local schools are already at or near capacity. We would have expected to see some provision for an additional school to be built somewhere to cater for all the anticipated additional children resulting from the increased housing.	No change.			
	The Local Plan is supported by an Infrastructure Delivery Plan and Infrastructure Technical Paper. Every development site in the local plan has also been considered by infrastructure providers to ensure that it has no significant constraints.			
New policies such as DLP50 glibly refer to infrastructure being required, but fail to give any detail of how and where, and simply defer decisions to site-specific planning applications made at the time of actual development. The scale of development proposed for Spen Valley would require the Council to provide several completely new primary schools and an additional secondary school.	The Infrastructure Technical Paper outlines how the school infrastructure has been considered in relation to the Local Plan. Every accepted housing site has been considered by the School Organisation and Planning Team factoring in existing school capacity and pupil number trends. This assessment was done based on existing primary and secondary school place planning areas, also considering the predicted phasing of when the development is likely to come forward. This work is on-going, and will be revised periodically to ensure that			

Summary of comments

You seem to have made no specific plan to meet infrastructure needs as is required in National Planning Policy Framework.

For example in your draft plan you state in Policy DLP 50 Educational and Health Care Needs Where the scale of development proposed may impact on education and health provision, the council will actively work with applicants to resolve key planning issues in advance of a planning application being submitted.

Policy DLP 50 Educational and health care needs This policy does not clearly set out the Council's expectations for financial contributions towards education and health provision. The supporting text to the policy states at paragraph 16.19 with respect to school places; where housing developments or the cumulative impact of a number of housing developments in an area gives rise to the need for extensions, refurbishment and/or remodelling to provide additional capacity, the council will look to the landowner/developer or a consortium of landowners/developers to fund the cost of providing the additional capacity at existing schools or a new school at the appropriate time, including the cost of acquiring additional land if necessary. Strategic school infrastructure Kirklees wide is included within the Preliminary Draft Regulation 123 List. This policy should be amended to reflect this so that developers are not charged twice for the same item of infrastructure. Health care facilities are not currently listed within the Preliminary Draft Regulation 123 List. Therefore planning obligations should only be sought where they meet all of the following tests to be consistent with the NPPF: - necessary to make the development acceptable in planning terms; - directly related to the development; and - fairly and reasonably related in scale and kind to the development. We therefore object to Policy DLP50.

In respect of Draft Policy DLP50 our client questions the role of the Community Infrastructure Levy (CIL) with regards to the implementation of the policy. Our client believes that CIL payments should be utilised towards funding improvements to existing educational facilities on account of the impact of new housing developments. Unless sites are of a sufficient size to require the delivery of a new educational facility in order to cater for the capacity of the development itself. However, Draft Policy DLP50 does not reference the use of CIL to improve educational facilities, or health facilities, and accordingly the policy creates confusion in respect of the delivery of identified needs in these areas. BDW consider that the policy should be reviewed in light of the Council's future adoption of CIL. The draft policy also makes reference to the Council working with applicants to resolve key planning issues. Developers are required to deliver Section 106 Agreement and CIL payments. Once provided it is then the Council's role to deliver the facilities needed utilising the payments received. The suggested wording indicates officers may seek an additional involvement from Developers in the delivery of the required facilities beyond a financial payment (where not a site specific requirement) and accordingly our client believes that this wording should be removed or re-phrased.

The following clause (used for healthcare): b. they are well-related to the catchment they will serve to minimise the need to travel or they can be made more accessible by walking, cycling and public transport should also be added as a criterion for educational facilities.

16.17

No comments were received on this part of the Plan.

16.18

No comments were received on this part of the Plan.

Council Response

future school provision meets the needs of new housing growth in specific geographical areas.

No change.

The Local Plan is supported by an Infrastructure Delivery Plan and Infrastructure Technical Paper. Every development site in the local plan has been considered by infrastructure providers to ensure that it has no significant constraints. The Local Plan includes policies to ensure that appropriate infrastructure is delivered alongside development including:

- Providing infrastructure
- Masterplanning sites
- Strategic transport infrastructure
- Highways and access
- Drainage
- Educational and health care needs
- New open space

No change.

The policy wording provides the flexibly to allow deliver of essential health and education infrastructure where needs arise as a result of development.

This infrastructure could be delivered using different methods and funding sources.

The council will set out clearly as part of the CIL process which types of infrastructure a contribution will be expected for through the CIL and planning obligations.

No change.

The policy wording provides the flexibly to allow deliver of essential health and education infrastructure where needs arise as a result of development.

This infrastructure could be delivered using different methods and funding sources.

The council will set out clearly as part of the CIL process which types of infrastructure a contribution will be expected for through the CIL and planning obligations.

Proposed change.

Text added to policy.

Support	Conditional Support	Object	No Comment
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No Change.

Support	Conditional Support	Object	No Comment
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No change.

Summary of comments	Council Response			
16.19	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
16.20 DLP_SP208	Support	Conditional Support	Object	No Comment 1
Additional school places will need to be available before development in order to prevent the need to bus children out of the immediate vicinity. This is a current problem in some areas. Freedom of choice regarding schools has caused transport problems in Kirklees. Consideration should be given to re-instating catchment areas. Children can then walk to school, thus nullifying the inconvenience caused by cars to residents near schools.	No change.			
	The Local Plan is supported by an Infrastructure Delivery Plan and Infrastructure Technical Paper. Every development site in the local plan has also been considered by infrastructure providers to ensure that it has no significant constraints.			
	The Infrastructure Technical Paper outlines how the school infrastructure has been considered in relation to the Local Plan. Every accepted housing site has been considered by the School Organisation and Planning Team factoring in existing school capacity and pupil number trends. This assessment was done based on existing primary and secondary school place planning areas, also considering the predicted phasing of when the development is likely to come forward. This work is on-going, and will be revised periodically to ensure that future school provision meets the needs of new housing growth in specific geographical areas.			
	Parental choice for school places is a national policy set by central government.			
16.21	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
16.22 DLP_SP333	Support 1	Conditional Support	Object	No Comment
The development at Storthes Hall of retirement places and a Care home is well-overdue - we have little provision in the area of Shelley/Shepley for enabling the elderly, frail and vulnerable to stay in the area in which they have lived, many of them for most of their lives. Many travel to Holmfirth or Huddersfield for this sort of provision which is not ideal. The complex at Storthes Hall would be well-used by local people.	No change.			
	Comments noted.			
16.23	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change			
Option DLP50 16.3.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change.			
Protection and improvement of local air quality	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No Change			
Policy DLP 51 DLP_SP36, DLP_SP541, DLP_SP651, DLP_SP831, DLP_SP1054, DLP_SP1064, DLP_SP1164, DLP_SP1185, DLP_SP1267, DLP_SP1453, DLP_SP1617	Support 3	Conditional Support 2	Object 1	No Comment 5
Proposed developments in the Lindley/Grimescar locality clearly have the potential to further increase Birchencliffe air pollution to unsafe levels. As specified in the Local Plan, any such development should be refused unless credible and sustainable mitigation measures can be introduced.	No Change			
Areas such as Birchencliffe where NO2 levels are in excess of government guidelines continue to be developed. Installing electrical charging sockets does nothing to mitigate this in reality - significant health issues are likely and the council needs to see such levels as early indicators of pollution/travel issues to be resolved prior to development	The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.			

Summary of comments

Needs to be strengthened - no development should make the air quality any less than what it already is. All developments should at least look to maintain and if possible improve air quality. Any air quality which is worse than it currently is, is unacceptable.

Our client objects to the reference in the policy to the need for applicants to provide an air quality assessment within their planning applications where relevant. Our client considers this matter to relate to the Council's Validation Criteria and thus isn't necessarily a matter that should be included within a Local Plan policy. The Council's Validation Criteria can be updated as required and more frequently than a Local Plan policy.

Increased levels of nitrogen dioxide already shown in Birkenshaw and Liversedge. Increase in development will have significant risk on public health.

Mirfield is located in an area vulnerable to the accumulation of pollutants leading to poor air quality. The health of the community will be affected by increased development, due to increased traffic and associated air pollution. Children and the elderly are most affected.

We would commend this policy addressing local air quality which would also contribute to improved action on climate emissions.

Natural England would like to see specific reference in the policy to the protection of ecological receptors, as well as human receptors, from the impacts of air pollution. We note the requirement for additional air quality assessment as part of the Habitats Regulations Assessment process and advise that improvements to the air pollution policy with regards to the protection of European Protected Sites from air pollution may be necessary to mitigate the impacts of development in the plan period.

Support, but may conflict with other policies

Public health is a crucial issue, and we welcome these policies. However we are concerned that the dispersal of housing and employment growth, towards locations that are less walkable and more likely to increase car-dependency and associated air pollution, will directly conflict with this policy. A particular example is the proposed residential allocation at Bradley Golf Course, which is not in a walkable location and has added health risk in reducing levels of activity by displacing the public golf course.

Other policies and proposed allocations must be carefully considered against their impact on the delivery of these essential policies.

16.24

DLP_SP542

Given this statement how has ME1965 been put forward as a proposed supported mineral extraction site. The air around site ME1965 must be amongst the best in the District. Quarry operations create dust - fine dust. And as this section states "it has been estimated that removing all fine particulate air pollution would have a bigger impact on life expectancy than eliminating passive smoking or road traffic accidents. The economic cost of the impacts of air pollution in the UK is estimated at £9-19 billion every year." One assumes that increasing the dust in the air therefore has the reverse effect.

16.25

DLP_SP543

"long term exposure to air pollution can lead to serious symptoms and conditions affecting health" = like living next to a mineral extraction site. Why then has the LDP put forward site ME1965.

Council Response

No Change

The Protection and Improvements of Local Air Quality policy is consistent with national planning policy framework, NPPF para 124. No changes have been proposed.

No Change.

The approach to require a proportionate level of evidence within the policy text is considered consistent with national planning policy guidance.

No Change

The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.

These comments are site specific comments and responses can be found on H591and H2089.

No Change

Policy supported

Proposed Change

Policy amended to reflect comments and now reads:
Development will be expected to demonstrate that it is not likely to result, directly or indirectly, in an increase in air pollution which would unacceptably affect or cause a nuisance to the natural and built environment or to people.

No Change

Supporting comments noted.
Site specific information can be found in the allocations and designations document H1747

Support	Conditional Support	Object	No Comment	1
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No Change

These comments are site specific. Responses to these comments can be found in the allocations and designations, ME1965.

Support	Conditional Support	Object	No Comment	1
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No Change

These comments are site specific. Responses to these comments can be found in the allocations and designations, ME1965.

Summary of comments	Council Response			
16.26 DLP_SP544	Support	Conditional Support	Object	No Comment 1
Why then has the LDP put forward proposal - ME1965 - which runs counter to this.	No Change			
	These comments are site specific. Responses to these comments can be found in the allocations and designations, ME1965.			
16.27	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
16.28 DLP_SP545	Support	Conditional Support	Object	No Comment 1
Some areas already have "clean" air. Surely it would be best to leave them that way and not introduce factors such as mineral extraction sites that will inevitably worsen air quality. How ever was ME 1965 supported	No Change			
	These comments are site specific. Responses to these comments can be found in the allocations and designations, ME1965.			
16.29	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
16.30	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
16.31	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
16.32	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
16.33	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	Proposed Officer Change			
	Additional paragraph added:			
	16.34 The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impacts of sites allocated in the Local Plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.			
Option DLP51 16.4.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
Option DLP51 16.4.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No change			
Protection and improvement of environmental quality	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			

Summary of comments	Council Response			
Policy DLP 52 DLP_SP126, DLP_SP547, DLP_SP832, DLP_SP1186, DLP_SP1454, DLP_SP1618, DLP_SP1722	Support 3	Conditional Support 3	Object 1	No Comment
Policy supported.	No Change			
We commend this policy, particularly the statement made in 16.40 "The precautionary principle will be adopted where there are threats of serious or irreversible damage". This policy will be invaluable when assessing unconventional hydrocarbon projects such as fracking.	Supporting comments noted.			
Our client objects to the reference in the policy to the need for applicants to provide a number of environmental assessments within their planning applications where relevant. Our client considers this matter to relate to the Council's Validation Criteria and thus isn't necessarily a matter that should be included within a Local Plan policy. The Council's Validation Criteria can be updated as required and more frequently than a Local Plan policy.	No Change			
Natural England broadly supports this policy however we would like to see specific reference in the supporting text to the need to avoid impacts on ecological receptors. NPPF para 125 makes it clear that planning policies and decisions should limit the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation. Protected species such as bats are particularly sensitive to light pollution.	The approach to require a proportionate level of evidence within the policy text is considered consistent with national planning policy guidance.			
We recommend that this policy justification is updated to include a recognition that development can impact on the quality and quantity of water sources, including groundwater. The policy justification should mention a link to other related policies.	Proposed Change			
For clarity, and consistency within the policy, text in the first paragraph should be amended to read, "...so as to ensure it does not reduce unacceptably the quality of life..." The objective should not be the absolute avoidance of any harm, but rather to ensure that any harm is not unacceptable.	Supporting text amended to include reference to ecological receptors.			
16.34	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	Proposed Change			
16.35	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	New paragraph added to supporting text.			
16.36	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	16.43 It is recognised that development can impact on the quality and quantity of water sources including ground water, see policy DLP 35.			
16.37	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	Proposed Change			
16.38	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	Policy wording amended to state "to an unacceptable level"			
16.39	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
16.40	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			

Summary of comments	Council Response			
16.41	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
16.42	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
Option DLP52 16.5.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
Option DLP52 16.5.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
Contaminated and unstable land	Support	Conditional Support	Object	No Comment
No Comments received on this part of the plan	No Change			
Policy DLP 53 DLP_SP626, DLP_SP1455, DLP_SP1689, DLP_SP1723	Support 2	Conditional Support 1	Object 1	No Comment
The Coal Authority supports the inclusion of a policy which acknowledges the need to address of the issue of unstable land as part of development proposals.	No Change			
	Supporting comments have been noted.			
We are pleased this policy has recognised the challenges to development posed by the presence of contaminated land, in particular the requirement to detail any measures that are needed to make the development acceptable:	No Change			
Additional Waste Considerations	It is considered that the allocation of WS1, Land north of Emerald Street and the protection of existing waste facilities, will meet the Council's waste needs during the Plan period. Evidence that is contained within the Waste Needs Assessment supports this approach. Should new waste management facilities be required, these will be dealt with through policy DLP45.			
The Local Plan presents the opportunity to include the below waste issues as additional policies/policy text.	We will continue to work adjoining authorities to meet Duty to Cooperate requirements.			
Hazardous waste: If the two existing hazardous waste landfills in the district are likely to be closed during the plan period, is there a policy to replace this capacity in the district or to raise with other local authorities under Duty-to-Cooperate as a strategic issue?	It is considered that the waste policies are able to address the needs of the district. We will continue to work with waste providers to consider waste issues and solutions over the Plan period.			
Municipal and Commercial Industrial waste capacity gap: It is made clear in the needs assessment that the energy from waste facility in Huddersfield may be out of commission before the end of the plan period, creating a large shortfall in treatment capacity for local authority collected waste. There is also a shortfall in Commercial Industrial treatment capacity. Should potential solutions be addressed in the plan? Is replacement capacity to be sited in the same location? Will there be a period when arisings will have to be exported?				
Our client objects to the reference in the policy to the need for applicants to provide a number of contamination assessments within their planning applications where relevant. Our client considers this matter to relate to the Council's Validation Criteria and thus isn't necessarily a matter that should be included within a Local Plan policy. The Council's Validation Criteria can be updated as required and more frequently than a Local Plan policy.	No Change			
	The approach to require a proportionate level of evidence within the policy text is considered consistent with national planning policy guidance.			
Land stability and the consideration of the suitability of development with regard to ground conditions are material planning considerations as set out in paragraphs 120 - 121 of the National Planning Policy Framework (NPPF).	No Change			
	Supporting comments noted.			
Construction work arising from new development in close proximity to the canal has the potential to adversely affect the structural integrity of the canal and its retaining structures. It is therefore essential				

Summary of comments

Council Response

that structural integrity is not put at risk as part of any development proposal, including excavations for foundations or vibrations from plant or machinery which could, in the worst case scenario, result in a breach of the canal causing flooding.

Therefore, we support the policy, which should ensure that the developers fully consider land stability and potential impacts on our infrastructure as required by national policy.

The Coal Authority supports the inclusion of a policy which acknowledges the need to address of the issue of unstable land as part of development proposals.

16.43	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
16.44	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
16.45	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	Proposed Officer Change			
	Inclusion of words "invasive species".			
16.46	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
16.47	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
16.48	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
16.49	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
Option DLP53 16.6.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
Option DLP53 16.6.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan	No Change			
Sport and Physical Activity	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No Change			
Policy DLP 54 DLP_SP274	Support 1	Conditional Support	Object	No Comment
Support for the policy and satisfied that Kirklees has an appropriate evidence base for sport, including an up-to-date playing pitch strategy and built sports facilities strategy (Sport England).	No change.			
	Support noted.			

Summary of comments	Council Response			
16.50 DLP_SP59, DLP_SP641	Support 2	Conditional Support	Object	No Comment
The council should support and encourage the plans for Farnley Country Park as an excellent opportunity for outdoor leisure activities.	No change.			
The inclusion of Farnley Country Park will address the outdoor element of this particular issue. Kirklees could have a well-maintained, free outdoor facility that takes into account access for all.	Support for Farnley Country Park, strategic green infrastructure option SGI2115, is noted.			
----- This paragraph is a reason not to build houses on Bradley Park golf course.	No change.			
	Comment noted.			
	Comment addressed in accepted housing option H1747.			
16.51 DLP_SP1476	Support	Conditional Support	Object 1	No Comment
The 'Kirklees Built Leisure and Sports Facilities Strategic Framework 2015' should be listed under 'Health and Supporting Communities rather than 'Green Belt and Open Space'.	No change.			
It is disappointing that the report is restricted to indoor facilities and golf and there is no analysis of full size outdoor pitches.	The Kirklees Built Leisure and Sports Facilities Strategic Framework 2015 is listed as supporting evidence to the Sport and Physical Activity policy set out in the 'Health and Supporting Communities1 section of the Strategies and Policies document.			
Participation in hockey in Kirklees has been in decline and there is a lack of facilities compared to 10 years ago. The reduction in availability of quality pitches has been a factor in players retiring or moving to clubs outside Kirklees and in limiting the number of juniors taking up the game.	An analysis of outdoor playing pitches has been undertaken in a separate report, the Kirklees Playing Pitch Strategy 2015, which looks at the supply and demand for football, rugby, cricket and hockey pitches across Kirklees as well as artificial grass pitches and provision of tennis courts and crown green bowling.			
The recent decline in local short-pile artificial turf pitches should have had some assessment and recognition in the supporting documents				
16.52	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
16.53	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
16.54	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
16.55 DLP_SP642	Support 1	Conditional Support	Object	No Comment
Agreement that existing sports provision is maintained to encourage a healthy community.	No change.			
	Support welcome.			
16.56 DLP_SP643	Support	Conditional Support	Object 1	No Comment
Any provision for sport and outdoor leisure should be encouraged.	Change.			
	Proposed change to paragraph 16.56 to clarify that development for alternative sport and leisure facilities which clearly outweigh the loss of the existing facility will be permitted, particularly where identified needs can be met:-			

Summary of comments	Council Response			
	"Proposals that provide alternative sport and leisure facilities will be permitted where the need for the development clearly outweighs the loss of the existing facility, particularly where identified sport and recreational needs in the area can be met."			
16.57	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
16.58	Support 1	Conditional Support	Object	No Comment
DLP_SP644				
The inclusion of Farnley Country Park will address this issue. By providing the means to fund the Park's development and ongoing maintenance, Kirklees could have a well-maintained, free outdoor facility that takes into account access for all.	No change.			
Option DLP54 16.7.1	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Option DLP54 16.7.2	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No Change			
Green belt and open space	Support	Conditional Support	Object	No Comment
In general terms the principles of the green belt to protect open spaces and the shape and character of existing communities should be maintained. This needs to be balanced however with the need for necessary community development and the supply of housing which can be constrained by the green belt. The green belt, whilst important, should be critically reviewed to balance both environmental, economic and social needs. Impact on the green belt should be minimised by identifying brownfield and town centre sites for development and by sitting housing close to existing public transport infrastructure.	Comment noted.			
17.1	Support	Conditional Support 1	Object 1	No Comment 1
DLP_SP834, DLP_SP1022, DLP_SP1873				
Policies DLP63, DLP64, and DLP65 noted and noted up-to-date evidence base which makes reference to Natural England's work on Accessible Natural Greenspace Standards (ANGSt) (Natural England).	No change.			
Support for the Spatial Strategy which emphasises the importance of green spaces within the urban areas but extreme concern that it does not attach the same strategic importance to the role of the Green Belt around and between villages, towns and urban areas. The Green Belt is actually of more critical importance in Kirklees than most local authority areas, because the green space between settlements is already very small. If the green belt is further eroded, even by small amounts, many hitherto discrete communities will cease to exist. Instead the Spatial Strategy, very mistakenly, chooses to prioritise the need for urban extension locations to enable housing delivery.	Support welcome.			
	No change.			
	Reason: The green belt review has assessed the degree to which each area of land around all the urban areas of Kirklees, as well as around all the villages, performs a green belt role when tested against the purposes of including land in the green belt. Those areas deemed to constitute strategic gaps that maintain separation between settlements have been identified as such in the Green Belt Review and Outcomes report and the methodology used is set out in the report. The need for urban extensions as locations to enable housing delivery forms part of the Spatial Development Strategy, where they offer an increased chance of new infrastructure and the potential for master planning, and sustainable extensions to settlements where exceptional circumstances can be demonstrated. The Spatial Development Strategy also clearly states that when identifying land to meet development needs, previously developed land within settlements remains the top priority.			
17.2	Support	Conditional Support	Object 4	No Comment
DLP_SP101, DLP_SP209, DLP_SP218, DLP_SP1057				
The uneven geographical distribution of the green belt across Kirklees and the uneven distribution of potential development sites means that releasing 1 or 2% of the total green belt could easily involve	No change as a result of this comment.			

Summary of comments

releasing 10 or 20% of the green belt in those critical rural fringe areas.

Officer proposed amendment.

While school playing fields should be in this protection category, they should not be viewed as part of the 70% when considering the scope of protected green belt land, since most of these areas are not public ally accessible. Much of the green space in this area is private land. The existing public space, including fields should be retained at all costs.

Why is so much building planned on green belt land? Objection to the release of Green Belt land to provide piece-meal urban extensions and / or safeguard land, in situations which compromise the long-established purposes of the Green Belt. Particular concern that the plan proposes to nibble away the green belt surrounding many of our semi-rural towns and villages, in the form of urban extensions. This will destroy the unique, varied and discrete communities that make Kirklees an attractive place to live.

17.3

DLP_SP58, DLP_SP210, DLP_SP415

It appears that here are proposals to build on every green field in the area; so how can the council justify this statement?

Objection to build houses on Bradley Park golf course, which is ideal for providing 'opportunities for sport and recreation to encourage physical activity and a healthy lifestyle'.

The Holme Valley offers a considerable area of green belt and whilst much of the space is not official 'leisure' land, it is used by walkers and cyclists and its importance as an open environment in Kirklees should not be underestimated for either residents or visitors to the region who come to appreciate the rural views, wildness of the moors and neat settlements each with their individual character.

Council Response

Reason:

It is accepted that the major urban extensions and 'detached' sites for employment land are concentrated in the north of the district and that this is the area where proportionately the amount of green belt land is least. However, at paragraph 4.1 of the Strategy and Policies document the Spatial Development Strategy states that meeting the need for housing and employment land must comply with the Leeds City Region Strategic Economic Plan, the Kirklees Economic Strategy and a strategy that acknowledges the size, character, role and function of the district's settlements, where development in Huddersfield and the north of the district will be concentrated.

Proposed change:

Amendment to paragraph 17.2 is required to incorporate additional text relating to inappropriate development in the green belt.

Reason:

Text incorporated from removed paragraph 17.4 and additional text from national policy guidance included to better reflect the fundamental aim of green belt policy.

No change as a result of this comment.

Reason:

No differentiation is made when considering the amount of land in the green belt between that which is public and that which is private, as land ownership does not determine whether land can be included within the green belt. Similarly, playing fields may be identified as Urban Greenspace whether they are privately owned or open to the public.

No change as a result of this comment.

Reason:

Paragraphs 4.5 and 4.6 of the Draft Local Plan Strategy and Policies document state that there is insufficient deliverable and/or developable brownfield (previously developed) land within the urban areas to meet housing and employment needs. This means that exceptional circumstances will exist to remove land from the green belt to accommodate development. In line with the Spatial Development Strategy set out in paragraph 4.1, brownfield sites will always be prioritised where possible, ahead of suitable greenfield sites within settlements, settlement extensions and detached green belt sites. The Green Belt Review and Outcomes report has assessed the green belt edge and land adjacent to it for the contribution it makes to the role and function of the green belt, and in line with the Spatial Development Strategy decisions will be made through the Local Plan process as to which sites best meet the need for housing and employment.

Support

Conditional Support

Object 3

No Comment

No change.

The plan protects green spaces through the allocation of valuable open spaces, sport and recreation facilities as urban green space and green spaces that are of particular importance to local communities as local green space.

No change as a result of this comment.

However, officer proposed change to amend paragraph 17.3 to incorporate relevant text relating to the protection of urban green space and local green space previously included in paragraph 17.4 which is proposed to be deleted.

Comment noted. See accept housing allocation H1747.

No change.

Comment noted.

Summary of comments

Council Response

17.4

DLP_SP100, DLP_SP187, DLP_SP271, DLP_SP447, DLP_SP672, DLP_SP689

The wording of this paragraph is not strong enough and should be made watertight and not open to different interpretations. The phrase "from inappropriate development" should be removed. The phrase "where this would be harmful to visual amenity and the character of an area" should also be removed.

Proposed change; paragraph deleted:

Reason:

The council considers that paragraph 17.4 when read as a whole repeats elements of previous paragraphs and that reference to the potential loss of green belt is misleading. The phrase 'inappropriate development' is taken from the NPPF (National Planning Policy Framework) and is the term used to describe development that should not be permitted within the green belt. This is entirely consistent with national policy. Removing the phrase would lead to less certainty over the intentions of the policies, which comply with the NPPF. The phrase and further reference to the protection of the green belt will be incorporated into revised paragraph 17.2.

The UDP of March 1999 designates land as 'NE8', Area of High Landscape Value. This designation appears to have been omitted from the draft LDF.

No change as a result of this comment.

Reason:

As a result of a Direction issued by the Secretary of State for Communities and Local Government, from 28th September 2007 some of the policies in the Unitary Development Plan were not 'saved'. Policy NE8 'Areas of High Landscape Value' was not saved at that time because it was superseded by the content of Planning Policy Guidance (PPG) Note 7.

Building on Bradley golf course does not enhance sport and recreation facilities. The policies are clearly there to be ignored if an essential area of green space such as this can be disregarded.

No change as a result of this comment.

Reason:

Draft Local Plan policy DLP54 seeks to protect and enhance sport and leisure facilities in accordance with national planning policy. Their loss will only be allowed where assessment has indicated that they are surplus to requirements, replacement facilities of equivalent or better standard can be provided or where alternative provision is proposed that addresses identified shortfalls. Whether any such criteria apply to Bradley Golf Course will be a matter for the consideration of the site and of national planning guidance as a whole, through the development plan process. Paragraph 17.4 forms part of the introductory text to the green belt, urban green space and local green space policies. Urban green space and local green space policies do not apply to Bradley Golf Course. Should it be shown that exceptional circumstances exist to remove Bradley Park Golf Course from the green belt, policies relating to development in the green belt will also not apply.

Support for the paragraph but it should refer to keeping development as far as possible to brownfield sites first.

No change as a result of this comment.

Reason:

The Spatial Development Strategy at paragraph 4.1 of the Strategy and Policies document sets out the sequential approach to the identification of land to meet development needs and that is the proper place to establish such an approach. It is not necessary to repeat the Spatial Development Strategy when setting out policies that will apply to new development in the green belt.

Sustainable transport routes should be included within this section to ensure protection.

No change as a result of this comment.

Reason:

Draft Local Plan policy DLP20 sets out policy relating to sustainable travel, which is also one of the core planning principles set out in national planning policy guidance. It is not necessary to repeat within green belt policies other issues or factors that are protected or supported by other policy areas.

Green belt

Support

Conditional Support

Object

No Comment

No comments received on this part of the Plan.

17.1.1 Development in the green belt

Support

Conditional Support

Object

No Comment

No comments received on this part of the Plan.

Summary of comments

Council Response

Policy DLP 55

Support 6 Conditional Support 1 Object 3 No Comment

DLP_SP546, DLP_SP833, DLP_SP953, DLP_SP1165, DLP_SP1187, DLP_SP1237, DLP_SP1380, DLP_SP1421, DLP_SP1678, DLP_SP1808

There is little detail within the Strategy and Policies document on the release of land from the Green Belt. The Council should include text in later drafts to provide more detail on the justification for the review of the Green Belt.

No change as a result of this comment.

Reason:
Section 4 of the Strategy and Policies document sets out the Spatial Development Strategy and states at paragraphs 4.5 and 4.6 that there is insufficient deliverable and/or developable land within the urban areas to accommodate the development needs of the district. The Green Belt Review and Outcomes report sets out the methodology used for a review of the green belt edge and the land immediately adjacent to it, for the purposes of the preparation of the Kirklees Local Plan. Exceptional circumstances are required to remove land from the green belt, or to add land to it, and the exceptional circumstances required for each green belt change will be determined as part of the Local Plan process, and set out as part of the justification for each new accepted green belt development option.

Objection to the policy on the basis that it is not positively framed and is not consistent with national policy. The NPPF seeks to restrict inappropriate development in the Green Belt. However, it includes various exceptions to 'inappropriate development' (examples include sports facilities, buildings for agriculture and forestry, etc.). The policy infers that development which is not inappropriate should then be subject to more general development policies (such as design, amenity, etc.). However, Draft Policy DLP55, in addition to repeating Green Belt policy, includes six criteria which all development in the Green Belt must meet, irrespective of whether or not that development is inappropriate. Clearly, the draft local plan approach is not consistent with national policy. Moreover, the additional six criteria are not directly relevant to the fundamental purpose of the Green Belt or the tests for inappropriate development.

Proposed change: policy deleted.

Reason:
The council considers that the policy does not aid the understanding of green belt policy. The criteria listed largely refer to policy areas that would need to be taken into consideration for any development proposal, including those in the green belt. This repetition is unnecessary and does not add clarity.

This policy should reflect changes proposed in the emerging Housing and Planning Bill and to the NPPF/G regarding redevelopment of brownfield sites.

No change as a result of this comment.

Reason:
The government consulted on proposed changes to the NPPF from 7th December 2015 to 22nd February 2016. The consultation is now closed and the government are considering representations received. Paragraph 20 of the consultation document stated that the government will bring forward proposals to amend national policy to allow for the development of brownfield land in the green belt providing it contributes to starter homes. This will be through amendment to paragraph 89 of the NPPF that prevents development of brownfield land where there is any additional impact on openness, to give more flexibility. Development on brownfield land may be considered not inappropriate where harm to openness is "not substantial". This would be a change from "not have a greater impact on openness". As there is no actual new wording, nor any transitional arrangements for proposed changes, it is not possible at the present time to draft a policy that complies with any published national planning policy, which may or may not be adopted at an indeterminate point in the future. To do so would contravene current planning guidance and lead to uncertainty.

An additional requirement should be stipulated: "All new buildings have to be built to the international energy efficiency standard Passivhaus".

No change as a result of this comment.

Reason:
Passivhaus standards have been considered and referred to in the Local Plan Design policy.

Policy supported. The special circumstances outlined in the policy are acceptable. The policy is sensible and appropriate to the preservation of the green belt. The consideration of landscape character, visual amenity, biodiversity and access in this policy is noted.

Proposed change: policy deleted.

Reason:
The council considers that the policy does not aid the understanding of green belt policy. The criteria listed largely refer to policy areas that would need to be taken into consideration for any development proposal, including those in the green belt. This repetition is unnecessary and does not add clarity.

17.5

Support Conditional Support Object No Comment

No comments were received on this part of the plan.

No change

Summary of comments	Council Response			
<p>17.6 DLP_SP1420</p>	Support	Conditional Support	Object 1	No Comment
<p>The Council should be more ambitious in delivering growth and meeting the objectively assessed needs through a review of green belt boundaries in the district.</p>	<p>No change.</p> <p>Reason: Exceptional circumstances are required to remove land from the green belt, or to add land to it. Exceptional circumstances will not exist unless the change can be shown to be necessary. A change will only be necessary if objectively assessed development needs outstrip the ability of non-green belt areas to accommodate them. It therefore follows that only such land as is required to meet those needs can be released from the green belt. This does not allow for a general review of the green belt for other purposes, or to accommodate more development than is necessary.</p>			
<p>17.7 DLP_SP23, DLP_SP144, DLP_SP1058</p>	Support 1	Conditional Support	Object 2	No Comment
<p>Agreement with the purposes of including land in the green belt.</p> <p>Gomersal is a village and needs to remain so. Using green belt for development will result in it becoming too large an area resulting in loss of character as a village. The Local Plan has given grossly insufficient weight to the purposes of the green belt set out in NPPF.</p>	<p>Support noted.</p> <p>No change.</p> <p>Reason: This paragraph of the Strategy and Policies document repeats the purposes of including land in the green belt, as set out in national planning guidance (NPPF 2012). Whether any green belt land around any settlement in Kirklees is suitable to be removed from the green belt will be a matter for the assessment of individual sites, the impact its removal would have on the overall role and function of the green belt, the existence of exceptional circumstances to justify a change to the green belt boundary and consistency with the draft Local Plan Spatial Development Strategy.</p>			
<p>17.8 DLP_SP145</p>	Support 1	Conditional Support	Object	No Comment
<p>Support for the presumption against inappropriate development in the green belt as set out in the National Planning Policy Framework.</p>	<p>Support noted.</p>			
<p>17.9 DLP_SP22</p>	Support	Conditional Support	Object 1	No Comment
<p>A development of 115 houses would result in the present houses being enveloped by new housing and therefore could not give 'consideration for the amenity of neighbours' as stipulated by paragraph 17.9.</p> <p>Officer proposed amendment to paragraph.</p>	<p>No change as a result of this comment.</p> <p>Reason: Each accepted housing option has been given an indicative capacity, but the detailed design and layout of any scheme for new housing development would be a matter for consideration at planning application stage and subject to normal development management policies designed to protect the amenity of neighbouring occupiers of land and buildings. The criteria listed in paragraph 17.9 are issues that would need to be addressed should any application be received for development in the green belt, whether that development is deemed to be appropriate, or inappropriate development for which very special circumstances exist. These include issues such as odour from stables or light pollution from proposals for floodlighting, for example.</p>			
<p>Officer proposed amendment to paragraph.</p>	<p>Proposed change: Paragraph amended.</p> <p>Reason: The deletion of policy DLP55 has necessitated amendment to this paragraph to remove the reference to the draft Local Plan policy for development in the green belt.</p>			
<p>17.10 DLP_SP948</p>	Support	Conditional Support	Object 1	No Comment
<p>The term 'Minimal Harm' should be defined.</p>	<p>Proposed change: Paragraph deleted.</p>			

Summary of comments

Council Response

	<p>Reason: The wording of paragraph 17.10 has been incorporated into revised paragraph 17.2. The term 'harm' will be retained. It is used in the National Planning Policy Framework (NPPF) and refers to an assessment of 'harm by reason of inappropriateness', and 'any other harm'. These terms are not defined in national guidance and each proposal for development in the green belt is judged on its own merits. Attempting to define the term would not be consistent with national policy and not allow for the proper consideration of individual proposals.</p>
<p>17.11 DLP_SP260</p>	<p>Support Conditional Support Object 1 No Comment</p>
<p>"Appropriate" development will necessarily require a higher level of expenditure for developers, potentially making schemes unviable. This clashes with the need for development.</p>	<p>Proposed change: Paragraph deleted.</p> <p>Reason: This paragraph is no longer required following deletion of DLP55 'Development in the green belt'. The Green Belt chapter of the Strategy and Policies document is intended to guide development in the green belt, which is strictly controlled. Appropriate development includes, for example, buildings for agriculture and forestry and other development appropriate to a green belt area. Speculative housing or employment development is not appropriate in the green belt and will not be supported."</p>
<p>Option DLP55 17.1.1.1</p>	<p>Support Conditional Support Object No Comment</p>
<p>Officer proposed amendment.</p>	<p>Proposed change: Deleted.</p> <p>Reason: This is no longer required following deletion of policy DLP55 'Development in the green belt'.</p>
<p>17.1.2 Buildings for agriculture and forestry</p>	<p>Support Conditional Support Object No Comment</p>
<p>No comments received on this part of the Plan.</p>	
<p>Policy DLP 56 DLP_SP1188, DLP_SP1619, DLP_SP1809</p>	<p>Support 1 Conditional Support 2 Object No Comment</p>
<p>The policy is sensible and appropriate to the preservation of the green belt.</p>	<p>Support noted.</p>
<p>An additional requirement should be stipulated: "All new buildings have to be built to the international energy efficiency standard Passivhaus".</p>	<p>No change.</p> <p>Reason: Passivhaus standards have been considered and referred to in the Local Plan Design policy.</p>
<p>17.12</p>	<p>Support Conditional Support Object No Comment</p>
<p>No comments were received on this part of the plan.</p>	<p>No change.</p>
<p>17.13</p>	<p>Support Conditional Support Object No Comment</p>
<p>No comments were received on this part of the plan.</p>	<p>No change.</p>
<p>17.14</p>	<p>Support Conditional Support Object No Comment</p>
<p>No comments were received on this part of the plan.</p>	<p>No change.</p>
<p>17.15</p>	<p>Support Conditional Support Object No Comment</p>
<p>No comments were received on this part of the plan.</p>	<p>No change.</p>
<p>17.16</p>	<p>Support Conditional Support Object No Comment</p>
<p>No comments were received on this part of the plan.</p>	<p>No change.</p>

Summary of comments	Council Response			
Option DLP56 17.1.2.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP56 17.1.2.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
17.1.3 Agricultural and forestry workers' dwellings	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 57 DLP_SP240, DLP_SP1189, DLP_SP1620, DLP_SP1810	Support 1	Conditional Support 2	Object 1	No Comment
Such policies encourage dwellings for Agricultural and Forestry workers and is often abused. There are many examples of existing agricultural dwellings being sold separately from farmland and then a planning application is made for new a dwelling. Often there are also existing dwellings in close proximity. The policy should be strengthened and robustly adhered to.	No change. Reason: Each application for a new agricultural workers' dwelling will be required to be consistent with the NPPF and to meet the terms of policy DLP57 and any other relevant policy. Applicants will be required to show that there is both a permanent and essential need for a new dwelling, based on the functional requirements of the enterprise it is intended to serve. It is not accepted that the existence of a policy encourages applications. The absence of a policy would result in less certainty over the information that is required to support proposals for such dwellings.			
An additional requirement should be stipulated: "All new buildings have to be built to the international energy efficiency standard Passivhaus".	No change. Reason: Passivhaus standards have been considered and referred to in the Local Plan Design policy.			
The policy is sensible and appropriate to the preservation of the green belt.	Support noted.			
17.17 DLP_SP841	Support	Conditional Support	Object	No Comment 1
No comments were received on this part of the plan.				
17.18	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.				
17.19	Support	Conditional Support	Object	No Comment
Officer proposed amendment to paragraph	Proposed change: paragraph amended. "To demonstrate that the need is permanent, applications for new dwellings in the green belt should show that the worker is required on a full time basis, that the enterprise is sound, meaning that it is financially able to sustain the farming enterprise, can support a permanent need both now and as far as can reasonably be seen ahead and that the dwelling will remain available while ever the need remains". Reason: Amendment required to ensure that the financial viability of an enterprise is demonstrated.			
17.20	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.				
17.21	Support	Conditional Support	Object	No Comment

Summary of comments	Council Response			
No comments were received on this part of the plan.	No change.			
17.22	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP57 17.1.3.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No change.			
Option DLP57 17.1.3.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No change.			
17.1.4 Facilities for outdoor sport, outdoor recreation and cemeteries	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.	No change.			
Policy DLP 58 DLP_SP275, DLP_SP1190, DLP_SP1621, DLP_SP1811	Support 2	Conditional Support 2	Object	No Comment
Officer proposed amendment to policy.	Proposed change: Policy amended to change 'genuinely' to 'evidently' and to remove criteria 'c' . Reason: The use of the term 'evidently' makes it clear that evidence will be needed to show that the scale of the building proposed is required for the proper functioning of the enterprise. Criteria 'c' repeats policy areas from the draft Local Plan and is unnecessary.			
Policy supported. The policy is sensible and appropriate to the preservation of the green belt.	Support noted.			
An additional requirement should be stipulated: "All new buildings have to be built to the international energy efficiency standard Passivhaus".	No change as a result of this comment. Reason: Passivhaus standards have been considered and referred to in the Local Plan Design policy.			
17.23 DLP_SP3	Support	Conditional Support	Object 1	No Comment
Bradley Park Golf Course provides leisure activities for people of all ages in the area; golfers, walkers, footgolfers, Sunday lunches for all, especially the elderly and the general public.	No change Reason: Paragraph 17.23 is part of the justification text for DLP 58 'Facilities for outdoor sport, outdoor recreation and cemeteries', which gives guidance on the issues to be considered should applications be received for development associated with existing sport and recreation facilities in the green belt. The policy, and therefore the justification, does not apply to sport and recreation facilities outside the green belt. Should it be shown that exceptional circumstances exist to remove Bradley Golf Course from the green belt, policy DLP58 will not be relevant to any application for development at the golf course.			
17.24	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
17.25	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
17.26	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			

Summary of comments	Council Response			
Option DLP58 17.1.4.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP58 17.1.4.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
17.1.5 The extension, alteration or replacement of existing buildings	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 59 DLP_SP1191, DLP_SP1622, DLP_SP1812	Support 1	Conditional Support 2	Object	No Comment
The policy is sensible and appropriate to the preservation of the green belt.	Support noted.			
An additional requirement should be stipulated:	No change.			
"All new buildings have to be built to the international energy efficiency standard Passivhaus" and "All retrofits and refurbishments to be undertaken to the EnerPHit Passivhaus retrofit standard".	Reason: Passivhaus standards have been considered and referred to in the Local Plan Design policy.			
17.27	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
17.28	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
17.29	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
17.30	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP59 17.1.5.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP59 17.1.5.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
17.1.6 Garden extensions	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 60 DLP_SP1813	Support 1	Conditional Support	Object	No Comment
The policy is sensible and appropriate to the preservation of the green belt.	Support noted.			
17.31 DLP_SP949	Support	Conditional Support	Object 1	No Comment
This paragraph contains the terms 'inappropriate development', 'very special circumstances' and	No change.			

Summary of comments

'harmful' in considering the change of use of Green Belt land by enclosing it to form a garden. Any enclosure will only be permitted if very special circumstances exist. This is a powerful demonstration of the sacrosanct value of Green Belt land. In light of this, it is inconceivable that Kirklees Council should propose a large building programme on green belt land. This action contravenes the Council's own policies and strategies.

Council Response

Reason:

The wording in the policy and the justification for it are intended to indicate the issues to be considered when applications are received to change the use of green belt land to a garden. Paragraph 83 of National Planning Policy Framework (NPPF) states that once established, green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. As the Council is now preparing the Kirklees Local Plan a review of the green belt at this time is entirely consistent with national guidance. The Strategy and Policies document at Section 4 sets out the Spatial Development Strategy and states at paragraphs 4.5 and 4.6 that settlement extensions will be required to meet the development needs of the district.

17.32	Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change.

17.33	Support	Conditional Support	Object	No Comment
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No comments were received on this part of the plan.

No change

Option DLP60 17.1.6.1	Support	Conditional Support	Object	No Comment
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No comments received on this part of the Plan.

17.1.7 Infilling and redevelopment of brownfield sites	Support	Conditional Support	Object	No Comment
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Officer proposed amendment.

Proposed change: heading changed from "Infilling and redevelopment of brownfield sites" to "Infilling and redevelopment in the green belt".

Reason:

To allow explanation of national policy on infilling in villages as it will apply in a Kirklees context, as well as infilling and redevelopment on brownfield sites.

Policy DLP 61 DLP_SP725, DLP_SP1166, DLP_SP1235, DLP_SP1422, DLP_SP1456, DLP_SP1489, DLP_SP1645, DLP_SP1815, DLP_SP1890, DLP_SP1892	Support 3	Conditional Support 1	Object 6	No Comment
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Whilst it is acknowledged that Local Plans can elaborate on national policy, there are no exceptional circumstances within Kirklees to justify the imposition of further arbitrary Green Belt tests. Openness is generally understood to mean the absence of buildings. The adoption of arbitrary tests of limiting the height of new buildings and limiting them to 'no greater than existing footprint' is unjustified. These matters should be left to the discretion and professional judgement of the planning officer and based on the individual circumstances of the planning application. In terms of criterion D, the meaning of 'detrimental cumulative impact on openness' is unclear and lacks definition. It is difficult to understand how this phrase meaningfully relates to the concept of openness or adds anything to the assessment. Provisions within the policy which exceed the national requirements are not justified, are too prescriptive and should leave the judgement to planning officers on a case by case basis.

No change as a result of this comment;

Reason:

The NPPF gives no guidance on the matters that could be considered to impact on openness and the policy seeks to be compliant with the NPPF while also giving greater understanding to the issues to be considered.

This policy should reflect changes proposed in the emerging Housing and Planning Bill and to the NPPF/G regarding redevelopment of brownfield sites.

No change as a result of this comment;

Reason:

The government consulted on proposed changes to the NPPF from 7th December 2015 to 22nd February 2016. The consultation is now closed and the government are considering representations received. As there is no actual new wording, nor any transitional arrangements for proposed changes, it is not possible at the present time to draft a policy that complies with any published national planning policy, which may or may not be adopted at an indeterminate point in the future. To do so would contravene current planning guidance and lead to uncertainty.

Objection to the specific reference in this generic policy to the Storthes Hall site. Part of the site has a current active use and the policy as worded encourages speculative development. Some form of redevelopment of the currently disused part of the site may or may not be acceptable but should be

No change as a result of this comment;

Reason:

Summary of comments

subject to the full range of relevant policies and principles of sustainable development. There are risks to the future of the Local Wildlife site at Thunderbridge meadows through impacts that may be generated by inappropriate development close by and control should be afforded by stronger policies.

In relation to the site at Storthes Hall, the policy should include positive provision of features to minimise the impact on Storthes Hall Woods, in particular, in any future plans.

Wording should be included within the policy to ensure that the redevelopment of brownfield land does not result in the loss of land of high environmental value and biodiversity losses. For example: "the redevelopment of brownfield land does not result in the loss of land that is of high environmental value or result in the biodiversity losses, which cannot be migrated or compensated for."

Policy supported. The policy is sensible and appropriate to the preservation of the green belt.

17.34

No comments were received on this part of the plan.

17.35

DLP_SP692, DLP_SP842

It is proper that Storthes Hall hospital grounds should be developed. It is the perfect opportunity to create affordable housing and housing for the elderly within a hamlet inclusive of a convenience store, health facility, and other small businesses to suit the residents.

Support for master planning of large developments like the Storthes Hall site.

17.36

No comments were received on this part of the plan.

17.37

No comments were received on this part of the plan.

17.38

No comments were received on this part of the plan.

Option DLP61 17.1.7.1

No comments received on this part of the Plan.

Option DLP61 17.1.7.2

No comments received on this part of the Plan.

Option DLP61 17.1.7.3

No comments received on this part of the Plan.

Council Response

It is considered that the Storthes Hall site is correctly referenced in DLP61 as it is a major brownfield site that is overwashed by the green belt and it is not accepted that the policy as worded encourages speculative development. The policy states openness must still be considered and that harm will be weighed against beneficial re-use. Any development proposal would need to take normal development management policies and procedures into account, including any potential adverse effect on landscape or biodiversity.

No change as a result of this comment;

Reason:

Any proposal for development or redevelopment on the Storthes Hall site will be subject o the normal policy requirements, including any impact on sensitive environmental habitats. Policies DLP 31 (biodiversity and geodiversity), DLP 32 (Strategic Green Infrastructure), DLP 33 (landscape) and DLP34 (trees) are all relevant to the consideration of any proposal that may impact on such areas.

Proposed change: Policy amended to include additional criteria "redevelopment does not result in the loss of land that is of high environmental value which cannot be mitigated or compensated for".

Reason:

To make the policy more closely comply with the NPPF which states at paragraph 111 that "planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value".

Support noted.

Support	Conditional Support	Object	No Comment
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No change.

Support 2	Conditional Support	Object	No Comment
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Support noted.

Support noted.

Support	Conditional Support	Object	No Comment
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No change.

Support	Conditional Support	Object	No Comment
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No change.

Support	Conditional Support	Object	No Comment
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No change.

Support	Conditional Support	Object	No Comment
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Support	Conditional Support	Object	No Comment
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Support	Conditional Support	Object	No Comment
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Summary of comments	Council Response			
17.1.8 The re-use and conversion of buildings	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 62	Support 1	Conditional Support 3	Object 1	No Comment
DLP_SP1192, DLP_SP1423, DLP_SP1566, DLP_SP1623, DLP_SP1816				
The policy justification should be amended to explain that in the case of Listed Buildings, any proposals would also need to comply with the provisions of Policy DLP36 and that any reuse or conversion would need to ensure that the elements which contribute to the significance of that building would not be harmed.	No change.			
	Reason: The development plan needs to be read as a whole, and policies elsewhere in the plan apply to development in the green belt. It would not be practicable to include reference in the green belt policies to all the other policies that could apply to each proposal.			
An additional requirement should be stipulated: "All new buildings have to be built to the international energy efficiency standard Passivhaus" and "All retrofits and refurbishments to be undertaken to the EnerPHit Passivhaus retrofit standard".	No change.			
	Reason: Passivhaus standards have been considered and referred to in the Local Plan Design policy.			
The policy is sensible and appropriate to the preservation of the green belt.	Support noted.			
This policy should reflect changes proposed in the emerging Housing and Planning Bill and to the NPPF/G regarding redevelopment of brownfield sites.	No change.			
	Reason: The government consulted on proposed changes to the NPPF from 7th December 2015 to 22nd February 2016. The consultation is now closed and the government are considering representations received. As there is no actual new wording, nor any transitional arrangements for proposed changes, it is not possible at the present time to draft a policy that complies with any published national planning policy, which may or may not be adopted at an indeterminate point in the future. To do so would contravene current planning guidance and lead to uncertainty."			
17.39	Support	Conditional Support	Object 1	No Comment
DLP_SP1193				
The re-use of buildings in preference to building new ones is one of the core principles underpinning planning as it encourages the recycling of materials. Where there is a conflict between climate change mitigation and re-use, action on climate change should take precedence.	No change.			
	Reason: As set out in the Strategies and Policies document section 11, addressing climate change is one of the core planning principles that underpins both plan making and decision taking. There is also a statutory duty for local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts. Proposals for development or redevelopment that contravened such policies are unlikely to be supported unless there were overriding factors justifying such development.			
17.40	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
17.41	Support	Conditional Support	Object	No Comment
No comments were received on this part of the plan.	No change.			
Option DLP62 17.1.8.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP62 17.1.8.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				

Summary of comments	Council Response			
17.2 Urban green space	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 63	Support 3	Conditional Support 1	Object 8	No Comment 1
DLP_SP88, DLP_SP214, DLP_SP982, DLP_SP1089, DLP_SP1168, DLP_SP1194, DLP_SP1490, DLP_SP1559, DLP_SP1567, DLP_SP1624, DLP_SP1644, DLP_SP1700, DLP_SP1817				
The policy is sensible and appropriate to the preservation of the green belt.	No change.	Support noted.		
Delete the final paragraph of the policy referring to other small areas being covered by the policy when these areas are not identified on the Proposals Map. This part of the policy is unjustified, without basis or evidence and is unsound. All areas of Urban Green Space should be identified on the map if justified by evidence.	No change.	The size threshold for the designation of sites as urban green space is 0.4 hectares. The approach to protect valuable green spaces below this size limit is justified in the policy justification text with reference to the council's Open Space Study which includes sites below 0.4 hectares in size.		
A number of open spaces simply contribute to the character of their local area. Although these may be important to the amenity of the area, there might be some debate about whether or not they contributed to the needs of that community for open space. Amend the policy to ensure that such open areas are also safeguarded through the provisions of this policy. Add an additional criterion to read: "the local space is not of amenity value or one which makes a positive contribution to the character of the local area" (Historic England).	No change.	Amenity benefits and a sense of place have been assessed through the Open Space Study Assessment and sites safeguarded as urban green space where these benefits are important. These benefits have been considered separately to meeting specific community needs.		
	Assessment of urban green space sites assesses the amenity and sense of place	Historic Environment		
Support biodiversity value of urban green spaces is acknowledged in paragraph 17.42 of the policy justification. Include similar wording in the policy to ensure that the biodiversity value of urban green spaces is fully considered should they be developed in accordance with Paragraphs 109 and 118 of the NPPF.	No change. Support welcome.	The policy reflects the approach regarding the protection of open space, sport and recreation facilities in Kirklees through the allocation of Urban Green Space sites and includes exceptions where development may be permitted. Detailed considerations regarding impact of development on biodiversity are covered in the Design and Biodiversity and Geodiversity policies. It is not necessary to repeat these considerations in the Urban Green Space policy.		
Support for protection of urban green spaces, in particular sports facilities.	Support welcome.			
Policies DLP63, DLP64 and DLP65 noted and the up-to-date evidence base which makes reference to Natural England's work on Accessible Natural Greenspace Standard (ANGST) (Natural England).	Comments noted.			
Policy not supported as national planning policy advice is adequate.	No change. The policy provides the local policy approach regarding the protection of open space, sport and recreation facilities in Kirklees through the designation of urban green space sites and includes exceptions where development may be permitted.			
Local food growing should be given higher priority in the plan. Local allotment land and green spaces should be protected in the Plan to support local food growing. Land maintained by councils, such as verges and roundabouts, could be made available to local food growing groups. Local planning policy could also encourage the growth of local and sustainable food, by having a positive stance on projects constructing polytunnels for growing food.	No change.	Allotments and green spaces are protected in the Plan through allocation as Urban Green Space. The importance of opportunities for local food growing is recognised in the Vision for Kirklees and is considered to be adequately covered in the Healthy, Active and Safe Lifestyles policy which supports initiatives that enable or improve access to healthy food, e.g. land for local food growing and allotments.		
The approach and evidence base for urban green space is unsound. Objection to allocation of land at New Lane, Cleckheaton as urban green space. Definition of urban green space does not accord with NPPF. There is a conflict between paragraph 17.45 definition of UGS & NPPF definition of open space. The local Kirklees definition of open space is leading to an excess of land which does not perform an open space function being identified and protected under the policy. This approach is not in accordance	No change.	The definition of urban green space is not in conflict with the NPPF definition of open space which recognises that open space includes		

Summary of comments	Council Response			
with national guidance.	See accepted urban green space allocation UGS1068 regarding land off New Lane, Cleckheaton.			
17.42	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.43	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.44	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.45	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.46	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.47	Support	Conditional Support	Object	No Comment
No comments were received directly relating to this part of the Plan.	No change.			
Comments were received in respect of specific sites and have been addressed through the site allocations.	No comments were received directly relating to this part of the Plan.			
	Comments relating to Highburton Recreation Ground are addressed in accepted urban green space option UGS922.			
17.48	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.49	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.50	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.51	Support	Conditional Support	Object 5	No Comment
DLP_SP65, DLP_SP69, DLP_SP86, DLP_SP89, DLP_SP91				
The Council must exercise great care when considering development of urban green space, such as skate parks. The Council should adopt a neutral stance on such matters until public consultation has taken place.	No change.			
	The urban green space policy provides for the protection of existing open space, sport and recreation facilities from development consistent with national planning policy. Exceptions will only allowed in the specific circumstances set out in the policy.			
	Publicity on planning applications is undertaken in accordance with the guidance set out within the Kirklees Development Management Charter. In determining planning applications, the council undertakes consultation on the proposed development with the relevant internal and external consultees			
Reference to exceptional circumstances being present before the Council can positively consider development within an UGS designation should be removed. The reason for this is that the policy gives the designation the status of a presumption against development, whereas by the designations title it is	No change.			
	The urban green space policy provides for the protection of existing open space, sport and recreation facilities			

Summary of comments

"urban" in character where development ought to focus.

Council Response

from development consistent with national planning policy. Exceptions will only allowed in the specific circumstances set out in the policy.

However, proposed minor change to the paragraph to clarify that exceptionally planning permission may be granted:- "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."

17.52

Support	Conditional Support	Object	No Comment
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No comments were received on this part of the Plan.

No change.

Option DLP63 17.2.1

Support	Conditional Support	Object	No Comment
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No comments received on this part of the Plan.

17.3 Local Green Space

Support	Conditional Support	Object	No Comment
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No comments received on this part of the Plan.

Policy DLP 64

Support 2	Conditional Support	Object 4	No Comment 1
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DLP_SP954, DLP_SP1090, DLP_SP1169, DLP_SP1646, DLP_SP1701, DLP_SP1794, DLP_SP1818

Local allotment land should be protected in the Plan to support local food growing. Land that is maintained by councils, such as verges and roundabouts, could be made available to local food growing groups.

No change.

Allotments and green spaces are protected in the Plan through allocation as Urban Green Space where justified. The importance of opportunities for local food growing is recognised in the Vision for Kirklees and is considered to be adequately covered in the Healthy, Active and Safe Lifestyles policy which supports initiatives that enable or improve access to healthy food, e.g. land for local food growing and allotments.

Support for the policy and the importance to have land for sport, leisure and growing food to maintain good physical and mental well being.

No change. Support welcome.

Note the green space and open space policies and the up-to-date evidence base which makes reference to Natural England's work on Accessible Natural Greenspace Standard (Natural England).

Natural England's comments are noted.

Policy is sensible and appropriate to the preservation of the green belt, important within the Kirklees Rural area and Denby Dale ward. Difficult to reconcile this with the site allocations which incur into the green belt throughout Kirklees as a whole and, to a lesser extent, within Denby Dale ward.

No change.

Comments noted.

No Local Green Space designated in Holme Valley North. The development sites should be reviewed and sites for LGS to be identified. Existing Urban Green Space off Robinson Lane, Brockholes has not been carried forward in the Local Plan. The council and the Planning Inspector have rejected a recent planning application on this site and its green space designation should be continued.

No change.

Designating Local Green Spaces should be consistent with local planning for sustainable development in the area. The Local Plan must identify sufficient land in sustainable location to meet identified needs and the Local Green Space designation should not be used in way that undermines this aim of plan making.

Sites to be considered for Local Green Space designation must be identified by local communities with evidence to show how the site meets the Local Green Space criteria and is demonstrably special to the local community. Local Green Spaces can also be identified through neighbourhood plans, as well as local plans.

See rejected Urban Green Space option UGS1277 regarding land off Robinson Lane, Brockholes.

17.53

Support	Conditional Support	Object	No Comment
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No comments were received on this part of the Plan.

No change.

17.54

Support	Conditional Support	Object	No Comment
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No comments were received on this part of the Plan.

No change.

Summary of comments	Council Response			
17.55	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.56	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.57	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
Option DLP64 17.3.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
17.4 New open space	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Policy DLP 65	Support	Conditional Support	Object 8	No Comment 1
DLP_SP962, DLP_SP1091, DLP_SP1170, DLP_SP1195, DLP_SP1457, DLP_SP1625, DLP_SP1647, DLP_SP1702, DLP_SP1819				
CIL payments should be used to fund improvements to existing recreational facilities unless sites are of a sufficient size to require the delivery of new facilities to cater for the capacity of the development itself. The policy does not reference the use of CIL to improve recreational facilities and creates confusion in respect of the delivery of identified needs in these areas. The policy should be reviewed in light of the Council's future adoption of CIL.	No change to policy wording. The policy is sufficiently flexible to allow the delivery of new or enhanced recreational facilities through a variety of mechanisms. A change is proposed to the Delivery and Implementation section to recognise the varying ways the policy may be delivered: "The policy will be implemented through the development management process, council policies and plans. The delivery of new and enhanced facilities will be provided through a wide range of public and private sector organisations, community groups and volunteers". The approach to CIL and planning obligations for the delivery of open space infrastructure will be set out in the Regulation 123 list.			
The policy does not include standards for new open space provision and this approach does not provide developers with certainty about the level of provision which could be requested. SPD should be prepared only where necessary and should not add unnecessarily to the financial burdens on development.	No change. The policy is sufficiently flexible to ensure that individual site circumstances can be taken into account in determining the requirements for new or enhanced open space provision and considerations set out in the Design policy will be relevant. The council is yet to determine the need for SPD on new open space provision.			
The policy is not effective as the phrase "unless the developer clearly demonstrates that it is not financially viable" provides an unacceptable let-out clause in the policy that will render it ineffective in practice and should be deleted. The policy should set out clear policies for the amounts and general locations of new green spaces to which new developments will be expected to contribute.	National policy is clear that sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. A viability appraisal will be required to be submitted to the council as part of a planning application where viability is an issue in order for the council assess evidence regarding deliverability of the site.			
The policy is sensible and appropriate to the preservation of the green belt, important within the Kirklees Rural area and Denby Dale ward. Difficult to reconcile this with the site allocations which incur into the green belt throughout Kirklees as a whole and, to a lesser extent, within Denby Dale ward.	No change. Comments noted.			
Local food growing should be given higher priority within the plan. Land for allotments and green open spaces should be protected to support local food growing and land maintained by councils, such as verges and roundabouts, could be made available to local food growing groups. Local planning policy could also encourage the growth of local and sustainable food, by having a positive stance on projects constructing polytunnels for growing food.	No change. Allotments and green spaces are protected in the Plan through allocation as Urban Green Space. The importance of opportunities for local food growing is recognised in the Vision for Kirklees and is considered to be adequately covered in the Healthy, Active and Safe Lifestyles policy which supports initiatives that enable or improve access to healthy food, e.g. land for local food growing and allotments.			
The green space and open space policies and the up-to-date evidence base which makes reference to	No change.			

Summary of comments	Council Response			
Natural England's work on Accessible Natural Greenspace Standard (ANGST) are noted (Natural England).	Comments noted.			
17.58	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.59	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.60	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.61	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.62	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.63	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
Table 9	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
17.64	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan. However, officer proposed change to delete this paragraph.	Proposed change. Officer proposed change to remove this paragraph as the council have yet to determine the need for an SPD regarding new open space provision.			
17.65	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
17.66	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
Option DLP65 17.4.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Option DLP65 17.4.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Monitoring and implementation	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.1	Support	Conditional Support	Object	No Comment

Summary of comments	Council Response			
No comments received on this part of the Plan.				
19.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.3	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.4 DLP_SP1196	Support	Conditional Support	Object 1	No Comment
Too many indicators with no specific targets. Targets should be SMART (specific, measurable, achievable, relevant and time based).	Proposed change			
	Indicators rationalised and targets set where appropriate			
There should be bigger and measurable targets for carbon reduction.	Indicator and target for carbon reduction has been revised.			
Monitoring should be undertaken by an independent body.	No change. Comment noted.			
19.5	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.6	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.7	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.8	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.9	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.10	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.11	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.12	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
19.13	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				

Summary of comments	Council Response			
Glossary	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Replaced Unitary Development Policies	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
1.1	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
1.2	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Table 10	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Monitoring framework	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Figure 9 DLP_SP1059, DLP_SP1570	Support 1	Conditional Support	Object 1	No Comment
<p>Fails to incorporate proposals for positive, pro-active management of the plan, placing too much reliance on outmoded forms of risk management (factors of safety). Places far too much emphasis on long-after-the-event monitoring and too little emphasis on actively managing and up-dating the plan</p>	<p>Proposed Change</p> <p>The indicators and targets have been reviewed and rationalised and targets inserted where appropriate. Triggers for plan review have also been indicated where a target is not achievable. The monitoring framework now considers positive and negative trends.</p> <p>The council is required to monitor the Local Plan through its Annual Monitoring Report which allows for regular review of the Plan</p>			
<p>Proposed indicators for monitoring impact on historic environment are supported</p> <p>Too many indicators will be confusing and impractical to monitor and over half have no specific target.</p>	<p>Support noted</p> <p>Proposed change</p> <p>Indicators rationalised and targets set where appropriate.</p> <p>Reason: To provide clarity to plan monitoring.</p>			
Table 11 DLP_SP720, DLP_SP1060	Support	Conditional Support	Object 2	No Comment
<p>DLP33a for Biodiversity and Geodiversity - there is no explanation of what this means or how it will be measured. How will developers be responsible for measuring this indicator?</p> <p>Too many indicators will be confusing and impractical to monitor and over half have no specific target.</p> <p>Fails to incorporate proposals for positive, pro-active management of the plan, placing too much reliance on outmoded forms of risk management (factors of safety). Places far too much emphasis on long-after-the-event monitoring and too little emphasis on actively managing and up-dating the plan</p>	<p>Change - Indicator clarified and target set</p> <p>Proposed change - Indicators reviewed and targets set where appropriate</p> <p>Proposed Change</p> <p>The indicators and targets have been reviewed and rationalised and targets inserted where appropriate. Triggers for plan review have also been indicated where a target is not achievable. The monitoring framework now considers positive and negative trends.</p> <p>The council is required to monitor the Local Plan through its Annual Monitoring Report which allows for regular</p>			

Summary of comments	Council Response			
	review of the Plan			
Housing delivery and phasing table	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Figure 10	Support	Conditional Support 3	Object 14	No Comment 4
DLP_SP5, DLP_SP6, DLP_SP28, DLP_SP170, DLP_SP179, DLP_SP183, DLP_SP286, DLP_SP907, DLP_SP923, DLP_SP1061, DLP_SP1286, DLP_SP1328, DLP_SP1360, DLP_SP1370, DLP_SP1382, DLP_SP1412, DLP_SP1424, DLP_SP1460, DLP_SP1562, DLP_SP1750, DLP_SP1771				
Objection if this table is used to phase or manage the release of sites. Suggested amendment to state "indicative only" or "will not be used for development management purposes".	Proposed change. The plan has been amended to state that the phasing table is indicative only.			
No justification for the tables and these appear to be out of context with the Draft Local Plan. No supporting text and clarification that this table was used to inform the Draft Local Plan housing trajectory.	Proposed change. A paragraph has been included to explain the role of the phasing table and its links to the trajectory.			
Need to include windfall allowance in the first five years of the plan	No change. Much of the capacity identified from planning applications in the five year supply is on windfall sites, so the inclusion of an allowance could lead to double counting.			
Site specific phasing comments: - H233 should be phased earlier than 2021 and should come forward before H634. - Site H29 (Pilling Lane, Skelmanthorpe) should be shown as delivering new homes earlier. - H351 (Land north of Bradley Road, Huddersfield) can start to deliver homes in the next five years. - Support for short term phasing of H38 (Ryecroft Lane, Scholes)	Proposed change H233, H634 and H351 phasing has been amended to show earlier delivery. H29 has been rejected as a local plan housing option.			
Concerns about build rates and lead-in times used. Not enough lead-in time has been allowed for medium to smaller sites especially in weaker market areas.	No change. The trajectory is indicative and as such is not intended to be enforceable. Information relating to the lead-in times and build rates is set out in the housing technical paper.			
Site specific comments not related to phasing.	No change. These comments have been dealt with as part of the assessment of each individual site.			
Phasing is unrealistically optimistic as it relies on strategic sites delivery in the early part of the plan. Specific concerns raised in relation to H1747, MX1905, MX1911, H758, H2089, H706. Strategic sites can take five years to provide housing completions.	Proposed change. The phasing table and trajectory have been amended to reflect potential later delivery on some of the larger sites, especially where these are currently in the green belt.			
Trajectory is not realistic or enforceable	No change. The trajectory is indicative and as such is not intended to be enforceable. Information relating to the lead-in times and build rates is set out in the housing technical paper.			
Lack of control over phasing will discourage development of previously developed sites	No change. The local plan has identified previously developed sites as allocations where these are available and have been assessed as accepted development options following the site selections methodology. Although the council recognise the importance of re-using previously developed sites in local plan policies, greenfield site development could not be restricted through the phasing of sites as there are not enough previously developed sites to meet the local plan housing requirement alone.			
Phasing should be controlled by policies. Allocations should only be released for development on a five year rolling time horizon to adapt to changing circumstances.	No change. To specifically restrict sites to a particular phase could prevent sufficient new homes being delivered to meet the local plan housing requirement. The council have prepared a local plan covering the period from 2013-2031			

Summary of comments

Likely to be lower delivery in the early years of the plan therefore smaller to medium sized sites should be allocated in the strongest market areas.

The phasing table sets out 4386 units but the Draft Local Plan quotes 5,100.

Sites in proximity to the M62 are likely to be affected by the motorway as a constraint to achieving sufficient house prices and therefore impacts on viability. Also, yet to be proven that noise and air quality issues can be adequately mitigated.

Over-estimation of the capacity of sites as a standard gross to net ratio has not been applied.

Council Response

to comply with national planning policy.

No change.

The indicative phasing of sites sets out the delivery of sites to meet the housing requirement and shows that a five year supply of deliverable housing sites can be demonstrated.

No change.

The capacity for the Kirklees Rural area and the capacity in the phasing table for this area in the draft local plan were consistent.

No change.

The local plan site allocations process has considered noise and air quality as factors in determining whether a site should be allocated for housing in the local plan. This included consultation with Environmental Health colleagues.

No change.

Average densities used are based on sites across Kirklees and include open spaces and estate roads. Also, each site has been subject to a technical assessment to determine whether constraints would lead to a reduction in the developable area of sites. As such, there is no requirement for a standard gross to net ratio to be applied on sites.

Reasonable alternatives for sustainability appraisal

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

4.1

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

4.2

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

4.3

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

Table 12

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

Table 13

Support Conditional Support Object No Comment

No comments received on this part of the Plan.

Table 14

Support Conditional Support Object 1 No Comment

DLP_SP87

DLP63 is not supported. National planning policy advice is adequate. The Sustainability Appraisal objectives often appear flawed e.g. they consider positives simply because a specific designation draft is large, or accepts the proposal because there may be a minor positive benefit e.g. references in SA Objectives re UGS 1219 Quarmby Cliff/ Ballroyd Clough

No Change

The sustainability appraisal objectives assumptions are set out in the SA Report and provide a consistent basis for undertaking the appraisal.

Local Plan Key Diagram

Support Conditional Support Object No Comment

No comments were received on this part of the Plan.

No change.

Summary of comments	Council Response			
Key Diagram	Support	Conditional Support	Object	No Comment
No comments were received on this part of the Plan.	No change.			
Wildlife Habitat Network	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Wildlife Habitat Network DLP_SP146, DLP_SP238, DLP_SP721	Support	Conditional Support	Object 3	No Comment
A site on Commercial Street, Slaithwaite is currently contaminated with Japanese Knotweed and an ecological survey of the land concludes it has little value. Concern that its partial designation as wildlife habitat network will preclude its eventual development for housing, even though part of the included site will have no wildlife value.	No change.			
Suggested new line of the wildlife habitat network which includes the lower part of the bank down to Kitchen Clough.	The suggested change does not allow sufficient space for the Wildlife Habitat Network. This section of the network is both a water course and woodland habitat. The long term objective of the wildlife habitat network is to improve connectivity between habitats.			
A very poor diagram which tells us nothing. Interested in wildlife around Oakwell Country Park to protect from development but can only make out a small green patch somewhere near Oakwell. It is impossible to make constructive comment on this section.	Development proposals within the Wildlife Habitat Network will be considered against the Biodiversity and Geodiversity policy and in this case may be acceptable up to 10m from the water course provided that the function and continuity of the Wildlife Habitat Network can be safeguarded.			
There is insufficient detail to know what the Wildlife Habitat Network includes and how it has been arrived at. It is inadequate for the purposes of this consultation.	No change to map.			
	The Wildlife Habitat Network can be viewed in greater detail on the interactive Local Plan map available to view online through the council's website. Information and detail explaining the methodology used to identify the Wildlife Habitat Network is set out in the council's Environmental Designations Technical Paper.			
	No change to map.			
	The Wildlife Habitat Network can be viewed in greater detail on the interactive Local Plan map available to view online through the council's website. Information and detail explaining the methodology used to identify the Wildlife Habitat Network is set out in the council's Environmental Designations Technical Paper.			
Biodiversity Opportunity Zones	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Biodiversity Opportunity Zones DLP_SP722	Support	Conditional Support	Object 1	No Comment
The Biodiversity Opportunity Zones is a very broad land map and it is unclear how it is to be used.	No change to map.			
	However, proposed change to justification text to clarify the purpose of the Biodiversity Opportunity Zones and how they are intended to be used. Further detail is provided in the Environmental Designations Technical Paper and on the council's website.			
	The Biodiversity Opportunity Zones represent 5 specific geographical areas of Kirklees which reflect the habitats found in these areas. The range of species of principal importance associated with the specific habitats in these zones has been identified. The purpose of the Biodiversity Opportunity Zones is to guide developers in providing the appropriate measures to conserve and enhance the priority habitats and species that occur within a particular zone.			
Strategic Green Infrastructure Areas	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				
Strategic Green Infrastructure Areas	Support	Conditional Support	Object	No Comment
No comments received on this part of the Plan.				

Summary of comments

Council Response

Mineral Safeguarding Areas

Support

Conditional Support

Object

No Comment

No comments received on this part of the Plan.