

STATEMENT OF COMMON GROUND BETWEEN KIRKLEES COUNCIL AND HISTORIC ENGLAND
REGARDING THE KIRKLEES PUBLICATION DRAFT LOCAL PLAN –
ALLOCATIONS AND DESIGNATIONS (SD2)

This statement formalises the common ground established between Kirklees Council and Historic England on matters relating to the soundness of the allocations proposed within the Kirklees Publication Draft Local Plan - Allocations and Designations (SD2).

BACKGROUND

On 24th February 2017 Historic England wrote to Kirklees Council to clarify their position regarding the Local Plan’s Sustainability Appraisal and to confirm that they considered that the Council had, as part of their site selection process, evaluated, in broad terms, the impact which the potential development sites might have upon the historic environment and to endorse the approach which the Council were using to undertake a more detailed evaluation of the proposed allocations (letter enclosed within BP28).

Further to this Historic England responded to the Kirklees Local Plan Inspector’s Matters, Issues and Questions (specifically Matter 21) on 17th November 2017. Appendix 1 of Historic England’s Matter 21 submission expressed significant concerns regarding the Heritage Impact Assessments of a number of the housing allocations, the evaluation of the potential harm that the development of these sites might cause to the historic environment, and the fact that none of the conclusions of the Heritage Impact Assessments were firmly or securely tied into the Local Plan.

It is in this context that Kirklees Council have engaged constructively with Historic England to set out a schedule of proposed allocations where heritage assets are present, details of completed HIA work, and the position of both parties with respect to likely effects/outcomes, areas of difference between the two parties, and areas of common ground.

This statement is further evidence of the extensive engagement and co-operation that has taken place between Kirklees Council and Historic England throughout the Local Plan preparation process.

N.B. Areas of common ground and areas of difference with respect to Sites E1832c (Cooper Bridge) and E2333a (Clayton West) are covered within separate Statements of Common Ground.

Table 1: Schedule of proposed allocations where heritage assets are present and for which a Heritage Impact Assessment has been prepared by Kirklees Council:

H40	H597	H730	H1728A	H2730A
H95	H623	H738	H1747	MX1930
H101	H102	H761	H351	H481
H198	H660	H763	H1774	H584
H442	H664	H764	H1783	H715
H508	H690	H768	H1811	H786
H531	H706	H783	H2649	H2667

OVERALL COMMON GROUND BETWEEN KIRKLEES COUNCIL AND HISTORIC ENGLAND:

- The selection of sites which have been put forward as allocations in the Publication Draft Local Plan have been arrived at following a series of evaluations by the Council of the potential impacts that all of the sites might have upon the historic environment.
- The process undertaken to arrive at the selection of sites included in the Local Plan is one which Historic England would not only endorse but which has involved full consultation with, and considerable input from, Historic England.
- The Publication Draft does not include any of the sites whose development Historic England considered, at that time, would be likely to result in substantial harm to a designated heritage asset (and whose allocation, therefore, would be likely to conflict with national policy guidance).
- With the exception of the Employment Allocations at Cooper Bridge (E1832c) and Clayton West (E2333a), Kirklees Council has undertaken a Heritage Impact Assessment (Submission Documents LE 67 TO LE 99) to assess the likely impact upon the historic environment of the development of sites to which Historic England considered unsound.
- The overall approach that has been used for the Heritage Impact Assessments has been agreed with Historic England as providing an appropriate and proportionate methodology by which to assess the likely impact which the development of those sites might have upon the historic environment.

The following Table summarises the areas of agreement and disagreement between Historic England and Kirklees Council.

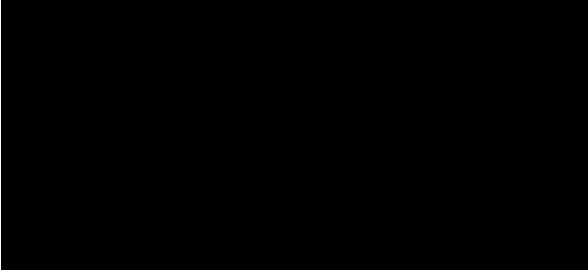
Table 2: Summary of the areas of agreement and disagreement between Historic England and Kirklees Council

Site Ref	The Heritage Impact Assessment has identified all the designated heritage assets likely to be affected by the development of this site	The Heritage Impact Assessment has correctly evaluated the contribution which the site makes to the significance of each designated heritage asset	The Heritage Impact Assessment has put forward mitigation measures which would effectively remove or reduce the harm	The site is capable of being developed
H40	Agree	Agree	Agree	Agree
H95	Agree	Disagree	Disagree	Disagree
H101	Agree	Disagree	Disagree	Agree ¹
H102	Agree	Disagree	Disagree	Agree ¹
H198	Agree	Disagree	Disagree	Agree ¹
H351	Agree	Agree	Agree	Agree
H442	Agree	Agree	Disagree	Agree ¹

Site Ref	The Heritage Impact Assessment has identified all the designated heritage assets likely to be affected by the development of this site	The Heritage Impact Assessment has correctly evaluated the contribution which the site makes to the significance of each designated heritage asset	The Heritage Impact Assessment has put forward mitigation measures which would effectively remove or reduce the harm	The site is capable of being developed
H481	Agree	Agree	Agree	Agree
H508	Agree	Agree	Disagree	Agree ¹
H531	Agree	Agree	Agree	Agree
H584	Agree	Agree	Disagree	Agree ¹
H597	Agree	Disagree	Disagree	Agree ¹
H623	Agree	Agree	Disagree	Agree ¹
H660	Agree	Disagree	Disagree	Agree ¹
H664	Agree	Agree	Disagree	Agree ¹
H690	Agree	Agree	Agree	Agree
H706	Agree	Agree	Disagree	Agree ¹
H715	Agree	Agree	Disagree	Agree ¹
H730	Agree	Disagree	Disagree	Disagree
H738	Agree	Disagree	Disagree	Disagree
H761	Agree	Agree	Disagree	Agree ¹
H763	Agree	Agree	Disagree	Agree ¹
H764	Agree	Agree	Agree	Agree
H768	Agree	Disagree	Disagree	Agree ¹
H783	Agree	Disagree	Disagree	Agree ¹
H786	Agree	Agree	Agree	Agree
H1728a	Agree	Disagree	Disagree	Agree ¹
H1747	Agree	Agree	Agree	Agree
H1774	Agree	Disagree	Disagree	Disagree
H1783	Agree	Agree	Agree	Agree
H2649	Agree	Disagree	Disagree	Agree ¹
H1811	Agree	Agree	Agree	Agree
H2667	Agree	Disagree	Disagree	Agree ¹
H2730a	Agree	Agree	Disagree	Agree ¹

¹ Historic England considers that these sites are only capable of accommodating some development.

Signed:



**Ian Smith
Historic England**

Signed:



**Richard Hollinson
Kirklees Council**

