

# **Kirklees Council House Extensions and Alterations Supplementary Planning Document (SPD)**

## **Consultation Statement – June 2021**

### **1. Introduction**

- 1.1 The House Extensions and Alterations SPD provides detailed guidance on how Local Plan policy LP24 (Design) should be implemented in determining planning applications. This Consultation Statement sets out the early engagement and public consultation carried out to inform the preparation of the House Extensions and Alterations Supplementary Planning Document (SPD).
- 1.2 The Consultation Statement has been prepared in accordance with Town and Country Planning (Local Planning) (England) Regulations 2012 to support the adoption of the House Extensions and Alterations SPD and the council's Statement of Community Involvement (SCI). The SCI outlines how the council will work with local communities and stakeholders in developing planning policy documents, including SPDs.
- 1.3 In accordance with the Regulations, this consultation statement sets out:
- who was consulted during the preparation of the SPD,
  - how they were consulted,
  - a summary of the main issues raised during the consultation,
  - how those issues have been addressed in the adopted SPD.

### **2. Background**

- 2.1 The House Extensions and Alterations SPD aims to promote high standards of design for house extensions and alterations in Kirklees that reflect national guidance and supports Local Plan Design Policy LP24. The guidance is to raise the place making agenda and be clear and precise about what the council would expect for well-designed residential extensions and alterations.
- 2.2 The purpose of the SPD is to inform prospective applicants, agents, architects, members of the public with an interest in an application, elected members of the Council and other decision-making bodies what the council considers to be good design in relation to house extensions and alterations and ensure future proposals achieve the required high quality and inclusive design to help deliver better places. This SPD provides detailed guidance and additional information about the implementation of Kirklees Local Plan policy LP24 'Design' and will be a material consideration in the determination of planning applications. The SPD will also reflect how good design can help in adapting locally to a changing climate to address the

council's Climate Emergency and enhancing the natural environment and supporting biodiversity.

- 2.3 The policy was subject to public consultation undertaken on the Kirklees Local Plan and the Statement of Public Consultation and Summary of Main Issues (April 2017) sets out the issues covered. Modifications were made to policy LP24 as requested by the Local Plan Inspector to clarify the requirements of design criteria to be applied in relation to policy LP24, specifically regarding sustainability.
- 2.4 The council is committed to improving the design of residential development. The aim is to ensure that the future housing development in the district has the required high-quality design to help deliver quality places for current and future occupiers and neighbours. This commitment is established through the Kirklees Local Plan and is further advocated through the House Extensions and Alterations SPD, which aims to create high quality buildings and street scenes.

### 3. Timetable of SPD production

- 3.1 The SPD was prepared by a project team led by the council's Planning Policy team, involving other internal specialisms including Development Management, Conservation & Design, Highways DM, Flood Management and Drainage, Public Health, Landscape Architect, Police Liaison Officer, Waste Liaison Officer, Biodiversity Officer, Cultural Development, and Climate Change Officer.
- 3.2 The production of the House Extensions and Alterations SPD has followed several stages. The timetable for the production of the SPD is set out below.

**Table 1: SPD Timetable**

Dates	Stage or Consultation Topics/Event
January – August 2020	Evidence gathering and early internal stakeholder engagement
July 2020 – August 2020	Strategic Environmental Assessment screening and consultation
1 <sup>st</sup> April 2020	Early Engagement Workshop (cancelled)
March – May 2020	Early Engagement Design Questionnaire
19 <sup>th</sup> October 2020 – 14 <sup>th</sup> December 2020	Public consultation on the Household Extensions and Alterations SPD

### 4. Early Engagement on the preparation of the SPD

- 4.1 Early engagement on the preparation of the Household Extensions and Alterations SPD was undertaken with internal and external stakeholders to understand their expectations and priorities to help inform the scope and content of the SPD. This period of internal officer engagement was held from March 2020 until August 2020.

4.2 The following council specialisms were consulted as part of the preparation and initial drafting of the SPD:

- Development Management
- Conservation and Design
- Highways Development Management
- Flood Management and Drainage
- Public Health
- Principal Landscape Architect Officer
- Biodiversity Officer
- Climate Change Officer
- Cultural Development
- West Yorkshire Police Designing Out Crime Officer
- Waste & Recycling Operations Planning Co-ordinator

4.3 Early engagement with the project team, wider internal specialisms and members identified several issues which are set out in the tables below together with the council's response on how the draft SPD has dealt with this issue.

**Table 2: Draft House Extensions and Alterations SPD: Internal Early Engagement**

Main issue raised	How it is dealt with in the SPD
<p><b><u>Waste</u></b> Document needs to make reference to the appropriate design of storage space for bins.</p>	<p>The SPD refers to the storage of bins and contains appropriate reference from the Highways Design Guide SPD regarding storage for waste.</p>
<p><b><u>Climate Change</u></b> Document needs to allow a flexibility for innovative design in relation to climate change proposals, particularly considering the potential requirement for future retrofitting of older properties.</p> <p>Document should include reference to a fabric first approach to mitigating/adapting to climate change.</p> <p>References to microgeneration opportunities should include solar thermal and hydro-electric generation.</p> <p>Document should reference the need for EV charging in new developments.</p>	<p>The SPD incorporates a section balancing the use of innovative designs in combatting climate change.</p> <p>The SPD includes reference to the fabric first approach.</p> <p>The SPD includes reference to the use of solar thermal and hydro-electric generation in the microgeneration section.</p> <p>This is already referenced in the Local Plan policy.</p>

<b>Main issue raised</b>	<b>How it is dealt with in the SPD</b>
<p>Concern around the promotion of solar gain and the potential for overheating.</p>	<p>The SPD includes reference to ventilation and cooling measures. Solar gain is an important part of reducing heating needs in winter and will be included in the document.</p>
<p><b>Highways</b></p> <p>There should be a reference to the new 'Highway Guidance Note – Emergency Access, Waste Management, Servicing and Deliveries', which provides advice on carry distances, storage provision, width and gradient of access routes etc.</p> <p>Document should refer to the Highways Design Guide SPD which is already adopted.</p> <p>The document promotes too much off-street parking.</p>	<p>The SPD includes reference to the 'Highway Guidance Note – Emergency Access, Waste Management, Servicing and Deliveries'.</p> <p>The SPD references the relevant information from the Highways Design Guide SPD in the document. The Highways Design Guide SPD will still be a material planning consideration for determining planning applications.</p> <p>The SPD is in line with adopted Local Plan policies and the adopted Highways Design Guide SPD.</p>
<p><b>Natural Environment</b></p> <p>The document should refer to the use of native species in planting choices.</p> <p>Reference should be made for using planting to soften/break up the built form.</p>	<p>The SPD refers to the use of native and appropriate species for planting.</p> <p>The SPD provides reference to the use of vegetation.</p>
<p><b>Accessibility</b></p> <p>Reference in the document to accessibility should consider linking to policy LP24(f) and make general reference to accessibility.</p> <p>Reference should be made to planning for future occupiers with dementia.</p>	<p>The SPD includes a section on Access for all users which refers to designing extensions for all users including disabled people and those with dementia.</p> <p>The SPD includes principles relating to designing extensions regarding dementia.</p>

Main issue raised	How it is dealt with in the SPD
<p><b><u>Flooding</u></b> References to flood risk in the document should be proportionate to the application size and impact.</p> <p>Reference to the requirements for flood risk assessments should be proportionate to the size of the proposals and their impact.</p>	<p>The SPD refers to the national guidance for flood risk assessments for minor applications, which is deemed suitable for the purposes of the document.</p>
<p><b><u>Residential Amenity</u></b> The document shouldn't include reference to the 45-degree rule but assess on a case-by-case basis.</p> <p>The document should make specific reference to what constitutes a habitable and non-habitable room.</p>	<p>The SPD has left the rule in as it is considered useful as a guiding point which provides clarity when considering designing extensions and alterations.</p> <p>The SPD refers to habitable and non-habitable rooms as a key design principle and provides examples.</p>
<p><b><u>Visual Amenity</u></b> The wording around front extensions should be softened regarding building lines.</p>	<p>The SPD has provided a softening of the proposed words on building lines to make allowance for officer judgement.</p>
<p><b><u>Specific Design Guidance</u></b> The specific guidance should provide more clarity on measurements that may be acceptable for different types of extensions.</p> <p>The document should differentiate between single and two storey extensions for each type of extension.</p> <p>The document should include specific reference to balconies and bungalows.</p> <p>The document does not need to make specific reference to annexes.</p> <p>The reference to Green Belt should be removed from the specific guidance and placed at the beginning of the document.</p>	<p>The SPD includes more clarity on measurements that will be acceptable for different types of extensions.</p> <p>The SPD includes specific reference to single and two storey extensions for rear and side extensions.</p> <p>The SPD provides specific guidance for balconies and bungalows.</p> <p>The SPD removes the section on annexes.</p> <p>The SPD has removed reference to the Green Belt in the specific guidance section and moved this to the 'Advice before you begin' section.</p>

<b>Main issue raised</b>	<b>How it is dealt with in the SPD</b>
<p>Further images need to be included to the specific guidance section.</p> <p>Concerns around whether only half the garden area seems insufficient.</p> <p>The principle that the extension should not be larger than the original house seems too generous.</p>	<p>The SPD has included further images to support the text.</p> <p>The SPD policy here is appropriate considering the other key design principles in the specific guidance section which would limit extensive development in larger gardens.</p> <p>The SPD has appropriate restrictions in the specific guidance to ensure that extensions do not become this large in practice. Therefore, it seems largely restrictive to set an arbitrary size to conform to.</p>
<p><b><u>Crime</u></b></p> <p>There should be reference to the Secured by Design standards.</p> <p>There should be reference to the Five evidence-based principles of Crime Prevention through Environmental design.</p> <p>Concerns raised about the use of screening for privacy and boundary treatments.</p>	<p>The SPD refers to the Secured by Design standards.</p> <p>The SPD provides links to the Secured by Design website.</p> <p>The concerns are noted and will be considered in the planning balance for developments.</p>
<p><b><u>Cultural Heritage</u></b></p> <p>The document could potentially refer to cultural heritage</p>	<p>It is considered to be outside the scope of the SPD.</p>
<p><b><u>Other</u></b></p> <p>The document could signpost the use of architects to help support better design.</p> <p>The document could use more images from the local area.</p>	<p>The SPD provides a section, which provides a signposting to the use of architects.</p> <p>The SPD will not be using images from the local area.</p>

4.4 A targeted workshop with external stakeholders, developers and interested organisations was due to be held on 1<sup>st</sup> April. This was cancelled due to the Covid-19 situation and design questionnaires were subsequently sent to all invitees (see Appendix 1 for list of Stakeholders) to seek their comments on:

- **Good design** - How successful have Kirklees been in securing good design in new housing developments? Are there any examples of good design in Kirklees or from elsewhere and what are the qualities that make these examples successful?
- **Barriers** - What are considered the main barriers to achieving good design in new housing developments or for extensions and alterations to existing residential properties. Are there any barriers to achieving good design in Kirklees which have been successfully overcome in other local authorities and can you provide examples of these?
- **Design Guidance in the SPD** - What key principles and elements of good design should be included in the Residential Design SPD and what guidance would be helpful to achieve this.

4.5 Five questionnaires were returned however none of these responses related to the House Extensions and Alterations SPD.

4.6 West Yorkshire Combined Authority were consulted early in the process on a draft document in July 2020. The following comments were raised:

**Table 3: Draft House Extensions and Alterations SPD: West Yorkshire Combined Authority**

Main issue raised	How it is dealt with in the SPD
<p><b><u>Climate Change</u></b> The document should include a reference to the net zero target for the council.</p>	<p>The SPD includes reference to the council's net zero target.</p>
<p><b><u>Residential amenity</u></b> The document could be more prescriptive in information on private residential amenity space and extension sizes</p>	<p>The SPD includes measurements for starting points in relation to extensions in the detailed guidance sections which cover these issues.</p>
<p><b><u>Other</u></b> The graphics in the document look dated and could be made clearer.  The document should recommend the use of an architect.</p>	<p>It is considered that the graphics are sufficiently clear for their intended purpose.  The SPD includes a recommendation to use architects</p>

## **5. Consultation on Strategic Environmental Assessment Screening**

- 5.1 As part of the process for developing the House Extensions and Alterations SPD, an assessment of the requirement for a Strategic Environmental Assessment (SEA) was needed. Consultation on the SEA Screening statement started on 13<sup>th</sup> July 2020 and finished 31<sup>st</sup> July 2020.
- 5.2 The council notified the following specified bodies of the SEA screening statement by email inviting comments in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004:
- Environment Agency
  - Historic England
  - Natural England
- 5.3 Responses were received from all three of the consulted bodies. A full summary of the responses received for the SEA consultation can be seen in the SEA determination statement.
- 5.4 The responses received confirmed the council's position that a further SEA was not required as the SPD will not change or introduce new planning policy over and above the Local Plan and, whilst there may be some environmental effects, these have already been covered in principle in the Sustainability Appraisal of the Local Plan.

## **6. Public Consultation on the House Extensions and Alterations SPD**

- 6.1 Public consultation on the draft House Extensions and Alterations SPD took place initially for a 6-week period from 19<sup>th</sup> October to 30<sup>th</sup> November 2020. This was extended for an additional two weeks to the 14<sup>th</sup> December 2020 (8 weeks in total). The consultation was available online and through email and postal comments.
- 6.2 In compliance with regulations 12, 13 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the following actions were undertaken:
- The draft House Extensions and Alterations SPD, SEA screening statement and SEA determination statement were published on the council's online consultation portal.
  - Details of the consultation and details of how to obtain hard copies of the documents were displayed in the windows of the customer service centres in Huddersfield and Dewsbury, on the council's web page and on the council's social media platforms.
  - Statutory consultees, organisations and private individuals that expressed an interest in planning policy and future publication of SPDs (see Appendix 2) were contacted directly by letter or email with details about the consultation, where to view the document, how to obtain hard copies and how to comment.

- A press notice was published in the Huddersfield Examiner on 23<sup>rd</sup> October 2020 and the Dewsbury Reporter on 22<sup>nd</sup> October 2020 highlighting the consultation process.
- Posters were placed in the Huddersfield and Dewsbury Customer Service Centres on 19<sup>th</sup> October 2020 advertising the Quality Places consultation.
- A feature space was placed on the council website on 19<sup>th</sup> October 2020 advertising the Quality Places consultation.
- A press release was posted on Kirklees Together on 19<sup>th</sup> October 2020 and on the Council's social media platforms on 19<sup>th</sup> October 2020.
- A notification email was sent to all councillors on 16<sup>th</sup> October 2020 detailing the start of the consultation.

6.3 During the public consultation the council invited the Planning Agents Forum to a presentation on the House Extensions and Alterations SPD to raise awareness of the consultation. This was held on Tuesday 3<sup>rd</sup> November 2020.

## 7. Main Issues Raised and The Council's Response

7.1 A total of 39 comments (from 13 consultees) were received to the public consultation on the House Extensions and Alterations SPD.

**Table 4: Number of Consultees**

Consultee Group	Number of Consultees
Regional/Local Organisations	4
Residents/Individuals	3
National Organisations	3
Developers/Planning Agents	1
Local Planning Authorities/Councils	1
Town/Parish Councils	1

7.2 Comments were received from the following:

- Coal Authority
- Environment Agency
- Holme Valley Parish Council
- Holme Valley Vision Network
- Huddersfield Civic Society
- Natural England
- Robert Halstead Chartered Surveyors & Town Planners
- Trans Pennine Trail
- Wakefield Council
- West Yorkshire Combined Authority
- Private individuals (x3)

- 7.3 A full list of public consultation comments received and the council’s responses to these can be found in Appendix 3. A summary of the main issues raised during consultation, including those from internal stakeholders, is set out below. It summarises the main points and the council’s response to how these issues have been addressed in the SPD.

**Table 5: Summary of Main Issues and Council Response**

<b>Summary of Main Issue</b>	<b>Council Response</b>
<p><b><u>Conflict with National/Local Policy and Stricter guidance</u></b></p> <p>Concerns were raised that advisory points are weaker than those in the NPPF and some of the advice extends beyond the policies in the Local Plan.</p> <p>Concerns raised that the wording in the SPD is too weak to drive meaningful change and it is unclear as to what the consequences of not meeting the guidance are.</p>	<p>No change. Comments noted. The SPD has been produced in line with the policies set out in the Local Plan. The document does not set out new policies.</p> <p>Comments noted. Proposed change to provide some strengthening of wording across the document.</p>
<p><b><u>Scope of the Document</u></b></p> <p>Concerns raised that the Council is trying to cover too many policies in the document and due to the differences of character across Kirklees the document fails to provide the clarity expected.</p> <p>Concerns also raised that there is too much generic information in the document that is not specific to Kirklees that would be better suited to an introductory guide.</p>	<p>No change. Comments noted.</p> <p>The aim of the SPD is to provide detailed guidance on the implementation of policy LP24 in relation to house extensions and alterations. The SPD will be a material consideration in the determination of planning applications and will be the starting point for applicants to consider in their proposals. The SPD can’t cover all eventualities and specific circumstances for planning applications will be considered on a case-by-case basis.</p>
<p><b><u>Climate Change</u></b></p> <p>Concerns raised that the climate emergency is not expressed in strong enough terms to drive meaningful change.</p>	<p>Comments noted. The suite of Quality Places SPDs and guidance aims to improve the quality of residential development in Kirklees through good design, including responding to the climate change emergency. However,</p>

<p>Concern raised that maximising solar gain can cause overheating issues and should not be promoted in the SPD.</p> <p>Concern raised that the requirements in the SPD may be too onerous on householders.</p>	<p>these SPD's must be in conformity with the Local Plan Policies. Proposed change to include reference to net-zero target in SPD.</p> <p>The SPD is the starting point for applicants and cannot cover all eventualities. The SPD references maximising solar gain and both ventilation and cooling. Given the balance required for reducing carbon from heating and cooling properties this strikes a balance between both aspects which is required.</p> <p>Proposed change to align key design principle to policy wording in Local Plan.</p>
<p><b><u>Natural Environment</u></b></p> <p>Recommendations made that the SPD could include more consideration of biodiversity enhancements in line with the NPPF.</p> <p>The SPD should include specific reference to protected species and requirements for surveys for these species.</p> <p>The SPD should align to the wording in LP24 and LP33 in relation to trees and should highlight the Council's guidance on trees.</p> <p>Concern raised that the requirements in the SPD may be too onerous on householders.</p>	<p>Comments are noted and welcomed. Given the scope of the House Extensions and Alterations SPD, it is not considered suitable or proportionate to provide further measures beyond advice on opportunities for biodiversity and natural environment improvements in paragraph 4.31 and 4.32.</p> <p>Proposed change to include specific reference to protected species and requirements for surveys for these species.</p> <p>Proposed change to align key design principle to policy wording in Local Plan.</p> <p>Proposed change to align key design principle to policy wording in Local Plan.</p>
<p><b><u>Flooding</u></b></p> <p>Concerns raised on the loss of permeable space due to insufficient protection of</p>	<p>Comments noted. No change. The SPD provides appropriate guidance in</p>

<p>outdoor space from parking and over large extensions.</p> <p>Concerns that there is no advice for single storey extensions which include bedrooms in flood zones.</p>	<p>section 5 and other key design principles 2 and 3 to limit extensive development in larger gardens. The issue of flooding and drainage is covered in key design principle 14.</p> <p>Proposed change to include advice for single storey extensions which include bedrooms in flood zones.</p>
<p><b><u>Statutory Consultees</u></b> The document should signpost pre-application advice services for statutory consultees.</p>	<p>Comments noted. Proposed change to signpost information on statutory consultees pre-application advice.</p>
<p><b><u>Graphics/Images</u></b> Comment raised that some of the graphics proposed look dated and could be more aesthetically pleasing.</p> <p>Concerns raised that there are no local images shown in the document.</p>	<p>No change. Comments noted. The images presented are clear and considered to be sufficient to express the information in the SPD. The choice of simple images was taken due to the range of audiences that the document is aimed to support.</p> <p>Local images have not been included in this SPD due to the varied nature of the local character in the district and to focus on presenting the information in the text in graphic form.</p>
<p><b><u>Specific Guidance</u></b> Concerns raised that the SPD does not provide sufficient protection to keeping extensions subservient to the original house, protecting sufficient private outdoor amenity space or reducing the amount of off-street parking.</p>	<p>No change. Comments noted.</p> <p>The SPD provides sufficient protection through the document, when applying all measures holistically.</p>
<p><b><u>Further Reference</u></b> The document should include further reference to other documents, including the Waste Strategy and Secured by Design.</p>	<p>Comments noted. Proposed change to the SPD to include reference to these documents.</p>

7.4 All comments on to the public consultation have been considered in preparing the final SPD. None of these require significant changes to the overall approach. A number of comments supported the preparation of the SPD and specific guidance.

7.5 The main changes to the SPD as a result of comments received are summarised as follows:

- Signposting to statutory consultees' pre-application advice.
- Including advice for single storey extensions with bedrooms in flood zones.
- Aligning key design principles on Natural Environment and maximising energy efficiency to policy wording in Local Plan.
- References included to both Secured by Design and Waste Strategy.

7.6 The council has also taken the opportunity to make some minor additional changes to the SPD to provide clarification, corrections, or minor up-dates to text. The key changes are set out in Appendix 4 (please note Appendix 4 does not include changes that are de minimis in nature).

## Appendix 1: List of Stakeholders Invited to Workshop and Sent a Design Questionnaire

National Organisation	Regional/Local Organisation	Planning Agents/Developers	Kirklees Network
Age UK CPRE Environment Agency Friends of the Earth Historic England Homes England Home Builders Federation Natural England Sport England Sustrans Yorkshire Sport	Batley & Birstall Civic Society Dewsbury Matters Huddersfield Civic Society Huddersfield Society for the Blind Huddersfield University Kirkburton and District Civic Society Onetel Spenn Valley Civic Society West Yorkshire Combined Authority	Acumen Architects Barratt Homes Conroy & Brook Darren Smith Homes Emerson Farrar Bamforth Harron Homes Heppendsalls ID Planning Jones Homes Martin Walsh NLP Planning PB Planning Persimmon Redrow SB Planning Spawforths Storrie Planning Strata	Black Minority Ethnic Network Dementia Engagement & Empowerment Group Disabled Employee Network Green Employee Network Kirklees Neighbourhood Housing Kirklees Visual Impairment Network LGBT Network Well-being User Group Working Carers Support Network Young Employee Network

## Appendix 2: Consultee List

<b>Adjoining Authorities</b>	
Barnsley Metropolitan Council Bradford Metropolitan District Council Calderdale Council City of York Council High Peak Borough Council	Leeds City Council Oldham Council Peak District National Park Authority Wakefield Council
<b>Town &amp; Parish Councils</b>	
Cawthorne Parish Council Denby Dale Parish Council Dunford Parish Council Gunthwaite and Ingbirchworth Parish Council High Hoyland Parish Council Holme Valley Parish Council Kirkburton Parish Council	Meltham Town Council Mirfield Town Council Morley Town Council Ripponden Parish Council Saddleworth Parish Council Sitlington Parish Council Tintwistle Parish Council West Bretton Parish Council
<b>Organisations</b>	
Age UK BL Ecology British Telecom Brooks Ecological Calderdale and Huddersfield NHS Canal & River Trust Coal Authority Crestwood Environmental Environment Agency Environment Kirklees FCS Consultants Fields in Trust Foundation Trust Connect Housing CPRE Dewsbury Matters England Hockey English Cricket Board Forestry Commission England Greater Huddersfield Clinical Commissioning Group Highways England Historic England Holme Valley Vision Network Homes and Communities Agency House Builders Federation	Mab Environment and Ecology Ltd Metro Middleton Bell Ecology Mid Yorkshire Hospitals NHS Trust Natural England National Grid National Trust Network Rail Newsome Ward Community Forum NHS Property Services Northern Gas Network North Kirklees Clinical Commissioning Group NTL Group Ltd Quants Environmental RDF Ecology Rugby Football League Rugby Football Union Sheffield Football Association Spenn Valley Civic Society Sport England South West Yorkshire Foundation Trust Sustrans Trans Pennine Trail UDVET UK Active Unity Housing Association

<p>Huddersfield and District Archaeological Society  Huddersfield Birdwatchers Club  Huddersfield Civic Society  Huddersfield University  JCA Ltd  Keep Our Rural Spaces  Kirkheaton Future  Kirklees Active Leisure  Kirklees Badger Group  Kirklees Neighbourhood Housing  Locala  Local Enterprise Partnership Leeds City Region</p>	<p>West Riding Football Association  West Yorkshire Archaeology Advisory Service  West Yorkshire Bat Group  West Yorkshire Combined Authority  West Yorkshire Ecology  West Yorkshire Police Authority  Yorkshire Water Services  Yorkshire Wildlife Trust  Whitcher Wildlife Ltd  Wildscenes  Woodland Trust  WYJS  Yorkshire Housing</p>
<b>Planning Agents &amp; Developers</b>	
<p>Acumen Architects  AHJ Architects  A N Designs  Avant Homes Yorkshire  Avison Young  Bailey Smailes Solicitors  Bamford Architectural  Barratt Homes  Bartle &amp; Sons  Barton Willmore  Bellway  B K Designs  BNP Paribas Real Estate UK  Bradley Stankler Planning  Bramleys  Carter Jonas  Chris Thomas LTD  Conroy Homes  Dacre, Son &amp; Hartley  Darren Smith Homes  Deloitte  Design Line Architectural  DK Architects  ELG Planning  Fairhurst  Farrar Bamforth Associates Ltd  F M Lister &amp; Sons  Gladmans  Hallam Design Associates  Harron Homes  Hawdon Russell</p>	<p>Kirkwells  K Rouse  Malcolm Sizer Planning Limited  Martin Walsh Architectural  MD Associates  MWP Planning  NLP Planning  NJL Consulting  One17 Chartered Architects  Paul Butler Planning  Paul Matthews Architectural  Persimmon Homes  Peacock and Smith  QUOD  Rapleys LLP  RG P LTD  Riva Homes  Robert Halstead Chartered Surveyors &amp; Town Planners  Robertshaws Chartered Surveyors  Rouse Homes  Sanderson Weatherall LLP  Savills  SB Homes Limited  Spawforths  SSA Planning Limited  Steven Abbott Associates LLP  Strata  Storrie Planning  Taylor Wimpey  Tetlow King Planning Limited</p>

Heppendsalls Hourigan Connolly Iain Bath Planning Ian Baseley Associates I D Planning Indigo Planning JWPC Chartered Town Planners	Turley Associates Vernon and Co Wake Architects Walton and Co Planning Lawyers Yorkshire Country Properties Younger Homes
<b>Private Individuals</b>	
Approximately 580 individuals were invited to comment, including other organisations and community groups not listed above.	

### Appendix 3: Full List of Comments Received on the Public Consultation and the Council's Response

Ref No.	Organisation	Document Section/ Page	Comment	Change(s) requested	Council Response & Proposed Changes
SPD_Ext11	Trans Pennine Trail	Whole document	The Trans Pennine Trail partnership supports these documents and provides further detail to evidence commitment to accessibility and the provision of green corridors. 'No comments' made in relation to House extensions and Alterations SPD.	The Trans Pennine Trail partnership supports these documents and provides further detail to evidence commitment to accessibility and the provision of green corridors. 'No comments' made in relation to House extensions and Alterations SPD.	No change.  Support noted and welcomed.
SPD_Ext10	The Coal Authority	Whole document	Having reviewed the SPD, the Coal Authority has no specific comments to make.	Having reviewed the SPD, the Coal Authority has no specific comments to make.	No change.  Comments noted.
SPD_Ext5	Wakefield Council	1.1	Wakefield Council have no specific comments on this document. The Council supports and welcomes its introduction.		No change.  Support noted and welcomed.
SPD_Ext15	West Yorkshire	1.1	<b>General comments:</b>		No change.

	Combined Authority		<p>Graphics/Images – Whilst the graphics are mostly clear, for a document that is about promoting good design they look dated. The document should show existing buildings as aesthetically pleasing and worth respect. Both Wakefield and Bradford’s SPDs have graphics with a bit more detail. Local photos of best practice – and otherwise – would help in illustrating certain points.</p>		<p>The images presented are clear and considered to be sufficient to express the information in the SPD. The choice of simple images was taken due to the range of audiences that the document is aimed to support.</p> <p>Local images have not been included in this SPD due to the varied nature of the local character in the district and to focus on presenting the information in the text in graphic form.</p>
SPD_Ext4	Natural England	1.1	<p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any</p>		<p>No change.</p> <p>An SEA Screening Statement has been published and Natural England have been consulted on this document.</p> <p>Following consultation with statutory consultees,</p>

			<p>other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>		<p>including Natural England, it was concluded that a Strategic Environmental Assessment is not required.</p>
SPD_Ext14	Huddersfield Civic Society	1.1	<p>Huddersfield Civic Society (HCS) welcomes the opportunity to comment on four guidance documents published by Kirklees Council in October 2020 as Supplementary Planning Documents (SPD), which it hopes “will encourage a higher standard of design of residential developments in the area”, these being:</p> <ul style="list-style-type: none"> <li>• Open Space SPD</li> <li>• Housebuilders Design Guide SPD</li> <li>• House Extensions and Alterations SPD</li> <li>• Biodiversity Net Gain in Kirklees Technical Advice Note</li> </ul>		<p>No Change.</p> <p>Comments noted.</p>

		<p>We note a government summary of the purpose of SPDs at <a href="https://www.gov.uk/guidance/plan-making">https://www.gov.uk/guidance/plan-making</a>:</p> <p><i>“Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.”</i></p> <p><b>Introduction and Comments applying to all documents</b></p> <p>HCS applauds the intentions underlying many of the proposals contained in the SPDs regarding how national and local planning policies, as stated in the Local Plan, should be interpreted in Kirklees. However, we are concerned that, in their current – or similar - form, we believe they may well fail to achieve their objectives.</p> <p>There is much general or introductory text which may fit better in a planning textbook rather than in an SPD, eg “Food Growth: Green</p>		<p>No Change.</p> <p>Comment noted.</p> <p>See council response in Housebuilders Design Guide SPD schedule of comments.</p>
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		<p>space on the site can be used to grow food and could form part of a wider urban agriculture scheme” and “a Design Code can set out a set of rules regarding the scale and massing of new homes; but allow for a rich diversity in architectural styles”.</p> <p>Whilst some text is specific to Kirklees much is not, so does it belong in a Kirklees SPD? Also, some important items are omitted, eg a requirement for consultation on major residential developments with affected residents in neighbourhoods nearby and to state how this should be done.</p> <p>In attempting to cover the application of policies to many different development circumstances it becomes difficult to follow what does, or does not, apply in any one specific circumstance, eg in a conservation area or in a space-constrained site. Which advice items here can be ignored if they conflict with a requirement stated in the relevant Conservation Area Appraisal? What happens if the shape or slope of a site does not allow 35+ dwellings per hectare?</p> <p>The coverage of a large number of local and national policy items, many of which are</p>		<p>No Change. Comments noted.</p> <p>No Change. Comments noted See council response in Housebuilders Design Guide SPD schedule of comments.</p> <p>No Change. Comment noted.</p> <p>No Change</p>
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		<p>imprecise as well as advisory, potentially results in a higher level of subjectivity in how many of these advisory items might be interpreted – and therefore assessed - for approval or rejection. This may result in an increase in the number of Planning disputes and appeals. We also note several advisory items have examples which appear to ‘water down’ NPPF policy statements.</p> <p>HCS also finds it hard to see what, in some of these items, might help and inspire an individual, business or hoped-for Developer to come to Kirklees and improve our built and natural environment, rather than go to another district that might offer either greater simplicity of guidelines or more certainty of outcome. Many of the images that accompany sections of the guide refer to commendable developments outside Kirklees, e.g. by CITU in Leeds, but do not necessarily map clearly to a specific requirement for a developer to include in a typical development in Kirklees.</p> <p>It is also unclear how these SPDs might fit with possible changes that may be proposed along the lines of the government’s recent “Planning for the Future” White Paper and whether time might be better spent now on matters such as</p>		<p>Comments noted.</p> <p>Comments noted.</p> <p>See council response in Housebuilders Design SPD schedule of comments.</p> <p>No Change.</p> <p>Comments noted.</p> <p>No Change.</p>
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		<p>We appreciate that these alternative solutions might themselves introduce further complications, the first because care would be needed not to fall foul of the legal requirement (referenced previously) for an SPD not to “introduce new planning policies” and the second because of there possibly not being an agreed single set of priority items that covers all common planning applications. The third, while meaning there needs to be more cross referencing, would potentially mitigate some of the issues with the first two and could provide a more focused approach to Kirklees requirements. However, this only goes to show why we think an attempt to use SPDs to provide an additional layer of guidance across the full scope of the approved Local Plan policies leaves the door open to ambiguity.</p> <p><b>House Extensions and Alterations SPD</b></p> <p>This document contains many good suggestions for those wishing to extend or improve their homes and how to interpret applicable Local Plan and NPPF policies. By its nature, the scope of this subject is very broad,</p>	<p>the determination of planning applications.</p> <p>No Change.</p> <p>The SPD sets out a comply or justify approach, which provides a starting point for what the council would expect to be acceptable in relation to householder extensions and alterations.</p> <p>Proposed change.</p> <p>Amend paragraph 4.21 for clarification: “Proposals should seek to retain adequate and useable private outdoor space for the occupiers of the building, such as garden space, paved or patio areas. If, following the proposed extension, the outdoor space is too small or significantly out of character with the local area permission will be refused. <i>Proposals which</i></p>
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		<p>given the very wide range of house types and local circumstances across Kirklees.</p> <p>However, we are unclear as to whether much of this document would therefore suit better as an introductory guide to the subject of house extensions, rather than being a formal document attempting to cover the applicability of Local Plan and NPPF policies across such a wide range of circumstances. An example is text in 4.27 “Microgeneration of renewable energy can support a strong reduction in household greenhouse gas emissions...”</p> <p>Whilst much of the guidance appears sound, it is often unclear what will happen if items stated as advisory cannot be met, eg if there is no means a practical extension to a property can meeting the requirement (Item 4.10) of having the recommended space of 21metres to a habitable room of nearby premises?</p> <p>Conversely, there are some occasions where this SPD appears to conflict with, or extend, the guidance currently stated in the underlying Local Plan Policy. Item 4.21 states that if an extension fails to meet various outdoor space requirements it ‘will be refused’, a far stricter</p>		<p><u>would result in outdoor space which is too small or significantly out of character with the local area are unlikely to be acceptable.”</u></p>
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			<p>statement than in Local Plan Policy 24 open which this is based.</p> <p>In summary, we are concerned that it is unrealistic to provide a guide to the very broad subject of house extensions and alterations in the form of an SPD.</p>		
SPD_Ext16	West Yorkshire Combined Authority	1.1	<p><b>General comments:</b></p> <ul style="list-style-type: none"> <li>• Graphics/Images – Whilst the graphics are mostly clear, for a document that is about promoting good design they look dated. The document should show existing buildings as aesthetically pleasing and worth respect. Both Wakefield and Bradford’s SPDs have graphics with a bit more detail. Local photos of best practice – and otherwise – would help in illustrating certain points.</li> <li>• Zero carbon – The Kirklees’ target for zero carbon by 2038 should be included SPD.</li> <li>• Materials palette – the SPD should mention somewhere of restricting the materials palette.</li> </ul>		<p>No change.</p> <p>The images presented are clear and considered to be sufficient to express the information in the SPD. Local images have not been included in this SPD due to the varied nature of the local character in the district and to focus on presenting the information in the text in graphic form.</p> <p>Change proposed.</p> <p>Amend paragraph 4.23: “Planning for climate change is an important part of a successful response to the climate emergency. <u>The council is committed to a</u></p>

					<p><u>target of zero carbon by 2038.”</u></p> <p>No change.</p> <p>Comments noted on the material palette. The SPD recognises in key design principle two that materials should be in keeping with the original building. Where proposals seek to deviate from the original materials proposals will need to justify new materials in line with the comply or justify principle.</p>
SPD_Ext33	Holme Valley Vision Network	1.1	<p>GENERAL COMMENTS</p> <p>We found that this was a more constructive document than the Housebuilders Design Guide and consider that giving examples of both good and bad practice is useful. The illustrations give meaning to the text and we would recommend this approach for other documents.</p> <p>We also welcome the advice given to those</p>		<p>No change.</p> <p>Comments noted.</p>

			<p>proposing development and building work talk to neighbours. We consider, in general, the planning process to be adversarial and again would recommend this is approach i.e. early discussion with those likely to be affected is adopted as the default position. Surely, each and every development “should aim to achieve a balance between these principles to create sustainable, well-designed extensions and alterations which will have a positive impact on the quality of life for occupiers and neighbours.”</p> <p>We will not comment on the technical matters to avoid repeating the points made above, save to raise the following question.</p> <p>LP 24 Design states “Development briefs, design codes and masterplans should be used to secure high quality, green, accessible, inclusive and safe design, where applicable.”</p> <p>When would high quality, green, accessible, inclusive and safe design be not applicable?</p>		<p>No Change.</p> <p>Development briefs, design codes and masterplans mentioned in Policy LP24 relate to housebuilder developments and are not in the scope of the house Extensions and Alterations SPD.</p> <p>High quality, green, accessible inclusive and safe design are always applicable to development. Where applicable refers to the proportionate use of masterplans in relation to the size of the scheme.</p>
SPD_Ext34	Holme Valley Parish Council	1.1	The Parish Council notes that the House Extensions and Alterations SPD contains many good suggestions for those wishing to extend		No change.

			<p>or improve their homes. The subject is broad given the range of house types and local circumstances across the Holme Valley.</p> <p>The document is particularly relevant to the Holme Valley, as we have so many applications for extensions and alterations</p> <p>The document, is clear with very helpful illustrations of acceptable and unacceptable alterations and extensions. However, we are concerned that it may be unrealistic to try to provide a guide to the very broad subject of house extensions and alterations in the form of an SPD.</p> <p>The Parish Council feel that Kirklees Council should provide guidance, rules and detail what should be done in specific circumstances</p>		<p>The comments are noted and welcomed.</p> <p>No Change.</p> <p>The aim of the SPD it to provide detailed guidance on the implementation of policy LP24 in relation to house extensions and alterations. The SPD will be a material consideration in the determination of planning applications and will be the starting point for applicants to consider in their proposals. The SPD can't cover all eventualities and specific circumstances for planning applications will be considered on a case-by-case basis.</p>
SPD_Ext42	Holme Valley Parish Council	1.1	<p>Overall</p> <ul style="list-style-type: none"> <li>• Welcome the issuing of these documents, which supply greater detail to supplement the</li> </ul>		<p>No change.</p> <p>Comments are noted and support is welcomed.</p>

		<p>provisions of the Local Plan.</p> <ul style="list-style-type: none"> <li>• Welcome being given the opportunity to comment on the documents.</li> <li>• Welcome the clarity of presentation</li> <li>• Welcome the frequent references to climate change / sustainability / biodiversity in the texts of all documents but there is no sense of urgency, given that Kirklees and HVPC have declared a climate emergency. Section 4.4 Sustainable design in SPD Extensions and alterations is noted.</li> </ul> <p>General Response:</p> <p>Overall, the SPDs which are generally clearly laid out and provide a useful guide for applicants across the topics covered.</p> <p>They are in many ways aligned with the more detailed information within the Holme Valley Neighbourhood Development Plan which articulates more specifics about elements such as our landscape and built character and gives the views of our community. This is important as the SPDs are written from a developer's</p>		<p>The suite of Quality Places SPDs and guidance aims to improve the quality of residential development in Kirklees through good design, including responding to the climate change emergency. However, these SPD's must be in conformity with the Local Plan Policies.</p> <p>No Change.</p>
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		<p>perspective so we hope that they can be used in conjunction with the NDP to better understand the relationship between buildings and the community they sit within.</p> <p>Climate change and the need to act on the climate emergency is reflected in the SPDs but not expressed in the strong terms required to drive real action. For example, the Householders Design Guide only encourages or supports renewable technologies / shared energy projects rather than requiring these things to be considered as standard and only not applied if rationale is provided.</p> <p>It is important that new houses are built with solar panels, ground source heating etc. considered seriously from the start, not left to individual homeowners to add later. Many of the new developments in the valley do not seem to include these and indeed, utilities often appear to be added to and put under considerable pressure thereby causing problems for existing residents. The utilities should be enhanced, and recent problems have been visible such as recent flooding at the new housing in Scholes and lack of sufficient electrical supplies to support the</p>		<p>Comment noted.</p> <p>The Housebuilders Design SPD addresses the design of new build housing, which must be in conformity with Local Plan policies.</p> <p>Comments noted.</p>
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			<p>promised car charging provision in Hade Edge.</p> <p>The House Extensions and Alterations SPD is an extremely useful document providing a full range of positive and negative examples and we welcome this clarity which should be very helpful to those seeking to extend or alter their homes.</p> <p>Overall, we welcome the opportunity to contribute to these SPDs and the additional clarity they bring. Many terms within the SPDs are subjective such as referencing character, distinctiveness and public views and we recognise that this challenge of balancing specificity with the general values of an area is a challenge for all planning documents.</p> <p>However, we hope that together with the Holme Valley specifics of the NDP, these SPDs will provide a clearer articulation of what is acceptable in the future.</p>		
SPD_Ext35	Holme Valley Parish Council	1.4	<p>The Parish Council welcomes a number of elements within the proposal</p> <p>→ The statement that the guide is relevant to</p>		<p>No change.</p> <p>Comments noted and support welcomed.</p>

			all extensions and alterations, whether planning permission is needed or not		
SPD_Ext36	Holme Valley Parish Council	2.1	The Parish Council welcomes a number of elements within the proposal  → The whole section on Advice before you begin and particularly the strong advice to check if planning permission is required		No change.  Comments noted and support welcomed.
SPD_Ext1		2.6	excellent to see this being promoted as i have personally found it very difficult to obtain pre-app advice that you can rely on over the last few years. whatever advice that is given needs to have authority from senior planners up the management chain		No change.  Comments noted.
SPD_Ext37	Holme Valley Parish Council	2.6	The Parish Council welcomes a number of elements within the proposal  → The Council welcomes and encourages discussion with the Planning Service before a planning application is submitted		No change.  Comments noted and support welcomed.
SPD_Ext26	Environment Agency	2.7	As referred to above in response to paragraph 4.1 of the Housebuilders Design Guide, we would welcome a signpost to our pre-application advice service if the Council would		Proposed change.  Amend paragraph 4.38:

			be willing to facilitate this. This would be most appropriate where a site is within close proximity to a main river, as otherwise we would be unlikely to be consulted on householder extensions and alterations.		“Further advice relating to flood risk and householder extensions can be found at Gov.uk by searching ‘Flood risk assessment standing advice for minor extensions’, the councils Strategic Flood Risk Assessment can be found on the council’s website by searching 'Strategic Flood Risk Assessment' <u>and pre-application advice can be obtained from the Environment agency on their website, in cases of close proximity to main rivers.</u> ”
SPD_Ext38	Holme Valley Parish Council	2.15	The Parish Council welcomes a number of elements within the proposal → Encouragement to applicants to discuss proposals with neighbours		No change.  Comments noted and support welcomed.
SPD_Ext27	Environment Agency	3.1	We welcome inclusion of 'watercourses' under bullet point for Garden space, and the		No change.  Comments noted and support welcomed.

			reference to 'Flood Risk Area' under Designations bullet point.		
SPD_Ext17	West Yorkshire Combined Authority	Key design principle 2: Impact on the original house	The principle that the extension should not be larger than the original house seems too generous. The impact on flooding and visual amenity of houses potentially almost doubling in size seems extreme – perhaps some stricter guidelines are needed here. Kirklees' local plan says 'Proposals should promote good design by ensuring extensions are subservient to the original building' – This does not appear to be possible if the extension can be if they are the same size.		No change.  The SPD has appropriate guidance to ensure that extensions do not become over dominant or out of keeping with the character of the area.
SPD_Ext18	West Yorkshire Combined Authority	4.8	Graphics/photos could help here with point 4.8 and the definition of 'reasonable'		Proposed changes.  Amend Paragraph 4.8 to read:  "A reasonable amount of space should be provided around new extensions in the interests of the amenity of future residents and to prevent overlooking and undue loss of privacy to any

					<p>existing residents, <i>as shown in figures 6 and 7.</i>"</p> <p>Amend figure 7 to follow immediately on from figure 6 in the document.</p>
SPD_Ext19	West Yorkshire Combined Authority	Key design principle 7: Outdoor space	Leaving only half the garden area seems insufficient – the impact on surface run off a flooding is a concern.		<p>No change.</p> <p>The SPD provides appropriate guidance in section 5 and other key design principles 2 and 3 to limit extensive development in larger gardens. The issue of flooding and drainage is covered in Key Design Principle 14.</p>
SPD_Ext20	West Yorkshire Combined Authority	4.23	There is an opportunity here to encourage whole house energy efficiency - not just the extension.		<p>Proposed Change.</p> <p>Amend Paragraph 4.23: "All development proposals, however small the footprint of the development, should embed key sustainable design principles for mitigating and adapting to</p>

					<p>climate change. Therefore, regard should be taken to the following design principles for all extensions and alterations.</p> <p><u>Consideration should also be taken for opportunities to further embed energy efficiency measures into the existing dwelling. Proposals should therefore have regard to the following design principles for all extensions and alterations.</u></p> <p>” –</p>
SPD_Ext39	Holme Valley Parish Council	4.23	The Parish Council welcomes a number of elements within the proposal → Sustainable design		<p>No change.</p> <p>Comments noted and support welcomed.</p>
SPD_Ext12	Robert Halstead Chartered Surveyors & Town Planners	Key design principle 8: Energy efficiency	I don't disagree with this, but it isn't always possible depending on the age and design of the property unless householders spend vast sums of money particularly when altering the house rather than extending it.	Extensions and alterations should maximize energy efficiency where possible or where appropriate	Proposed Change. Amend Key design principle 8 for clarification: “Extensions and alterations should, <u>where practicable,</u> maximise energy efficiency.”

SPD_Ext21	West Yorkshire Combined Authority	4.24	Care should be taken when encouraging designs to maximise solar gain – Increased levels of insulation and south facing windows will quickly lead to overheating – and this problem is becoming worse with climate change. Passive solar construction only works where the extra heat gain can be balanced with thermal mass and solar shading. This is something that is hard to get right without an architect – and many householders will not have one.		No change.  Comments welcomed. The SPD is the starting point for applicants and cannot cover all eventualities. The SPD references maximising solar gain and both ventilation and cooling. Given the balance required for reducing carbon from heating and cooling properties this strikes a balance between both aspects which is required.
SPD_Ext23	West Yorkshire Combined Authority	4.25	Is a micro wind generator is suitable for this illustration? As they are currently only really useful off-grid in rural areas. It might be better to show solar thermal panels alongside the photovoltaics?		Comments noted.  The image is illustrative and does not represent we would expect across the whole borough and may be appropriate in rural locations in Kirklees. The design and choice of climate adaptations and mitigations would be

					<p>expected to be considered against the local character and context of the site in line with key design principles 1 and 2.</p> <p>Proposed Change.</p> <p>To Amend figure text to state: <u>“Illustrative example of an extension achieving energy efficiency methods though the use of climate mitigation and adaptation strategies.”</u></p>
SPD_Ext22	West Yorkshire Combined Authority	4.25	<p><i>‘Locating garages on the north side of homes to act as additional thermal buffers’</i> – this bullet point is repeated.</p> <p>There could be a bullet point for ‘Careful design to avoid excessive surface area and its associated heat loss’</p>		<p>Proposed change.</p> <p>Amend paragraph 4.25 to remove repeated bullet point and add bullet point stating <u>“Careful design to avoid excessive surface area and its associated heat loss”</u>.</p>
SPD_Ext28	Environment Agency	4.27	<p>Paragraph 4.27</p> <p>This paragraph makes reference to ground</p>		<p>No change.</p> <p>Comments noted.</p>

			source heat pumps – for information, under certain circumstances these might require an abstraction licence from the Environment Agency if an ‘open-loop’ system is proposed.		This level of detail is not considered appropriate for the scope of this document.
SPD_Ext29	Environment Agency	Key design principle 11: Water retention	Key design principle 11: Water Retention  We welcome and support all opportunities to retain and conserve water, which will help to adapt to climate change which is likely to lead to more frequent periods of prolonged dry weather resulting in potential water shortages.		No change.  Comments noted and support welcomed.
SPD_Ext13	Robert Halstead Chartered Surveyors & Town Planners	Key design principle 12: Natural environment	I'm not sure householders should be expected to ensure that their proposals contribute towards the enhancement of the natural environment. Its a good idea to promote the natural environment and biodiversity, but not convinced it should be mandatory for small household extensions and alterations.	Extensions and alterations should consider how they might contribute towards the enhancement of the natural environment and biodiversity.	Proposed Change.  Amend Key Design Principle 12 to read: <u>“Extensions and alterations should consider how they might contribute towards the enhancement of the natural environment and biodiversity.”</u>

SPD_Ext30	Environment Agency	Key design principle 12: Natural environment	<p>Key design principle 12: Natural Environment</p> <p>We note that Policy LP34 'Conserving and enhancing the water environment' is referred to within key design principle 14: Drainage and flood risk, but is not include in key design principle 12: Natural Environment. We consider that it would sit well in here and suggest adding it in.</p>		<p>Proposed change.</p> <p>Amend Key design principle 12 to include reference to Policy LP34.</p>
SPD_Ext3	Natural England	4.30	<p>Biodiversity enhancement</p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p>		<p>No change.</p> <p>Comments are noted and welcomed. Given the scope of the House Extensions and Alterations SPD, it is not considered suitable or proportionate to provide further measures beyond advice on opportunities for biodiversity and natural environment improvements in paragraph 4.31 and 4.32.</p>



					<p>relation to bats and birds. Where this occurs, <u>applications will need to be supported by appropriate surveys for protected species if the council determines there is a likelihood of their presence.</u> Statutory obligations are placed to ensure habitats are protected, and applicants would be required to show how these habitats would be protected as part of any planning permission. <u>Further standing advice on protected species can be found on the Natural England website."</u></p>
SPD_Ext31	Environment Agency	Key design principle 14: Drainage and flood risk	<p>Key design principle 14: Drainage and Flood Risk</p> <p>Where properties are located adjacent to main rivers, an Environmental Permit may be required from the Environment Agency in addition to planning permission, even at</p>		<p>No change.</p> <p>The SPD is focused on providing guidance on the design of household extensions and alterations.</p>

			householder level. We welcome a reference to this being made here in order to manage expectations of householders who may otherwise not be aware of the requirements upon them.		
SPD_Ext24	West Yorkshire Combined Authority	4.40	The amount of hardstanding in the good example looks excessive. A larger back garden should be shown so that it doesn't look like almost all the plot is paved, and a larger area of planting at the front too.		Proposed Change.  Amend image to reflect a larger back garden and increased planting.
SPD_Ext25	West Yorkshire Combined Authority	4.41	The number of off-street car parking spaces for the dwellings is above the average for new build. This has significant impacts on surface water run-off and makes it easier for households to own more cars –with the zero-carbon target this should be reduced? Perhaps a bike store should be shown on the diagram above?		No change.  The off-street parking is in line with the policy LP22 in the local plan and those set out in the adopted Kirklees Highways Design SPD.
SPD_Ext40	Holme Valley Parish Council	4.46	The Parish Council welcomes a number of elements within the proposal - Requirements for people with dementia and disability access		No change.  Comments noted and support welcomed.
SPD_Ext41	Holme Valley Parish Council	4.47	The Parish Council welcomes a number of elements within the proposal		No change.

			- Requirements for people with dementia and disability access		Comments noted and support welcomed.
SPD_Ext32	Environment Agency	5.1	<p>Section 5</p> <p>Where single storey extensions are being proposed to provide bedrooms, careful consideration and adequate mitigation will be required if the site lies with flood zones 2 or 3, and will need to be discussed within a site-specific flood risk assessment. In some circumstances this may lead to conflict between the requirements of key design principle 14 and key design principle 17 if finished floor levels not able to be raised above potential flood levels.</p>		<p>Proposed Change.</p> <p>Add with new paragraph after 4.38: <u>“Where single storey extensions containing bedrooms are proposed within flood zones 2 or 3 careful consideration and adequate mitigation measures will be required to ensure safety.”</u></p>
SPD_Ext2		5.32	<p>Similarly could a bungalow owner who has new houses built up to the boundary extend upwards to make the property a house without having to get it approved by the Council? It would be an extension or alternation and allow the property to maximise the household space on the plot of land.</p>		<p>No change.</p> <p>Information on permitted development rights is highlighted in the ‘Advice Before You Begin’ section of the document. Where development rights are not conferred through permitted development rights a planning</p>

					application would be required.
SPD_Ext43		Key Design Principle 2: Impact on the original house	where possible blending outer wall with level to original building where possible so it look as one whole property and not extended one. The extension is to make house larger so it can be used by the owners and not having to move out area extension size should be consultation of need of owners		No change. The principle on setbacks is to ensure that extensions to properties do not look out of keeping with the streetscene and wider character of the area.

#### Appendix 4: List of Minor Changes

The following change has been made to Section 5.5 Balconies to reflect the correct wording for the document:

Section	Draft SPD	Proposed Change
<p>5.5</p> <p><b>Balconies</b></p>	<p><b>Balconies</b></p> <p>5.28 Outbuildings, such as garden offices, detached garages and granny annexes, can have as much of an impact on the appearance of the building as any other extension. Wherever possible these should reflect the style, shape and architectural features of the existing house and not be detrimental to the space around the building.</p> <p>5.29 Outbuildings should normally:</p> <ul style="list-style-type: none"> <li>• Be subservient in footprint and scale to the original building and its garden taking into account other extensions and existing outbuildings</li> <li>• Be set back behind the building line of the original building so they do not impact on the street scene.</li> <li>• Preserve reasonable private amenity space appropriate for potential number of occupants for the house, a general principle that no more than 50% of garden space should be lost.</li> </ul>	<p><b>Balconies</b></p> <p><del>5.28 Outbuildings, such as garden offices, detached garages and granny annexes, can have as much of an impact on the appearance of the building as any other extension. Wherever possible these should reflect the style, shape and architectural features of the existing house and not be detrimental to the space around the building.</del></p> <p><del>5.29 Outbuildings should normally:</del></p> <ul style="list-style-type: none"> <li><del>• Be subservient in footprint and scale to the original building and its garden taking into account other extensions and existing outbuildings</del></li> <li><del>• Be set back behind the building line of the original building so they do not impact on the street scene.</del></li> <li><del>• Preserve reasonable private amenity space appropriate for potential number of occupants for the house, a general principle that no more than 50% of garden space should be lost.</del></li> </ul>

		<p><b>5.5 Balconies</b></p> <p><u>5.27 Balconies and roof terraces on existing buildings should not negatively affect neighbouring properties or alter the local character of the area. Balconies and roof terraces should be:</u></p> <ul style="list-style-type: none"> <li>• <u>Positioned, and screened if required, so that they do not overlook neighbouring homes or gardens.</u></li> <li>• <u>Sited away from locations that are sensitive to additional noise levels or disruption.</u></li> </ul>
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