

**Draft Local Plan - Summary of Representations received and Council Response on the Draft Local Plan Sustainability Appraisal Report (September 2015) and the Habitats Regulations Assessment Report (October 2015)**

**Table 1: Consultation comments received in relation to the SA Report for the Draft Kirklees Local Plan (September 2015)**

Consultee	Consultation comments – summarised where appropriate	DRAFT Response and any action taken to address consultation comment in this updated SA Report
Natural England	Natural England welcomes the Sustainability Appraisal and considers the framework and assessment broadly compliant with the Strategic Environmental Assessment Directive 2001/42/EC at this stage and as regards our statutory remit. However we have a number of comments which we advise that you consider in order ensure compliance.	Noted, specific comments are addressed below.
Natural England	<p>SA Objective 11: Natural England broadly welcomes this objective however, as mentioned in para 1.19.1 of this letter we advise that you ensure you have sufficient evidence regarding agricultural land quality to inform your decisions regarding the weight given to agricultural land quality against other sustainability concerns.</p> <p>The Local Plan should give appropriate weight to the roles performed by the area’s soils. These should be valued as a finite multi-functional resource which underpins our well-being and prosperity. Natural England note that para 4.51 of the Sustainability Appraisal report, provided in support of this consultation, identifies a number of large sites on green field land that are likely to be on the best and most versatile agricultural land. While we accept the conclusions of the SA that the requirements of agricultural land will need to be balanced with other sustainability issues we advise that you should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information is available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan.</p> <p>To assist in understanding agricultural land quality within the plan area and to safeguard ‘best and most versatile’ agricultural land in line with paragraph 112 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England.</p>	<p>Noted. The SA of site options has drawn on the available GIS data showing agricultural land quality in the district. It is not feasible at this strategic level of assessment for site specific ALC survey data to be collected in relation to all of the site options.</p> <p>Decisions about the weight that should be given to agricultural land quality versus other sustainability concerns are taken by Kirklees Council when taking into account the SA findings and other factors to inform the selection of site allocations for the Local Plan. It is not considered appropriate for the SA to weight certain SA objectives over others.</p>

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Natural England	<p>SA Objective 12: Natural England broadly supports this objective however we question the assumptions used in para 4.53 regarding a 500m buffer around the Peak District National Park, as discussed in para 1.19.4 of this letter above. As a precautionary distance, we would consider 500m too short, therefore we advise that you provide further details as to why this distance was selected. Natural England advise that you seek the opinion of the National Park Authority regarding the impact of allocations on setting and special qualities of the National Park and refer to the Peak District National Park Management Plan available from the Peak District National Park’s website.</p> <p>Where it is considered that there is a risk of impacts on the setting and special qualities from an allocation but that this can be mitigated we advise that the site box includes the requirement for a Landscape and Visual Impact Assessment (LVIA) to be included in the site boxes in the Allocations and Designations document in order to inform decision making and the design of mitigation. Where it is not possible to determine whether mitigation is possible, we advise that LVIA should be undertaken at these sites to inform the Plan.</p>	<p>It is recognised that the specific distance over which there may be impacts on the setting of the Peak District National Park from new development will vary depending on factors such as the topography of the land and the scale of the development proposed. However, the SA is a strategic level assessment and it is necessary to apply an indicative buffer distance that can be used in the SA of numerous site options, for which 500m is considered appropriate. As explained in the assumptions table in Appendix 4 of the SA report for the Draft Local Plan, all of the scores against SA objective 12 are currently uncertain, recognising that effects cannot be assessed in detail until the specific proposals for sites come forward. The SA findings for SA objective 12 are also informed by the Kirklees Landscape Character Assessment.</p>
Historic England	<p>In terms of the historic environment we considered that the Scoping Report identified the plans and programmes and the key sustainability issues which are likely to be of relevance to the development of the Local Plan. We also believed that it established an appropriate baseline together with a reasonable set of objectives against which to monitor the likely significant effects of the Plan and that it set out the basis for an appropriate framework against which to assess the potential impacts which the Policies and proposals of the Plan might have upon the historic environment. We are pleased to note that the changes which we suggested have been incorporated into this latest iteration of the Appraisal.</p>	<p>Noted, no action required.</p>
Historic England	<p>On the whole, we would concur with the conclusions in the document regarding the likely significant effects which the policies and proposals of the Plan would be likely to have upon the historic environment. Where there is likely to be an adverse effect, we would concur with the mitigation measures which have been suggested.</p> <p>The only aspects of the Appraisal where we consider further thought is necessary are as follows: -</p>	<p>Noted. The advice provided in paragraph 4.63 of the SA report for the Draft Local Plan reflects the fact that the SA is a strategic level assessment and that detailed impacts cannot be assessed until specific development proposals for each site are known, which they are not currently. Whilst</p>

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	<p>Paragraph 4.63 This Paragraph does not accurately reflect the advice given to the Council by Historic England regarding the appropriateness of the “orange” sites as Allocations. In our response we made it clear that, before allocating any of these sites, additional work needs to be undertaken by the Council to evaluate the potential impact.</p>	<p>not within the SA as part of the local plan evidence base additional work is being undertaken to evaluate potential impacts.</p>
<p>Mr Gary Hutchinson</p>	<p>Have concerns with what appears to be inaccurate reporting for this site (H591). Page 34 Map 7 - significant effect on objective 5 Amenity. Only shows small part of the site. Is this accurate? Is a site not assessed as a whole? Also it states on more than one objective that it is "mainly green" with an "existing property located in south western corner of site" This site is all greenbelt with no existing properties within.</p>	<p>As shown in the detailed SA matrix for site H591 in Annex 1 of the SA report, the score for SA objective 5 (amenity) is minor negative. Map 7 shows those sites identified as having a likely significant negative effect on this objective; therefore H591 did not feature on the map. The site on the map that the consultee is referring to is most likely H552 which covers the western half of site H591. A significant negative effect has been scored for amenity (SA objective 5) for that site.</p> <p>However, it is noted that there is inconsistency between the appraisal of H552 and H591 as both sites are adjacent to what appears to be a farm and a scrap yard to the west, with potential for effects in terms of noise and air pollution. This has been amended in the updated SA report.</p> <p>The references to the site being ‘mainly green’ refer to the colour coding used in the heatmapping, rather than whether the site is brownfield or greenfield. This is explained in the assumptions table in Appendix 4 of the SA report for the Draft Local Plan.</p>
<p>Mr David G Collins</p>	<p>I am very sorry but I found the document unintelligible. Too much background, too much detail, no highlighting of conclusions, in fact conclusions will be nearly impossible to find. A good report should start with the main conclusions,</p>	<p>The SA report is clearly divided into sections including those setting out the methodology and conclusions. The SA</p>

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	followed by detail, followed by methodology. Not all mixed together.	report is lengthy due to the need to meet all of the requirements set out in the SEA Regulations and due to the number of site options requiring assessment. The full report is also accompanied by a Non-Technical Summary.
Mrs Christine Sykes	It is clear that a great deal of effort has gone into this document. It is hoped that the Local Plan will be put in place as soon as possible because the council will be vulnerable without one.	Noted. No action required.
Bellway Homes (Yorkshire) Ltd	We note that the Sustainability Appraisal prepared by LUC indicates that the development of Site (H561) will have a number of potential significant positive effects including employment, leisure and recreation, sustainable transport and climate change. The only negative impact relates to pollution. In relation to pollution issues the assessment indicates that there are residential properties to the south and west and a school to the north and that these may be affected by noise and light pollution during the construction phase. In this regard we cannot see how the Site is any different to any other proposed housing allocation as most housing allocations should adjoin the existing urban area. Notwithstanding our lack of understanding as to why the Site has scored poorly in relation to the pollution criterion any affects will be temporary and can be readily controlled or mitigated by a construction management plan.	<p>The only significant negative effect identified in relation to this site is for SA objective 15: pollution, although a number of other potential minor negative effects were also highlighted.</p> <p>The reasons for the significant negative score against SA objective 15 are described clearly in the detailed SA matrix for the site in Annex 1 of the SA report for the Draft Local Plan and the site has been appraised in line with the assumptions that were used to ensure consistency between the SA of all site options. It is recognised in the SA report that some of the negative effects of site options could be mitigated through detailed proposals for sites although these cannot be known for all sites at this stage.</p>
Bellway Homes (Yorkshire) Ltd	We are also somewhat surprised that the Site only score a +? In relation to education. The assessment suggests that most of the Site is within 6-10 minute travel time to a primary school and only the north part is within a 5 minute travel time. As the Site adjoins a primary school to the north and as such this score and the travel times referred to are difficult to understand. The assessment cannot be correct in this regard.	The score in relation to access to education is informed by the heatmapping exercise that was undertaken by the Combined West Yorkshire Authorities, as described in Chapter 2 of the SA report for the Draft Local Plan. The methodology behind that work is summarised in the SA report.
Bellway Homes (Yorkshire) Ltd	The Sustainability Appraisal concludes that the negative impacts will need to be considered further in terms of mitigation and/or enhancement and it is plain that	The SA findings are not the only factor taken into account by Kirklees Council

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	<p>the only significant negative impact identified can be mitigated. The only significant negative score (a red score) is strange and somewhat inexplicable but nevertheless it is clear from the Councils own assessment that the residential allocation of the Site would comprise sustainable development and that the allocation of the Site would be a more sustainable option than release some of the land from the Green Belt.</p> <p>We welcome the conclusion of the Sustainability Appraisal and it is clear from the Sustainability Appraisal that the development of the Site would comprise sustainable development. As sustainable development is at the heart of the planning system we cannot understand why the Site is not allocated for housing development.</p>	<p>when deciding which site options to allocate in the Local Plan. Information about the reasons for the Council's decision making is provided in this updated SA report and in the Council's Rejected Site Options Report.</p>
Mr Gerald Newsome	<p>These comments apply to H31, H32, H684, H455, H659, and to H334. The "Sustainability Objectives Document" on house building at these sites is badly flawed, as it only considers the individual sites, it does not consider the cumulative effect of building on two or even all of the sites.</p> <p>For example: H684 shows 105 units, all sites total 704 units. Thus whilst children may be accommodated from one school, finding places for 300+ children in Lepton and at King James is much more difficult. Thus the "Sustainability Objectives traffic light system for Education shown as "Green" for one site (children accommodated at local schools) should be "Orange" for two sites and "Red" for more than two sites. Apparently Kirklees have two policies DLPs on Education that I came across accidentally and now can't find. One states for smaller developments, the Education Department should liaise with Builders. However from reports in The Examiner this doesn't work well, as local schools are sometimes full. For large developments additional educational facilities should be developed concurrent with the housing. Obvious, but correct, but would it happen?</p> <p>Similarly with Transport "Green" for one site may be OK, but for 2-7 sites there would be an escalating degree of chaos on the roads in and around Lepton/ Fenay Bridge that has been commented on many times by many people commenting on this Plan.</p>	<p>It is recognised that some of the sustainability issues covered by the SA could be affected by the allocation of a number of sites within close proximity but it is not possible at the options stage to consider all potential combinations of site allocations. Therefore, each individual site option has been considered individually on its own merits to ensure consistency. Further consideration can be given to the cumulative effects of the Local Plan as a whole once allocated sites are identified – this has been addressed in this updated SA report.</p> <p>The SA scores for education are based on the level of access from each site to existing schools, as explained in the assumptions that are presented in the SA report. Scores are not based on school capacity as this information was not available. School place planning is further considered in the infrastructure delivery plan and infrastructure technical paper.</p>

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Mr G R Newsome	<p>Due to the title of this document most people will never look at it. It does of course compare all the important factors of each individual housing site. It is a very complicated document and reading it is like wading through treacle.</p> <p>It looks at each site individually and does not take into account the cumulative effects of all sites in a particular Ward or locality. The above sites are all in Lepton, H31 for example has a capacity of 68 dwellings However the total capacity of all site in Lepton is 704 dwellings. Thus whilst the education conclusion for one site is "Green" children can get in at the various schools, but taking the sites together the local schools would have to take in 300 children, thus the sites should be changed to "Red". Significant changes to the education pyramid would be required or school capacity requires to be increased. There are ongoing instances within Kirklees of schools local to housing sites, or even the next nearest, not being able to accommodate children from new developments. In similar vein the effect on transport and roads for developing one site may be marginal, but the effect with seven sites with 704 houses the effect is significant. Surely the light for each site should again change from "Green to "Red".</p>	<p>The full SA report is accompanied by a Non-Technical Summary which summarises in non-technical language the key points from the SA report.</p> <p>It is recognised that some of the sustainability issues covered by the SA could be affected by the allocation of a number of sites within close proximity but it is not possible at the options stage to consider all potential combinations of site allocations. Therefore, each individual site option has been considered individually on its own merits to ensure consistency. Further consideration can be given to the cumulative effects of the Local Plan as a whole once allocated sites are identified – this has been addressed in this updated SA report.</p> <p>As noted above, the SA scores for education are based on the level of access from each site to existing schools, as explained in the assumptions that are presented in the SA report. Scores are not based on school capacity as this information was not available. School place planning is further considered in the infrastructure delivery plan and infrastructure technical paper.</p>
DPP Planning on behalf of Kier Living	<p>Our assessment of the suitability of the Site (H549) for residential development is supported by the Council own sustainability appraisal. In respect of this Site the Council own sustainability appraisal indicates that development here will have a number of significant positive effects its accessibility to schools and health facilities and local services and facilities, leisure and recreation, affordable housing, sustainable transport and climate change. The sustainability appraisal</p>	<p>The SA findings are not the only factor taken into account by Kirklees Council when deciding which site options to allocate in the Local Plan. Information about the reasons for the Council's decision making is provided in this updated SA report and in</p>

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	<p>identified no significant negative effects and only minor negative impacts in relation to pollution, flood risk and recycling of waste material.</p> <p>In relation to pollution issues the assessment indicates there are residential properties within 100m which may be affected by noise during the construction phase, including properties directly adjacent to the northern and western boundary of the site. In this regard we cannot see how the Site is any different to any other proposed housing allocation as most housing allocations should adjoin the existing urban area. Notwithstanding our lack of understanding as to why the Site should be scored negatively in relation to pollution any affects will be temporary and can be readily controlled or mitigated by a construction management plan.</p> <p>In relation to flood risk the assessment notes that the Site is mainly on greenfield land and is outside of flood zones 2 and 3 but indicates that a minor negative effect is likely. Given that the land is at low risk of flooding we again do not fully understand why the Site is scored negatively as the reason given would be applicable to all greenfield sites allocated for housing. Notwithstanding this any localised flooding issues could be dealt with by a sound drainage strategy and mitigation proposals prepared as part of a planning application submission.</p> <p>In relation to recycling of waste material the assessment states that where housing development is proposed on brownfield land, there may be good opportunities for using existing buildings and materials. This Site mainly comprises greenfield land and there is little opportunity to recycle material. As the assessment notes this is only a minor issue and given the lack of available brownfield land within the district it only has a minor negative effect. As discussed previously the allocation of the Site reduces the need for Green Belt land releases and therefore and negative impact associated with the inability to recycle material etc. needs to be balanced against the greater harm associated with development on Green Belt land.</p> <p>The Sustainability Appraisal concludes that there are no significant negative scores against the Site and it is therefore clear from the Councils own assessment that the residential allocation of the Site would comprise sustainable development. The only negative scores are by the Council's own admission,</p>	<p>the Council's Rejected Site Options Report.</p> <p>The reasons for the minor negative scores against SA objective 5 (amenity) and 16 (flooding) are described clearly in the detailed SA matrix for the site in Annex 1 of the SA report for the Draft Local Plan and the site has been appraised in line with the assumptions that were used to ensure consistency between the SA of all site options. It is recognised in the SA report that some of the negative effects of site options could be mitigated through detailed proposals for sites although these cannot be known for all sites at this stage.</p>

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	<p>minor and would certainly be outweighed by the fact that the allocation of the Site would be a more sustainable option than release land from the Green Belt.</p> <p>Given all of the above it is plain that there are no environmental constraints to the allocation of the Site for residential development.</p>	
Ian Mitchell	<p><i>Comments have been summarised:</i></p> <p>Consultee objects to site H233 being included in the Local Plan. The land is in the Green Belt and there are more suitable sites available. Disagrees with SA findings in relation to a number of issues including flood risk, biodiversity and suggests additional detailed information which should be taken into account about the site.</p>	<p>The site has been appraised in line with the assumptions that are set out in the SA report and which were used to ensure consistency between the SA of all site options.</p>
Mr R Sherwell	<p>In my opinion this Sustainability Appraisal has areas of inaccuracy and is therefore misleading. As the main thrust of NPPF (National Planning Policy Framework) is regarding 'Sustainability', and considering the lasting negative effect of incorrect Local Plan decisions, it is very disappointing that the Council are using an inaccurate Sustainability report as evidence in the process. It should be withdrawn.</p> <p>As example: Sustainability Report H8 Scholes "This site is within 46-50 minutes travel time of the nearest employment node; therefore a minor negative effect on this objective is expected." H335 Cinderhills "The whole of this site is more than 60 minutes from an employment node; therefore a significant negative effect is likely for this SA objective. Curious when the two sites are only 1/4 mile apart!</p>	<p>The scores for these two sites in relation to access to employment opportunities are informed by the heatmapping exercise that was undertaken by the Combined West Yorkshire Authorities, as described in Chapter 2 of the SA report for the Draft Local Plan. The methodology behind that work is summarised in the SA report and explains why sites near to one another may have quite different travel times – the travel times are based on modelling of walking and public transport routes rather than an 'as the crow flies' distance.</p>
Max Rathmell	<p><i>Comments have been summarised:</i></p> <ul style="list-style-type: none"> <li>• Length of SA report makes it impossible to read.</li> <li>• Concerns that the selection of SA objectives might be used to support the Council's goals.</li> <li>• SA objectives have been given equal weighting however consultee feels certain objectives should have priority (e.g. housing and job creation).</li> <li>• The consultee states that some of the scores have been intentionally adjusted in order to offset the scores of significant negatives with minor positive scores.</li> <li>• Enabling works (e.g. flood prevention or access) have not been considered on a site by site basis and only in general terms.</li> </ul>	<p>The full SA report is accompanied by a Non-Technical Summary which summarises in non-technical language the key points from the SA report.</p> <p>The SA objectives were developed at the Scoping stage and were subject to consultation with the statutory consultees at the time.</p> <p>They have been designed to cover all of the</p>



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		<p>topics required by the SEA Regulations, as explained in the SA Scoping Report and the SA Report for the Draft Local Plan.</p> <p>It is not considered appropriate to weight the SA objectives as this could result in significant effects being masked. The SA findings are one of various factors taken into account by the Council when selecting which sites to include in the Local Plan and at that stage consideration can be given to the detailed reasons for the scores given and their relative importance in relation to specific site options.</p> <p>The SA scores for the site options have been given in line with the assumptions set out in the SA report, in order to ensure consistency between the SA of a large number of site options.</p> <p>It is not possible to consider the detail of required enabling works for all site options at this strategic level of assessment.</p>
Mr David Hirst	<p>I have fully read your SA Matrices for all the above mentioned Sites (H31) and have read nothing in them that address any issues that have a definite positive outcome. All your outcomes are worded as, and I quote 'is likely'. I don't think 'is likely' is an adequate outcome for any SA Objective. I don't think schools in the area are 'likely' to cope unless more finances are made available to employ more staff and extend the school size.</p> <p>I don't think the A629 'is likely' to cope with the extra traffic that will be generated unless more finances are allocated to the existing road network. I don't think public transport system 'is likely' to be of any use unless more than the one bus per hour is scheduled on this route and the buses provided are better than the third world busses provided at present. And I certainly don't think the local drainage system 'is likely' to handle the extra water runoff caused</p>	<p>The term 'likely' is used in the SA report in recognition that in accordance with the SEA Regulations, the assessment seeks to identify 'likely significant effects on the environment' from the proposals for the Local Plan.</p> <p>As explained in the SA report, the appraisal work for site options was undertaken in a two stage process with the SA findings for the full suite of reasonable options being presented to the Council prior to the</p>

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	<p>by the tarmacing of the land which is adjacent to a flood plain. The fields at the moment absorb a great deal of rainwater which once urbanised will direct water directly into an already full to capacity Fenay Beck. Have the council not seen the recent TV footage of Mytholmroyd and Hebden Bridge etc. And can the council explain why on the Spectrum Spatial Map the areas in question are already marked as 'Accept'. Is this decision a forgone conclusion and any objection a pointless exercise. To develop any of this Greenfield Land would be foolhardy and morally wrong when as the council is well aware of the vast amounts of Brownfield Land still not developed.</p>	<p>preparation of the Draft Local Plan. Therefore, the SA findings were able to inform the Council's decision making about which sites to identify as accepted and rejected sites at that stage.</p>
Mrs Mary Gott	<p><i>Comments have been summarised:</i></p> <p>The consultee raised a number of concerns regarding the appraisal scores for site H1701:</p> <ul style="list-style-type: none"> <li>• The Sustainability Appraisal considers only the impact of a predetermined land use as designated in the Local Plan and does not assess the actual present use of "allotments, community gardens and urban farms".</li> <li>• Questions the use of GIS and assumptions and not local survey or knowledge.</li> <li>• Questions the use of heatmapping and why there are differences in travel time within a small plot of land.</li> <li>• Disagrees with a number of the SA scores given and indicated that more specific local information should be taken into account.</li> <li>• Consultee highlights that the SA refers to the site as greenfield but the Draft Local Plan calls it brownfield.</li> <li>• SA13 – Consultee highlights that Bagshaw Museum is to the east and not the west of the site.</li> </ul>	<p>The site options have been subject to SA to assess the likely impacts of their development for reasonable potential uses. The purpose of the SA is not to assess the current use of sites.</p> <p>The use of assumptions and GIS data ensures consistency between the appraisal of a large number of site options. It is not reasonable to conduct site level surveys of numerous site options at this strategic level of assessment and the GIS data used is considered to be reliable and fit for purpose.</p> <p>The score for this site in relation to travel times are informed by the heatmapping exercise that was undertaken by the Combined West Yorkshire Authorities, as described in Chapter 2 of the SA report for the Draft Local Plan. The methodology behind that work is summarised in the SA report and explains why sites near to one another or different parts of the same site may have quite different travel times – the travel times are based on modelling of walking and public transport routes rather</p>

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		<p>than an 'as the crow flies' distance.</p> <p>All SA scores are based on the assumptions set out in the SA report, which allow for consistency between the appraisal of a large number of site options. At this strategic level of assessment it is not possible to take into account issues such as capacity at individual doctor's surgeries.</p> <p>The updated SA report has amended the references to the site being greenfield to ensure consistency with the Local Plan. The typo in relation to the location of the Museum has also been corrected although this does not affect the SA scores.</p>
Mr Roger Bedford	<p><i>Comments have been summarised:</i></p> <p>The consultee has raised concerns in relation to the re-designation of H233 from being within the Green Belt to include housing. Highlighted issues relating to the character of Denby Dale, local flooding, right to light and impacts on local biodiversity particularly at Tanner Wood although no comments made directly in relation to the SA findings.</p>	<p>Site H233 has been subject to SA in line with the assumptions that were used to appraise all site options consistently. Information about the reasons for the Council's decision making is provided in this updated SA report and in the Council's Rejected Site Options Report.</p>
Mr John Turnbull	<p><i>Comments have been summarised:</i></p> <p>The consultee raised concerns in relation to the planning application for the H455:</p> <ul style="list-style-type: none"> <li>• There is no proposal for an expansion to the local schools which the consultee states are oversubscribed.</li> <li>• The plans have no details for access to the proposed site and there are safety issues.</li> <li>• The proposed site forms part of an ancient woodland area with archaeological interest with potential for negative impacts on local wildlife as a result of development.</li> <li>• The site is of great significance visually from the historic Castle Hill and the loss of openness could have an impact on tourism to Kirklees.</li> </ul>	<p>Most of the consultee's comments relate to a planning application for this site and not the SA.</p> <p>The SA recognises that the site is adjacent to the Lepton Great Wood candidate Local Wildlife Site.</p> <p>In relation to effects on the historic environment, an error was made in the scoring and an uncertain effect should have been given because the site was rated as 'orange' in relation for potential negative</p>

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		impacts on the setting of Scheduled Monument at Castle Hill. This score has now been updated in this updated SA report.
AEW UK	<p><i>Comments have been summarised:</i></p> <p>The SA relating to traveller accommodation has been considered and it is considered that a number of the SA assessment conclusions, in relation to the Bankwood Way site, are questionable.</p> <p>The consultee objects to the proposals to allocate a Traveller site in Birstall (GTTS1953). The agent has stated that the proposed Traveller site would potentially have a negative effect on the existing commercial, leisure and retail uses in the area and would not be an appropriate use in this location.</p> <p>Consultee objects to a number of the specific scores given in the SA.</p> <p>The consultee also refers to the SA in relation to rejected sites GTTS1960, GTTS1964, GTTS2045, GTTS1963 and GTTS1962 and those rejected for flood risk reasons in the SAGTTS1954, GTTS1955, GTTS1956 and GTTS2039. The consultee agrees with the rejection of these sites apart from site GTTS1956 saying that only a very small part of the site is within an area of high flood risk (Flood Zone 2 / 3a area).</p>	<p>Site GTTS1953 has been subject to SA in line with the assumptions that were used to appraise all Traveller site options consistently. Information about the reasons for the Council's decision making is provided in this updated SA report and in the Council's Rejected Site Options Report.</p> <p>The score for GTTS1953 against SA objective 8 has been noted as including an error and this has been corrected in this updated SA report.</p> <p>The score for GTTS1956 against SA objective 16 has been noted as including an error and this has been corrected in this updated SA report.</p>
Mr David Craggs	<p><i>Comments have been summarised:</i></p> <p>The consultee comments mainly relate to the Draft Local Plan itself. In relation to the SA the consultee disagrees with some of the scores given for sites E1832 and E1834.</p>	Sites E1832 and E1834 have been subject to SA in line with the assumptions that were used to appraise all employment site options consistently. Information about the reasons for the Council's decision making is provided in this updated SA report and in the Council's Rejected Site Options Report.
David and Julie Hilton	<p>We would like to state that we support the local plan and applaud the non-use of green belt land for building. Green belt is critical in supporting wildlife and stopping the merging of villages into one urban sprawl.</p> <p>To conclude, we believe brown field sites should first be developed or re-</p>	Noted, no action required.

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Pegasus Group on behalf of Mr J Wiley	<p>developed and all green belt protected and preserved.</p> <p><i>Comments have been summarised:</i></p> <p>Agent has provided a report in support of allocating the rejected site H315. Disagrees with the findings of the Council's Rejected Site Options Report in relation to this site and has referred to the SA to support this argument.</p> <p>Disagrees that proximity of M62 could affect residents at the site and states that allocated sites have a similar relationship with the motorway.</p> <p>Disagrees with scores for SA objectives 6, 11 and 14.</p> <p>In overall conclusion the agent stated that Rejected Sites Options document runs contrary to the detailed assessment in the SA Report.</p>	<p>Site H315 has been subject to SA in line with the assumptions that were used to appraise all residential site options consistently. Information about the reasons for the Council's decision making is provided in this updated SA report and in the Council's Rejected Site Options Report.</p>
Mr G Maxwell	<p>It is very difficult to understand how "scores" have been allocated to each of the options. For instance in the minerals extraction site appraisal in the text there is clear reference that sensitive receptors close to a quarry operation (500m for blockstone and 250m for aggregate) would suffer loss of residential amenity. Yet with some options such as ME1965 which is as close as 5m to someone's house the appraisal score (colour on chart p115) is exactly the same for sites that have no dwellings within these sensitivity zones. There seems to be no reason why site ME1973 has been rejected whilst the others approved. It is next to an old quarry and has no sensitive receptors within 250m and in the case of a 500m radius very few. It also scores the same on p115 as other accepted sites. This seems like a totally subjective selection. The colour scores on p115 show exactly the same on several occasions for a site which is currently a farmer's field as for one which is currently a working quarry. How can this be the case? This sustainability appraisal - to say it nicely - needs to be revisited. It seems to have several flaws which I feel fundamentally undermine the whole LDP process.</p>	<p>The reasonable alternative minerals site options have been subject to SA in line with the assumptions that were used to appraise all site options consistently. These assumptions have been applied correctly for the site options referred to by the consultee.</p> <p>Information about the reasons for the Council's decision making is provided in this updated SA report and in the Council's Rejected Site Options Report.</p>
Mr G Maxwell	<p>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</p>	<p>The site options, as well as the vision, objectives and policies in the Local Plan, have been subject to SA, with their likely effects being identified in relation to each of the SA objectives. The purpose of the SA is not to assess the site options against other</p>

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	reduced the anxiety experienced by some residents fearing developments that should not have been proposed. - see ME1965	policies and proposals in the Local Plan, although the SA report does include an assessment of the cumulative effects of the Local Plan as a whole.
Mr & Mrs IA Wainwright	There are such a large number of question marks in the tables that I find it hard to believe someone could have drawn a line between accepted and rejected at this point. Would it not have been fairer to keep all the sites in the frame until the tables were completed rather than give people the impression that decisions had already been made? I hope that the division between accepted and rejected isn't a foregone conclusion because I can see sites that are far more suitable for building on the rejected list than some of the accepted ones. Obviously nobody wants things in their back yards etc. but it would sweeten the pill if we could all see an objective and fair assessment rather than suspect 'done deal'.	<p>The uncertainties highlighted in the SA apply to all sites consistently and the reasons for highlighting such uncertainties are explained in the assumptions that are set out in the SA report. The presence of uncertainties does not indicate incomplete work as there are certain issues that cannot be assessed with certainty at this strategic level of assessment.</p> <p>In addition, the SA findings are not the only factor taken into account by Kirklees Council when deciding which site options to allocate in the Local Plan. Information about the reasons for the Council's decision making is provided in this updated SA report and in the Council's Rejected Site Options Report.</p>
Mrs O Shaw	<p>This site (H564) is within 600m of more than three recreational and leisure facilities. I wish you to consider the following:</p> <ul style="list-style-type: none"> <li>• Spen Valley Greenway - Is not available for public open space use e.g. children playing. It is used by cyclists and horseriders.</li> <li>• Miry Lane - This is approximately 600 m away.</li> <li>• King George V Recreation Ground - At least 1000 m away.</li> <li>• Springfield Farm, Lower Blacup Farm and Upper Blacup Farm - Not a public amenity space. Planning permission has been passed for housing at Lower Blacup Farm. Phase 2 will reach Upper Blacup Farm. This area is also on a very steep slope.</li> <li>• Lynfield Recreational Ground - I had difficulty finding it. Found it on google maps and visited through Lynfield housing estate. It is a mile away.</li> <li>• Bridon Way is in Cleckheaton not Hightown and is over a mile away.</li> <li>• Cuniver Court Play Area - Small and for young children only.</li> </ul>	The GIS data that has been used to inform the SA of all site options on a consistent basis shows that there are more than three recreational and leisure facilities within 600m of the site. With particular reference to the points made by the consultee, Spen Valley Greenway is a Sustrans route and is publicly available for cycling use, which is counted as a recreational and leisure activity.

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	<ul style="list-style-type: none"> <li>• Teasel Close Play Area - small and for young children only. These small play areas on small housing developments are surely for the benefit of the residents and not the public in general.</li> <li>• Claybourne Playing Fields - This is the football field owned by the local football club. Not for public use.</li> <li>• Hightown School - Not for public use. School use only. The area has security fencing and locked gates.</li> <li>• Hightown Bowling Green - Not public amenity space.</li> <li>• Site H198 - This is 3/4 miles away at the far end of Windy Bank Estate. This site is an accepted site for housing.</li> </ul> <p>I look forward to your reply on these points raised.</p>	
Mr Brian Thornton	<p>Please see Save Mirfield Group Comments sent to you by Cheryl Tyler. Major development should not be allowed without infrastructure improvements first. The A644 between Dewsbury through Ravensthorpe and Mirfield is heavily congested between the hours 07:00 and 19:00 weekdays. The school are all full to over capacity, the doctors waiting times are too long and the doctors can't get to visit patents quick enough due to major traffic congestion. The rail station has no wheel chair access when traveling in the direction of Leeds or London. The on street parking local to the railway station is ridiculous. In atwon of 20,000 people we have one (comment is incomplete).</p>	Noted. These points do not relate directly to the SA.
Mrs J Isley	<p><i>Comments have been summarised:</i></p> <p>The consultee raised concern about the proposed allocation of site H1701. Highlighted the key sustainability issues (Table 3.1 in the SA report) which state that "derelict and neglected land will be brought into beneficial use to assist in the regeneration of the District" arguing that the site is not derelict or neglected but should be classified as urban green given that it is an allotment of "high value and high quality". The consultee also stated that the use of GIS and secondary data sources instead of local knowledge and consultations meant that the results of the appraisal were misleading.</p> <p>The consultee also highlighted a number of SA scored which they believe are incorrect and questioned the variable travel times identified for the site.</p> <ul style="list-style-type: none"> <li>• Consultee highlights that the SA refers to the site as greenfield but the Draft Local Plan calls it brownfield.</li> </ul>	<p>The use of assumptions and GIS data ensures consistency between the appraisal of a large number of site options.</p> <p>Site H1701 has been subject to SA in line with the assumptions set out in the SA report.</p> <p>The scores for the site in relation to travel times are informed by the heatmapping exercise that was undertaken by the Combined West Yorkshire Authorities, as described in Chapter 2 of the SA report for the Draft Local Plan. The methodology behind that work is summarised in the SA report and explains why sites near to one</p>

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	<ul style="list-style-type: none"> <li>SA13 – Consultee highlights that Bagshaw Museum is to the east and not the west of the site.</li> </ul>	<p>another or different parts of the same site may have quite different travel times – the travel times are based on modelling of walking and public transport routes rather than an ‘as the crow flies’ distance.</p> <p>The updated SA report has amended the references to the site being greenfield to ensure consistency with the Local Plan. The typo in relation to the location of the Museum has also been corrected although this does not affect the SA scores.</p>
Huddersfield Friends of the Earth, Holmfirth Transition Town and Marsden and Slaithwaite Transition Towns Chayley Collis	<p><i>Comments have been summarised:</i></p> <ul style="list-style-type: none"> <li>The consultee highlights that at para 1.185 the SA concludes that the Local Plan would have a cumulative mixed (minor positive and minor negative) effect on climate change which the consultee finds “unacceptable”. The consultee recommends that 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”.</li> <li>The consultee highlights that at para 1.108 the SA states that in relation to DLP27 Renewable and low carbon energy “one of the alternative options considered would have slightly more positive effects than the draft policy.” The consultee subsequently recommends some amendments to DLP27.</li> <li>The consultee highlights that at para 1.179 the SA highlights that “cumulative minor negative effect on flood risk”. The consultee believes that more needs to be done with regard to action to prevent flooding.</li> <li>The consultee highlight that at paras 1.169 and 1.157 the SA states that there will be an uncertain effect on biodiversity and a significant negative effect on efficient land use due to the predominant use of greenfield land for future development through the plan. The consultee was concerned with these findings stating that new development should seek to “minimise impact on biodiversity and provide net gains, where possible”.</li> </ul>	<p>Noted. These comments relate mainly to the Local Plan and refer only to the SA in support of wider points being made. No changes made to the updated SA report as a result.</p>
Huddersfield Friends of the Earth, Holmfirth	<p>We are concerned to see 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>These points are noted. No action taken in the updated SA report.</p>



Consultee	Consultation comments – summarised where appropriate	DRAFT Response and any action taken to address consultation comment in this updated SA Report
<p>Transition Town and Marsden and Slaithwaite Transition Towns Chayley Collis</p>	<p>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. More on local planning policies and biodiversity is at: “Planning for a healthy environment: good practice guidance for green infrastructure and biodiversity” TCPA and the Wildlife Trusts 2010.</p> <p>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. This will obviously impact on opportunities for local food growing.</p>	
<p>Holmfirth Transition Town Janet Williams</p>	<p>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 change’.</p> <p>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’</p>	<p>The SA objectives have been subject to consultation with the statutory consultees and it is not considered appropriate to make further changes at this stage, which could introduce inconsistency with previous stages of the SA. The focus of SA objective 9 is on the provision of housing, while the objective of reducing reliance on carbon-based energy is addressed through other SA objectives namely 18 (efficient use of water, energy and material use) and 19 (climate change).</p>
<p>George Clifton</p>	<p>Sustainability Analysis Report Annex 1</p> <p>There are some errors or anomalies in this report.</p> <p>Sites H256 and H257; the west end of these sites are apparently 60 minutes from a primary school yet the east end of the sites are only 10 minutes from a primary school. There is a similar anomaly for secondary and further education, employment nodes and GPs/hospitals. Sites H256 and H257 score negatively for Objective 10 Sustainable Transport and it is not clear why unless it relates to the same distance problem as above. Objective 19 Climate Change only duplicates this rating. Sites H136 and H252 have their brownfield and Green Belt status reversed.</p>	<p>The scores in relation to access to travel time are informed by the heatmapping exercise that was undertaken by the Combined West Yorkshire Authorities, as described in Chapter 2 of the SA report for the Draft Local Plan. The methodology behind that work is summarised in the SA report and explains why different parts of the same site may have quite different travel times – the travel times are based on modelling of walking and public transport routes rather than an ‘as the crow flies’ distance. Differences are especially likely</p>

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		<p>where sites are large in size.</p> <p>The error in relation to the greenfield/brownfield status of H252 has been corrected.</p>
Carter Jonas on behalf of Savile Estate	<p>Land at Rumble Road Bywell (H357) should be put forward as a housing allocation to address the current planned shortfall in housing allocation set out in the Draft Local Plan. The site does not form part of the Green Belt and is surrounded on four sides by development including established housing areas. Consideration of the Sustainability Appraisal would suggest that the only potential negative effect is respect to light pollution. The summary is however confusing suggesting that the site has negative effects on leisure and recreation (and also as a positive effect) and also on biodiversity. Given that it is an agricultural field it is not clear what recreation and leisure benefits will be affected, likewise biodiversity.</p> <p><i>A number of other indirect references are made to the SA in support of comments on other housing site options.</i></p>	<p>This site option has been subject to SA in line with the assumptions set out in the SA report. The reasons for the scores given for leisure and recreation and biodiversity are clearly explained in the detailed SA matrix in Annex 1.</p>
Kirklees Green Party	<p>General comment: We are concerned to see 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>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. More on local planning policies and biodiversity is at: "Planning for a healthy environment: good practice guidance for green infrastructure and biodiversity" TCPA and the Wildlife Trusts 2010.</p> <p>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. This will obviously impact on opportunities for local food growing.</p>	<p>These points are noted. No action taken in the updated SA report.</p>
John McMillan	<p>Re: site H768</p> <p><i>Comments have been summarised:</i></p>	<p>Each site option has been subject to SA in line with the assumptions set out in Appendix 4 of the SA Report. It is to be</p>

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	<p>Disagrees with various SA scores and suggests that scores should be made less positive, in most cases to be more consistent with other site options within Skelmanthorpe.</p>	<p>expected that site options within the same town or village will have differences in scores, as each site has been considered on its own merits. The changes in scores proposed by the consultee would result in inconsistencies between the appraisal of this site and other options.</p>
<p>Ms Heather Wood</p>	<p>Re: site H8 <i>Comments have been summarised:</i></p> <p>Very similar comments are made within the SA matrices for the site options – shows a shallow depth of assessment.</p> <p>Disagrees with various SA scores and suggests additional information that the consultee thinks should be taken into account. Education and health scores are based on access only and not capacity of schools and healthcare facilities.</p> <p>This LUC Sustainability Assessment document is 2709 pages long. Its contents seem to be of such a generic nature as to be virtually meaningless. It pays no attention to the adverse effect the development would have on residential amenity; the likely visual impact; the loss of existing views from neighbouring properties; or the adverse effect on highway safety or the convenience of road users.</p> <p>In fact, the report appears to be saying that the building of so many houses will have little or no impact at all! These proposed developments will naturally bring many new residents – and it is pretty obvious that an influx of so many additional people will most definitely have an impact on this area. In conclusion the report does nothing to justify the building of so many houses and the inclusion of these four sites in the Local Plan in particular.</p> <p>My final thoughts are that KC used LUC - a company with offices in London, Bristol, Glasgow, Edinburgh – so a company with a thorough knowledge of this area, obviously!</p>	<p>Each site option has been subject to SA in line with the assumptions set out in Appendix 4 of the SA Report. The changes in SA findings proposed by the consultee would result in inconsistencies between the appraisal of this site and other options.</p> <p>The SA identifies significant differences between the sustainability effects of various site options within the district. However, a set of assumptions (as set out in Appendix 4 of the SA report) has been used to inform the assessment in order to ensure consistency, which accounts for similar language being used in many of the SA matrices.</p> <p>The SA is a strategic level of assessment and the need to assess a large number of reasonable alternative site options requires a desk-based assessment that cannot go into as much detail as the assessment of sites at the planning application stage.</p>
<p>Mr &amp; Mrs Keith &amp; Joan Dorman</p>	<p>Sustainability Appraisal. This seems to have been carried out by a London consultancy with no local knowledge. The distances and travelling times to schools, shops, work-places etc. are vastly overstated and incorrect (for instance</p>	<p>As described in Chapter 2 of the SA report, the travel distances that have informed some of the SA scores are based on the</p>

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	<p>the GP is 10mins walk away not 30mins). H296 has been red flagged for being near to Honley Wood, possible disturbance to wildlife, yet there are council signs welcoming people to the wood which is already well used by walkers, dog walkers, children and mountain-bikers.</p>	<p>heatmapping exercise that was carried out by the West Yorkshire Combined Authorities. The methodology used for that work is summarised in the SA report.</p> <p>The likely effects of each site option on biodiversity have been informed by the assumptions presented in Appendix 4 of the SA report, where it is explained that uncertainty has been applied to all scores to recognise the limitations of a distance-based assumption. It is necessary to take this approach in a strategic level SA examining a large number of sites; however impacts on biodiversity can only be assessed with more certainty once specific proposals for the sites that are eventually allocated are known (i.e. at the planning application stage).</p>
<p>Crowley Associates on behalf of Mr &amp; Mrs K. Dorman</p>	<p><i>Comments have been summarised:</i></p> <p>We note that the land in our Clients' ownership is variously described as site H296 and site H588. H588 has been subject to SA but H296 has not. Assume it was assessed as part of site H588 which may have skewed the results of the appraisal.</p> <p>Disagrees with various scores given for the site in the SA and notes that other sites score less well. Disagrees with some of the travel times quoted for the site.</p>	<p>Both site options H296 and H588 have been subject to SA individually and the SA findings for both options are summarised in the SA report for the Draft Local Plan, with the detailed SA matrices being presented in Annex 1 (see pages 903 and 1586).</p> <p>The consultee has assumed that the SA scores applied for H588 also apply for H296 which is not the case – there are various differences between the scores for these two site options in the SA report.</p> <p>Each site option has been subject to SA in line with the assumptions set out in Appendix 4 of the SA Report. The changes in SA findings proposed by the consultee</p>

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		would result in inconsistencies between the appraisal of this site and other options.
Carol Ripley	<p>Re: site H584 <i>Comments have been summarised:</i></p> <p>The consultee lists various pieces of information about this site option, although in most cases these are not linked directly to the SA findings.</p> <p>The consultee states that in the Sustainability Appraisal – Non Technical Summary of the plan, the site is one of the 50 Residential sites with 4 or more likely significant negative effects. The consultee considers that it actually has six likely significant negative effects, as the consultee proposes to add two others in relation to landscape and biodiversity.</p>	Each site option has been subject to SA in line with the assumptions set out in Appendix 4 of the SA Report. The changes in SA findings proposed by the consultee would result in inconsistencies between the appraisal of this site and other options.
Brendan Mowforth	<p>Re: H584</p> <p>This proposal is to develop on a green belt site that currently is used for productive agriculture, whilst farming in the Pennines can be challenging, the future demand for food across means that we should not develop land that mankind will need in future.</p> <p>The site is a valuable break between Honley and Brockholes, any development would be visible from many miles away, having a serious impact on the landscape.</p> <p>Access to the site would be from Gynn lane or Hallings, both are narrow roads and additional traffic especially along Hallings will lead to difficulties due to it being a single track road.</p> <p>The proposal to construct a footpath along the Gynn Lane road side will lead to the loss of mature trees, and reduce the woodland available for wildlife.</p> <p>The site is on a steep hillside making the retention of runoff water difficult. This is likely to add to the flooding problems on the adjacent playing fields and at times the Gynn lane/A616 road junction.</p> <p>The site is isolated from the main facilities of Honley, would expand the urban</p>	<p>A number of these comments do not relate directly to the SA findings.</p> <p>Each site option has been subject to SA in line with the assumptions set out in Appendix 4 of the SA Report. The changes in SA findings proposed by the consultee would result in inconsistencies between the appraisal of this site and other options.</p>

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	<p>sprawl further and use green belt to do so.</p> <p>The development plans sustainability appraisal –non technical summary shows that the site is one of 50 residential sites with 4 or more likely significant negative effects, to which effect 12 landscape and effect 14 biodiversity should be added.</p>	
Nicola Cantrell	<p>Re: site H252 <i>Comments have been summarised:</i></p> <p>Site H252: land West of Farnley Tyas. This is the site behind Yew Tree Farm and is 0.56ha. In the Local Plan supporting document-Annexe 1 Residential Sustainability Appraisal Matrices this site is documented as being a Brownfield site. This site is in the Green Belt according to Kirklees documentation.</p> <p>Expresses support for various sites being rejected from the Local Plan.</p>	<p>The SA description of a site being brownfield refers to whether the site itself has been previously developed, while the fact that a site is within the Green Belt refers to this wider designation – there are brownfield sites that are located within the wider Green Belt.</p>
George Wright	<p>Re: site H1701 <i>Comments have been summarised:</i></p> <p>Site is described as greenfield in the SA but brownfield in the Local Plan. The SA is flawed and misconceived in its assessment of this site. Disagrees with the allocation of this site.</p>	<p>The appraisal of this site has been amended in this updated SA report to reflect the fact that it is described as brownfield in the Local Plan. Only part of the site has been previously developed.</p>
ID Planning on behalf of Wrose Developments	<p>Re: site H672 <i>Comments have been summarised:</i></p> <p>Disagree with significant negative effect on amenity and references a noise study which has been carried out for the site.</p> <p>Criticises high level and generalised approach to assessing transport distances through the heatmapping work. Refers to a transport assessment that has been carried out for the site and the potential to incorporate improved sustainable transport links.</p> <p>Disagrees with landscape score and refers to a Landscape and Visual Impact Assessment that has been carried out.</p>	<p>The reasonable alternative site options have been subject to SA/SEA in line with the SEA Regulations. All sites have been appraised consistently in line with the assumptions presented in Appendix 4 of the SA report. Amending scores based on additional evidence studies that are not consistently available for all sites is considered to be inappropriate.</p> <p>The methodology behind the heatmapping work (which was carried out by West Yorkshire Combined Authorities) is summarised in the SA report.</p>

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	<p>Significant negative effect on biodiversity is not justified.</p> <p>The site has not been assessed in relation to the Green Belt Review.</p>	<p>The SA objectives and assumptions do not score sites in relation to whether they are in the Green Belt as this is a policy designation rather than a sustainability issue (text has been added to this updated SA report to explain that).</p>
<p>Mr Thomas Blackburn</p>	<p>Re: site H1701</p> <p>The Sustainability Appraisal itself is in conflict as it refers to the site as being GREENFIELD in point numbers 11, 12, 16, 17 and 19. In fact the SA is misleading and incorrect in many areas.</p>	<p>The appraisal of this site has been amended in this updated SA report to reflect the fact that it is described as brownfield in the Local Plan. Only part of the site has been previously developed.</p>
<p>Mr John Mellor</p>	<p>On re-reading the Kirklees Local Plan regarding site H1701, I note that in SA Objective 8 is states that “some open space COULD be lost”. Does this mean that there will still be room for the allotments on this site if only some open space is to be sacrificed? There is also a statement that other greenbelt areas could be used, but I can’t see any local alternatives as this land is only accessed publicly by those with an allotment, so is already an exclusive woodland area, which borders parkland, and I don’t know of any similar sites in this area.</p>	<p>As set out in the assumptions in Appendix 4, a potential negative effect is identified against SA objective 8 where a recreation feature could be lost as a result of development, although this score is shown as uncertain as in some cases it may be possible to retain such features within the proposed development site. However, this cannot be known with certainty until detailed proposals come forward for each site.</p>
<p>Mrs Yvonne Quincey</p>	<p>Re: H1701 <i>Comments have been summarised:</i></p> <p>Disagrees with SA findings, states that inaccuracies have resulted from the use of secondary source material.</p> <ul style="list-style-type: none"> <li>• Why are there differences in travel time for those at one end of the plot to the other?</li> <li>• Data used to inform heatmapping doesn’t reflect experiences of local people.</li> <li>• Health score is based only on access to healthcare facilities, no consideration given to capacity issues.</li> <li>• Disagrees with score for open space objective.</li> </ul>	<p>The scores relating to travel distances are informed by the heatmapping exercise that was undertaken by the Combined West Yorkshire Authorities, as described in Chapter 2 of the SA report for the Draft Local Plan. The methodology behind that work is summarised in the SA report and explains why travel times within a site may differ – the travel times are based on modelling of walking and public transport routes rather than an ‘as the crow flies’ distance.</p>

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	<ul style="list-style-type: none"> <li>• SA is idealistic in considering that people who live near to employment sites would work there and use sustainable transport modes.</li> <li>• The SA states that the site is greenfield, while the DLP states that it is brownfield.</li> <li>• Disagrees with statement against landscape SA objective that the site is in an area classed as 'urban'.</li> <li>• SA incorrectly states that Bagshaw Museum is to the west of the site – it is to the east.</li> </ul>	<p>It is not possible to assess the available capacity of healthcare facilities at this strategic level of assessment.</p> <p>The appraisal of this site has been amended in this updated SA report to reflect the fact that it is described as brownfield in the Local Plan. Only part of the site has been previously developed.</p> <p>The reference to the site being within an area classed as 'urban' in relation to the landscape SA objective reflects that the site lies within an area classified as 'urban' within the Landscape Character Assessment.</p> <p>The error in relation to the location of Bagshaw Museum has been corrected in this updated SA report although this does not affect the SA score for heritage.</p>
<p>ID Planning on behalf of Redrow Homes Yorkshire</p>	<p>Re: H366 <i>Comments have been summarised:</i></p> <p>Site is scored negatively in relation to amenity but the employment land to the north is in fact a proposed housing site in the Local Plan.</p> <p>Disagrees with the significant negative effect in relation to efficient land use, but accepts that the assumptions have been applied consistently for all site options.</p> <p>Disagrees with score in relation to the landscape and has submitted a Landscape and Visual Impact Assessment for the site which the consultee feels should reduce the negative score.</p>	<p>The score for this objective has been reviewed in the updated SA report to take account of the proposed redevelopment of the adjacent employment land and to ensure consistency with the appraisal of other nearby sites.</p> <p>As noted by the consultee, the assumptions relating to SA objective 11 have been applied consistently for all site options.</p> <p>All site options have been appraised consistently in relation to their likely effects on the landscape and it is not appropriate to adjust scores based on additional</p>



Consultee	Consultation comments – summarised where appropriate	DRAFT Response and any action taken to address consultation comment in this updated SA Report
		assessment work that has been carried out as equivalent information is not available for all sites. It is necessary at this strategic level of assessment to appraise all sites consistently using the same evidence base documents.
Mr Henryk Peterson	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.	The reasonable alternative site options have been subject to SA/SEA in line with the SEA Regulations. All sites have been appraised consistently in line with the assumptions presented in Appendix 4 of the SA report. The SA highlights the potential positive and negative effects of site options being developed, but does not make the decision regarding which sites should be allocated in the Local Plan. It is one of many considerations taken into account by the Council when making decisions.
Scholes Futures Group	<p>Re: sites H8, H38, SL2300 (previously H83), H47 and H335 <i>Comments have been summarised:</i></p> <p>Consultee seems to be querying a number of the SA scores although this is not explicit.</p> <p>H8 and SL2300 are Green Belt not just greenfield.</p> <p>Comments on the availability of bus services and other transport services in and out of Scholes.</p>	<p>The reasonable alternative site options have been subject to SA/SEA in line with the SEA Regulations. All sites have been appraised consistently in line with the assumptions presented in Appendix 4 of the SA report.</p> <p>The SA objectives and assumptions do not score sites in relation to whether they are in the Green Belt as this is a policy designation rather than a sustainability issue (text has been added to this updated SA report to explain that). Whether a site is greenfield land or not depends on whether it has previously been developed and is a separate consideration to whether the site is within the Green Belt.</p>

Consultee	Consultation comments – summarised where appropriate	DRAFT Response and any action taken to address consultation comment in this updated SA Report
		<p>The scores in relation to travel times have been informed by the heatmapping exercise that was undertaken by the Combined West Yorkshire Authorities, as described in Chapter 2 of the SA report for the Draft Local Plan. The methodology behind that work is summarised in the SA report.</p>

**Table 2: Consultation comments received in relation to the HRA Report for the Draft Kirklees Local Plan (October 2015)**

Consultee	Consultation comments – summarised where appropriate	DRAFT Response and any action taken to address consultation comment in this updated HRA Report
Natural England	<p>Natural England welcomes the assessment framework and presentation of the report however we have 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).</p>	<p>Noted, see responses to specific comments below.</p>
Natural England	<p><u>Bradford Core Strategy Habitats Regulations Assessment</u></p> <p>We are pleased to see reference to the draft Bradford Core Strategy Habitats Regulations Assessment (HRA) however we are concerned about the method in which the assessment findings and draft mitigation have been applied in this assessment. In particular we note that paras 5.24 and 5.25 conclude no adverse effects on the integrity of the South Pennine Moors Special Area of Conservation (SAC) as similar safeguards to those proposed in the Bradford Core Strategy HRA can be adopted. Natural England do not object in principle to the use of data collected by Bradford for their Core Strategy HRA or the adoption of similar approaches to avoidance and mitigation, however we do not consider that adverse effects can be ruled out until proposed mitigation has been detailed in the context of the Kirklees Local Plan.</p> <p>Furthermore much of the data collected and avoidance and mitigation measures proposed by Bradford are specific to local circumstances at Ilkley/Rombolds Moor and may not be appropriate to local circumstances in and adjacent to Kirklees, for instance the visitor surveys carried out by Bradford. We advise that you consider the data available from the Bradford Core Strategy HRA and identify where direct application is applicable and where there are evidence gaps where further data is necessary to support the assessment of the Kirklees Local Plan.</p>	<p>Noted.</p> <p>A revised approach and evidence base has been agreed with Natural England, including undertaking additional survey work on sites that are within 2.5km of the south Pennine Moors. This will be presented in the HRA of the Publication Draft Local Plan.</p>
Natural England	<p><u>HRA Screening Methodology</u></p> <p>Natural England note that para 3.13 of the HRA report refers to a 1-2km screening distance for foraging Special Protection Area (SPA) bird species, whereas para 3.28 refers to the 2.5km distance proposed by Bradford. We advise that your reasoning for using this distance rather than Bradford's approach is explained We recommend that you identify one screening distance</p>	<p>A revised approach and evidence base has been agreed with Natural England, including undertaking additional survey work on sites that are within 2.5km of the south Pennine Moors. This will be presented in the HRA of the Publication Draft Local Plan.</p>

Consultee	Consultation comments – summarised where appropriate	DRAFT Response and any action taken to address consultation comment in this updated HRA Report
	<p>with a clear rationale for the decision.</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, we advise that you provide further details regarding why hydrological impacts on Denby Grange Colliery SAC can be screened out.</p>	<p>Further consideration will also be given to the potential hydrological impacts on Denby Grange Colliery Ponds SAC during the preparation of the updated HRA report.</p>
Natural England	<p><u>HRA Screening Assessment of the Draft Local Plan</u></p> <p>While we note that DLP24 is not promoting development, we advise that the HRA should consider the in-combination effects of this policy with broad targets for growth and specific allocations in the plan. Natural England consider that further details of the assessment are required with regards to DLP27 Renewable and Low Carbon Energy. For example of the assessment of a similar policy we would direct your attention to the assessment of Bradford Core Strategy Policy EN6 in their HRA. It is also worth noting that EN6 includes specific reference to the potential for adverse effects on the integrity of the South Pennine Moors SPA and SAC in the policy text.</p>	<p>Consideration will be given to Bradford's assessment of Policy EN6 when the assessment of DLP27 is updated during the preparation of the updated HRA report for the Publication Draft Local Plan, and policy amendments will be recommended if appropriate.</p>
Natural England	<p><u>Appropriate Assessment</u></p> <p>Natural England disagree with the assessment of no adverse effects on integrity with regards to allocations within 2km of the South Pennine Moors Phases 1 and 2 SPA in paras 5.13 and 5.14 of the HRA. We do not consider that the potential impacts of the plan on functionally connected land for birds can be effectively passed down the line to the project stage.</p> <p>We advise that evidence will need to be provided to demonstrate either that the specific allocations in the plan are unsuitable for SPA birds and that development on these sites will not impact on adjacent functionally connected land or evidence on the availability and distribution of functionally connected land in the area to show that development at these locations can go ahead without adverse effects on SPA birds.</p> <p>Should assessment be left to the project stage and surveys show that a site cannot be delivered without adverse effects on integrity of the South Pennine Moors Phases 1 or 2 SPA then the Plan would be unsound.</p>	<p>As described above, A revised approach and evidence base has been agreed with Natural England, including undertaking additional survey work on sites that are within 2.5km of the south Pennine Moors. This will be presented in the HRA of the Publication Draft Local Plan.</p> <p>The assessment of DLP39 will be revisited during the preparation of the updated HRA report for the Publication Draft Local Plan. Further consideration will also be given to the potential hydrological and recreational impacts on Denby Grange Colliery Ponds SAC during the preparation of the updated HRA report.</p>

Consultee	Consultation comments – summarised where appropriate	DRAFT Response and any action taken to address consultation comment in this updated HRA Report
	<p>Natural England disagree with the argument in para 5.16 that DLP39 will protect European Sites from proposals for minerals extraction as this policy makes no reference to protecting natural environmental receptors. As mentioned in this letter Natural England are concerned about the potential for adverse effects on the integrity of Denby Grange Colliery SAC from both changes in hydrology and recreational pressures and consequently disagree with the assessment in paras 3.32 - 3.35 of the HRA.</p>	
CPRE	<p>Object: May not be legally compliant in relation to Habitats Regulations</p> <p>As the Council may be aware, 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.</p> <p>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, we do not consider this to be a robust approach, and suggest that a more prescriptive policy be added along the lines of Bradford's MM28. We have supplied a PDF copy of MM28 for your reference.</p>	<p>As noted above by Natural England, consideration has been given to the approach taken by Bradford in its Core Strategy, although as Natural England has stated, transferring the exact same approach may not be appropriate. A revised approach and evidence base has been agreed with Natural England, including undertaking additional survey work on sites that are within 2.5km of the south Pennine Moors. This will be presented in the HRA of the Publication Draft Local Plan.</p>
Mr Michael Stringer	<p>I tried to open the link on the "international and national importance for nature conservation from the detrimental impacts of development (2)" but could not - all I got was the same page on "1.2 Supporting Documents" repeated.</p> <p>Has anybody assessed Oakwell Park in North Kirklees with regard to this? There are foxes, rabbits, grey squirrels, badgers (I'm told but not seen personally) here as well as lesser spotted woodpeckers, jays, sparrow hawks, owls, herons, goldfinches, greenfinches, chaffinches, bullfinches, blue tits, great tits, coal tits, long-tailed tits, nuthatches, dunnocks and wrens as well as the ubiquitous magpies, crows, jackdaws, blackbirds, robins and sparrows. We have also seen rose-ringed parakeets too. All this birdlife visits us to feed across the Bradford Road (A652). There may be other wildlife present here too that I have not seen personally.</p>	<p>Oakwell Park is not designated as a European site (SAC, SPA or Ramsar site); therefore it does not fall within the scope of the HRA.</p>

Consultee	Consultation comments – summarised where appropriate	DRAFT Response and any action taken to address consultation comment in this updated HRA Report
	<p>I ask about the designation of Oakwell Park because I think it is obviously attractive to a wide variety of wildlife. It is important that we do everything we can to protect and encourage it to thrive. The Green Belt designation is vital in this respect; we cannot allow Oakwell Park to be "developed" into a tiny corner. The wildlife needs the green space to exist and expand. And we need this so people can experience it, wonder at it and enjoy it for generations to come.</p>	
Mr Chris Dean	<p>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>Noted, this comment relates to the Local Plan itself rather than the HRA report.</p>
Mr Robert Bamforth	<p>Paragraph 1.27 specifically mentions the South Pennines Special Protection Area (presumably meaning South Pennines SPA phase 2) and other, more localised, protected areas just beyond the Kirklees boundary. However it fails to mention the Peak District National Park (South Pennines SPA Phase 1) and the extensive cross boundary impacts between Kirklees and the Peak Park Authority in the Colne and Holme Valleys. We are very concerned that the plan as a whole does not place sufficient emphasis on protecting the 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), which is co-sponsored by Kirklees Metropolitan Council via the Standing Conference of South Pennine Authorities (SCOSPA). Yet there is no mention in the plan of IMSACAP or SCOSPA.</p>	<p>The HRA assesses the likely impacts of the Local Plan on the integrity of South Pennine Moors Phase 2 SPA and Peak District Moors (South Pennine Moors Phase 1) SPA, as well as the South Pennine Moors SAC, as explained in Chapter 3 of the HRA report.</p> <p>The reference to paragraph 1.27 does not relate to the HRA report.</p>