

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

PDLP - Strategies and Policies

Consultee: **968497 Erica Amende**

Agent:

Rep ID: **PDLP_SP93**

Paragraph/Site: **1.4**

Duty to Co-operate

Concern that despite what the council says, that duty to co-operate has not/isn't happening effectively. An example is provided of waste management to demonstrate concerns. People are no longer allowed to take household waste to their nearest facilities if it lies outside of Kirklees and is adjoining local authorities. This is increasing journey time to dispose of waste.

Council DtC Response

DTC Response: SD14 (Duty to Co-operate Statement) sets out how the council has discharged its duty to co-operate in relation to 'waste' (please see paragraphs 5.35 to 5.38).

PDLP - Strategies and Policies

Consultee: **943608 Mr Robert Bamforth**

Agent:

Rep ID: **PDLP_SP585**

Paragraph/Site: **1.26**

Duty to Co-operate

The council have failed to satisfy the required duty of co-operation with neighbouring authorities. Overall housing and industrial development projects across West Yorkshire have been excessively aspirational, to a point where aggregate total of planned development is manifestly unrealistic and undeliverable. Large scale green belt releases will effectively merge settlements in Kirklees with those on other side of district boundaries. The employment release at Clayton West will compete with existing, unimplemented and better positioned sites adjacent to M1 in Wakefield and Barnsley.

Council DtC Response

DTC Response: None of Kirklees's neighbouring local planning authorities consider that the council has failed to comply with the duty to co-operate. Meaningful cooperation has taken place and evidence to that effect is documented in SD14 (Duty to Cooperate Statement).

The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions.

Kirklees Council met with Barnsley and Wakefield Councils throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14).

Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28).

Kirklees Council met with Peak Park on 5th Feb 2016. Furthermore SD14 identifies at paragraph 3.3 that the council has reflected Yorkshire West Local Nature Partnership's statement of principles and priorities at paragraph 13.20 of the Strategy and Policies document and that the Council also discussed the South Pennine Moors Special Protection Area (SPA) with YWLNP at their meeting on January 5th 2016.

SD14 demonstrates how Kirklees Council has undertaken the required level of co-operation with neighbouring authorities (such as the Peak Park Planning Authority) and other agencies concerned with the protection and conservation of the South Pennine moorlands (such as Natural England and YWLNP).

PDLP - Strategies and Policies

Consultee: **968497 Erica Amende**

Agent:

Rep ID: **PDLP_SP92**

Paragraph/Site: **7.6**

Duty to Co-operate

Leeds City Council has submitted comments indicating its concerns for traffic on the A653 and there may be a funding shortfall which implies a lack of duty to cooperate. While no comments from Calderdale have been found about the A644, it is clear that Cooper Bridge has the most problems to surmount, given the number of specially commissioned reports and the extra text material throughout the documentation.

Council DtC Response

DTC response: Details of discussions in relation to the economy can be found in submission document SD14: Duty to Cooperate, paragraphs 5.10-5.13. This confirms that the Council has considered the impacts of its own economic ambition on other neighbouring authorities and that agreement has been reached that Kirklees can accommodate its own identified needs and is not required to meet any requirements of its neighbouring authorities. Appendix C, strategic

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issues table, reference 17 on pages 105-107 confirms individual discussions in relation to Chidswell and Cooper Bridge - with affected local authorities has taken place. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that commits both Councils to seeking to agree infrastructure improvements (to the A644 and Cooper Bridge Gyratory/Bradley Road Junction) and at what stage these are necessary taking account of the anticipated rate and phasing of Site E1832c. This statement will be finalised in advance of the Local Plan hearing sessions. Leeds City Council consider MX1905 to be sound and that Kirklees Council have complied with the duty to cooperate. Kirklees Council agrees that Leeds and Kirklees Councils should continue cooperating to minimise increases in traffic and congestion along the A653. Consequently, the mitigation mechanisms suggested by Leeds City Council are reflected in the 'other site specific considerations' for Site MX1905, e.g. with respect to phasing development accordingly.

PDLP - Strategies and Policies

Consultee: **943608**

Mr Robert Bamforth

Agent:

Rep ID: **PDLP_SP586**

Paragraph/Site: **Policy PLP 30**

Duty to Co-operate

The plan does not appear to demonstrate required level of cooperation with Peak Park Planning Authority, neighbouring authorities and agencies concerned with protection and conservation of South Pennine Moorlands. The plan makes no mention of IMSACAP, SCOSPA, 'Pennine Prospects' or related conservation programmes.

Council DtC Response

DTC Response: None of Kirklees's neighbouring local planning authorities consider that the council has failed to comply with the duty to co-operate. Meaningful cooperation has taken place and evidence to that effect is documented in SD14 (Duty to Cooperate Statement). Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28). Kirklees Council met with Peak Park on 5th Feb 2016. Furthermore SD14 identifies at paragraph 3.3 that the council has reflected Yorkshire West Local Nature Partnership's statement of principles and priorities at paragraph 13.20 of the Strategy and Policies document and that the Council also discussed the South Pennine Moors Special Protection Area (SPA) with YWLNPN at their meeting on January 5th 2016. SD14 demonstrates how Kirklees Council has undertaken the required level of co-operation with neighbouring authorities (such as the Peak Park Planning Authority) and other agencies concerned with the protection and conservation of the South Pennine moorlands (such as Natural England and YWLNPN). Policy PLP30 refers to the need to consider conservation objectives including SPA and SAC.

PDLP Allocations & Designations

Consultee: **943814**

Cllr Robert Finnigan

Agent:

Rep ID: **PDLP_AD3606**

Paragraph/Site: **E1832c**

Duty to Co-operate

Leeds City Councils Highways Section confirmed that no recent discussions had taken place on the proposal at Chidswell and that they continue to have significant concerns which have not been addressed about the impact this industrial and housing development would have on the A653 corridor.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Leeds City Council consider MX1905 to be sound and that Kirklees Council have complied with the duty to cooperate. Kirklees Council agrees that Leeds and Kirklees Councils should continue cooperating to minimise increases in traffic and congestion along the A653. The mitigation mechanisms suggested by Leeds City Council are reflected in the 'other site specific considerations' for Site MX1905, e.g. with respect to phasing development accordingly. These issues have been addressed within Highways England's letter to Kirklees Council dated 12th April 2017 (see BP28). Further to this correspondence, the 'site specific considerations' (in relation to impacts upon the Strategic Road Network) have been modified for MX1905 in accordance with Highways England's current position (see ADMM58 in SD4). Highways England's recommendations within BP28 were informed by LE141 and their latest Network Analysis Tool modelling. At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate, and that education issues in relation to MX1905 have been resolved.

PDLP Allocations & Designations

Consultee: **1049121**

Mr Anthony Rae

Agent:

Rep ID: **PDLP_AD798**

Paragraph/Site: **E1832c**

Duty to Co-operate

In terms of overall sustainability the combined Kirklees and Calderdale proposed allocations are not sustainable in view of the transport impacts (and in addition to the local environmental impact on existing greenfield sites). Both authorities should be required to produce a combined sustainability assessment

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to demonstrate how they believe the proposals can be delivered without adverse impacts on generated traffic, local and strategic highways congestion, travel-to-work carbon emissions, and loss of Greenbelt functionality.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **943042**

Phil Grosvenor

Agent:

Rep ID: **PDLP_AD1369**

Paragraph/Site: **E2333a**

Duty to Co-operate

There seems to have been no consultation with Wakefield or Barnsley councils, which have much bigger, flatter sites, within a few miles, and much closer to the M1 motorway.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues. The Calder Catchment Strategic Flood Risk Assessment (SFRA) (LE43) was undertaken by JBA Consulting. This work was jointly commissioned between Kirklees Council, Calderdale Council and Wakefield Council to ensure updated flood risk assessment for the Calder Catchment. The SFRA process included working with planning, flood management and drainage officers from Calderdale and Wakefield to agree the approach and ensure consistency, and also with the Environment Agency to utilise their expertise and ensure the approach taken in the document met their requirements. The Environment Agency confirmed in writing on 25th August 2016 that they found the Calder Catchment Level 1 SFRA to be acceptable. Subsequently on 19th December 2016, the Environment Agency confirmed in writing (with respect to the duty to cooperate) that they have been consulted at various stages of the production of the local Plan, worked with the council to reach satisfactory outcomes, and are satisfied that issues they raised have been given due consideration.

PDLP Allocations & Designations

Consultee: **943162**

Mr Frank Dolan

Agent:

Rep ID: **PDLP_AD1419**

Paragraph/Site: **E2333a**

Duty to Co-operate

Residents in the nearby villages of West Bretton and Calder Grove have not been made aware of the proposals. Both are within the Wakefield MC area and the former is also the home of the internationally recognised Yorkshire Sculpture Park. Traffic exiting the M1 at exits 38 and 39 already chokes these villages especially for 2 to 3 hours in both early morning and early evening.

Council DtC Response

DTC Response:

The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does

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acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues. Wakefield Council did not comment on this site.

PDLP Allocations & Designations

Consultee: **944899**

Mr Ian Hutchinson

Agent:

Rep ID: **PDLP_AD1406**

Paragraph/Site: **E2333a**

Duty to Co-operate

Little or no consultation has been carried out with surrounding authorities to check the availability of more appropriate land just over the border.

Council DtC Response

DTC Response:

Please refer to the Duty to Cooperate Statement (SD14) for cross boundary and inter-authority issues, this employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees.

The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site.

PDLP Allocations & Designations

Consultee: **968632**

Mrs Dawn Gemmell

Agent:

Rep ID: **PDLP_AD234**

Paragraph/Site: **E2333a**

Duty to Co-operate

Cross boundary and inter-authority issues have not been considered. Adjacent Local Authorities have large employment sites in development along the M1. In addition HS2 is likely to promote employment development in other areas, and render this site redundant. The transport impact on West Bretton, Wakefield; a village with narrow roads and proximity to the Yorkshire Sculpture Park have not been considered.

Council DtC Response

DTC Response: At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate.

In relation to the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network.

With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees Council will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues.

PDLP Allocations & Designations

Consultee: **969350**

Mrs Charlotte McKay

Agent: **969343**

Mrs Charlotte McKay

Rep ID: **PDLP_AD719**

Paragraph/Site: **E2333a**

Duty to Co-operate

Furthermore, we do not consider that the Council have effectively discharged their duty to cooperate with neighbouring authorities. In particular we believe that there are better placed employment sites closer to the M1 within Wakefield and Barnsley which could better accommodate any employment need and we feel that the Council should have worked more closely with these neighbouring authorities in order to look at the potential of the M1 junctions for employment uses. In addition residents in the Wakefield Villages which would be used to access these allocations are unaware of the proposals and this supports our view that there has been insufficient cross boundary consultation on this Local Plan.

Council DtC Response

DTC Response: At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate.

Wakefield Council were consulted on the publication draft Local Plan and commented in detail, however they did not comment on Site E2333a specifically. The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions.

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PDLP Allocations & DesignationsConsultee: **973343****Paula Kemp**

Agent:

Rep ID: **PDLP_AD1452**Paragraph/Site: **E2333a****Duty to Co-operate**

Every village road leads down to the Dearne Valley and the A636 Wakefield Road which is also a major feeder route for the Holme Valley. This road is increasingly busy and congested and to add traffic from the proposed 5,500 new homes in Kirklees Rural is a travesty of National Policy relating to soundness. What consultation has taken place with neighbouring councils of Wakefield and Barnsley?

Council DtC Response

DTC Response: At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate. In relation to the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues.

PDLP Allocations & DesignationsConsultee: **944083****Mr and Mrs M H & S Howker**

Agent:

Rep ID: **PDLP_AD3626**Paragraph/Site: **H87****Duty to Co-operate**

Concerns have not been discussed with adjoining Calderdale Council.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions.

Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & DesignationsConsultee: **1049121****Mr Anthony Rae**

Agent:

Rep ID: **PDLP_AD797**Paragraph/Site: **H351****Duty to Co-operate**

In terms of overall sustainability the combined Kirklees and Calderdale proposed allocations are not sustainable in view of the transport impacts (and in addition to the local environmental impact on existing greenfield sites). Both authorities should be required to produce a combined sustainability assessment to demonstrate how they believe the proposals can be delivered without adverse impacts on generated traffic, local and strategic highways congestion, travel-to-work carbon emissions, and loss of Greenbelt functionality.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & DesignationsConsultee: **943199****Ian, Denise and Olivia Thompson**

Agent:

Rep ID: **PDLP_AD413**Paragraph/Site: **H519****Duty to Co-operate**

There is no evidence of communication with Calderdale Council regarding the amount of proposed building in a small residential area. The roads in the area are gridlocked and the amount of additional traffic will lead to air pollution, affecting the health and well-being of residents in the area.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **943394**

Mr and Mrs Magner

Agent:

Rep ID: **PDLP_AD1356**

Paragraph/Site: **H519**

Duty to Co-operate

Has proper consultation been made with Calderdale Council regarding the volumes and the close proximity of the Kirklees and Calderdale development proposals? If not - please do - as I believe that our existing roads, schools, sewerage (including rain run off which contributes to flooding the main road under the M62, and further problems down hill), Doctors and public transport infrastructure can not cope.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & Designations

Consultee: **943568**

John Watkinson

Agent:

Rep ID: **PDLP_AD1166**

Paragraph/Site: **H519**

Duty to Co-operate

With a number of developments already planned by neighbouring Calderdale Council which will be close to or adjoining developments in the Kirklees draft plan, it seems evident to me that there cannot have been any meaningful consultations with Calderdale on this issue.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & Designations

Consultee: **943640**

Mr Paul Oldfield

Agent:

Rep ID: **PDLP_AD1364**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building by both Council's in a small localised residential area demonstrates a lack of joined up thinking and planning. Both Councils are proposing building on land that adjoins the others and in essence will create one big urban sprawl. This consultation cannot have taken place and as such fails to meet the requirement of legal compliance or if it has there is no evidence and the proposals are negligent.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & Designations

Consultee: **944083**

Mr and Mrs M H & S Howker

Agent:

Rep ID: **PDLP_AD3624**

Paragraph/Site: **H519**

Duty to Co-operate

Concerns have not been discussed with adjoining Calderdale Council.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in

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SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & Designations

Consultee: **956612**

Mr Brian Craven

Agent:

Rep ID: **PDLP_AD663**

Paragraph/Site: **H519**

Duty to Co-operate

The site is very close to the Calderdale boundary and there is no evidence of consultation with Calderdale to prevent urban sprawl.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **963723**

Mr Nolan

Agent:

Rep ID: **PDLP_AD366**

Paragraph/Site: **H519**

Duty to Co-operate

Concern that the council has not consulted with Calderdale council regarding the number of houses in a small area. This shows a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **964440**

Mrs Karen Oldfield

Agent:

Rep ID: **PDLP_AD580**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building by both Council's in a small localised residential area demonstrates a lack of joined up thinking and planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **964933**

Mr John Wardle

Agent:

Rep ID: **PDLP_AD325**

Paragraph/Site: **H519**

Duty to Co-operate

No evidence that Kirklees has consulted with Calderdale with regard to the amount of proposed building in a small residential area demonstrating a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **964941**

Mr Raymond Dando

Agent:

Rep ID: **PDLP_AD136**

Paragraph/Site: **H519**

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

Duty to Co-operate	There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates a lack of joined up planning.
Council DtC Response	DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.
PDLP Allocations & Designations Paragraph/Site: H519	Consultee: 964947 Ms Maureen Croghan Agent: Rep ID: PDLP_AD137
Duty to Co-operate	There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in a small residential area demonstrated a lack of joined up planning.
Council DtC Response	DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.
PDLP Allocations & Designations Paragraph/Site: H519	Consultee: 966873 Mr Chris Aitken Agent: Rep ID: PDLP_AD885
Duty to Co-operate	There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates a lack of joined up planning.
Council DtC Response	DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.
PDLP Allocations & Designations Paragraph/Site: H519	Consultee: 966955 Mr Mark Flinders Agent: Rep ID: PDLP_AD155
Duty to Co-operate	Kirklees council have not consulted with Calderdale council in regard to the building of small residential area and therefore demonstrates a lack of joined up planning.
Council DtC Response	DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.
PDLP Allocations & Designations Paragraph/Site: H519	Consultee: 968680 Mrs Nolan Agent: Rep ID: PDLP_AD367
Duty to Co-operate	Concern whether there is evidence that the council has consulted with Calderdale council regarding the amount of proposed building in a small residential area - if not this would show lack of joined up planning.

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

Council DtC Response DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **969542**

MS JUDITH CORK

Agent:

Rep ID: **PDLP_AD198**

Paragraph/Site: **H519**

Duty to Co-operate

I would like reassurance that Calderdale council is confident that building this number of houses will NOT increase the likelihood of flooding down in the valley (remember Boxing day last year?).

Council DtC Response

DTC Response: The Calder Catchment Strategic Flood Risk Assessment (SFRA) (LE43) was undertaken by JBA Consulting. This work was jointly commissioned between Kirklees Council, Calderdale Council and Wakefield Council to ensure updated flood risk assessment for the Calder Catchment. The SFRA process included working with planning, flood management and drainage officers from Calderdale and Wakefield to agree the approach and ensure consistency, and also with the Environment Agency to utilise their expertise and ensure the approach taken in the document met their requirements. The Environment Agency confirmed in writing on 25th August 2016 that they found the Calder Catchment Level 1 SFRA to be acceptable. Subsequently on 19th December 2016, the Environment Agency confirmed in writing (with respect to the duty to cooperate) that they have been consulted at various stages of the production of the local Plan, worked with the council to reach satisfactory outcomes, and are satisfied that issues they raised have been given due consideration.

PDLP Allocations & Designations

Consultee: **1045734**

MR ROBERT BRIGGS

Agent:

Rep ID: **PDLP_AD124**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed buildings in a small residential area demonstrates a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1045886**

Mr Ben Hodgson

Agent:

Rep ID: **PDLP_AD147**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building within this small residential area demonstrates a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1045955**

Mr Steven Holme

Agent:

Rep ID: **PDLP_AD156**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates a lack of joined up planning.

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

Council DtC Response DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1046902**

Mr Raymond Pukacz

Agent:

Rep ID: **PDLP_AD199**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1048043**

Mrs J Eastwood

Agent:

Rep ID: **PDLP_AD265**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1049283**

Mrs Lesley Senior

Agent:

Rep ID: **PDLP_AD462**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1049284**

Mr Alan Dutton

Agent:

Rep ID: **PDLP_AD467**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in such a small residential area demonstrates a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1049366**

Mr Wayne Raistrick

Agent:

Rep ID: **PDLP_AD534**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed buildings in a small residential area demonstrates a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1049369**

Mrs Kirsten Halstead

Agent:

Rep ID: **PDLP_AD537**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed buildings in a small residential area demonstrates a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1049392**

Mrs Debbie Coombes

Agent:

Rep ID: **PDLP_AD554**

Paragraph/Site: **H519**

Duty to Co-operate

The area is shared between Kirklees and Calderdale but no plans seen showing consultation with Calderdale.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1049416**

Mr Allan Raw

Agent:

Rep ID: **PDLP_AD583**

Paragraph/Site: **H519**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale Council. The proximity of such an expansion of housing in what is a small residential area illustrates this.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

PDLP Allocations & DesignationsConsultee: **1049418** **Mr Ian Brown**

Agent:

Rep ID: **PDLP_AD591**Paragraph/Site: **H519****Duty to Co-operate**

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates a lack of planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & DesignationsConsultee: **1049784** **Mr A Abbasi**

Agent:

Rep ID: **PDLP_AD681**Paragraph/Site: **H519****Duty to Co-operate**

There is no evidence that Kirklees council has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & DesignationsConsultee: **1049788** **Mrs A Nasr**

Agent:

Rep ID: **PDLP_AD683**Paragraph/Site: **H519****Duty to Co-operate**

There is no evidence that Kirklees council has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & DesignationsConsultee: **944083** **Mr and Mrs M H & S Howker**

Agent:

Rep ID: **PDLP_AD3630**Paragraph/Site: **H734****Duty to Co-operate**

Concerns have not been discussed with adjoining Calderdale Council.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & DesignationsConsultee: **944083** **Mr and Mrs M H & S Howker**

Agent:

Rep ID: **PDLP_AD3629**Paragraph/Site: **H809****Duty to Co-operate**

Concerns have not been discussed with adjoining Calderdale Council.

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

Council DtC Response DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & Designations Consultee: **944083** **Mr and Mrs M H & S Howker** Agent: Rep ID: **PDLP_AD3631**

Paragraph/Site: **H1647**

Duty to Co-operate Concerns have not been discussed with adjoining Calderdale Council.

Council DtC Response DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & Designations Consultee: **944083** **Mr and Mrs M H & S Howker** Agent: Rep ID: **PDLP_AD3627**

Paragraph/Site: **H1656**

Duty to Co-operate Concerns have not been discussed with adjoining Calderdale Council.

Council DtC Response DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & Designations Consultee: **944083** **Mr and Mrs M H & S Howker** Agent: Rep ID: **PDLP_AD3628**

Paragraph/Site: **H1657**

Duty to Co-operate Concerns have not been discussed with adjoining Calderdale Council.

Council DtC Response DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & Designations Consultee: **944083** **Mr and Mrs M H & S Howker** Agent: Rep ID: **PDLP_AD3625**

Paragraph/Site: **H1747**

Duty to Co-operate Concerns have not been discussed with adjoining Calderdale Council.

Council DtC Response DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & Designations Consultee: **966873** **Mr Chris Aitken** Agent: Rep ID: **PDLP_AD886**

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

Paragraph/Site: **H1747**

Duty to Co-operate

There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates a lack of joined up planning.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

PDLP Allocations & Designations

Consultee: **1049121**

Mr Anthony Rae

Agent:

Rep ID: **PDLP_AD796**

Paragraph/Site: **H1747**

Duty to Co-operate

In terms of overall sustainability the combined Kirklees and Calderdale proposed allocations are not sustainable in view of the transport impacts (and in addition to the local environmental impact on existing greenfield sites). Both authorities should be required to produce a combined sustainability assessment to demonstrate how they believe the proposals can be delivered without adverse impacts on generated traffic, local and strategic highways congestion, travel-to-work carbon emissions, and loss of Greenbelt functionality.

Council DtC Response

DTC Response: These issues have been addressed within Highways England's letter to Kirklees Council dated 12th April 2017 (see BP28). Further to this correspondence, the 'site specific considerations' (in relation to cumulative impacts upon the Strategic Road Network) have either been removed or modified in accordance with Highways England's current position (see BP28 and SD4). Highway England have agreed that Local Plan Policy PLP 4 will enable the Council to seek contributions towards additional mitigation measures from applications upon allocations that do not in themselves generate a significant impact upon the SRN (but that may contribute towards cumulative impact). N.B. SRN infrastructure falls under the definition of essential infrastructure and thereby Policy PLP4. Highways England's recommendations within BP28 were informed by LE141 and their latest Network Analysis Tool modelling.

PDLP Allocations & Designations

Consultee: **944083**

Mr and Mrs M H & S Howker

Agent:

Rep ID: **PDLP_AD3632**

Paragraph/Site: **H215**

Duty to Co-operate

Concerns have not been discussed with adjoining Calderdale Council.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date. Calderdale Council did not comment on this site specifically.

PDLP Allocations & Designations

Consultee: **950061**

Miss Frances Stonehouse

Agent:

Rep ID: **PDLP_AD3617**

Paragraph/Site: **H69**

Duty to Co-operate

We question whether the plan is effective and has been based on joint working on cross-boundary strategic priorities when the Bradford boundary is so close to this development.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. BP28 provides further evidence of cooperation between Bradford and Kirklees Councils.

PDLP Allocations & Designations

Consultee: **973343**

Paula Kemp

Agent:

Rep ID: **PDLP_AD1455**

Paragraph/Site: **H358**

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

Duty to Co-operate	Every village road leads down to the Dearne Valley and the A636 Wakefield Road which is also a major feeder route for the Holme Valley. This road is increasingly busy and congested and to add traffic from the proposed 5,500 new homes in Kirklees Rural is a travesty of National Policy relating to soundness. What consultation has taken place with neighbouring councils of Wakefield and Barnsley?
Council DtC Response	DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues.
PDLP Allocations & Designations	Consultee: 977278 Ms Ruth Aspinall Agent: Rep ID: PDLP_AD3320
Paragraph/Site: H358	
Duty to Co-operate	Wakefield Council are concerned that Emley School is full and over subscribed.
Council DtC Response	DTC Response: Wakefield previously raised concerns about this sites possible impact on school place provision within the district. However cooperation has occurred and will continue to occur and data on school place planning is being shared between the two authorities. Wakefield Council consider this allocation to be sound and legally compliant. Wakefield Council have also confirmed that they consider Kirklees to have complied with the duty to cooperate.
PDLP Allocations & Designations	Consultee: 1046002 Mr Barry Brook Agent: Rep ID: PDLP_AD165
Paragraph/Site: H358	
Duty to Co-operate	Lack of evidence about consultation with Wakefield Council regarding school provision,
Council DtC Response	DTC Response: Wakefield Council have confirmed through their response to the Regulation 19 consultation that they consider this site allocation to be sound and legally compliant and that Kirklees Council has complied with the Duty to Cooperate. Wakefield previously raised concerns about this sites possible impact on school place provision within the district. However cooperation has since occurred and will continue to occur and data on school place planning is being shared between the two authorities. Wakefield Council will be consulted as planning applications are submitted on this allocation so possible impacts on education provision can be considered and mitigated if necessary.
PDLP Allocations & Designations	Consultee: 943162 Mr Frank Dolan Agent: Rep ID: PDLP_AD1420
Paragraph/Site: H3325a	
Duty to Co-operate	Residents in the nearby villages of West Bretton and Calder Grove have not been made aware of the proposals. Both are within the Wakefield MC area and the former is also the home of the internationally recognised Yorkshire Sculpture Park. Traffic exiting the M1 at exits 38 and 39 already chokes these villages especially for 2 to 3 hours in both early morning and early evening.
Council DtC Response	DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

to discuss cross-boundary infrastructure and traffic impact issues. Wakefield Council did not comment on this site.

PDLP Allocations & Designations

Consultee: **944899**

Mr Ian Hutchinson

Agent:

Rep ID: **PDLP_AD1407**

Paragraph/Site: **H3325a**

Duty to Co-operate

Little or no consultation has been carried out with surrounding authorities to check the availability of more appropriate land just over the border.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions.

PDLP Allocations & Designations

Consultee: **969350**

Mrs Charlotte McKay

Agent: **969343**

Mrs Charlotte McKay

Rep ID: **PDLP_AD717**

Paragraph/Site: **H3325a**

Duty to Co-operate

There has been insufficient cross-boundary consultation (with Wakefield) on this plan

Council DtC Response

DTC Response: At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate. Wakefield Council were consulted on the publication draft Local Plan and commented in detail, however they did not comment on Site H3325a specifically. The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions.

PDLP Allocations & Designations

Consultee: **973343**

Paula Kemp

Agent:

Rep ID: **PDLP_AD1454**

Paragraph/Site: **H3325a**

Duty to Co-operate

Every village road leads down to the Dearne Valley and the A636 Wakefield Road which is also a major feeder route for the Holme Valley. This road is increasingly busy and congested and to add traffic from the proposed 5,500 new homes in Kirklees Rural is a travesty of National Policy relating to soundness. What consultation has taken place with neighbouring councils of Wakefield and Barnsley?

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues. Wakefield Council did not comment on this site.

PDLP Allocations & Designations

Consultee: **1034329**

Mr David Pursehouse

Agent:

Rep ID: **PDLP_AD1989**

Paragraph/Site: **H288a**

Duty to Co-operate

Duty to co-operate must apply in the protected areas within 1km of Hade Edge that fall outside Kirklees.

Council DtC Response

DTC Response: None of Kirklees's neighbouring local planning authorities consider that the council has failed to comply with the duty to co-operate. Meaningful cooperation has taken place and evidence to that effect is documented in SD14 (Duty to Cooperate Statement). Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28). Kirklees Council met with Peak Park on 5th Feb 2016. Furthermore SD14 identifies at paragraph 3.3 that the council has reflected Yorkshire West Local Nature Partnership's statement of principles and priorities at paragraph 13.20 of the Strategy and Policies document and that

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the Council also discussed the South Pennine Moors Special Protection Area (SPA) with YWLNP at their meeting on January 5th 2016. SD14 demonstrates how Kirklees Council has undertaken the required level of co-operation with neighbouring authorities (such as the Peak Park Planning Authority) and other agencies concerned with the protection and conservation of the South Pennine moorlands (such as Natural England and YWLNP).

PDLP Allocations & Designations

Consultee: **948408**

Mr Andrew Birkitt

Agent:

Rep ID: **PDLP_AD4**

Paragraph/Site: **H626**

Duty to Co-operate

I have seen no evidence that any authority has been consulted with (i.e. Natural England) detailing how the council plan to protect wildlife near to this proposed site. Has a survey been conducted? if so what are the results of this survey? Can the council confirm what European protected species reside in proximity to this site and how they would be protected? This plan cannot be compliant based on the scant information the council has provided in their response to the first 'round' of objections.

Council DtC Response

DTC Response: Meaningful cooperation has taken place and evidence to that effect is documented in SD14 (Duty to Cooperate Statement). Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28). Furthermore SD14 identifies at paragraph 3.3 that the council has reflected Yorkshire West Local Nature Partnership's statement of principles and priorities at paragraph 13.20 of the Strategy and Policies document and that the Council also discussed the South Pennine Moors Special Protection Area (SPA) with YWLNP at their meeting on January 5th 2016. SD14 demonstrates how Kirklees Council has undertaken the required level of co-operation with neighbouring authorities (such as the Peak Park Planning Authority) and other agencies concerned with the protection and conservation of the South Pennine moorlands (such as Natural England and YWLNP).

PDLP Allocations & Designations

Consultee: **943814**

Cllr Robert Finnigan

Agent:

Rep ID: **PDLP_AD3607**

Paragraph/Site: **MX1905**

Duty to Co-operate

Leeds City Councils Highways Section confirmed that no recent discussions had taken place on the proposal at Chidswell and that they continue to have significant concerns which have not been addressed about the impact this industrial and housing development would have on the A653 corridor.

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Leeds City Council consider MX1905 to be sound and that Kirklees Council have complied with the duty to cooperate. Kirklees Council agrees that Leeds and Kirklees Councils should continue cooperating to minimise increases in traffic and congestion along the A653. The mitigation mechanisms suggested by Leeds City Council are reflected in the 'other site specific considerations' for Site MX1905, e.g. with respect to phasing development accordingly. These issues have been addressed within Highways England's letter to Kirklees Council dated 12th April 2017 (see BP28). Further to this correspondence, the 'site specific considerations' (in relation to impacts upon the Strategic Road Network) have been modified for MX1905 in accordance with Highways England's current position (see ADMM58 in SD4). Highways England's recommendations within BP28 were informed by LE141 and their latest Network Analysis Tool modelling. At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate, and that education issues in relation to MX1905 have been resolved.

PDLP Allocations & Designations

Consultee: **943939**

Jim Aveyard

Agent:

Rep ID: **PDLP_AD1416**

Paragraph/Site: **MX1905**

Duty to Co-operate

Cross boundary and inter-authority issues have not been properly addressed. The huge amount of development proposed by Leeds in the South of their area, Kirklees in the North of their area and Wakefield in the West of their area will result in the addition of 10,000 dwellings. There is no coherent plan to deal with the issues development to this extent will raise.

Council DtC Response

DTC Response:

At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate, and that education issues in relation to this allocation have been resolved, and that highway issues are resolvable. In relation to the preparation of highways and transport

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evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. Wakefield Council's position (in relation to the predicted highway impact of MX1905) is that there is some form of mitigation that can be explored further, and will cooperate in enabling Kirklees through continued discussion to arrive at those solutions (in line with the duty to cooperate). Wakefield previously raised concerns about this sites possible impact on school place provision within its district. However cooperation has since occurred and will continue to occur and data on school place planning is being shared between the two authorities. Wakefield Council will be consulted as planning applications are submitted on this allocation so possible impacts on education provision can be considered and mitigated if necessary. Wakefield Council also confirmed in their representation that the allocation is legally compliant.

Leeds and Kirklees Councils should continue cooperating to minimise increases in traffic and congestion along the A653. Consequently, the mitigation mechanisms suggested by Leeds City Council are reflected in the 'other site specific considerations' for this site allocation, e.g. with respect to phasing development accordingly. Leeds City Council confirmed in their representation that this allocation is sound and legally compliant. Local Plan Policy PLP 4 will enable the Council to seek contributions towards additional mitigation measures from applications upon allocations that generate a significant impact upon the A653.

PDLP Allocations & Designations

Consultee: **969350**

Mrs Charlotte McKay

Agent: **969343**

Mrs Charlotte McKay

Rep ID: **PDLP_AD711**

Paragraph/Site: **MX1905**

Duty to Co-operate

Wakefield Council made comments on the Draft Local Plan in relation to education, highways, drainage and the green belt. We do not consider these issues have been fully considered or addressed.

Council DtC Response

DTC Response: At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate, and that education issues in relation to MX1905 have been resolved, and that highway issues are resolvable. In relation to the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. Wakefield Council's position (in relation to the predicted highway impact of MX1905) is that there is some form of mitigation that can be explored further, and will cooperate in enabling Kirklees through continued discussion to arrive at those solutions (in line with the duty to cooperate).

PDLP Allocations & Designations

Consultee: **1049376**

MS JANET TATE

Agent:

Rep ID: **PDLP_AD2358**

Paragraph/Site: **MX1905**

Duty to Co-operate

Insufficient published evidence that Kirklees has consulted with Leeds Council and Wakefield Council.

Council DtC Response

DTC Response: Leeds City Council consider MX1905 to be sound and that Kirklees Council have complied with the duty to cooperate. At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate, and that education issues in relation to MX1905 have been resolved, and that highway issues are resolvable. The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Wakefield Council confirmed in their representation that the allocation is legally compliant.

PDLP Allocations & Designations

Consultee: **1049463**

Mr Daniel Taylor

Agent:

Rep ID: **PDLP_AD613**

Paragraph/Site: **MX1905**

Duty to Co-operate

It is unclear whether the duty to cooperate has been fully carried out. A development of this size will have an affect on neighbouring districts and suitable weight should be given to their objections.

Council DtC Response

DTC Response: Leeds City Council consider MX1905 to be sound and that Kirklees Council have complied with the duty to cooperate. At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate, and that education issues in relation to MX1905 have been resolved, and that highway issues are resolvable. Wakefield Council confirmed in their representation that the allocation is legally compliant.

PDLP Allocations & Designations

Consultee: **943162**

Mr Frank Dolan

Agent:

Rep ID: **PDLP_AD1421**

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

Paragraph/Site: **ME2248a**

Duty to Co-operate

Residents in the nearby villages of West Bretton and Calder Grove have not been made aware of the proposals. Both are within the Wakefield MC area and the former is also the home of the internationally recognised Yorkshire Sculpture Park. Traffic exiting the M1 at exits 38 and 39 already chokes these villages especially for 2 to 3 hours in both early morning and early evening.

Council DtC Response

DTC Response:

The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues. Wakefield Council did not comment on this site.

PDLP Allocations & Designations

Consultee: **943162**

Mr Frank Dolan

Agent:

Rep ID: **PDLP_AD1425**

Paragraph/Site: **ME2314**

Duty to Co-operate

Residents in the nearby villages of West Bretton and Calder Grove have not been made aware of the proposals. Both are within the Wakefield MC area and the former is also the home of the internationally recognised Yorkshire Sculpture Park. Traffic exiting the M1 at exits 38 and 39 already chokes these villages especially for 2 to 3 hours in both early morning and early evening.

Council DtC Response

DTC Response: At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate. In relation to the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Wakefield will work with Kirklees Council over time to discuss cross-boundary infrastructure and traffic impact issues.

PDLP Allocations & Designations

Consultee: **973343**

Paula Kemp

Agent:

Rep ID: **PDLP_AD1449**

Paragraph/Site: **ME1965a**

Duty to Co-operate

Every village road leads down to the Dearne Valley and the A636 Wakefield Road which is also a major feeder route for the Holme Valley. This road is increasingly busy and congested and to add traffic from the proposed 5,500 new homes in Kirklees Rural is a travesty of National Policy relating to soundness. What consultation has taken place with neighbouring councils of Wakefield and Barnsley?

Council DtC Response

DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues. Wakefield Council did not comment on this site.

PDLP Allocations & Designations

Consultee: **943162**

Mr Frank Dolan

Agent:

Rep ID: **PDLP_AD1423**

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

Paragraph/Site: **ME2248b**

Duty to Co-operate

Residents in the nearby villages of West Bretton and Calder Grove have not been made aware of the proposals. Both are within the Wakefield MC area and the former is also the home of the internationally recognised Yorkshire Sculpture Park. Traffic exiting the M1 at exits 38 and 39 already chokes these villages especially for 2 to 3 hours in both early morning and early evening.

Council DtC Response

DTC Response: At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate. In relation to the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues.

PDLP Allocations & Designations

Consultee: **943162**

Mr Frank Dolan

Agent:

Rep ID: **PDLP_AD1424**

Paragraph/Site: **ME2248c**

Duty to Co-operate

Residents in the nearby villages of West Bretton and Calder Grove have not been made aware of the proposals. Both are within the Wakefield MC area and the former is also the home of the internationally recognised Yorkshire Sculpture Park. Traffic exiting the M1 at exits 38 and 39 already chokes these villages especially for 2 to 3 hours in both early morning and early evening.

Council DtC Response

DTC Response: At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate. In relation to the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues.

PDLP Allocations & Designations

Consultee: **968632**

Mrs Dawn Gemmell

Agent:

Rep ID: **PDLP_AD3594**

Paragraph/Site: **WS16**

Duty to Co-operate

- Kirklees have not considered cross boundary and inter authority Issues on waste.

Council DtC Response

DTC Response: SD14 (Duty to Co-operate Statement) sets out how the council has discharged its duty to co-operate in relation to 'waste' (please see paragraphs 5.35 to 5.38).

PDLP Allocations & Designations

Consultee: **1034329**

Mr David Pursehouse

Agent:

Rep ID: **PDLP_AD1993**

Paragraph/Site: **SL2170a**

Duty to Co-operate

Duty to co-operate must apply in the protected areas within 1km of Hade Edge that fall outside Kirklees.

Council DtC Response

DTC Response: None of Kirklees's neighbouring local planning authorities consider that the council has failed to comply with the duty to co-operate. Meaningful cooperation has taken place and evidence to that effect is documented in SD14 (Duty to Cooperate Statement). Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28). Kirklees Council met with Peak Park on 5th Feb 2016. Furthermore SD14 identifies at paragraph 3.3 that the council has reflected Yorkshire West Local Nature Partnership's statement of principles and priorities at paragraph 13.20 of the Strategy and Policies document and that the Council also discussed the South Pennine Moors Special Protection Area (SPA) with YWLNP at their meeting on January 5th 2016. SD14 demonstrates how Kirklees Council has undertaken the required level of co-operation with neighbouring authorities (such as the Peak Park Planning Authority) and other agencies concerned with the protection and conservation of the South Pennine moorlands (such as Natural England and YWLNP).

PDLP Allocations & Designations

Consultee: **1034329**

Mr David Pursehouse

Agent:

Rep ID: **PDLP_AD1994**

Representations received on the Kirklees Publication Draft Local Plan relating to Duty to Co-operate

Paragraph/Site: **SL2170b**

Duty to Co-operate

Duty to co-operate must apply in the protected areas within 1km of Hade Edge that fall outside Kirklees.

Council DtC Response

DTC Response: The DTC extends beyond the Kirklees boundary. The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. None of Kirklees's neighbouring local planning authorities consider that the council has failed to comply with the duty to co-operate. Meaningful cooperation has taken place and evidence to that effect is documented in SD14 (Duty to Cooperate Statement). Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28). Kirklees Council met with Peak Park on 5th Feb 2016. Furthermore SD14 identifies at paragraph 3.3 that the council has reflected Yorkshire West Local Nature Partnership's statement of principles and priorities at paragraph 13.20 of the Strategy and Policies document and that the Council also discussed the South Pennine Moors Special Protection Area (SPA) with YWLNP at their meeting on January 5th 2016. SD14 demonstrates how Kirklees Council has undertaken the required level of co-operation with neighbouring authorities (such as the Peak Park Planning Authority) and other agencies concerned with the protection and conservation of the South Pennine moorlands (such as Natural England and YWLNP).

PDLP Sustainability Appraisal

Consultee: **943957**

Mr Ian Smith

Agent:

Rep ID: **PDLP_SA124**

Paragraph/Site: **4.1**

Duty to Co-operate

Neither the Plan nor the Sustainability Appraisal has undertaken any meaningful evaluation, at all, of what potential impact the sites that are being put forward for development might have upon the heritage assets of the area.

Council DtC Response

DTC Response: Correspondence within BP28 (dated 24 th February 2017) clarifies Historic England's current position with respect to these earlier comments, specifically that Historic England no longer consider that there has been no evaluation of the impact of any of the sites upon the historic environment. Historic England now fully acknowledge that the selection of sites which have been put forward as allocations in the Local Plan have been arrived at following a series of evaluations by the Council of the potential impacts that of all the sites might have upon the historic environment. Historic England endorse the process undertaken to arrive at the selection of sites included in the Local Plan and this has involved full consultation with, and considerable input from, Historic England throughout. Historic England have also confirmed that the Local Plan does not include any sites whose development will result in substantial harm to a designated heritage asset (and whose allocation, therefore, would be likely to conflict with national policy guidance).

At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2 nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ' safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.