

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

	capacity. For further correspondence relating to this representation see Core Document 'Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation'
Proposed Change Requested	The 'constraints' section of the site description does not indicate that any additional mitigation on the wider highway network will be required. It is considered that the cumulative effect in combination with other proposed allocations may necessitate additional highway mitigation. A statement should be added saying that "development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity". Development of this site will need to be phased in line with proposed Policy PLP4 that requires investment in infrastructure and new development to be coordinated. For further correspondence relating to this representation see Core Document 'Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation'
Council Response	No change. Highways England intend to retract their comments on the publication draft at the earliest opportunity to reflect their current position. These matters have been subsequently addressed within Highways England's letter to Kirklees Council dated 12th April 2017 (BP28). Further to this correspondence, the 'site specific considerations' (in relation to individual site and cumulative site impacts upon the Strategic Road Network) have either been removed or modified in accordance with Highways England's expressed position (see SD4 and BP28). Highways England's recommendations within BP28 were informed by LE141 and their latest Network Analysis Tool modelling. Highways 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).
Paragraph/Site: H307	Consultee: 942647 Rob Ellis Agent: Rep ID: PDLP_AD702
Duty to Co-operate	Previous concerns regarding school place provision in relation to this site have been addressed through co-operation and co-operation should continue to share data on school place planning. It is essential that as planning applications are submitted on this allocation and Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.
Council Response	No Change The continued co-operation with Wakefield Council on school place planning is acknowledged and supported.
Paragraph/Site: H307	Consultee: 972766 Mr Steve Hardy Agent: 941889 Mr Alistair Flatman Rep ID: PDLP_AD2240
Council Response	No change. Support noted.
Paragraph/Site: H367	Consultee: 942647 Rob Ellis Agent: Rep ID: PDLP_AD699
Duty to Co-operate	Previous concerns regarding school place provision in relation to H758 have been addressed through co-operation and co-operation should continue to share data on school place planning. It is essential that as planning applications are submitted on this allocation and Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.
Council Response	No Change The continued co-operation with Wakefield Council on school place planning is acknowledged and supported.
Paragraph/Site: H559	Consultee: 942234 unknown Agent: 941775 Mr Paul Butler Rep ID: PDLP_AD2496
Council Response	No change. Support noted.
Paragraph/Site: H559	Consultee: 942647 Rob Ellis Agent: Rep ID: PDLP_AD733
Soundness - Justified	This allocation is not sound as it is not justified. Wakefield considers the site plays an important role in preventing the coalescence of Chidswell and Gawthorpe to the south. It does not support the amendments to the Kirklees green belt review made following representations from a house builder that downgrade the importance of this site in green belt terms. It should be noted that the role of this site in preventing coalescence will also be magnified if the southern boundary of the adjacent site MX1905 is redrawn so that it forms a robust defensible boundary along the farm track to the north of the currently boundary in the plan which does not meet the requirements of national policy. A new road through this site will also provide access to the southern portion of MX1905 and could have highway impacts on Chidswell Lane and the local network in Wakefield. There appears to be no consideration of mitigation of impacts on the local network outside of Kirklees, particularly with regard as to how traffic from these potential developments can be prevented from using

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	Chidswell Lane. The evidence that Kirklees has made available in terms of transport modelling does not appear to do this.
Soundness - Consistent with National Policy	The southern boundary of this site shown on the draft policies map is not robust. The Framework at paragraph 85 is clear that green belt boundaries should be defined 'clearly, using physical features that are readily recognisable'. This boundary is partly formed by a drainage ditch but is unlikely to meet the requirements of the framework along the rest of its length.
Proposed Change Requested	Wakefield considers this site should remain as part of the green belt.
Council Response	No changeWakefield Council have confirmed through their response to the Regulation 19 consultation that they consider this site allocation to be legally compliant and that Kirklees Council has 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.

Paragraph/Site: **H559** Consultee: **955914 Miss Pauline Bell** Agent: Rep ID: **PDLP_AD3**

Soundness - Justified	We need to preserve the wildlife and areas for nature and for people to enjoy the countryside. Leeds Road is already heavy with traffic and at times cannot cope. More housing would potentially gridlock the area at peak times. The noise level from the road is already very high.
Council Response	ChangeAdditional information has been added to the site allocation text box on page 59 in the Allocation and Designation document (SD2) through the Proposed Modifications to the Local Plan document (SD4) reference AD-MM23 and AD-MM24 with regards to mitigating the impact of development on the site on the highway network. Wakefield Council has confirmed through their response to the Regulation 19 consultation that they consider this site allocation to be legally compliant and that Kirklees Council has 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.

Paragraph/Site: **H559** Consultee: **970990 Church Commissioners for England** Agent: **941839 Nolan Tucker** Rep ID: **PDLP_AD2242**

Soundness - Effective	Principle in emerging policy for draft allocation H559 to provide access to MX1905 as part of allocation but consider amendments are required to ensure the text meets the tests of 'soundness'. Location of access has been agreed between parties, however, no reference to when access should be delivered.
Proposed Change Requested	- Text referred to in "other site specific considerations" should be amended:From: "Access to MX1905 to be provided as apart of this allocation."To:"As a part of the H559 allocation, vehicular access between allocation MX1905 and Owl Lane (B6128) is to be agreed with the local planning authority and completed by the developer/landowner of H559 to ensure the appropriate and timely delivery of both allocations."
Council Response	No change Policy PLP4 Providing infrastructure in the Strategy and Policies document (SD1) requires that essential infrastructure comes forward when needed.Whilst it is expected that a road will be constructed, the provision of vehicular access to MX1905 cannot threaten the viability of H559 and such a requirement may not meet the legal tests for developer contributions as set out in the CIL Regulations i.e necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. This would need to be considered at the time of a planning application and not pre-judged at the plan making stage.

Paragraph/Site: **H559** Consultee: **1045848 Mrs Toni Rios** Agent: **1045846 Mr Christopher Yapp** Rep ID: **PDLP_AD377**

Soundness - Justified	The 'constraints' section of the site description does indicate that any "additional mitigation on the wider highway network will be required". In view of the site's proximity to sites H46 and MX1905 the following wording is proposed: "This development has the potential for a severe adverse impact on the operation of the Strategic Road Network and will require physical mitigation measures and travel plans in order to minimise the impact of the traffic generated. Highways England has a number of planned improvements to the Strategic Road Network funded as part of the government's Road Investment Strategy (RIS). These schemes will provide additional capacity at congested locations. Development proposals will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan or other appropriate schemes. Construction of the site should also be phased to take place following completion of the committed RIS improvements." For further correspondence relating to this representation see Core Document 'Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation'
Proposed Change Requested	Amended wording in site text box.

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Council Response	ChangeHighways England intend to retract their comments on the publication draft at the earliest opportunity to reflect their current position. These matters have been subsequently addressed within Highways England's letter to Kirklees Council dated 12th April 2017 (BP28). Further to this correspondence, the 'site specific considerations' (in relation to individual site and cumulative site impacts upon the Strategic Road Network) have either been removed or modified in accordance with Highways England's expressed position (see SD4 and BP28). Highways England's recommendations within BP28 were informed by LE141 and their latest Network Analysis Tool modelling. Highways 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).				
Paragraph/Site: H813	Consultee: 942647	Rob Ellis	Agent:	Rep ID: PDLP_AD701	
Duty to Co-operate	Previous concerns regarding school place provision in relation to this site have been addressed through co-operation and co-operation should continue to share data on school place planning. It is essential that as planning applications are submitted on this allocation and Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.				
Council Response	No ChangeThe continued co-operation with Wakefield Council on school place planning is acknowledged and supported.				
Paragraph/Site: H2148	Consultee: 942647	Rob Ellis	Agent:	Rep ID: PDLP_AD700	
Duty to Co-operate	Previous concerns regarding school place provision in relation to this site have been addressed through co-operation and co-operation should continue to share data on school place planning. It is essential that as planning applications are submitted on this allocation and Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.				
Council Response	No ChangeThe continued co-operation with Wakefield Council on school place planning is acknowledged and supported.				
Paragraph/Site: H85	Consultee: 942154	unknown	Agent: 941891	Paul Leeming Rep ID: PDLP_AD1980	
Council Response	No ChangeSupport noted				
Paragraph/Site: H85	Consultee: 942647	Rob Ellis	Agent:	Rep ID: PDLP_AD720	
Duty to Co-operate	Previous concerns regarding school place provision on this site have been addressed through co-operation and co-operation should continue to share data on school place planning. It is essential that as planning applications are submitted on this allocation and Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.				
Council Response	No ChangeThe continued co-operation with Wakefield Council on school place planning is acknowledged and noted.				
Paragraph/Site: H95	Consultee: 942154	unknown	Agent: 941891	Paul Leeming Rep ID: PDLP_AD1984	
Council Response	No ChangeSupport noted				
Paragraph/Site: H95	Consultee: 942647	Rob Ellis	Agent:	Rep ID: PDLP_AD722	
Duty to Co-operate	Previous concerns regarding school place provision on this site have been addressed through co-operation and co-operation should continue to share data on school place planning. It is essential that as planning applications are submitted on this allocation and Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.				
Council Response	No ChangeThe continued co-operation with Wakefield Council on school place planning is acknowledged and supported.				
Paragraph/Site: H95	Consultee: 943957	Mr Ian Smith	Agent:	Rep ID: PDLP_AD3731	
Soundness - Justified	- The allocation of this site would bring development to within 30 metres of the Scheduled Monument at Thornhill Hall. There are also a number of Grade II Listed buildings to the south of this area. In addition, the site also adjoins the boundary of the Thornhill Conservation Area. - The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of these designated heritage assets. - the Council is accepting				

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that the principle of the loss of this currently-open area and its subsequent development is acceptable. - there has been no evaluation of what contribution this site makes to the Scheduled Monument, the Listed Buildings or the Conservation Area or what harm might result to those elements which contribute to their significance by its eventual development.

Soundness - Consistent with National Policy

- Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. National policy guidance makes it clear that Scheduled Monuments are considered to be in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional. - the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay "special attention" to "the desirability of preserving or enhancing the character or appearance" of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting. - There is also a requirement in the 1990 Act that "special regard" should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

Proposed Change Requested

Before allocating this site for development:-(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Scheduled Monument, Conservation Area and the Listed Buildings in its vicinity and what impact the loss of this site and its subsequent development might have upon their significance.(2) If it is considered that the development of this site would harm elements which contribute to the significance of any of these assets, then the Plan needs to set out the measures by which that harm might be removed or reduced.(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these designated heritage assets, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).

Council Response

No changeCorrespondence 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).

Paragraph/Site: **H269**

Consultee: **942647 Rob Ellis**

Agent:

Rep ID: **PDLP_AD721**

Duty to Co-operate

Previous concerns regarding school place provision on this site have been addressed through co-operation and co-operation should continue to share data on school place planning. It is essential that as planning applications are submitted on this allocation and Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.

Council Response

No ChangeThe continued co-operation with wakefield Council on school place planning is acknowledged and supported.

Paragraph/Site: **H269**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3735**

Council Response

No change 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).

Paragraph/Site: **H1754**

Consultee: **942647 Rob Ellis**

Agent:

Rep ID: **PDLP_AD703**

Duty to Co-operate

Previous concerns regarding school place provision in relation to this site have been addressed through co-operation and co-operation should continue to

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share data on school place planning. It is essential that as planning applications are submitted on this allocation and Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.

Council Response

No ChangeThe continued co-operation with Wakefield Council on school place planning is acknowledged and supported.

Paragraph/Site: **H2646**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3736**

Soundness - Justified

- The Double Locks at the junction of the Calder and Hebble Navigation with Dewsbury Cut are Grade II Listed Buildings.

Soundness - Consistent with National Policy

- There is a requirement in the 1990 Act that "special regard" should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

Proposed Change Requested

The Constraints Section needs to identify that this site lies close to a Listed Building.

Council Response

No changeOutline planning permission (2013/90249) for 104 dwellings was granted on 17th April 2015 therefore the principle of development has been established. Correspondence within BP28 (dated 24th 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).

Paragraph/Site: **H46**

Consultee: **1045848 Mrs Toni Rios**

Agent: **1045846 Mr Christopher Yapp**

Rep ID: **PDLP_AD379**

Soundness - Justified

This site does not have a significant individual traffic impact on the motorway network but, by virtue of its location or proximity to other proposed developments, it may need to contribute to additional schemes identified in the Infrastructure Delivery Plan if committed schemes will not provide sufficient capacity. For further correspondence relating to this representation see Core Document 'Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation'

Proposed Change Requested

In view of the sites proximity to sites H559 and MX1905 the following wording is proposed: "This development has the potential for a severe adverse impact on the operation of the Strategic Road Network and will require physical mitigation measures and travel plans in order to minimise the impact of the traffic generated. Highways England has a number of planned improvements to the Strategic Road Network funded as part of the government's Road Investment Strategy (RIS). These schemes will provide additional capacity at congested locations. Development proposals will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan or other appropriate schemes. Construction of the site should also be phased to take place following completion of the committed RIS improvements." For further correspondence relating to this representation see Core Document 'Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation'

Council Response

No changeHighways England intend to retract their comments on the publication draft at the earliest opportunity to reflect their current position. These matters have been subsequently addressed within Highways England's letter to Kirklees Council dated 12th April 2017 (BP28). Further to this correspondence, the 'site specific considerations' (in relation to individual site and cumulative site impacts upon the Strategic Road Network) have either been removed or modified in accordance with Highways England's expressed position (see SD4 and BP28). Highways England's recommendations within BP28 were informed by LE141 and their latest Network Analysis Tool modelling. Highways 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).

Paragraph/Site: **H3379**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3741**

Soundness - Justified

- The allocation of this site would bring development to within 30 metres of the Scheduled Monument at Thornhill Hall. There are also a number of Grade II

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Listed buildings to the south of this area. In addition, the site also adjoins the boundary of the Thornhill Conservation Area. - The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of these designated heritage assets. - the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. - there has been no evaluation of what contribution this site makes to the Scheduled Monument, the Listed Buildings or the Conservation Area or what harm might result to those elements which contribute to their significance by its eventual development.

Soundness - Consistent with National Policy

- Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, national policy guidance makes it clear that Scheduled Monuments are considered to be in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional. - the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay "special attention" to "the desirability of preserving or enhancing the character or appearance" of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting. - There is also a requirement in the 1990 Act that "special regard" should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. - In the absence of any assessment of the degree of harm which this proposed Allocation might cause to these designated heritage assets, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compatible with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.

Proposed Change Requested

Before allocating this site for development:-(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Scheduled Monument, Conservation Area and the Listed Buildings in its vicinity and what impact the loss of this site and its subsequent development might have upon their significance.(2) If it is considered that the development of this site would harm elements which contribute to the significance of any of these assets, then the Plan needs to set out the measures by which that harm might be removed or reduced.(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these designated heritage assets, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).

Council Response

No changeCorrespondence 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).

Paragraph/Site: **H2089**

Consultee: **941518 Mrs Christine Sykes**

Agent:

Rep ID: **PDLP_AD23**

Soundness - Justified

The site serves to link the two distinct communities of Mirfield and Ravensthorpe, access to Sands Lane is dependant on the incorporation of private land which would not be available. Sands Lane is narrow, has no pavements and because of a railway bridge cannot be widened. Access from Sands Lane to Steanard Lane will be compromised because the River Calder floods several times a year.

Proposed Change Requested

The land within the correct Mirfield boundary adjacent to Sands Lane should remain as Greenbelt. The removal of the need to access Sands Lane and properties on land further towards Lees Hall Road should be accessed from Dewsbury only.

Council Response

No ChangeSite access is achievable. Additional mitigation on the wider highway network will be required.The site promoter has submitted supporting information (SS14), including an access statement detailing how the site is deliverable.The scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries.

Paragraph/Site: **H2089**

Consultee: **942142 unknown**

Agent: **950095 Mr Jonathan Dunbavin**

Rep ID: **PDLP_AD1842**

Soundness - Justified

The Ravensthorpe Road site has one of the higher orders of Green Belt boundaries and the potential to significantly and adversely affect the purposes of

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	including land within Green Belt particularly in relation to sprawl and encroachment				
Proposed Change Requested	The allocation should be reduced or deleted. performs less well than alternatives such as Fieldhead Farm				
Council Response	No ChangeThe scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries.The relative scoring of alternative sites is set out in the sustainability appraisal (SD5).The Spatial Development Strategy (SD1, Strategy and Policies, page 36) outlines that most growth will be met in Huddersfield and Dewsbury.				
Paragraph/Site: H2089	Consultee: 942154	unknown	Agent: 941891	Paul Leeming	Rep ID: PDLP_AD1982
Council Response	No ChangeSupport Noted				
Paragraph/Site: H2089	Consultee: 942409		Agent: 950095	Mr Jonathan Dunbavin	Rep ID: PDLP_AD1815
Soundness - Justified	The Ravensthorpe Road site has one of the higher orders of Green Belt boundaries and the potential to significantly and adversely affect the purposes of including land within Green Belt particularly in relation to sprawl and encroachment				
Proposed Change Requested	The allocation should be deleted. It performs less well than alternatives such as site H366				
Council Response	No ChangeThe scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries.The relative scoring of alternative sites is set out in the sustainability appraisal (SD5).The Spatial Development Strategy (SD1, Strategy and Policies, page 36) outlines that most growth will be met in Huddersfield and Dewsbury.				
Paragraph/Site: H2089	Consultee: 942410		Agent: 950095	Mr Jonathan Dunbavin	Rep ID: PDLP_AD1688
Soundness - Justified	The Ravensthorpe Road site has one of the higher orders of Green Belt boundaries and the potential to significantly and adversely affect the purposes of including land within Green Belt particularly in relation to sprawl and encroachment				
Proposed Change Requested	The allocation should be deleted. It performs less well than alternatives such as site MX1904				
Council Response	No ChangeThe scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries.The relative scoring of alternative sites is set out in the sustainability appraisal (SD5).The Spatial Development Strategy (SD1, Strategy and Policies, page 36) outlines that most growth will be met in Huddersfield and Dewsbury.				
Paragraph/Site: H2089	Consultee: 942647	Rob Ellis	Agent:		Rep ID: PDLP_AD732
Soundness - Positively Prepared	The policy for H2089 should be amended. An additional point should be added to the section titled 'Other Site Specific Considerations' as follows: 'This development could have an impact on the local highway network in Wakefield. Evidence will need to be provided to demonstrate that any impacts within Wakefield are being adequately mitigated. In particular impacts on Thornhill Road / Hostingley Lane and to Horbury Road before it crosses Horbury Bridge need to be considered.' Wakefield considers with this modification the policy would be sound. Wakefield previously raised concerns about this sites possible impact on school place provision within the district. However cooperation has occurred and should continue to occur and data on school place planning is being shared between the two authorities. It is essential that as planning applications are submitted on this allocation Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.				
Proposed Change Requested	The policy for H2089 should be amended. An additional point should be added to the section titled 'Other Site Specific Considerations' as follows: 'This development could have an impact on the local highway network in Wakefield. Evidence will need to be provided to demonstrate that any impacts within Wakefield are being adequately mitigated. In particular impacts on Thornhill Road / Hostingley Lane and to Horbury Road before it crosses Horbury Bridge need to be considered.'Wakefield considers with this modification the policy would be sound.				
Council Response	No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the				

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cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.(BP12)The site promoter has submitted supporting information (SS14), including a high level delivery statement, masterplan and an access statement detailing how the site is deliverable, this includes two outline planning permissions (2016/94117 and 2016/94118).The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11). 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.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 evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network.With respect to highway impacts, 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 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.A proposed modification AD-MM26 has been made to the site allocations text box for this site in relation to mitigation on the wider highway network as shown in the Local Plan Proposed Modification document (SD4, pages 16 & 17).

Paragraph/Site: **H2089**

Consultee: **942774**

Lauren Garside

Agent:

Rep ID: **PDLP_AD3814**

Soundness - Positively Prepared

- Developments which lead to detrimental impacts on Local Wildlife Sites, is therefore likely to damage the biodiversity value of the Local Wildlife Site and lead to net losses in biodiversity. Such is in contradiction of Policy PLP 30 of the emerging Kirklees Local Plan.

Soundness - Justified

- The proposed allocation is immediately adjacent to Jordan and Oliver Wood Local Wildlife Site, part of which is an ancient woodland (Oliver Wood). - Developments which lead to detrimental impacts on Local Wildlife Sites, is therefore likely to damage the biodiversity value of the Local Wildlife Site and lead to net losses in biodiversity. - The development of large housing estates immediately adjacent to areas of woodland can significantly impact the biodiversity value of woodland through poor design and recreational disturbance. As mitigation to reduce such impacts we advised that a 20m ecological buffer is established between the development site and the Local Wildlife Site. This has not been carried out.

Soundness - Consistent with National Policy

- Developments which lead to detrimental impacts on Local Wildlife Sites, is therefore likely to damage the biodiversity value of the Local Wildlife Site and lead to net losses in biodiversity. Such is in contradiction of Paragraphs 9 and 118 of the NPPF.

Proposed Change Requested

Policy wording should be added to the allocation stating the requirement for a 20m ecological buffer to be established between the Local Wildlife Site and Ancient Woodland. This area should be planted with native plants or local provenance and managed for biodiversity.

Council Response

No ChangeThe protection of Local Wildlife Sites is set out in Policy PLP30 (SD1, Strategy and Policies, page 133), which includes proposals that have a direct or indirect adverse effect on a LWS or ancient woodland not being permitted unless the development can be shown to be of overriding public interest and there are no alternative means to deliver the proposal.

Paragraph/Site: **H2089**

Consultee: **944352**

Michael Hutchinson

Agent:

Rep ID: **PDLP_AD21**

Soundness - Justified

SGI2110 is over washed by housing allocation H2089. Lady Wood is hatched in yellow, reference is made to Mirfield Promenade in the allocations text box, no reference to Lady Wood.

Proposed Change Requested

SGI2110 should be removed from the housing allocation to give greater clarity. Lady Wood should be referred to by name.

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Council Response No change. Development of site H2089 will be expected to take account of the Mirfield Promenade proposal as set out in the site allocations box in the Kirklees Publication Draft Local Plan Allocations and Designations document (SD2). A masterplan will be required for the site which seeks to retain important biodiversity areas, such as Lady Wood.

Paragraph/Site: **H2089**

Consultee: **946105 Ms J Yelland**

Agent:

Rep ID: **PDLP_AD1067**

Soundness - Justified - Traffic already at gridlock. Addition of 4,000 houses will hinder the renaissance of the town as few people will be able to access it from either direction due to traffic congestion. Pollution from traffic congestion will be increased and result in poorer health of residents living along Huddersfield Road. - Boxing day flooding in 2015 showed the vulnerability of the Mirfield population. This will also be worsened by the added housing as there will be less ground to soak up heavy rain and it can only contribute to more flooding. - No exceptional circumstances to build on Green belt land. If more housing is required, it should be built in converted mills or in tower blocks in city centres. - Massive detrimental impact on the landscape and huge environmental destruction.

Council Response No Change The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.(BP12) In addition, the site promoter has submitted supporting information (SS14), including an access statement detailing how the site is deliverable. The site is not within a high flood risk area on the Environment Agency Flood Map. The management of surface water in development proposals is set out in Policy PLP28 (SD1, Strategy and Policies, page 127) which includes reference to maintaining typical greenfield run-off rates from sites.

Paragraph/Site: **H2089**

Consultee: **946110 Mr J Pinder**

Agent:

Rep ID: **PDLP_AD223**

Soundness - Positively Prepared I submitted detailed comments on this allocation on 9/1/16 under Comment ID DLP-AD1637 giving reasons why this allocation was totally inappropriate. There have been no changes made as a result of all the points raised so my conclusion is that consultation was carried out only as a legal requirement without any intention of changing the original allocation however justified any comments. The destruction of one of the few green spaces in the area by one of the largest proposed allocations for Kirklees in an already overdeveloped area.

Soundness - Justified The destruction of one of the few green spaces in the area by one of the largest proposed allocations for Kirklees in an already overdeveloped area Roads which are already gridlocked cannot absorb traffic from up to a further 4000 houses Including Sands Lane, as one access to this site, which is single lane over a single lane railway bridge shows how little consideration has been given to reality Originally only 100 jobs were identified resulting in road traffic at peak times being impossible as people travel out of the area The area is already under resourced for schools, doctors and recreational areas Kirklees have allowed Dewsbury to go into permanent decline as against Huddersfield and this new housing is not going to reverse this .More fundamental changes need to be made to avoid this becoming a "sink area". The wording in the Reports/Commentary is "Council boiler plate" verbiage which does not stand up to scrutiny

Soundness - Effective This allocation is not EFFECTIVE because to be achieved the costs of roads, schools, doctors and railway stations is incapable of being funded by the Council and they should not be permitted to even consider such extensive development without being obliged to first put in place the required infrastructure

Proposed Change Requested Remove or significantly reduce this allocation

Council Response The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base.

Paragraph/Site: **H2089**

Consultee: **947780 Mr Daniel Bray**

Agent: **968969 Miss Clare Plant**

Rep ID: **PDLP_AD1037**

Soundness - Effective The delivery rate on the site is very ambitious, as well as the infrastructure that is required amongst the site specific considerations. Early timescale for delivery on this site raises concern, The over-reliance on large strategic sites early in the plan period threatens ability of the Local Plan housing target being

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achieved.

Council Response

No ChangeThe phasing table set out in SD1 (Strategy and Policies, Appendix 3, pages 225 - 247) as amended by minor modification SP-MM33 (SD4, Proposed Modifications to the Local Plan) sets out information on a site specific basis to demonstrate that the Local Plan housing requirement can be met during the plan period.The site promoter has submitted supporting information (SS14), including a high level delivery statement, masterplan and an access statement detailing how the site is deliverable, this includes two outline planning permissions (2016/94117 and 2016/94118).

Paragraph/Site: **H2089**

Consultee: **965342**

Ms Jayne Russell

Agent:

Rep ID: **PDLP_AD3523**

Soundness - Justified

The area is a UK BAP Priority Habitat. Part lies within a high coal risk referral area. The site has flood risk issues on Steanard Lane. The proposal would reduce the green space available within the Mirfield Ward, this is already below the recognised requirement for healthy living.

Soundness - Consistent with National Policy

The purpose of the green belt is to prevent neighbouring towns from merging into one another. The proposed development would merge Mirfield, Ravensthorpe and Thornhill Lees.

Council Response

No Change.The scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries.The site is not within a high flood risk area on the Environment Agency Flood Map. The management of surface water in development proposals is set out in Policy PLP28 (SD1, Strategy and Policies, page 127) which includes reference to maintaining typical greenfield run-off rates from sites.Part of the site lies within a high risk coal referral area and there are mine entrances therefore a Coal Mining Risk Assessment is needed. Reports are required in relation to contaminated land, noise and air quality to determine the level of mitigation required.The site is adjacent to important ancient woodland, and a local wildlife site. There are blocks of lowland mixed deciduous woodland, UK BAP priority habitat on the site which add significantly to the nearby Local Wildlife Site. A landscaping masterplan for the wider site which uses locally native tree species should link to other woodland. The site includes an area of archaeological interest (PRN642) therefore a pre- determination archaeological evaluation is required.

Paragraph/Site: **H2089**

Consultee: **969052**

Mr Matthew Hudson

Agent:

Rep ID: **PDLP_AD373**

Legally Compliant

The plan is unsound. The site address is "Land to the south of Ravensthorpe Road / Lees Hall Road, Dewsbury". Consultation on the plan made no or little reference to the fact that a large amount of the development is within the Mirfield boundary. This feels like a deliberate act to dissuade the people of Mirfield from questioning the plan, hence the public consultation is not in line with the government guidelines and is not legally compliant.

Soundness - Justified

The plan is unsound. There has been no consideration to the consequences flooding has when gaining access to the area, especially from the Mirfield side. Sands Lane has been inaccessible because of flooding at least once every year for the last 10 years.

Soundness - Consistent with National Policy

The plan is unsound. The plan will merge Mirfield with Ravensthorpe (urban sprawl) and is contrary to government guidelines.

Proposed Change Requested

Modify the plan and remove all development within the Mirfield boundary to maintain the boundary between Mirfield and Ravensthorpe and prevent urban sprawl.All access to any proposed development should bypass the frequent flooding areas (ie. Mirfield Side).

Council Response

No ChangeThe council's Statement of Community Involvement (SD16) sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.All comments were considered as part of the pre-submission process and published on the council's website.The site is not within a high flood risk area on the Environment Agency Flood Map. The management of surface water in development proposals is set out in Policy PLP28 (SD1, Strategy and Policies, page 127) which includes reference to maintaining typical greenfield run-off rates from sites.The scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries.

Paragraph/Site: **H2089**

Consultee: **969134**

Mr Merlin Ash

Agent:

Rep ID: **PDLP_AD3838**

Soundness - Justified

Natural England has been made aware that allocation H2089 lies immediately adjacent to Jordan and Oliver Wood Local Wildlife Site and advise that the site

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brief should include avoidance and mitigation measures in order to avoid significant impacts upon this locally designated site. For further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Proposed Change Requested

Natural England has been made aware that allocation H2089 lies immediately adjacent to Jordan and Oliver Wood Local Wildlife Site and advise that the site brief should include avoidance and mitigation measures in order to avoid significant impacts upon this locally designated site.

Council Response

No ChangeThe protection of Local Wildlife Sites is set out in Policy PLP30 (SD1, Strategy and Policies, page 133), which includes proposals that have a direct or indirect adverse effect on a LWS not being permitted unless the development can be shown to be of overriding public interest and there are no alternative means to deliver the proposal.

Paragraph/Site: **H2089**

Consultee: **969233**

Mr Marcus Jessop

Agent:

Rep ID: **PDLP_AD352**

Soundness - Positively Prepared

- Allocations and Designations section 4.2 refers to site H2089 as impacting on the towns of Dewsbury and Thornhill only. There is no mention of the town of Mirfield. - "Technical Information About Sites" page 46 provides summary of site. Accepts that a significant amount of green belt land is included, it concludes that a distinct boundary will remain between the towns of Dewsbury and Thornhill. - No mention is made in either document that a significant proportion of the proposed development is in fact in Mirfield, therefore eliminating any boundary between Mirfield and Dewsbury and Thornhill. - The residents of Mirfield have not been made aware of the proposed development within Mirfield, the loss of green belt, and the elimination of the boundary with the towns of Dewsbury and Thornhill, effectively merging three towns into one. Residents of Mirfield have not been provided with the correct information to facilitate a judgement and in turn to engage in the planning process. Since the boundary between Dewsbury and Mirfield has been incorrectly placed by the council on their maps, site H2089 incorrectly appears to solely relate to Dewsbury and Thornhill. This error is compounded by the dialogue within the two mentioned documents failing to mention the impact upon Mirfield, despite a significant element of the proposed development taking place within Mirfield. . - Council have failed to adequately engage the local population

Proposed Change Requested

-The boundary between Mirfield and Dewsbury included on the maps prepared by the Council should be moved to correctly reflect the boundary between the two towns. -Reference should be made in the Allocations and Designations document, paragraph 4.2, and within page 46 of the "Technical Information About Sites" about the impact of site H2089 on the elimination of the border between Dewsbury and Mirfield. The residents of Mirfield should then be made aware of the error in the Local Plan and given the opportunity to engage with the Council.

Council Response

No ChangeThe council's Statement of Community Involvement (SD16) sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.All comments were considered as part of the pre-submission process and published on the council's website.Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan.

Paragraph/Site: **H2089**

Consultee: **969233**

Mr Marcus Jessop

Agent:

Rep ID: **PDLP_AD338**

Soundness - Positively Prepared

- Council have failed to consider all brownfield sites within the Local Plan. Council must utilise brownfield land before releasing green belt land. -Boundary between the towns of Mirfield and Dewsbury is not shown in the correct place, a significant proportion of the proposed "Dewsbury Riverside" development is actually within Mirfield. Local Plan therefore not been positively prepared as Mirfield residents have not been made aware that the proposed development spans Mirfield and Dewsbury. Had Mirfield/Dewsbury boundary been correctly drawn to show the significant number of proposed new housing taking place within Mirfield, and the loss of the green space, a potentially greater number of local residents would have engaged within the consultation process.

Soundness - Justified

- The former Lower Spen Valley landfill site located between Ravensthorpe and Hecmondwike represents 188 acres of brownfield land that has not been considered by the Council for residential or industrial development. There are several developers who have the capability and are prepared to make safe by way of decontamination of former landfill sites. - Site includes natural woodland, a nature trail, and a significant number of BAP sites. - Site represents an area of outstanding natural beauty enjoyed by local residents and persons from afar. - Enjoyed by the public for leisure and sporting activities including walking, cycling, hiking, cross country, trail hunting, running and horse riding. - The site includes a significant number and length of bridleways utilised on a daily basis

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by horse riders, walkers and cyclists. - The site includes a large number of grazing paddocks and stables for a large number of horses. - Since the Council have failed to allocate alternative suitable facilities the Local Plan is not sound.

Soundness - Consistent with National Policy

- Green belt, Local Plan is unsound as it would lead to the merging of three distinct towns, Mirfield, Dewsbury and Thornhill Lees together with the encroachment of the countryside. - Council have failed to plan positively to encourage use of green belt land and the amenities that it has to offer including horse riding, walking, cycling and rambling within the woods and designated nature trails and bridleways amongst the BAP environment - Only in exceptional circumstances may the Council utilise green belt land for development. Council justification is regeneration of Dewsbury. Proposed development spans Mirfield, Thornhill Lees and outskirts of Dewsbury, does nothing to regenerate Dewsbury. - Proposed development is of such a scale it effectively represents a new town which could lead to further decline of Dewsbury - Council have not presented sufficient exceptional circumstances to justify the utilisation of green belt land. The stated exceptional circumstances that the development is necessary to afford the regeneration of Dewsbury is unsound and unproven as it may lead to a flight from Dewsbury to the “new” town and therefore the further deterioration of Dewsbury. - The Council have attempted to justify the use of green belt land located at the very outskirts of Dewsbury, and includes significant plots of land within the towns of Mirfield and Thornhill Lees. - For the Plan to be sound, and green belt land to be used under exceptional circumstances for the regeneration of Dewsbury, one would expect land to be located within Dewsbury, not the outlying towns.

Proposed Change Requested

The 188 acre former Ravensthorpe landfill site, being brownfield land, should be considered and assessed for development before the inclusion of the greenbelt H2089 site. Council should ensure that adequate sporting and recreational facilities are provided to replace the loss of those on site. Local horse riding, horse stabling, cross country cycling and hiking, and trail hunting. Boundary between the towns of Mirfield and Dewsbury should be redrawn in the correct place to demonstrate impact upon Mirfield. Once redrawn the Council should then re-engage with the local population to ensure that the Plan is positively prepared. Council need to provide hard evidence as to how the proposed development will lead to the regeneration of Dewsbury.

Council Response

No Change The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district’s housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The relative scoring of alternative sites is set out in the sustainability appraisal (SD5). The Spatial Development Strategy (SD1, Strategy and Policies, page 36) outlines that most growth will be met in Huddersfield and Dewsbury. New open space will be required in accordance with PLP63 (SD1, Strategy and Policies, page 197).

Paragraph/Site: **H2089**

Consultee: **972220**

Agent: **941908**

Mr Andrew Rose

Rep ID: **PDLP_AD1789**

Proposed Change Requested

Include the District and Local Centres as part of the allocation. Miller Homes suggest that the housing allocation be amended to be a mixed-use scheme and include these aspects as part of the actual allocation.

Council Response

No Change It is not considered appropriate to amend the allocation to mixed use, residential growth of this scale will need to be supported by a range of community facilities to deliver sustainable development. Policy PLP13 (Town Centre Uses) allows the creation of new Local Centres in areas of significant residential growth (SD1).

Paragraph/Site: **H2089**

Consultee: **972220**

Agent: **941908**

Mr Andrew Rose

Rep ID: **PDLP_AD3317**

Soundness - Justified

Although supportive of the allocation at H2089, Miller Homes object to the Landscape Character Assessment undertaken for this site. From the assessment, it is not possible to understand the relative importance of the landscape character area in the wider landscape context. The report does not define the criteria used to determine landscape sensitivity and does not state what the important landscape characteristics of areas are (Character Area 37 and Character Profile E7). The matrix used in the assessment seems to confer a hierarchy which is not consistent with the descriptions of character types. The Landscape Character

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	Assessment is not considered to form a suitable tool to inform the decision making process to show which areas should be conserved and which areas could accommodate development without significant harm.
Proposed Change Requested	Review the Landscape Character Assessment undertaken on the Dewsbury Riverside site and address accordingly.
Council Response	No ChangeThe landscape character assessment (LE133), sets out the methodology that has been used to inform the assessment and conclusions.

Paragraph/Site: **H2089**

Consultee: **972595**

Mrs Cheryl Tyler

Agent:

Rep ID: **PDLP_AD522**

Soundness - Positively Prepared There is no evidence to provide justification for site of this size on this location. The plan seeks to focus growth in urban areas of Huddersfield and Dewsbury. The proposal does not comply with green belt purposes in national policy. New housing will not deliver regeneration benefits to Dewsbury. No evidence to suggest alternative sites closer to Dewsbury town centre have been considered.

Soundness - Consistent with National Policy There is no evidence to provide justification for site of this size on this location. The plan seeks to focus growth in urban areas of Huddersfield and Dewsbury. The proposal does not comply with green belt purposes in national policy. New housing will not deliver regeneration benefits to Dewsbury. No evidence to suggest alternative sites closer to Dewsbury town centre have been considered.

Proposed Change Requested The allocation should be removed, with sites closer to Dewsbury identified to have positive regeneration benefits or the Council should use other means to regenerate areas, such as refurbishing the existing housing stock, or identifying urban renewal schemes

Council Response No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries.The site promoter has submitted supporting information (SS14), including a high level delivery statement, masterplan and an access statement detailing how the site is deliverable, this includes two outline planning permissions (2016/94117 and 2016/94118).The relative scoring of alternative sites is set out in the sustainability appraisal (SD5).The Spatial Development Strategy (SD1, Strategy and Policies, page 36) outlines that most growth will be met in Huddersfield and Dewsbury.

Paragraph/Site: **H2089**

Consultee: **972595**

Mrs Cheryl Tyler

Agent:

Rep ID: **PDLP_AD271**

Soundness - Effective The trips generated by the proposed Dewsbury Riverside allocation (Site H2089) and the inadequate mitigation strategy proposed, it is considered that there would be severe area-wide residual transport impacts arising from the proposed development. It is therefore considered that it would be inappropriate to allocate site H2089 for development and furthermore that allocation would be contrary to the provisions of the National Planning Policy Framework and policies contained in the Draft Local Plan. The A644 corridor through Mirfield and Ravensthorpe is full to capacity throughout much of the day and the Council identifies 4 junctions in this corridor within the 30 most congested in the district. The proposed Dewsbury Riverside allocation would generate 'significant amounts of movement' and is of a scale where failure to deliver necessary housing could be considered to prejudice the soundness of the Local Plan. A robust assessment of feasibility and deliverability is considered necessary at this stage to inform decision making on potential allocation of the site.

Proposed Change Requested The allocation should be removed until it can be demonstrated that there is a realistic Highway Solution to mitigate against the potential severe adverse impact on the operation of the Highway Network . If this cannot be achieved the proposed allocation should be at least reduced in size to an extent where the impact on the Highway Network is within acceptable levels

Council Response No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are

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forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.(BP12)In addition, the site promoter has submitted supporting information (SS14), including an access statement detailing how the site is deliverable.

Paragraph/Site: **H2089**

Consultee: **972595**

Mrs Cheryl Tyler

Agent:

Rep ID: **PDLP_AD268**

Soundness - Consistent with National Policy

We do not believe the proposed allocation H2089 complies with National Planning Policy. Whilst it is clear that a site of this size helps meet Kirklees housing requirement there is no evidence to justify the, location and shape of the proposed green belt changes in this location.

Proposed Change Requested

The proposed boundary should be revised, removing the area to the west that to reduce the impact of the urban area encroaching on the countryside. More appropriate alternatives for “rounding off” this proposed allocation should be fully evaluated and considered

Council Response

No ChangeThe scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries.The relative scoring of alternative sites is set out in the sustainability appraisal (SD5).The Spatial Development Strategy (SD1, Strategy and Policies, page 36) outlines that most growth will be met in Huddersfield and Dewsbury.

Paragraph/Site: **H2089**

Consultee: **972595**

Mrs Cheryl Tyler

Agent:

Rep ID: **PDLP_AD523**

Soundness - Justified

The Council appears to suggest that the need to meet housing requirements is a sufficient exceptional circumstance. However, we do not consider that this figure represents an objectively assessed need as required by the NPPF and as it is theoretical it cannot be considered sufficient to justify the release of large areas of Green Belt land.

Soundness - Consistent with National Policy

Proposed allocation H2089 continues to serve a purpose as Green Belt land in accordance with paragraph 80 of the NPPF. As such the land should only be removed from the Green Belt if the Council can demonstrate that there are exceptional circumstances as to why this land should be removed from the Green Belt.

Proposed Change Requested

The Council should demonstrate that exceptional circumstances exist which support the removal of this site from Green Belt, only then should it be considered further.In the event that the Council can demonstrate that there are exceptional circumstances which indicated that the site should be removed from the Green Belt it still shouldn't be allocated for housing in this plan period, at most it should be safeguarded as Safeguarded Land.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries.The site promoter has submitted supporting information (SS14), including a high level delivery statement, masterplan and an access statement detailing how the site is deliverable, this includes two outline planning permissions (2016/94117 and 2016/94118).The Kirklees housing requirement has been calculated in accordance with NPPF including using CLG Household Projections as a starting point and considering a range of factors listed in NPPF/NPPG. This process is summarised in SD23 (Housing Technical Paper, paragraphs 4.8 - 4.13) and in more detail in the Kirklees SHMA (SD18, paragraphs 6.1 - 6.44). The Employment Technical Paper (SD22, paragraphs 4.12-4.31) provides a detailed explanation why the SENS1 housing requirement scenario has been used. SD23 (Housing Technical Paper) sets out a detailed five year housing land supply calculation (Table 11, page 28) demonstrating five years supply of deliverable housing capacity including the

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required 20% buffer. The phasing table in SD1 (Strategy and Policies, pages 227 - 247) demonstrates that the Local Plan housing requirement can be delivered.

Paragraph/Site: H2089	Consultee: 972595 Mrs Cheryl Tyler	Agent:	Rep ID: PDLP_AD266
Legally Compliant	The consultation summary document produced in 2015 identified 400 homes in Mirfield ward. The document failed to identify there were indeed a further 570 dwellings to be provided in Mirfield boundary as part of H2089, implying H2089 is in Dewsbury.		
Proposed Change Requested	Revise plan to remove the homes in H2089 from the Mirfield boundary or repeat the 2015 consultation exercise in light of this issue.		
Council Response	No ChangeThe council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.All comments were considered as part of the pre-submission process and published on the council's website.		

Paragraph/Site: H2089	Consultee: 973538	Agent: 950095 Mr Jonathan Dunbavin	Rep ID: PDLP_AD1484
Soundness - Justified	The Ravensthorpe Road site has one of the higher orders of Green Belt boundaries and the potential to significantly and adversely affect the purposes of including land within Green Belt particularly in relation to sprawl and encroachment		
Proposed Change Requested	The allocation shouldve redyced or deleted. performs less well than alternatives such as site H672		
Council Response	No ChangeThe scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defendable new green belt boundaries.The relative scoring of alternative sites is set out in the sustainability appraisal (SD5).The Spatial Development Strategy (SD1, Strategy and Policies, page 36) outlines that most growth will be met in Huddersfield and Dewsbury.		

Paragraph/Site: H2089	Consultee: 978569 Tony Rivero	Agent:	Rep ID: PDLP_AD356
Soundness - Positively Prepared	Support improvements at Ravensthorpe Railway station. However this should be more specific and reference should be made that development must make a contribution to the improvements.		
Proposed Change Requested	H2089 Other site specific considerations bullet point 9Proposals for this site should also contribute towards:Remove first bullet point (Improved road, rail, pedestrian and cycle connections) as that is covered by bullet points 6 & 8Improvements to Ravensthorpe railway station (see also Policy TS9) and surrounding areasDelivery Of New Community Hubs(Remaining bullet points unaltered)		
Council Response	No ChangeThe text as currently worded allows the flexibility for the appropriate improvements and funding to be secured alongside the development of the allocation.		

Paragraph/Site: H2089	Consultee: 1048599 Mr Geoffrey Peace	Agent:	Rep ID: PDLP_AD678
Legally Compliant	Kirklees has failed to inform the public sufficiently of the detail's of their new plan.		
Soundness - Justified	The plan is too dependent on input by third party involvement for road and infrastructure services as yet unknown to the public to comment. There are constraints on this site, roads, mine workings, power station gas main and flood problems on Ravensthorpe Road. Who will supply and pay for road and other infrastructure projects to support this plan.		
Proposed Change Requested	Kirklees Council need to show where they are going to locate roads and other infrastructure to support development of this size and integrate it into road and other infrastructure.		
Council Response	No ChangeThe council's Statement of Community Involvement (SD16) sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.All comments were considered as part of the pre-submission process and published on the council's website.Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. The Council has strategically modelled the transport network (local highway, public		

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transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.(BP12)The site promoter has submitted supporting information (SS14), including a high level delivery statement, masterplan and an access statement detailing how the site is deliverable, this includes two outline planning permissions (2016/94117 and 2016/94118).The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11).

Paragraph/Site: **H2089**

Consultee: **1049165** Name not provided

Agent:

Rep ID: **PDLP_AD412**

Legally Compliant

Local plan not been done transparently. Several areas resubmitted under different application numbers to hide from public, also attempt to have controversial sites listed as rejected when site has been resubmitted with slight alteration. This site has been marketed under the name 'Dewsbury Riverside'. It is isn't Dewsbury. Done in order to deter people of Mirfield, Ravensthorpe and Thornhill from commenting, making it more difficult and seem like the impact is less.

Soundness - Positively Prepared

- Part of development in Mirfield, boundaries shown are incorrect and do not take account in any part of submission of effect that development will have on Mirfield and it's residents.

Soundness - Justified

- Area known to flood. Building on land removes ability to soak up rainwater and increase effects of flooding on Ravensthorpe, Mirfield, and other areas downstream. Massive flood risk. - Destroying landscape, damaging BAP site - Market attractiveness low, Ravensthorpe an area not appealing to buyers. - Huge environmental impact on occupiers and neighbouring areas. Greatly increase traffic dramatic drop in air quality, remove even more of countryside. - Spurious claims in High Level Delivery Statement, Spawforths. Document constantly makes false claims, entire report full of claims not backed up by facts. Clearly done very little research on site, document not a fair representation of possible outcome of this land. - No plans available to public on proper highway plan, massive holes in reports and unfinished surveys. Development will have huge negative impact on environment, peoples health, wellbeing, traffic issues magnified to terrifying levels.

Soundness - Effective

Access severely lacking, no plans to show adequate roadways. Steanard Lane single track. No plans to improve Mirfield station. Currently severe issues with parking. Only direct train route to London. Building of houses will exacerbate issue.

Soundness - Consistent with National Policy

- Ignoring all the rules of Green Belt which have been provided as part of Kirklees Local Plan, Publication Draft Local Plan Green Belt Review November 2016 2.11. - Mirfield, Ravensthorpe and Thornhill will ALL merge into one another. - One of few areas of countryside left being destroyed for housing. - No character left, one big mega city. - Loads of derelict and brownfield sites in Kirklees being ignored by developers - 3.15 Severity of this development is a huge merger of built up areas

Proposed Change Requested

- Until road infrastructure has been improved, there should be no more progress with this application. - It must be massively reduced in size and located towards the thornhill, Dewsbury side of the plot to avoid merging of all towns involved. - All houses on Mirfield land should be removed from the plot as Mirfield is not mentioned in any part of the document.

Council Response

No ChangeThe council's Statement of Community Involvement (SD16) sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.All comments were considered as part of the pre-submission process and published on the council's website.The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield

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development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The scale and extent of this site begins to impact on the strategic role of the green belt in this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.(BP12)The site promoter has submitted supporting information (SS14), including a high level delivery statement, masterplan and an access statement detailing how the site is deliverable, this includes two outline planning permissions (2016/94117 and 2016/94118).The protection of biodiversity and geodiversity is set out in Policy PLP30 (SD1, Strategy and Policies, page 133).The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11).

Paragraph/Site: **H2089** Consultee: **1049204 Mrs Naomi Ramsden** Agent: Rep ID: **PDLP_AD429**

Soundness - Justified The land will be affected by odor nuisance from the Biffa waste site which borders the land.

Proposed Change Requested Eliminate odour from Biffa site.

Council Response No Change Odour from the Biffa site is not considered to be a soundness issue, and will be controlled by other appropriate legislation/guidance.

Paragraph/Site: **H2089** Consultee: **1062885 Mr John Pilgrim** Agent: Rep ID: **PDLP_AD2961**

Council Response No change. Support noted.

Paragraph/Site: **H2089** Consultee: **1092884 Mr Marcus Jessop** Agent: Rep ID: **PDLP_AD3839**

Soundness - Positively Prepared Concern over consultation and public awareness

Soundness - Justified Concern due to loss of trees and woodland in particular Lady Wood Concern due to the loss/use of green belt on the basis of its function: Prevent urban sprawl, Stop towns merging Protect the countryside Promote urban regeneration The density is not appropriate compared to surrounding area Wildlife and ecology issues concerns on site, namely: Ancient woodland Natural spring Protective species The development of the site would be visibility intrusive harming character and appearance of area Footpath and bridleway are used by ramblers, horse rider, cyclists and dog walkers The local infrastructure is not suited to 4000 homes Existing roads in Mirfield and Ravensthorpe already at capacity and congested Doctors, Hospitals and schools are at capacity with existing population Preference for housing growth to be located elsewhere in district, including the concept of a new garden town with appropriate infrastructure. Mirfield has had a lot of development on brownfield and greenfield in recent years Brownfield sites should be used first Derelict/empty houses in the area should be used Flood risk due to loss of vegetation

Proposed Change Requested Remove the site.

Council Response No Change The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The scale and extent of this site begins to impact on the strategic role of the green belt in

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this location by reducing the gap between Dewsbury and Thornhill, although the landform to the south and the remaining gap prevents any risk of physical merger. The site is well related to the form of the settlement in this location and presents defensible new green belt boundaries. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.(BP12)The site promoter has submitted supporting information (SS14), including a high level delivery statement, masterplan and an access statement detailing how the site is deliverable, this includes two outline planning permissions (2016/94117 and 2016/94118).The relative scoring of alternative sites is set out in the sustainability appraisal (SD5).The Spatial Development Strategy (SD1, Strategy and Policies, page 36) outlines that most growth will be met in Huddersfield and Dewsbury.The protection of biodiversity and geodiversity is set out in Policy PLP30 (SD1, Strategy and Policies, page 133).New open space will be required in accordance with PLP63 (SD1, Strategy and Policies, page 197).The site is not within a high flood risk area on the Environment Agency Flood Map. The management of surface water in development proposals is set out in Policy PLP28 (SD1, Strategy and Policies, page 127) which includes reference to maintaining typical greenfield run-off rates from sites.The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11).

Paragraph/Site: **H40**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3747**

Soundness - Justified

- Sheep Ings Farmhouse and its attached barn immediately adjacent to this area are Grade II Listed Buildings. The loss of this site and its subsequent development could harm elements which contribute to their significance. - the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. - there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of these Listed Buildings or what harm might result to those elements which contribute to their significance by its eventual development.

Soundness - Consistent with National Policy

- Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. - there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that "special regard" should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. - In the absence of any assessment of the degree of harm which this proposed Allocation might cause to these Listed Buildings, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compatible the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.

Council Response

No changeCorrespondence within BP28 (dated 24th 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).

Paragraph/Site: **H40**

Consultee: **969401 Mr Stuart Naisbett**

Agent:

Rep ID: **PDLP_AD648**

Soundness - Justified

Although the plan may be legally compliant and complies with the duty of care I do not believe this to be a sound outcome for the local area, as it will increase traffic on the already busy infrastructure, and road network. I do not support this plan at all.

Council Response

No change. - The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against.

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See Transport Model Technical Paper.

Paragraph/Site: **H40**

Consultee: **1034145 Mrs Leanne McConnell**

Agent:

Rep ID: **PDLP_AD482**

Soundness - Justified

Clarification about which areas of the site in flood zones 2 and 3 is required. The land is affected by former coal mining. The site is adjacent to ancient woodland and natural habitats that could be affected. The roads are not suitable for HGV traffic during construction or intensification of use from future development. The school can not accommodate further children.

Proposed Change Requested

This land should remain as green belt and not be designated for any development. Development should be on the basis of the removal of flood zones 2&3 for less houses and a designation of open space within the development which doesn't form part of the flood plain. Consideration should be given as to the impact of designating this land for development on the local primary school, Hopton Primary School.

Council Response

No change. - The majority of the site is located in main river flood zone 1. The allocation acknowledges in the site text that part of the site lies within flood zone 2 and 3. No residential development to take place in flood zone 3. A flood risk assessment is required as part of a detailed planning application. - The allocation acknowledges in the site text that part or all of the site lies within a high risk coal referral area. This can be further considered as part of a detailed planning application. - No objections have been raised from Natural England or West Yorkshire Ecology. - The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. - The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H40**

Consultee: **1049114 Ms Lisa Harriss**

Agent:

Rep ID: **PDLP_AD470**

Legally Compliant

People whose properties are in the neighbouring vicinity should have been consulted. The posting of an unsigned, undated letter with an invalid phone number three days before the closing date of the consultation does not constitute a fair and proper consultation.

Soundness - Justified

The maps indicating the extent of the flood risk areas is not accurate and the proposal does not consider the impact of increased surface water flooding on neighbouring properties. Significant flooding was experienced during the December 2015 floods. The evidence provided for consideration is not accurate. The site also has a history of open cast mining so may be contaminated and liable to subsidence. The plans do not adequately address the increased impact on roads and infrastructure, particularly on Granny Lane which floods, is narrow and constitutes a high accident risk. The development will also add to air quality issues and be detrimental to community health. Education standards will be impacted by adding to already oversubscribed schools.

Soundness - Consistent with National Policy

This site is affected by flood risk categories 2 and 3 and is therefore contrary to the NPPF which states that inappropriate development in areas at risk of flooding should be avoided. The access to the site will be through a category 3 flood risk area and development is therefore in breach of NPPF guidelines.

Proposed Change Requested

Do not consider building on land that has a known history of flooding and which has a history of open cast mining, which may be contaminated and liable to subsidence and further increased flooding.

Council Response

No change. - The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. - The majority of the site is located in main river flood zone 1. The allocation acknowledges in the site text that part of the site lies within flood zone 2 and 3. No residential development to take place in flood zone 3. A flood risk assessment is required as part of a detailed planning application. - The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. No highways safety issues have been raised. - The allocation acknowledges in the site text that part or all of the site lies within a high risk coal referral area. This can be further considered as part of a detailed planning application. - No

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air quality objections have been raised by Environmental Health. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.- The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H40**

Consultee: **1049249 Mr Graeme Hall**

Agent:

Rep ID: **PDLP_AD446**

Soundness - Justified

Any development would significantly increase the traffic problems along Granny Lane which floods annually. The land forms the last corridor of green belt in Mirfield that prevents urban sprawl and neighbourhoods from merging into one another. There is a lack of local infrastructure, including schools, local health & dental services, and there will be further pressure on over stretched transport routes, e.g. roads and railways. A range of wildlife would be affected, including bats, owls, pheasants, foxes, rabbits, squirrels, and existing trees/hedgerow would be lost. Considerable costs will be incurred in dealing with poor ground conditions resulting from historic mining in the area and flooding.

Proposed Change Requested

Reject site H40 and retain as green belt.

Council Response

No change.- The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.- The majority of the site is located in main river flood zone 1. The allocation acknowledges in the site text that part of the site lies within flood zone 2 and 3. No residential development to take place in flood zone 3. A flood risk assessment is required as part of a detailed planning application. - This site sits in an area of urban fringe where there is existing sporadic development in the green belt. The site is between existing residential development and mixed residential and industrial property at the junction with Hagg Lane . This is a flat, well contained site with clear boundaries to three sides. There is no risk of sprawl although the north eastern boundary is less well defined. - The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. - Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. - No objections have been raised from Natural England or West Yorkshire Ecology. - The allocation acknowledges in the site text that part or all of the site lies within a high risk coal referral area. This can be further considered as part of a detailed planning application.

Paragraph/Site: **H40**

Consultee: **1049378 Miss Nancy Stokes**

Agent:

Rep ID: **PDLP_AD664**

Soundness - Justified

The flooding problem in this area has been made worse by absence of work on the river. The build-up of vegetation under Newgate Bridge prevents the river from expanding and makes it shallower and slower flowing. The river at Shepley Bridge has not been dredged in years so debris will have built up. This will cause water to become stagnant and also increase the risk of flooding. If the proposed development goes ahead there will be no flood plain to allow flood water to spread out. Traffic along Granny Lane has increased recently because of cars avoiding speed cameras on Huddersfield Road, cars avoiding double parking on Hopton New Road and cars avoiding the traffic lights on Station Road. Extra vibration from additional traffic will aggravate the problem of a weak river bank made weaker by the Boxing Day floods of 2015.

Proposed Change Requested

Remove the vegetation and silt from beneath the viaducts at Newgate Bridge, dredge the river at Shepley Bridge and regularly check the river bank for signs of weakness. Make Granny Lane access only and monitor the effect of traffic at peak times.

Council Response

No change. - The majority of the site is located in main river flood zone 1. The allocation acknowledges in the site text that part of the site lies within flood zone 2 and 3. No residential development to take place in flood zone 3. A flood risk assessment is required as part of a detailed planning application. - The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to

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suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.

Paragraph/Site: **H40**

Consultee: **1049866 Mrs Judith Newell**

Agent:

Rep ID: **PDLP_AD758**

Soundness - Justified

This is green belt, more housing will lower the value of properties overlooking, no safe access, there is a known flooding problem. Granny Lane and Steanard Lane not suitable for heavier traffic. Have the previous Gregory Springs pit workings been forgotten? Contamination must be a possibility. There is also the spring which has caused us problems in the past. The infrastructure is not there, school-places etc.

Council Response

No change. - This site sits in an area of urban fringe where there is existing sporadic development in the green belt. The site is between existing residential development and mixed residential and industrial property at the junction with Hagg Lane. This is a flat, well contained site with clear boundaries to three sides. There is no risk of sprawl although the north eastern boundary is less well defined.- Highways assessments show that site access is achievable.- The allocation acknowledges in the site text that part or all of the site lies within a high risk coal referral area. This can be further considered as part of a detailed planning application.- The majority of the site is located in main river flood zone 1. The allocation acknowledges in the site text that part of the site lies within flood zone 2 and 3. No residential development to take place in flood zone 3. A flood risk assessment is required as part of a detailed planning application. - The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.- A contamination report (Phase 1) is required as part of a planning application.- The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H794**

Consultee: **941518 Mrs Christine Sykes**

Agent:

Rep ID: **PDLP_AD24**

Soundness - Justified

The road infrastructure cannot accommodate the density of housing proposed. The eastern end of the site would need to rely on sewage pumps as does part of the existing development at St Mary's Avenue. The children of potential residents would not be able to find a place in a local school as all Mirfield schools are full.

Proposed Change Requested

This site should be used for a school building

Council Response

No change. - Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. - Kirklees Strategic Drainage have raised no objections to surface water flood risk or surface water drainage.- The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H758**

Consultee: **942142 unknown**

Agent: **950095 Mr Jonathan Dunbavin**

Rep ID: **PDLP_AD1834**

Soundness - Justified

The Fieldhead Farm site performs better than this site. The promotion of unsustainable sites that contribute to Green Belt purposes or poor performance in the SA are not justified in preference to release of this site.

Council Response

No ChangeFull consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Paragraph/Site: **H758** Consultee: **942409** Agent: **950095** **Mr Jonathan Dunbavin** Rep ID: **PDLP_AD1810**

Soundness - Justified The Lower Blacup Farm site (H366) performs better than this site. The promotion of unsustainable sites that contribute to Green Belt purposes or poor performance in the SA are not justified in preference to release of this site.

Proposed Change Requested The allocation should be deleted. It performs less well than alternatives such as site H366

Council Response No Change Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.

Paragraph/Site: **H758** Consultee: **942647** **Rob Ellis** Agent: Rep ID: **PDLP_AD698**

Duty to Co-operate Previous concerns regarding school place provision in relation to this site have been addressed through co-operation and co-operation should continue to share data on school place planning. It is essential that as planning applications are submitted on this allocation and Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.

Council Response No Change The continued co-operation with Wakefield Council on school place planning is acknowledged and supported.

Paragraph/Site: **H758** Consultee: **943022** **Mr Robin Coghlan** Agent: Rep ID: **PDLP_AD326**

Council Response No Change. Support noted. The Council acknowledge the comment that Kirklees and Leeds councils need to cooperate to minimise increases in traffic and congestion on the A653. Comment also noted that measures in line with Policy TS5 should be considered including lobbying for external funding from other sources to support public transport along the A653 corridor.

Paragraph/Site: **H758** Consultee: **945160** **Mr Neil Watson** Agent: Rep ID: **PDLP_AD551**

Soundness - Justified The site is not justified on the grounds of: - traffic congestion - air pollution - biodiversity - motivation of the council is to use best land to generate higher council tax due to failure to attract businesses rather than to address housing issues as a whole.

Proposed Change Requested Delete allocation H758 from the Plan.

Council Response No Change The site is proposed as an accepted housing allocation. It formed an accepted housing allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The allocation is supported by Leeds City Council and Wakefield District Council. The site is in the Kirklees Unitary Development Plan and has outline permission for housing (2015/92908) granted in January 2015. This site (H758) has a slightly larger boundary (with a spur to the north west corner approximately 1ha) than the planning permission. The capacity of the site has been amended to reflect the planning permission and the increased area. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. Site access is achievable and no highway safety issues have been identified. Application 2016/91279 Discharge condition 32 Road safety audit and 2016/92722 discharge condition 34 highway condition were approved. A noise assessment has been requested but it is considered with good design, orientation and noise insulation that the development is acceptable. The area is not in or near an Air Quality management area or an area of concern in terms of Air Quality. Measures to negate the impact the development will have on Air Quality include provision of travel plans, EV charge points to encourage electric vehicles. No objections have been raised on wildlife and biodiversity from technical consultees. The council has provided evidence to justify its objectively assessed housing and employment needs to support its spatial strategy.

Paragraph/Site: **H758** Consultee: **1034182** **Mrs Julie Oldroyd** Agent: Rep ID: **PDLP_AD6**

Soundness - Justified Building additional housing at the bottom of Soothill Lane will have a detrimental effect on the local area in the following ways: Adds to congestion, road

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safety, health and wellbeing of current inhabitants, adds to air pollution, impacts on school and health service provision, impacts on environment reducing the amount of green space, Impacts on wildlife.

Proposed Change Requested

Building additional housing capacity on the edge of more rural areas instead of adding to the already growing population in an already built up area which struggles to cope with current capacity.

Council Response

No ChangeThe site is proposed as an accepted housing allocation. It formed an accepted housing allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The allocation is supported by Leeds City Council and Wakefield District Council.The site is in the Kirklees Unitary Development Plan and has outline permission for housing (2015/92908) granted in January 2015. This site (H758) has a slightly larger boundary (with a spur to the north west corner approximately 1ha) than the planning permission. The capacity of the site has been amended to reflect the planning permission and the increased area.Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. Site access is achievable and no highway safety issues have been identified. Application 2016/91279 Discharge condition 32 Road safety audit and 2016/92722 discharge condition 34 highway condition were approved. A noise assessment has been requested but it is considered with good design, orientation and noise insulation that the development is acceptable.The area is not in or near an Air Quality management area or an area of concern in terms of Air Quality.Measures to negate the impact the development will have on Air Quality include provision of travel plans, EV charge points to encourage electric vehicles.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Wakefield District Council supports the allocation based on the joint working on school place planning.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district. No objections have been raised on wildlife and biodiversity from technical consultees.

Paragraph/Site: **H1938**

Consultee: **943957**

Mr Ian Smith

Agent:

Rep ID: **PDLP_AD3726**

Council Response

No ChangeSupport noted

Paragraph/Site: **H323**

Consultee: **1034182**

Mrs Julie Oldroyd

Agent:

Rep ID: **PDLP_AD8**

Soundness - Justified

Object to any building on this area of land due to the negative impact it will have on: Wildlife, existing local population, air pollution, existing traffic congestion, local schools and health service provision, health and wellbeing. This area is one of the very few green spaces in Batley and as such provides a haven for wildlife (water voles; bats; newts) and an area for dog walking and recreation. This area used to be an allotment site and would serve the people of Batley much better to return to this or as a wildlife area/both. There are a number of unused buildings in the Batley area which could be upgraded as accommodation bringing wealth into the area rather than adding additional buildings in an area which could be better used to encourage outdoor pursuits for the local population.

Proposed Change Requested

This area used to be an allotment site and would serve the people of Batley much better to return to this or as a wildlife area/both.

Council Response

No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.Further investigation of the impact on wildlife was carried out on this site further to comments raised at the draft Local Plan stage and the site was discussed at the Local Wildlife Sites Panel meeting on 20/07/2016 (LWS113). West Yorkshire Ecology Service has not raised an objection to the allocation of the site subject to the measures outlined below.0.45ha has been removed from the developable area to protect a UK BAP priority habitat along Howley Beck. As part of any development a minimum stand-off distance of 10m must be retained from the top of the bank of the beck mainly as coarse grassland with occasional scattered scrub. In addition, a habitat management plan for the beck corridor specifically for water voles will be required with any proposed development. Any development which requires excavation within 5m of the water will require a detailed water vole survey.The Council commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.Highway assessments show that the site access

is achievable and that wider links to the network are acceptable. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Paragraph/Site: **H323**

Consultee: **1034182 Mrs Julie Oldroyd**

Agent:

Rep ID: **PDLP_AD7**

Soundness - Justified

Objection to building on this area of land due to the negative impact it will have on: wildlife, existing local population, air pollution, existing traffic congestion, local schools and health service provision, health and wellbeing

Proposed Change Requested

This area used to be an allotment site and would serve the people of Batley much better to return to this or as a wildlife area/both. Re-use existing buildings

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. It was an allocated site within the Kirklees Unitary Development Plan. Further investigation of the impact on wildlife was carried out on this site further to comments raised at the draft Local Plan stage and the site was discussed at the Local Wildlife Sites Panel meeting on 20/07/2016 (LWS113). West Yorkshire Ecology Service has not raised an objection to the allocation of the site subject to the measures outlined below. 0.45ha has been removed from the developable area to protect a UK BAP priority habitat along Howley Beck. As part of any development a minimum stand-off distance of 10m must be retained from the top of the bank of the beck mainly as coarse grassland with occasional scattered scrub. In addition, a habitat management plan for the beck corridor specifically for water voles will be required with any proposed development. Any development which requires excavation within 5m of the water will require a detailed water vole survey. The Council commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. Highway assessments show that the site access is achievable and that wider links to the network are acceptable. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & DesignationsParagraph/Site: **H11**Consultee: **949632****Miss Lyndsey Hepworth**

Agent:

Rep ID: **PDLP_AD632****Soundness - Justified**

There are currently too many houses and traffic in the areas of High Street, Raikes Lane and Field Head Lane, mainly due to the main roads in the area already being highly congested. This applies not only at rush hour during the week but finding that you are unable to navigate through Birstall, particularly on a Saturday, where you will see traffic queuing through the length of the village. Field Head Estate is used as a cut through to try and avoid this heavy traffic with many people using Raikes Lane. This has been further increased with the other new housing built on this area over the last few years. The 2 roads coming from this are cobbled, steep and narrow. Any problems on the M62, which is an increasing occurrence at the moment, results in Birstall being gridlocked. 100 houses on top of land already in development would strengthen the problems. Birstall is meant to have a village feel and cannot support all these additional houses.

Proposed Change Requested

Should this development be passed, it should include double yellow lines on both side of the road at this section to avoid the common problem of parking from houses.

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Site access is achievable, 2.4m x 43m visibility splays required along Field Head Lane. No highways safety issues have been raised. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping section of the Publication Plan. This has informed the spatial strategy.

Paragraph/Site: **H11**Consultee: **963036****Mr Michael Nolan**

Agent:

Rep ID: **PDLP_AD448****Soundness - Positively Prepared**

The site should be protected as green belt

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - Access to this land is from an already congested road and more housing will only make this worse. This will be the third housing development with access to Fieldhead lane which is already overloaded.

Proposed Change Requested

Delete allocation H11 from the Plan and protect as green belt.

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. Site access is achievable, 2.4m x 43m visibility splays required along Field Head Lane. No highways safety issues have been raised. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network.

Paragraph/Site: **H11**Consultee: **967348****Ogden Group**Agent: **942076****Mr Richard Irving**Rep ID: **PDLP_AD2236****Council Response**

No Change Support for the allocation noted.

Paragraph/Site: **H11**Consultee: **978303****Cllr Andrew Palfreeman**

Agent:

Rep ID: **PDLP_AD2526**

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Council Response	No Change Conditional support for housing allocation noted.				
Paragraph/Site: H138	Consultee: 942142	unknown	Agent: 950095	Mr Jonathan Dunbavin	Rep ID: PDLP_AD1829
Soundness - Justified	The Fieldhead Farm site performs better than this site. The promotion of unsustainable sites that contribute to Green Belt purposes or poor performance in the SA are not justified in preference to release of this site				
Council Response	No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The sustainability appraisal is an independent assessment of the likely social, environmental and economic impacts of the plan carried out in accordance with an agreed methodology with the SA consultees. In assessing allocations/designations to be included in the local plan, a further assessment has been undertaken as outlined in the site selection methodology where consideration is given as to whether issues can be mitigated. The site allocation text sets out required mitigation measures and potential constraints. All allocations within the local plan will be subject to planning permission and tested against the policies in the plan to ensure that appropriate mitigation is in place to deliver the allocation.				
Paragraph/Site: H138	Consultee: 942169		Agent: 972788	Mr Nick Pleasant	Rep ID: PDLP_AD2361
Soundness - Consistent with National Policy	The allocation is supported and can be delivered during the early part of the plan period. However, objection is made to the site allocation text identifying site constraints/technical requirements. NPPF Paragraph 173 is clear that LPAs should not place constraints on development through planning obligations or onerous policy requirements.				
Proposed Change Requested	The proposed technical supporting document element of the policy should be removed as should reference to "risk" elements.				
Council Response	No Change It is important to identify potential constraints to the allocations to ensure that consideration is given to any required mitigation measures and so that this can be factored into the planning, design and viability of the site at the earliest stage. Detailed requirements will be considered at a planning application stage.				
Paragraph/Site: H138	Consultee: 942409		Agent: 950095	Mr Jonathan Dunbavin	Rep ID: PDLP_AD1808
Soundness - Justified	The Lower Blacup Farm site (H366) performs better than this site. The promotion of unsustainable sites that contribute to Green Belt purposes or poor performance in the SA are not justified in preference to release of this site.				
Proposed Change Requested	The allocation should be deleted. It performs less well than alternatives such as site H366				
Council Response	No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The sustainability appraisal is an independent assessment of the likely social, environmental and economic impacts of the plan carried out in accordance with an agreed methodology with the SA consultees. In assessing allocations/designations to be included in the local plan, a further assessment has been undertaken as outlined in the site selection methodology where consideration is given as to whether issues can be mitigated. The site allocation text sets out required mitigation measures and potential constraints. All allocations within the local plan will be subject to planning permission and tested against the policies in the plan to ensure that appropriate mitigation is in place to deliver the allocation.				
Paragraph/Site: H138	Consultee: 943097	June and Geoffrey Ord	Agent:		Rep ID: PDLP_AD301
Soundness - Justified	The site is not justified on the grounds of: - access - the plan does not indicate how the safe access to and from the site would be achieved because of the increased number of vehicles arising from the large number of houses - traffic congestion - there is already a number of bottle necks due to the traffic lights at the six road junction which cannot and does not satisfactorily deal with the present traffic flow at peak periods. These roads have to cope with four major schools. - infrastructure capacity - 260 more houses can only mean more strain on the existing facilities - air pollution - health and well-being concerns from increased pollution.				
Proposed Change Requested	Delete allocation H138 from the Plan on the basis that safe access cannot be achieved to A62 and Smithies Moor Road without major alterations We do not consider that there are any modifications which would allow safe access for vehicles to the A62 and Smithies Moor Lane without major alterations to these				

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two roads taking place. The health and wellbeing of people is paramount and emissions at these crossroads is, we understand, significantly higher than the recommended National levels.

Council Response

No ChangeSite Access Achievable - Possible access onto A62 Huddersfield Road or Smithies Moor Lane. 2.4m x120 (40mph speed limit) or 4m x43m (30mph speed limit) visibility splays may also be required. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. In order to address infrastructure needs the Publication plan contains policy PLP4 Providing infrastructure which states that new development should contribute to the provision of infrastructure, taking into account local and strategic needs and financial viability. Additionally, the impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H138**

Consultee: **946107**

Mr & Mrs D & C A Denton

Agent:

Rep ID: **PDLP_AD1148**

Soundness - Justified

Volume of traffic at Birstall Smithies is bad and will get worse with development. Increase in air pollution Impact on wildlife on site.

Council Response

No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. No objections have been raised by technical consultees.

Paragraph/Site: **H138**

Consultee: **955834**

Mr Adam Godbold

Agent:

Rep ID: **PDLP_AD692**

Soundness - Positively Prepared

The allocation of H138 does not accord with the sustainability appraisal objectives- see PDLP_SA78.

Soundness - Justified

It is considered that the allocation would have a significant adverse impact on the environmental and social dimensions of sustainability. The proposal does not meet the objectives of Sport England. Development would have an impact on highway safety. There is a large swathe of trees protected by TPOs on edge of A62 Huddersfield Road.

Soundness - Consistent with National Policy

It is considered that the allocation would have a significant adverse impact on the environmental and social dimensions of sustainability, which does not accord with para 151 and 152 of NPPF. The allocation of Site H138 is in direct conflict with NPPF Paragraph 74 as the Draft Local Plan does not demonstrate that the existing playing fields on land to the south of Mill Street would be replaced by equivalent or better provision in terms of quality or quantity. Development would not also accord with paragraphs 32 and 110 of NPPF

Proposed Change Requested

Delete allocation H138 from the Plan.

Council Response

No ChangeThe site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users. SD8 Kirklees Local Plan: Publication Draft Sustainability Appraisal Report Schedule of Responses sets out a detailed response on the SA issues.

Paragraph/Site: **H138**

Consultee: **955963**

Mr Paul Carbutt

Agent:

Rep ID: **PDLP_AD975**

Soundness - Justified

Air pollution, traffic congestion around Mill Street, traffic lights and the access to the land through Mill Street. This is already used as a rat run for motorists trying to avoid the traffic lights and build up of traffic. Green spaces are at a premium and need to be preserved not taken away.

Proposed Change Requested

Delete allocation H138 from the plan.

Council Response

No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its

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allocation is considered consistent with the council's site allocation methodology. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.

Paragraph/Site: **H138**

Consultee: **955976**

mr Simon Mann

Agent:

Rep ID: **PDLP_AD1204**

Soundness - Justified

More traffic in excess of 500 vehicles will impact on Co2 and cause problems for the environment; increase traffic noise and effect resident's safety. Smithies Moor Lane is too busy to cope with the volume of traffic and excessive speeds. Traffic congestion at Smithies junction and at the top of Smithies Lane to Whitelee Road will be worse. Leeds Road and Smithies Moor Lane cannot take any more traffic. Local services, such as doctors, hospitals and schools, would not cope.

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H138**

Consultee: **956441**

Mrs siobhan Peoples

Agent:

Rep ID: **PDLP_AD1290**

Soundness - Justified

This land is currently used for recreation and is home to wildlife. A62 and Smithies Moor Lane are both currently congested, the increase in cars from development would exacerbate this. Major concern is access via Mill Street, currently a cul-de-sac. Potential impact on highway safety for children playing and space for off-street parking. The choice and allocation for high schools in the area is becoming increasingly difficult. Doctors, dentists and other local services will also feel the impact.

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users. Site access is achievable. Possible access onto A62 Huddersfield Road or Smithies Moor Lane. 2.4m x120 or 4m x43m visibility splays required depending on where access is located. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Paragraph/Site: H138	Consultee: 960054 Mrs Christine Farmery	Agent:	Rep ID: PDLP_AD1036
Soundness - Positively Prepared	This plan is not sound and does not meet the councils Sustainability Objectives.		
Soundness - Justified	I have concerns that this site can accommodate the amount of houses proposed, due to the increased volume of traffic. This will also increase the Carbon Monoxide levels around the area already high leading to poor air quality in the area. There will be an increased need for School places and Health care in an area where Schools and GP practices are already over subscribed. The field is an open space area for sport and observing nature in a time when these sites are being increasingly built on and being reduced in the area.		
Proposed Change Requested	Increase school places and healthcare should be made before the increase in families moving into the area.		
Council Response	No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.		
Paragraph/Site: H138	Consultee: 960498 Mrs Lindsay Tutt	Agent:	Rep ID: PDLP_AD787
Soundness - Positively Prepared	This site does not have a 'significant positive' impact on the sustainability objective. The development would result in the loss of a well used football pitch contrary to the aim to protect and enhance existing recreational facilities and the impact on health and well-being through the removal of green space contrary to government paper on childhood obesity.		
Soundness - Justified	NPPF policy 8 states that existing open space, sports and recreational buildings and land including playing fields should not be built on unless the loss is replaced by equivalent or better in a suitable location. The site allocation is not justified on the grounds of: - lack of safe, suitable access. The current infrastructure does not allow access from the A62 - there are already in excess of 18,000 vehicles per day using this section of road and the 40mph speed limit in additional to a dual line is surely unsafe. Exiting Mill Street is already dangerous and a challenge for the people who live here. More traffic would worsen this situation and would increase the possibility of accidents.		
Soundness - Consistent with National Policy	The site allocation is contrary to: NPPF policy 8 which states that existing open space, sports and recreational buildings and land including playing fields should not be built on unless the loss is replaced by equivalent or better in a suitable location. Further it is contrary to NPPF policy 4, paragraph 32 which states that plans should take account of whether safe and suitable access to the site can be achieved for all people.		
Proposed Change Requested	Delete allocation H138 from the Plan.		
Council Response	No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage.Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See BP12 Transport Model		

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Technical Paper.

Paragraph/Site: **H138**

Consultee: **963036 Mr Michael Nolan**

Agent:

Rep ID: **PDLP_AD449**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - Highway capacity/traffic congestion - the addition of 220 houses in this location with such limited road access and services will cause gridlock at the traffic lights on Huddersfield road as a possible 400 cars try to enter and leave the site.

Proposed Change Requested

Delete allocation H138 from the Plan and retain as an open space for the benefit of all.

Council Response

No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.

Paragraph/Site: **H138**

Consultee: **965712 Mr Phillip Parker**

Agent:

Rep ID: **PDLP_AD364**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - existing traffic congestion in this area already and implications of increased traffic - Parking problems in Mill St/Bridge Street already - Drainage problems in this area already - Excessive local population already - Infrastructure capacity - struggling local provisions already - doctors,school, council services etc. - Impact on wildlife and green land. - This is an old coal mining area, and excavating could have an impact on existing houses - Highway capacity - parking - air pollution from increased cars - drainage issues - negative impact on already overstretched area of Birstall

Proposed Change Requested

Delete allocation H138 from the Plan.

Council Response

No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. Site access is achievable. Possible access onto A62 Huddersfield Road or Smithies Moor Lane. 2.4m x120 or 4m x43m visibility splays required depending on where access is located.Issues of field flooding and cellar flooding have been recorded. No objections have been raised by technical consultees as problems can be investigated and resolved as part of the detailed planning process.The allocation acknowledges that the site falls within a high risk coal referral area. Mitigation measures can be addressed as part of a detailed planning application.No objections have been raised by technical consultees with regard to impact on wildlife. This proposed allocation contains a corner of lowland mixed deciduous woodland. It also has some substantial hedgerows. The proposed developable area of the site allocation has been reduced by 0.22ha leaving 7.48ha. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.

Paragraph/Site: **H138**

Consultee: **969240 mrs joanna terry**

Agent:

Rep ID: **PDLP_AD630**

Soundness - Positively Prepared

Develop derelict, brownfield sites in preference to H138. Site H138 does not meet the council's sustainability tests so is not positively prepared.

Soundness - Justified

Objection is raised to the planning of copious amount of housing for this site on the grounds of: - Air pollution and health risk - high risk area: following a move by PPG, the COHMA levels will increase to level 2 in February. Is the factory aware of the plans for housing and evacuation plans agreed. - Traffic congestion - A62 Huddersfield Road is gridlocked daily by the copious amount of traffic that travels through Birstall. According to DfT.gov.uk/traffic-counts,

the A62 already has to contend with a daily flow of approx 18,000 vehicles. - highway capacity and traffic congestion - Mill St turning on to the A62. Often that to turn left and go on Muffit Lane, down Church Lane, to get back to Birstall, because of queuing traffic. - Bridge Street and Mill street used as a 'rat run' to avoid the crossroad traffic lights. Congestion from workers and lorries with PPG just being across from Mill Street - highway safety - already a fatality from a resident pulling out of Mill St on to A62 - access Smithies Moor Lane - while access is achievable, there are concerns over safety. Further justification is required for the visibility splays of 2.4m x 120m or 4m x 43m as this is not in conformity with TD42/95 Geometric Design of Major/Minor priority Junction. - air pollution - from increased traffic (approx 500 cars to the area) - infrastructure capacity - Schools, Doctors and implications of the closure of the A and E at Dewsbury Hospital. There is no reference to any new GPs surgeries opening for the potential 1000 new residents, plus no mention of new schooling facilities to cope with the extra children. The local schools are already over subscribed. - flooding and drainage issues from the river which will be exacerbated with further housing - loss of green area for play and amenity impact on biodiversity and geodiversity - disagree with SAO14 that H138 has a negligible impact as nearly 8 hectares of mature, diverse and well connected flora and fauna would be lost as a result of the development - insufficient evidence to demonstrate that mitigation accompanying H138 will secure sustainable development

Soundness - Effective

Previous attempts to develop the site have called into question the feasibility of the site

Soundness - Consistent with National Policy

The site H138 does not constitute sustainable development as defined by NPPF as it would have a significant adverse impact on the environmental and social dimensions of sustainability. The allocation of H138 is contrary to SA Objective 8 as it would result in the loss of a well used football pitch and although there is existing facilities nearby, there is a net loss of recreational space. The allocation of H138 is in conflict with NPPF para 74 as it does not demonstrate that the existing playing fields on land to the south of Mill Street would be replaced by equivalent or better provision in terms of quality or quantity. The allocation of H138 is contrary to SAO10 and NPPF Policy 4 Promoting sustainable transport. Disagree that H138 has a significant positive impact. There is insufficient evidence to demonstrate that a safe, efficient access can be made on to the A62. Additionally, there is heavy congestion at main crossroads in Birstall. Consider that safety of motorists would be severely compromised. The Local Plan fails to recognise that a right turn onto the A62 is not possible in the current situation. The allocation is contrary to NPPF paragraph 157 that local plans should contain a clear strategy for enhancing the built and natural environment. The allocation is contrary to NPPF paragraph 182 as it does not meet the tests of soundness.

Proposed Change Requested

Delete allocation H138 from the Plan. Develop brownfield sites in preference to H138

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. LE118 – Kirklees Council Air Quality Assessment (AQA) provides an assessment of the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users. The Sustainability appraisal objective issues are addressed in SD8 Kirklees Local Plan: Publication Draft Sustainability Appraisal report Schedule of Responses (April 2017) The Council has strategically modeled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See BP12 Transport Model

Technical Paper. Issues of field flooding and cellar flooding have been recorded. No objections have been raised by technical consultees as problems can be investigated and resolved as part of the detailed planning process. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.

Paragraph/Site: **H138**

Consultee: **969501 mr christopher terry**

Agent:

Rep ID: **PDLP_AD727**

Soundness - Positively Prepared

The draft plan will see Birstall become a town rather than a village. The council should reconsider this site in a village which already has sufficient housing stock for sale and suggest homes are built where they are required and in an area which has the infrastructure to support them such as Huddersfield

Soundness - Justified

The area is of High Risk due to its proximity to the PPG Factory. As of February 2017, a warehouse in the Midlands which holds numerous volatile chemicals will relocate to the Birstall site. This will increase the PPGs site COMAH rating to level 2. There are evacuation plans in place for the village but I have real concerns regarding another 200+ homes, with a potential 400+ cars being built in such proximity to a dangerous site. It is impossible to exit Mill St by turning right to join the A62 between the hours of 7am – 9:30am. I understand that the ‘Smithies’ junction is one of the most polluted in West Yorkshire. The Fields at Mill St are already prone to flooding. There will be no capacity to disperse the water on site. Infrastructure. The village cannot sustain this level of expansion. There are class sizes of 37 children and this trend of large class sizes is apparent across the village schools. GPs, Sewers, Roads, and recreational facilities will all struggle to cope. Recreation and Wildlife. The area is one of Birstall’s last green spaces. There are native mixed hedge rows, foxes and various species of birds in the area. Young adults play football every weekend. In a nation where obesity is prevalent should we be losing existing recreational spaces. The site is on a severe slope has poor access issues is prone to flooding. There are 93 Houses for sale in Birstall with 50 homes falling under the National average house prices. Increasing the search to a 1 mile radius of Birstall there are 475 houses for sale with 270 homes below the National average. I fail to see the demand for new homes in Birstall.

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council’s site allocation methodology. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – Publication Plan. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. National planning policy requires each local authority to determine the extent of their housing market area and to meet their housing needs. Kirklees is a self-contained housing market area for local plan purposes and as such the Local Plan evidence base has assessed the housing needs for the district based on national household projections with consideration of local economic aspirations. The Local Plan seeks to meet such housing needs. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district’s housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. Business and industry may have noise and odour implications. It is considered that these can be addressed through a detailed planning application. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. Issues of field flooding and cellar flooding have been recorded. No objections have been raised by technical consultees as problems can be investigated and resolved as part of the detailed planning process. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-

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going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. This proposed allocation contains a corner of lowland mixed deciduous woodland. It also has some substantial hedgerows. The proposed developable area of the site allocation has been reduced by 0.22ha leaving 7.48ha. No objections have been raised by technical consultees with regard to impact on wildlife. Issues of field flooding and cellar flooding have been recorded. No objections have been raised by technical consultees as problems can be investigated and resolved as part of the detailed planning process. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average.

Paragraph/Site: **H138**

Consultee: **972997**

Grahame Jackson

Agent:

Rep ID: **PDLP_AD2165**

Soundness - Positively Prepared

No discussions with locals regarding access/egress to the site. no additional access shown on site.

Soundness - Justified

Excess water and no drainage to cope. Previous mine workings and no record of where they are. Inadequate infrastructure to deal with size of development. Extra car emissions to an already overloaded road plan.

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. Issues of field flooding and cellar flooding have been recorded. No objections have been raised by technical consultees as problems can be investigated and resolved as part of the detailed planning process. The allocation acknowledges that the site falls within a high risk coal referral area. Mitigation measures can be addressed as part of a detailed planning application. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.

Paragraph/Site: **H138**

Consultee: **978303**

Cllr Andrew Palfreeman

Agent:

Rep ID: **PDLP_AD2534**

Soundness - Justified

Part of site should be returned to the green belt and the football pitch to public open space for the following reasons: Part of the site is a football field recently safeguarded by the Cabinet in its Sportsground Policy (approved November 2015) The site has severe flooding problems This would represent a major extension of Birstall village and result in no space between urban settlements, as it would connect White Lee and Batley with Birstall. Birstall Smithies junction is the worst area in Kirklees for poor air quality. This development would be served by the A62 which has major traffic congestion now and the Transport Strategy shows this will worsen over the lifetime of the local plan.

Proposed Change Requested

We believe the main part of site should be returned to the green belt and the football pitch to public open space.

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

allocation is considered consistent with the council's site allocation methodology. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See BP12 Transport Model Technical Paper. Issues of field flooding and cellar flooding have been recorded. No objections have been raised by technical consultees as problems can be investigated and resolved as part of the detailed planning process. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.

Paragraph/Site: **H138**

Consultee: **1048450 MR & MRS CHRISTINE HARRISON**

Agent:

Rep ID: **PDLP_AD1039**

Soundness - Justified

How can the overwhelmed transport system cope with a further 500 vehicles a day from this new site. Air quality impact, noise pollution, impact on local schools and increase of patients to our already overloaded NHS Hospitals. This area is the last area of green space Birstall has.

Proposed Change Requested

Delete allocation H138 from the Plan and retain as an open space.

Council Response

No Change The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. In the case of this site, highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. Business and industry may have noise and odour implications. However, it is considered that these can be addressed through a detailed planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.

Paragraph/Site: **H138**

Consultee: **1048450 MR & MRS CHRISTINE HARRISON**

Agent:

Rep ID: **PDLP_AD334**

Soundness - Justified

The allocation of site H138 is not justified on the grounds of: - significant adverse impact on the environmental and social dimensions of sustainability - failure of previous applications to develop calls into question feasibility of site - contrary to Plan objective to encourage new recreation facilities & areas of open space when existing facilities are been destroyed by this proposed plan - unsuitable access as the existing access is to the recreation ground from Bridge Street and Mill. A further increase in vehicles appears to be totally unfeasible - Pollution - the increase of Co2 levels would also have an impact - Infrastructure capacity- The proposed plan of 226 houses would impact on all our NHS, Schools, transport links etc.,

Proposed Change Requested

Delete allocation H138 from the Plan.

Council Response

No Change Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the

published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district’s housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H138**

Consultee: **1048584 mr Stephen Smith**

Agent:

Rep ID: **PDLP_AD363**

Soundness - Justified

The site is not justified on the grounds of: - previous development has put pressure on infrastructure - highway capacity/traffic congestion with additional of 300+ extra vehicles - access and parking issues - Mill Street (designated access) - infrastructure capacity - schools, doctors difficult to access - air pollution from increased cars and impact on health

Proposed Change Requested

Delete allocation H138 from the Plan.

Council Response

No Change Full consideration of the likely impacts of the Local Plan’s strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district’s housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. Site access is achievable. Possible access onto A62 Huddersfield Road or Smithies Moor Lane. 2.4m x120 or 4m x43m visibility splays required depending on where access is located. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air

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quality annually and set out its findings in its annual monitoring report.

Paragraph/Site: **H138**

Consultee: **1049188 Mrs Helen Nicholson**

Agent:

Rep ID: **PDLP_AD1291**

Soundness - Justified

I frequent the area and find the traffic atrocious at the best of times- attached is a photograph taken whilst at a standstill at 3.30pm today, coming down from Ikea towards Birstall. I think it is actually a dangerous plan to place yet more pressure on such a busy area. The road are so busy and I commonly see dangerous manoeuvres carried out by drivers, in frustration at the traffic.

Council Response

No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage.

Paragraph/Site: **H138**

Consultee: **1049275 Ms Clare Trudell**

Agent:

Rep ID: **PDLP_AD452**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - pollution - no infrastructure to support the application - loss of valuable sports recreation grounds - highway safety/traffic congestion resulting from increase in 500 vehicles. Impact on Leeds Road and Junction 27 - highway capacity insufficient to deal with increased traffic - overdevelopment and impact on village if further development goes ahead - lack of sports fields and safe areas in village for children to play which would be reduced further.

Proposed Change Requested

Delete allocation H138 from the Plan.

Council Response

No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – Publication Plan. This has informed the spatial strategy for the Plan.

Paragraph/Site: **H138**

Consultee: **1049277 mrs ann burnside**

Agent:

Rep ID: **PDLP_AD461**

Soundness - Justified

The site should not be allocated on the grounds of: - impact on the surrounding area - traffic congestion which is already extremely congested - increased air pollution from vehicles particularly at the crossroads - loss of one of the only green areas left in this built up area of Birstall.

Proposed Change Requested

Delete allocation H138 from the Plan.

Council Response

No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its

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allocation is considered consistent with the council's site allocation methodology. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.

Paragraph/Site: **H138**

Consultee: **1049399 Miss Kirsty Mortimer**

Agent:

Rep ID: **PDLP_AD2345**

Soundness - Justified

- Detrimental effect: - High level of traffic to a road that is currently busy. Where will extra traffic go? Mill Street cannot accommodate it. - Will reduce air quality i.e. Co2, Co and nox emissions. - Noise pollution, from the road, from the increased population - Devastation to the environment we have chosen to invest and live in. - Drainage an issue. - Where will our children play? Council resources and areas for children around us are sparse as it is. - Nice area, respectable people. Huge concern about new neighbours. - Do not want area spoilt or crime rates to go up.

Proposed Change Requested

- Do not go ahead.

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. Business and industry may have noise and odour implications. It is considered that these can be addressed through a detailed planning application. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – Publication Plan. This has informed the spatial strategy for the Plan.

Paragraph/Site: **H138**

Consultee: **1049425 Mr Damon Fletcher**

Agent:

Rep ID: **PDLP_AD1132**

Soundness - Positively Prepared

The green belt was put in place to encourage development on brownfield land and there are plenty of existing plots to choose from, preventing the need for green belt land to be changed.

Soundness - Justified

There would need to be two or more entrances for a development of this size to prevent congestion. The existing road structure is already under strain. The road should be an access for residents of Smithies Moor Lane but is used as a shortcut by other road users. Another entrance would add to the issues and cause immediate problems.

Soundness - Consistent with National Policy

A recent application for a single dwelling in the grounds of an existing house in the green belt was refused because of impact on openness. Why have the rules been changed to make room for a large housing development? The proposal to change green belt land to land available for housing development breaches section 9 of the NPPF. The green belt is supposed to be permanent and this is set out in the legislation.

Proposed Change Requested

The matter of the openness of the green belt should be reviewed and changed.

Council Response

No Change The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district

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's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. This site is an existing UDP employment allocation and is not part of the greenbelt. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/asreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.

Paragraph/Site: **H138**

Consultee: **1049477 MRS Heidi Fletcher**

Agent:

Rep ID: **PDLP_AD697**

Soundness - Positively Prepared

There are already congestion issues on Smithies Moor Lane. Development would further contribute to these problems as more people used the road to access the housing.

Soundness - Justified

This site is green belt and currently used for agriculture. Development on green belt land cannot preserve openness, will jeopardise the local environment and negatively impact on the residents who live near it.

Proposed Change Requested

Delete allocation H138 from the Plan

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. This site is an existing UDP employment allocation and is not part of the greenbelt.

Paragraph/Site: **H138**

Consultee: **1049477 MRS Heidi Fletcher**

Agent:

Rep ID: **PDLP_AD661**

Soundness - Positively Prepared

Development of the site would exacerbate congestion and parking problems for existing residents, particularly as Smithies Moor Lane is used as a shortcut.

Soundness - Justified

The site should not be developed because it is not brownfield land. The site contains an underground stream which floods regularly so development would not be sustainable.

Soundness - Consistent with National Policy

Development on this green belt site would conflict with NPPF which states that authorities should use brownfield land for development.

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Proposed Change Requested	Consider the openness of the green belt before a decision is made on this site.
Council Response	No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage.Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network.The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See BP12 Transport Model Technical Paper.The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Paragraph/Site: **H138**

Consultee: **1049666 Mr Lee Franklin**

Agent:

Rep ID: **PDLP_AD1293**

Soundness - Positively Prepared We are losing more and more green space, there are other areas in Batley, Huddersfield where derelict buildings which look unsightly and should be used to make the place look better.

Soundness - Justified The site stores water that would increase run off if developed. Road system is already heavily congested. The site will increase congestion. Schools, doctors and dentists, no plans in place for extra facilities. Development will exacerbate existing problems There are plenty of empty properties that can be redeveloped.

Council Response No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.An assessment of open spaces and playing pitches has been carried out as required by NPPF, and for playing pitches has been undertaken in accordance with Sport England methodology. The allocation of sites as urban green space is justified based on the outcome of these assessments and evidence set out in the Council's Open Space Study (revised 2016), Playing Pitch Strategy (2015) and Urban Green Space Review.The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average.Issues of field flooding and cellar flooding have been recorded. No objections have been raised by technical consultees as problems can be investigated and resolved as

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part of the detailed planning process. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: H138	Consultee: 1049796 Adam Godbold	Agent:	Rep ID: PDLP_AD2510
Soundness - Positively Prepared	The allocation of H138 does not accord with the sustainability appraisal objectives. Also see PDLP_SA90		
Soundness - Justified	It is considered that the allocation would have a significant adverse impact on the environmental and social dimensions of sustainability. The proposal does not meet the objectives of Sport England. Development would have an impact on highway safety. There is a large swathe of trees protected by TPOs on edge of A62 Huddersfield Road.		
Soundness - Consistent with National Policy	It is considered that the allocation would have a significant adverse impact on the environmental and social dimensions of sustainability, which does not accord with para 151 and 152 of NPPF. The allocation of Site H138 is in direct conflict with NPPF Paragraph 74 as the Draft Local Plan does not demonstrate that the existing playing fields on land to the south of Mill Street would be replaced by equivalent or better provision in terms of quality or quantity. Development would not also accord with paragraphs 32 and 110 of NPPF		
Proposed Change Requested	Remove the site from the plan.		
Council Response	No ChangeThe site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users. SD8 Kirklees Local Plan: Publication Draft Sustainability Appraisal Report Schedule of Responses sets out a detailed response on the SA issues.		

Paragraph/Site: H138	Consultee: 1050182 Jennifer Jackson	Agent:	Rep ID: PDLP_AD2147
Soundness - Justified	UDP highlighted problems around Jct 29 - this problem still exists and has got worse. Applications rejected due to traffic impact. Additional planning granted on Bridge St Birstall Smithies is the most polluted/busiest stretch of road in country - site would increase the problem. Flooding prolific in whole area. KC drainage dept have stated no building should be carried out in this area. Mine shafts present on the land. Water culverts on land Protected woodland Schools, dentists and doctors are full.		
Soundness - Consistent with National Policy	Supports points raised in SCG petition.		
Council Response	No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. Issues of field flooding and cellar flooding have been recorded. No objections have been raised by technical consultees as problems can be investigated and resolved as part of the detailed planning process. The allocation acknowledges that the site falls within a high risk coal referral area. Mitigation measures can be addressed as part of a detailed planning application. This proposed allocation contains a corner of lowland mixed deciduous		

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woodland. It also has some substantial hedgerows. The proposed developable area of the site allocation has been reduced by 0.22ha leaving 7.48ha. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. See response to Smithies Community Group PDLP_AD2510

Paragraph/Site: **H138**

Consultee: **1059264 J and T Wilson**

Agent:

Rep ID: **PDLP_AD1203**

Soundness - Positively Prepared There has been a lack of time for local residents and businesses to make objections. They are unaware that they have to object for a third time and many will not have done so on this occasion.

Soundness - Justified Objection to site H138 and 262 dwellings. Similar plans have been rejected in the past. Leeds/Huddersfield Road and Smithies Moor Lane are already gridlocked at peak times and cannot cope with an extra 500 cars. This has been made worse by new developments in the area, including on White Lee Road, 30 flats on Smithies Moor Lane and 30 houses on Bridge Street. Smithies Moor Lane and Smithies Moor Rise are already a major rat runs at peak times. There are concerns about a major chemical works, Azel Noble, opposite the site and an increase in CO₂ and NOX from the huge increase in traffic and diesel wagons queuing at the traffic lights, as well as 262 gas boilers discharging into the same hollow. Implications for environmental protection, noise and odour have been acknowledged and this linked to the air quality. There are also concerns about school places, a high risk coal referral area, flooding and the ability of drainage infrastructure to cope with the proposal. There are several natural springs and two streams on the site. The loss of the football field, trees, hedgerows and many species of wildlife in such a built up area is a major concern.

Council Response

No Change Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. Site access is achievable. There are no significant constraints with the site which cannot be mitigated against at the planning application stage. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. Concerns relating to the chemical works can be addressed at the time of a planning application and mitigation measures put in place where required. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report. Business and industry may have noise and odour implications. It is considered that these can be addressed through a detailed planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The allocation acknowledges that the site falls within a high risk coal referral area. Mitigation measures can be addressed as part of a detailed planning application. Issues of field flooding and cellar flooding have been recorded. No objections have been raised by technical consultees as problems can be investigated and resolved as part of the detailed planning process. This proposed allocation contains a corner of lowland mixed deciduous woodland. It also has some substantial hedgerows. The proposed developable area of the site allocation has been reduced by 0.22ha leaving 7.48ha. No objections have been raised by technical consultees with regard to impact on wildlife.

Paragraph/Site: **H138**

Consultee: **1059322 Ray Downs**

Agent:

Rep ID: **PDLP_AD1232**

Soundness - Justified Objection to site H138 on the basis of increased flood risk Main Points on and around Smithies Moor Lane, Mill Street & Bridge Street; increased congestion

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to an already over congested area; increased pollution CO2 level in what is already a high reading area; access to the site and concerns over safety due to increased levels of traffic.

Council Response

No Change Issues of field flooding and cellar flooding have been recorded. No objections have been raised by technical consultees as problems can be investigated and resolved as part of the detailed planning process. Site access is achievable. Possible access onto A62 Huddersfield Road or Smithies Moor Lane. 2.4m x120 or 4m x43m visibility splays required depending on where access is located. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The Council has commissioned an Air Quality Assessment (AQA) to assess the potential cumulative impact of sites allocated in the local plan. The Council will monitor air quality annually and set out its findings in its annual monitoring report.

Paragraph/Site: **H138**

Consultee: **1059636 Julie Ingham**

Agent:

Rep ID: **PDLP_AD1397**

Soundness - Justified

Volume of traffic would increase. Doctors are at capacity. Land should remain as green belt.

Council Response

No Change This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site is identified in the Kirklees UDP as an employment allocation and is not part of the greenbelt. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H138**

Consultee: **1059701 Mary McMahon**

Agent:

Rep ID: **PDLP_AD1446**

Soundness - Justified

Traffic congestion made worse by proximity to the junction 27 retail park and associated pollution. Impacts of the loss of well used recreation land.

Council Response

No Change The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The site allocation text outlines that replacement playing pitch provision will be required to meet the needs of existing users.

Paragraph/Site: **H172**

Consultee: **978303 Cllr Andrew Palfreeman**

Agent:

Rep ID: **PDLP_AD2525**

Council Response

No Change The conditional support for H172 is noted. However, the representation considers the site could be equalled used for business or light industry.

Paragraph/Site: **H172**

Consultee: **1060849 Ruth Owen**

Agent:

Rep ID: **PDLP_AD3579**

Soundness - Justified

Increased amount of traffic in the village, on a weekend and evening on street parking is very bad. The doctors at the surgery only work part time. The school is dangerous due to parked cars. The land should be used as allotments or something for the village.

Council Response

No Change Site access direct onto classified road. It is not considered that there will be a major impact on the mainline network. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and

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how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district.

Paragraph/Site: **H173**

Consultee: **978303**

Cllr Andrew Palfreeman

Agent:

Rep ID: **PDLP_AD2532**

Soundness - Justified

The [site is] served from Whitehall Road (the same roundabout) which we believe will have significant detrimental impact on the Whitehall Road (A58) and surrounding highway network. This will be compounded by the addition of the Merchant Fields site (H69 in Cleckheaton Ward) which will also be served by Whitehall Road. (A58) We understand that air quality around Whitehall Road (A58) is extremely poor (some of the worst in Kirklees and West Yorkshire) and believe that the Council's Environmental Health department is deliberately holding off discussing what action to take or declaring an Air quality Improvement area so as not to jeopardise these proposals. On public Health grounds we believe these proposals should be rejected.

Proposed Change Requested

The North West Boundary of the sites has an earth bund which was established to protect existing residents from the business development proposed. We believe the land on which the bund sits should be classed as open space and a consultation held with local residents about whether they wish the bund to stay in its present state, be reconfigured or removed and that this should be a condition of the re-allocation for housing.

Council Response

No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The site is not near an area of poor air quality. Air quality emissions from this site has been considered and recommendations have been made to safeguard sustainability of development with the aim to aid with the reduction of pollutants in the district. The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district.

Paragraph/Site: **H193**

Consultee: **978303**

Cllr Andrew Palfreeman

Agent:

Rep ID: **PDLP_AD2528**

Soundness - Justified

H193 (previously SL2291)- Dewsbury Road Gomersal -This would extend development into the Green Belt for no logical reason and would need to be served by an access road which would join Dewsbury Road on the point of a busy junction.

Council Response

No ChangeSite access is achievable, it is not considered that there will be a major impact on the mainline network.

Paragraph/Site: **H203**

Consultee: **943957**

Mr Ian Smith

Agent:

Rep ID: **PDLP_AD3727**

Council Response

No Change Support noted.

Paragraph/Site: **H203**

Consultee: **978303**

Cllr Andrew Palfreeman

Agent:

Rep ID: **PDLP_AD2524**

Council Response

No changeSupport noted.

Paragraph/Site: **H224**

Consultee: **965712**

Mr Phillip Parker

Agent:

Rep ID: **PDLP_AD451**

Soundness - Justified

Strongly object to the building of more houses in this area due to the following: - Existing traffic congestion already in this area - Parking problems in Bridge Street already - Drainage problems in this area already - Excessive local population - Struggling local provisions- doctors, schools etc - Impact on wildlife, green land etc - This is an old coal mining area, and excavating could have a big impact on existing houses - Impact of 250 houses on area - negative effect on this already overstretched part of Birstall

Proposed Change Requested

Delete allocation H224 from the Plan.

Council Response

No ChangeThis site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has outline planning permission for 21 dwellings (application reference: 2012/92614) therefore the principle for the development of this site has been established.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Paragraph/Site: H224	Consultee: 978303	Cllr Andrew Palfreeman	Agent:	Rep ID: PDLP_AD2527
Council Response	No Change Support Noted This site is a proposed accepted housing allocation. The site was proposed as an accepted site in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has outline planning permission for 21 dwellings (application reference: 2012/92614) therefore the principle for the development of this site has been established.			
Paragraph/Site: H531	Consultee: 943957	Mr Ian Smith	Agent:	Rep ID: PDLP_AD3728
Soundness - Justified	By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development.			
Soundness - Consistent with National Policy	Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay "special attention" to "the desirability of preserving or enhancing the character or appearance" of its Conservation Areas.			
Proposed Change Requested	An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.			
Council Response	No Change 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).			
Paragraph/Site: H531	Consultee: 959056	Mr C Springthorpe	Agent: 941970	Mr Alastair Skelton Rep ID: PDLP_AD330
Council Response	No change Support noted.			
Paragraph/Site: H531	Consultee: 978303	Cllr Andrew Palfreeman	Agent:	Rep ID: PDLP_AD2516
Soundness - Justified	H531 (previously SL2299) - East Bierley off Hunsworth Lane – this would be a significant extension to the village into the Green Belt which would dramatically change the character of the village.			
Council Response	No Change The site is proposed as an accepted housing allocation. This represents a change from the draft Local Plan (November 2015) where the site was allocated as Safeguarded Land. The reasons for change are outlined below. This site is reasonably well related to the settlement and is contained by road, track and field boundaries. The extent of the site does not encroach onto Birkenshaw. It would join with ribbon development on Hunsworth Lane but there is already an existing access at this point and the recreation ground would maintain the existing open approach to the village, but which would need to be removed from the green belt. There are no significant constraints with the site which cannot be mitigated at the planning application stage. Third party land would be required to achieve suitable site access layout from Hunsworth Lane, 2.4m x 43m visibility splays required. Potential secondary / alternative / emergency access off Soureby Cross Way. There would be no significant impact on the mainline. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The site is available and the site promoters have agreement to bring the site forward for development.			
Paragraph/Site: H601	Consultee: 942234	unknown	Agent: 941775	Mr Paul Butler Rep ID: PDLP_AD2498
Council Response	No Change Support noted.			

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & DesignationsParagraph/Site: **H601**Consultee: **978303****Cllr Andrew Palfreeman**

Agent:

Rep ID: **PDLP_AD2531****Soundness - Justified**

The [site is] served from Whitehall Road (the same roundabout) which we believe will have significant detrimental impact on the Whitehall Road (A58) and surrounding highway network. This will be compounded by the addition of the Merchant Fields site (H69 in Cleckheaton Ward) which will also be served by Whitehall Road. (A58) We understand that air quality around Whitehall Road (A58) is extremely poor (some of the worst in Kirklees and West Yorkshire) and believe that the Council's Environmental Health department is deliberately holding off discussing what action to take or declaring an Air quality Improvement area so as not to jeopardise these proposals. On public Health grounds we believe these proposals should be rejected.

Proposed Change Requested

The North West Boundary of the sites has an earth bund which was established to protect existing residents from the business development proposed. We believe the land on which the bund sits should be classed as open space and a consultation held with local residents about whether they wish the bund to stay in its present state, be reconfigured or removed and that this should be a condition of the re-allocation for housing.

Council Response

No changeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.Site is within a AQMA, a full air quality impact assessment is required at application stage.

Paragraph/Site: **H761**Consultee: **943957****Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3730****Soundness - Justified**

There has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area, or to the special architectural or historic interest of the Listed Buildings, or what harm might result to those elements which contribute to the significance of these designated assets by its eventual development

Soundness - Consistent with National Policy

Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay "special attention" to "the desirability of preserving or enhancing the character or appearance" of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.

Council Response

No changeCorrespondence within BP28 (dated 24th 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).

Paragraph/Site: **H761**Consultee: **949632****Miss Lyndsey Hepworth**

Agent:

Rep ID: **PDLP_AD633****Soundness - Justified**

There are currently too many houses and traffic in the areas of High Street, Raikes Lane and Field Head Lane, mainly due to the main roads in the area already being highly congested. This applies not only at rush hour during the week but finding that you are unable to navigate through Birstall, particularly on a Saturday, where you will see traffic queuing through the length of the village. Field Head Estate is used as a cut through to try and avoid this heavy traffic with many people using Raikes Lane. This has been further increased with the other new housing built on this area over the last few years. The 2 roads coming from this are cobbled, steep and narrow. Having 70 houses in the space, combined with a further 31 dwelling at Site H11 less than a mile away will push the infrastructure too far. Any problems on the M62, which is an increasing occurrence at the moment, results in Birstall being gridlocked. 100 houses on top of land already in development would strengthen the problems. Birstall is meant to have a village feel and cannot support all these additional houses. There are not enough schools, doctors, dentists or other services in the area to cope with development of the size proposed in Birstall.

Council Response

No ChangeSite access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network. The impact of development on school place planning has been

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H761**

Consultee: **949764 Ms Sheila Jelfs**

Agent:

Rep ID: **PDLP_AD447**

Soundness - Justified

Geophysical survey needed to determine effect of building on land containing underground springs which carry substantial amounts of water. Potential negative impact on Conservation Area. Site access issues as part of the lane is single width and cobbled and cannot accommodate the additional traffic from this site.

Proposed Change Requested

Reject this site option. The site is entirely unsuitable for development.

Council Response

No Change No objections received from technical consultees with regards to flood risk issues or risk from active springs. There are no significant highways constraints with the site which cannot be mitigated at the planning application stage. Site access is achievable from Raikes Lane. LE85 Heritage Impact Assessment section 6 sets out options for mitigation/enhancement which are considered to address the concerns of Historic England. BP28 Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation contains a letter from Historic England that the Publication Draft did not include any of the sites whose development it considered to 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).

Paragraph/Site: **H761**

Consultee: **954032 mr Alec Jackson**

Agent:

Rep ID: **PDLP_AD2209**

Soundness - Justified

Unsuitable access to the site. Traffic heavy at school times. Field is boggy and operates as a soakaway for run-off water from the estate. Run-off will create problems for new development. Flood risk for properties on Wesley Court, North terrace and High Street.

Proposed Change Requested

One or two bungalows to be built on the site where the pavillion was built.

Council Response

No Change No objections were raised by technical consultees on flood risk or surface water drainage. Further assessments can be made as part of a detailed planning application. No objections have been raised from consultees with regards to active springs on site. Site access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network.

Paragraph/Site: **H761**

Consultee: **954089 Mr David Hallas**

Agent:

Rep ID: **PDLP_AD794**

Soundness - Justified

The allocation of the site will not protect the specific characteristics of the area identified in the Birstall Conservation Area Appraisal. Highway access would need to be significantly improved for this site to be developed, and this is also likely to significantly affect the character of the conservation area, including local cobbled streets namely 'Raikes Lane' and 'The Mount'.

Proposed Change Requested

The modifications necessary in order to make the Local Plan sound is for Kirklees to take into account the aims as set out in its own documentation - namely, the 'Consultation Summary of the Kirklees Local Plan' and their previous document entitled, 'Birstall, Conservation and Appraisal'.

Council Response

No Change LE85 Heritage Impact Assessment section 6 sets out options for mitigation/enhancement as part of the allocation of this site. BP28 Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation contains a letter from Historic England that the Publication Draft did not include any of the sites whose development it considered to 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).

Paragraph/Site: **H761**

Consultee: **962306 E Best**

Agent:

Rep ID: **PDLP_AD2205**

Soundness - Positively Prepared

Not well publicised.

Soundness - Justified

Would increase HGV traffic through the estate. Schools, doctors and dentist surgeries would be over stretched. No employment opportunities as Birstall is a small village. Planning in place for housing on Fieldhead Lane.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Council Response

No ChangeThe council's Statement of Community Involvement set out when, how and with whom it would consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan.The Statement of Pre-submission was available to view on the council's website as part of the consultation on the Publication draft Local Plan.No objections were raised by technical consultees on flood risk or surface water drainage. Further assessments can be made as part of a detailed planning application. No objections have been raised from consultees with regards to active springs on site.Site access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H761**

Consultee: **962970**

Ms Janette Petty

Agent:

Rep ID: **PDLP_AD3633**

Legally Compliant

Sparse notification to public, information not distributed. Plans available to public in Dewsbury - but no assistance to fully understand the disregarded and approved plans.

Soundness - Justified

Impact on local infrastructure and local services. Increased pressure on council services, roads and environment. No green belt area left. Impact on schools, GP surgeries and traffic congestion. Raikes Lane is a small road with no entry at the far end (Gelder Road) - it is totally unsuitable for further increased traffic. Over the past 8 years there has been a number of new houses built and this has already had an impact on traffic and local services..

Proposed Change Requested

Reconsider the impact on Raikes Lane and consider another site other than Raikes Lane.

Council Response

No ChangeThe council's Statement of Community Involvement set out when, how and with whom it would consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan.The Statement of Pre-submission was available to view on the council's website as part of the consultation on the Publication draft Local Plan.No objections were raised by technical consultees on flood risk or surface water drainage. Further assessments can be made as part of a detailed planning application. No objections have been raised from consultees with regards to active springs on site.Site access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H761**

Consultee: **963036**

Mr Michael Nolan

Agent:

Rep ID: **PDLP_AD450**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - Access - limited access to this site will cause major disruption. Access via fieldhead estate is very restricted and would become blocked with all the parked vehicles on the estate roads - Highway capacity/traffic congestion - access on to fieldhead lane would add to the already overloaded road and the link roads are very limited in width and could easily be blocked - Highway safety - the field head lane access would emerge adjacent to a school entrance adding to the danger faced by children and parents entering or leaving the school. Middlegate is already partially blocked at school times due to vehicles partly parked on the pavements - infrastructure capacity - all local schools are already full.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Proposed Change Requested	Delete allocation H761 from the Plan and retain in current form.
Council Response	No Change Site access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H761** Consultee: **963917 Mr & Mrs IA Wainwright** Agent: Rep ID: **PDLP_AD735**

Soundness - Positively Prepared More generally, the way Kirklees went about this consultation just compounded the problems of the first round. Nobody knew about it and you didn't do anything locally to cure that. Local residents had to do their own display in Birstall library to try to remedy the flawed consultation but that was only possible because the deadline was extended. There was no remedy this time because it's Christmas and you have stuck to the statutory minimum time for reply so most people with an interest do not know.

Soundness - Justified Specific points we raised in the initial consultation and in a separate letter have been ignored. The only response from Kirklees to date states that some of the objections we raised were not raised - eg, "No objections have been raised from consultees with regards to active springs on site" (source: Statement of Pre-Submission Consultation). There is even reference in that document to "consultation responses will be addressed in the Statement of Consultation". The latter document is also referred to in a question and answer session with the Huddersfield Examiner dated 12 April 2016 as being produced after the first consultation. We have been unable to locate this Statement of Consultation that addresses consultation responses properly. Just to emphasise the risks you are ignoring - one main worry is the rise in water saturation of the hill and our underground stream systems. This problem is going to get worse with climate change and all the old houses here do not have modern foundations. Some of us are also Ashlar-built so one point of weakness can undermine integrity entirely. By not addressing concerns and completing the H761 table using wrong and inadequate data, the assessments are unreliable and incomplete. Therefore, the basis of deciding the status of the site as accepted or rejected is premature and irrational.

Proposed Change Requested Not sure how to you can remedy at this late stage without redoing everything but you could try assessing H761 properly.

Council Response No Change BP23 Local Plan methodology statement sets out the methodology for assessing site allocations. With regard to consultation SD12 Statement of Pre-submission consultation and SD13 Statement of consultation sets out how, when and with whom consultation was undertaken and outcomes and how it shaped the local plan development. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.

Paragraph/Site: **H761** Consultee: **972861 H Jordan** Agent: Rep ID: **PDLP_AD3637**

Soundness - Justified There are concerns about flood risk, roads, gridlock and the capacity of schools, doctors, dentists and hospitals to cope with the increase in population. The Mount is unsuitable for all the extra traffic that would potentially need to use it and extra cars added to the already congested A62, A650 and village square is worrying for traffic flow, pollution and safety for pedestrians.

Proposed Change Requested Less houses and less cars. Build a school and access road onto the A62.

Council Response No Change No objections were raised by technical consultees on flood risk or surface water drainage. Further assessments can be made as part of a detailed planning application. No objections have been raised from consultees with regards to active springs on site. Site access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H761** Consultee: **978303 Cllr Andrew Palfreeman** Agent: Rep ID: **PDLP_AD2533**

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Soundness - Justified H761 – High Street Birstall - We believe that housing development on this site is a flawed proposal, only being considered due to the land being in the Council's ownership. Its impact on surrounding properties will be significant and it will have a major impact on the whole town of Birstall including the conservation area. We are concerned that the site cannot be adequately served by the local road network which has limited scope for extra capacity. We believe that the site should be wholly or partially returned to public open space.

Council Response No Change LE85 Heritage Impact Assessment section 6 sets out options for mitigation/enhancement which are considered to address the concerns of Historic England. BP28 Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation contains a letter from Historic England that the Publication Draft did not include any of the sites whose development it considered to 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). Site access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network.

Paragraph/Site: **H761** Consultee: **1045226 Mrs Anita Stevenson** Agent: Rep ID: **PDLP_AD171**

Soundness - Justified Not enough information had been provided about the impact of the site, including impacts on highways, schools and local employment opportunities.

Proposed Change Requested The site on fieldhead lane would be more suitable for the building of houses as it is accessible via a main road leading to the by-pass. It is also earmarked for less houses which would put less stress on local schools and health care.

Council Response No Change Site access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H761** Consultee: **1050458 Christine Barstow** Agent: Rep ID: **PDLP_AD2215**

Soundness - Justified Health and safety aspects of the environment Roads Safety Area not suitable for increased cars. Local schools Doctors and Dentists Drainage

Proposed Change Requested Plan not to go ahead Speed bumps needed along Raikes Lane

Council Response No Change The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. Site access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network. No objections were raised by technical consultees on flood risk or surface water drainage. Further assessments can be made as part of a detailed planning application. No objections have been raised from consultees with regards to active springs on site.

Paragraph/Site: **H761** Consultee: **1050460 George Barstow** Agent: Rep ID: **PDLP_AD2214**

Soundness - Justified Roads are not suitable for increased traffic. Road safety issues. Drainage not able to take more housing Schools at capacity GP & Dentist surgeries are at capacity.

Proposed Change Requested Plan not to go ahead Raikes Lane needs road bumps, safety issues need putting in place.

Council Response No Change No objections were raised by technical consultees on flood risk or surface water drainage. Further assessments can be made as part of a detailed planning application. No objections have been raised from consultees with regards to active springs on site. Site access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have

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been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H761**

Consultee: **1059731 Mr David Jackson**

Agent:

Rep ID: **PDLP_AD1475**

Soundness - Justified

Raikes Lane was not designed for the volume of traffic which the housing estates have created. The route from Fieldhead Estate onto Raikes Lane to the two cobbled roads, Raikes Lane/The Mount have at this moment in time difficulty accommodating two vehicles passing at the same time. The proposed development of 70/75 dwellings will aggravate this problem. Kirklees spent a substantial amount of money landscaping and planting trees on part of Raikes Lane, now it is proposing to remove the trees and build yet another estate. Part of the site which borders North Terrace has a very steep incline. Water drains down the hill, comes into contact with the underground spring which then causes problems in the cellars of properties in North Terrace. The proposed development looks as if it will surround the properties of 9a and 9b. As there is only one access lane to these properties I am concerned what infrastructure is in place for access to and also room to maintain my boundary wall and hedges.

Council Response

No ChangeNo objections were raised by technical consultees on flood risk or surface water drainage. Further assessments can be made as part of a detailed planning application. No objections have been raised from consultees with regards to active springs on site.Site access can be achieved from Raikes Lane. Kirklees Council Local Highways Links work has confirmed that the site is acceptable subject to highway improvements in context with the development and the local highway network.

Paragraph/Site: **H796**

Consultee: **978303 Cllr Andrew Palfreeman**

Agent:

Rep ID: **PDLP_AD2523**

Proposed Change Requested

H796 - Croft Street – We accept that this has been land allocated for Housing in the last two local plans but request that part of the site is returned to public open space for community use.

Council Response

No ChangeSupport for this housing allocation noted.

Paragraph/Site: **H796**

Consultee: **1060849 Ruth Owen**

Agent:

Rep ID: **PDLP_AD3580**

Soundness - Justified

Increased amount of traffic in the village, on a weekend and evening on street parking is very bad. The doctors at the surgery only work part time. The school is dangerous due to parked cars. The land should be used as allotments or something for the village.

Council Response

No ChangeThe site will have no immediate impact on the road network no objections have been raised from technical consultees.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district.

Paragraph/Site: **H218**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3732**

Council Response

No ChangeSupport noted

Paragraph/Site: **H218**

Consultee: **978303 Cllr Andrew Palfreeman**

Agent:

Rep ID: **PDLP_AD2529**

Soundness - Justified

H218 (Blue Hills Farm) – We see no justification to remove this land from the Green Belt. Development of this land will significantly intensify housing in this area and add to the already major highway congestion issues at Birkenshaw roundabout and on the A58. The [site is] served from Whitehall Road (the same roundabout) which we believe will have significant detrimental impact on the Whitehall Road (A58) and surrounding highway network. This will be compounded by the addition of the Merchant Fields site (H69 in Cleckheaton Ward) which will also be served by Whitehall Road. (A58) We understand that air quality around Whitehall Road (A58) is extremely poor (some of the worst in Kirklees and West Yorkshire) and believe that the Council's Environmental Health department is deliberately holding off discussing what action to take or declaring an Air quality Improvement area so as not to jeopardise these proposals. On public Health grounds we believe these proposals should be rejected.

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Council Response	No ChangeExceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.The site is not near an area of poor air quality. Air quality emissions from this site has been considered and recommendations have been made to safeguard sustainability of development with the aim to aid with the reduction of pollutants in the district
Paragraph/Site: H49a	Consultee: 960555 mr Neil Greenbank Agent: Rep ID: PDLP_AD427
Soundness - Positively Prepared	There has been no notification by site notice or by neighbour notification letter. Most people that will be affected by this decision are unaware of the issue. Previous comments against changing the green belt designation have been ignored.
Soundness - Justified	Allowing this development leaves the adjacent Green Belt vulnerable to sprawl and encroachment contrary to the purposes of including land in the Green Belt. Scholes village has increased by approximately 20% in the last 10 years with little or no investment by the Council in improving the local infrastructure.
Soundness - Consistent with National Policy	There are no "very special circumstances" justifying taking this land out of green belt as defined in para 034 of the National Planning Policy Framework, which also states that "unmet housing need is unlikely to outweigh the harm to Green Belt" justifying inappropriate development within the Green Belt. No adequate survey has been undertaken, contrary to paragraph 015 of NPPF, otherwise issues relating to access would have been raised and would have led to this application being refused at an earlier stage.
Proposed Change Requested	There are no changes that would make this compliant as it is an inappropriate application.
Council Response	No ChangeThe council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.All comments were considered as part of the pre-submission process and published on the council's website.This site is well related to the settlement edge, is contained on three sides and represents rounding off of this part of Scholes. The eastern boundary while not strong, is present so a new green belt boundary can be found which would prevent sprawl. The site appears as countryside but its relationship with the wider countryside is limited by its containment.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.
Paragraph/Site: H49a	Consultee: 1035086 Mr Teheran Parker Agent: Rep ID: PDLP_AD17
Soundness - Effective	Oddfellows St can't be upgraded is it is too narrow at the Scholes Lane End It is a private road and residents may not want to sell their bit of road.
Proposed Change Requested	Leave the site as Green Belt to maintain the break between the settlement and the motorway.
Council Response	No ChangeSite access is achievable, third party land is required to bring the road up to adoptable standards. This site is well related to the settlement edge, is contained on three sides and represents rounding off of this part of Scholes. The eastern boundary while not strong, is present so a new green belt boundary can be found which would prevent sprawl. The site appears as countryside but its relationship with the wider countryside is limited by its containment.
Paragraph/Site: H49a	Consultee: 1035086 Mr Teheran Parker Agent: Rep ID: PDLP_AD16
Legally Compliant	People who live adjacent to the site have not been informed in writing regarding the changes.
Proposed Change Requested	Start again,the council have not complied with the governments guidelines.
Council Response	No ChangeThe council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.

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Paragraph/Site: H49a	Consultee: 1035086 Mr Teheran Parker	Agent:	Rep ID: PDLP_AD15
Legally Compliant	We have not been notified via communication from the Kirklees council and only got the original proposal via a flier from the Lib Dems. This is a change from DLP which was a safeguarded land site. People who are adjacent to this land be kept fully informed via communication from the Council.		
Proposed Change Requested	The process should be redone and ensure that dwellings that are affected by the proposal are informed in the correct time and manner.		
Council Response	No ChangeThe council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.		

Paragraph/Site: H49a	Consultee: 1035294 Mrs Amanda Jewell	Agent:	Rep ID: PDLP_AD346
Soundness - Positively Prepared	The issue of access across a privately owned road has not been considered.		
Soundness - Justified	This does not meet the legal requirement to change the status from green belt as it meets none of the criteria. The case for changing the status has been built on irrelevancies and assumptions.		
Proposed Change Requested	Demonstrate how removing this plot of land from the green belt protects additional green belt. Clarify why creating a symmetrical village is justification for such action. Explain how the current residents of Oddfellows Street will finance the added cost of maintaining a private road.		
Council Response	No ChangeHighways assessments have concluded that third party land is required to bring the road up to adoptable standards. This site is well related to the settlement edge, is contained on three sides and represents rounding off of this part of Scholes. The eastern boundary while not strong, is present so a new green belt boundary can be found which would prevent sprawl. The site appears as countryside but its relationship with the wider countryside is limited by its containment.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.		

Paragraph/Site: H49a	Consultee: 1045990 Cllr Kath Pinnock	Agent:	Rep ID: PDLP_AD1981
Soundness - Positively Prepared	This site was originally included as a Safeguarded Land site, and then was changed to Housing without, as far as I can see, an adequate consultation with local residents.		
Soundness - Justified	In any case allocation for any use other than Green Belt does violence to the status of the Green Belt in this part of Scholes		
Proposed Change Requested	Remove the site from the plan		
Council Response	No ChangeThe differences between the draft and publication draft Local Plan are as a result of consultation, the changes are identified in SD12, Statement of Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.		

Paragraph/Site: H49a	Consultee: 1048892 Mrs Helen Boston	Agent: 1048890 Mrs Helen Boston	Rep ID: PDLP_AD671
Council Response	No ChangeSupport noted		

Paragraph/Site: H49a	Consultee: 1049393 Cllr Andrew Pinnock	Agent:	Rep ID: PDLP_AD572
Soundness - Positively Prepared	This site was originally included as a Safeguarded Land site, and then was changed to Housing without, as far as I can see, an adequate consultation with local residents.		
Soundness - Justified	In any case allocation for any use other than Green Belt does violence to the status of the Green Belt in this part of Scholes		
Proposed Change Requested	Remove the site from the plan		

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Council Response No Change The differences between the draft and publication draft Local Plan are as a result of consultation, the changes are identified in SD12, Statement of Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H49a**

Consultee: **1050111 Mr Andrew Thornton**

Agent:

Rep ID: **PDLP_AD802**

Soundness - Positively Prepared I fail to see how the removal of the land from green belt status complies with the councils stated aim of protecting the green belt in Kirklees. It meets none of the legal requirement of protecting the green belt. There has been no notification by the council of its intentions to remove the land from green belt status, indeed local residents have never been made aware of the councils intentions, deliberately in my view keeping the residents in the dark to push through the plan without any objections. Why isn't the council using brownfield sites for building and protecting its green belt.

Soundness - Justified The proposals for this land do not take into account the impact of the proposed development on the village of Scholes for things such as traffic, pollution, services etc. Access to the proposed site is limited with any increase in traffic passing through narrow roads totally unsuitable to any increase in vehicle traffic. Scholes has already seen 3 major housing developments in the last few years leading to the infrastructure becoming strained and frankly dangerous.

Proposed Change Requested I suggest that the council look at alternative sites that are far more suitable for development.

Council Response No Change The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. Access achievable from Oddfellows Street, third party land required to bring road up to adoptable standards. It is not considered that there will be a major impact on the mainline network. No objections raised from Environmental Health.

Paragraph/Site: **H49a**

Consultee: **1058570 Cllr John Lawson**

Agent:

Rep ID: **PDLP_AD1995**

Soundness - Positively Prepared This site was originally included as a Safeguarded Land site, and then was changed to Housing without, as far as I can see, an adequate consultation with local residents.

Soundness - Justified In any case allocation for any use other than Green Belt does violence to the status of the Green Belt in this part of Scholes

Proposed Change Requested Remove the site from the plan

Council Response No Change The differences between the draft and publication draft Local Plan are as a result of consultation, the changes are identified in SD12, Statement of Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H49a**

Consultee: **1060827 Mr J Lund**

Agent: **1040443 Mrs Helen Boston**

Rep ID: **PDLP_AD2064**

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Council Response	No ChangeSupport noted
Paragraph/Site: H49a	Consultee: 1076080 Mr Paul Hainsworth Agent: Rep ID: PDLP_AD3819
Soundness - Positively Prepared	- why has there been no local consultation especially in light of the initial concerns with the original plan to consider in 15 years? What consideration/response has been given to these initial concerns?
Soundness - Justified	- concern of the impact on both our physical outlook and the value of the property - had we have known of this change in plan we would not have purchased this property and certainly not at the price we paid. - how would vehicles access the new plot? Scholes Lane is already extremely busy and I can't see how you can safely invite the additional traffic? - the village is already over crowded with traffic following the recent new builds by the school and the cricket field (probably 100 houses in the last 3 to 4 years) - what additional plans would be made to ensure the safety of the children and pedestrians in the village? - can the drainage cope in Scholes? We already have issues with flooding on Spinners Way, Scholes lane and indeed our property - what has changed since the initial decision to consider in the next round of town planning? What additional compelling reason was presented? From what I have read are we seriously suggesting that the fact it would provide symmetry to the village is a compelling argument?
Council Response	No ChangeThe council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. Site access is achievable from Oddfellows street onto Scholes Lane, third party land would be required to bring the road up to adoptable standards. No objections have been raised from drainage consultees. The differences between the draft and publication draft Local Plan are as a result of consultation, the changes are identified in SD12, Statement of Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
Paragraph/Site: H69	Consultee: 942310 unknown Agent: 941889 Mr Alistair Flatman Rep ID: PDLP_AD3618
Council Response	No ChangeSupport from the site promoter for the site is noted together with the site specific evidence to support the site contained at SS6_H69
Paragraph/Site: H69	Consultee: 946801 K Laycock Agent: Rep ID: PDLP_AD814
Soundness - Justified	The site should be deleted as an allocation on the grounds of: - pollution - schools - traffic
Proposed Change Requested	Delete allocation H69 from the Plan
Council Response	No ChangeA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.
Paragraph/Site: H69	Consultee: 950061 Miss Frances Stonehouse Agent: Rep ID: PDLP_AD3617
Legally Compliant	Residents have not been given the opportunity to comment on the change of use. Is level of consultation sufficient? Not all residents are aware of the process. Plan only available at 2 locations - not sufficient. Residents should have been written to directly, outlining the sites that would most affect them.
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.

Soundness - Justified

Rushed technical assessments. Too much reliance on green belt sites. Will have an impact on the SRN and local highway network. Have all sites in the location been assessed to establish the cumulative effect on the SRN? Roads are unsuitable. Mazebrook Avenue and Brookfield View are unsuitable for access. Roads are already heavily congested. Road safety concerns. No local rail links, limited public transport links. Area has worst air pollution levels in Yorkshire, development will not reduce this. Plan fails to address impact on doctors, dentists and hospitals. Primary schools are oversubscribed. What are future plans? Land behind Mazebrook Crescent provides a natural drainage. Development will cause flooding. Noise pollution would increase. Question whether area removed for biodiversity is big enough. Other constraints should be red until further investigation deems otherwise. The loss of green belt would merge Hunsworth and Cleckheaton. would not be the "rounding off" of natural development. Green belt in this well populated area should be valued. Loss of recreation area. Site has been rejected in the past on more than one occasion.

Soundness - Consistent with National Policy

We also question whether the plan is consistent with policies in the NPPF as green belt has been targeted over brown field sites.

Proposed Change Requested

Remove site from the plan.

Council Response

No Change Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper (BP12). Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy

for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. 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.

Paragraph/Site: **H69**

Consultee: **953449**

Mrs Kathryn Lynch

Agent:

Rep ID: **PDLP_AD3493**

Soundness - Justified

Hunsworth is already an area of high air pollution, due to new industrial buildings and Chain Bar. Traffic is extremely congested at peak times, this will get much worse. Local schools are already turning children away as they are over subscribed. Doctors surgeries are already full. Dangers of children walking to school due to very high volumes of traffic. Infrastructure cannot cope.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **953464**

Mrs Clare Dobson

Agent:

Rep ID: **PDLP_AD567**

Soundness - Positively Prepared

Developing H69 will merge Hunsworth village with Cleckheaton town. This is against the government's advice on use of greenbelt. Its allocation is inconsistent with H240 which was rejected because development would merge Drub with Hunsworth. It cannot be sound to reject a site for that reason but ignore that same reason for a neighbouring site.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Soundness - Justified This proposal is unsound for the following reasons: - Access will be close to the M62/M606 junction 26 which is England's 7th most congested spot out of 20300 congestion sites. Acknowledge improvements to this area but consider with all of the proposed building in the local area, this will undo the benefits of the new work to be carried out. - Health. This area has one of the highest rates of emergency calls for respiratory hospital admissions. Building here will increase pollution and also significantly reduce grass, plants and trees that help to clean that pollution. - Local schools are oversubscribed. There are currently children living in the immediate vicinity of this site that have to travel to Dewsbury because they could not get a space in local schools. Schools have all been set targets to increase the number of children walking to school. This will not be achieved if children are having to travel further. - You have removed a section of this land because it is a BAP priority habitat. Any building surrounding this will impact that habitat therefore that is not sound.

Proposed Change Requested Delete allocation H69 from the Plan.

Council Response No ChangeThe balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. West Yorkshire Ecology service has no objection to the site on this basis.

Paragraph/Site: **H69**

Consultee: **954057**

Miss Vicky Terry

Agent:

Rep ID: **PDLP_AD852**

Soundness - Justified The site is not justified on the grounds of: - no need for further housing in the area - traffic congestion - drainage issues - impact on residential amenity - loss of light and impact on health

Proposed Change Requested Delete allocation H69 from the Plan.

Council Response No ChangeThe site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & DesignationsParagraph/Site: **H69**Consultee: **955999****Mrs Katie Myers**

Agent:

Rep ID: **PDLP_AD3583****Soundness - Justified**

Air pollution. Traffic congestion. The number of houses will double the size of the village and the locally community will be merged into Cleckheaton. Schools - Whitechapel Primary is already over subscribed. Infrastructure and local services would not be able to cope with this development.

Soundness - Consistent with National Policy

This would result in merging Hunsworth with Cleckheaton. This greenspace acts as a boundary to separate them.

Proposed Change Requested

Removal of this site from the plan.

Council Response

No ChangeA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**Consultee: **958827****Mrs Dawn smith**

Agent:

Rep ID: **PDLP_AD815****Soundness - Justified**

The site should be deleted as an allocation on the grounds of: - merger of Hunsworth and Cleckheaton - traffic capacity/congestion - infrastructure capacity - schools, doctors, dentists - loss of view and privacy

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The detailed design of the site will be dealt with at a planning application stage and will consider residential amenity.

Paragraph/Site: **H69**

Consultee: **958874 Mr Alan Howe**

Agent:

Rep ID: **PDLP_AD612**

Soundness - Positively Prepared Green belt should be developed as a last resort

Soundness - Justified - Traffic congestion/highway capacity namely Chain bar roundabout and Junction 26 of the M62 While traffic development proposals are in place to reduce this, however this does not address a number of factors. - Air pollution – already one of the most polluted areas in respect to air quality - an aspect of importance if we are to comply with national and internationally set targets to improve air quality and carbon emissions. It needs to be demonstrated that building will not increase emission levels. - Improvements to Chain Bar roundabout have not reduced queuing to get on to the roundabout. The public need to be reassured that the situation will continue to be monitored and planning permission will not be granted until traffic problems resolved. - merger of Cleckheaton and Hunsworth which will destroy its character

Proposed Change Requested Delete allocation H69 from the Plan

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Paragraph/Site: **H69**

Consultee: **961561 MRS JANICE BARLOW**

Agent:

Rep ID: **PDLP_AD816**

Soundness - Justified The site should be deleted as an allocation on the grounds of: - increase in air pollution - Chain bar is already noted as one of the worse places for air pollution in West Yorkshire - Schools are at capacity - impact on the community centre - how will infrastructure be funded - visit village before making a final decision.

Proposed Change Requested Delete allocation H69 from the Plan.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Council Response

No ChangeA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **961773 mr Tim Halloway**

Agent:

Rep ID: **PDLP_AD2219**

Soundness - Justified

The site is not justified on the grounds of: - The plan goes against the guidelines of the House of Commons Briefing paper 00934 January 16 Green Belt Planning Policy - Air quality - Chain bar already has high levels and is causing hospital admissions. The increase in traffic will worsen the problem. - the development will almost double the amount of housing in hunsworth and sprawl across green belt land into Cleckheaton - Local Schools are at capacity - local doctors and health services are operating at capacity - the local infrastructure including roads, services and education is not suitable for further development - traffic congestion Chain bar and A58 Whitehall Road - public transport is limited and not adequate for additional housing flood risk - the lower level of Merchant Fields already floods - impact on wildlife

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **961779 Mr Mark Woodall**

Agent:

Rep ID: **PDLP_AD3608**

Soundness - Justified

Air pollution will increase due to traffic congestion. Congestion in the area will increase. Number of houses will double the size of the village. Removal of

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

greenbelt between Hunsworth and Cleckheaton will be seen as increasing urbanisation - merging towns. Loss of community and local distinction Dentists, GP's and schools are at capacity.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **962007**

Mr Leigh Reynolds

Agent:

Rep ID: **PDLP_AD817**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - Highway capacity - roads are already gridlocked Allocation should be deleted or reduce number by half.

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69**

Consultee: **962044**

John Bastow

Agent:

Rep ID: **PDLP_AD818**

Soundness - Positively Prepared

Brownfield first - don't build on green belt while brownfield sites exist

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - increased air pollution will impact on health - the area is already noted as having the worst area quality in Kirklees - impact on local eco-system - floodrisk will increase - no evidence of increased local services being provided e.g. schools, health facilities - loss of greenspace - impact on Spen heritage trail - traffic congestion - site access is inadequate

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district

's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The detailed design of the site will be dealt with at a planning application stage and will consider residential amenity.

Paragraph/Site: **H69**

Consultee: **963315 mr michael roe**

Agent:

Rep ID: **PDLP_AD819**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - increased traffic/traffic congestion - floodrisk - local schools are full - doctors at capacity - impact on wildlife

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **963318**

Mrs Alanna Stead

Agent:

Rep ID: **PDLP_AD3305**

Soundness - Positively Prepared

The Local Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. Infrastructure is essential for the functioning of an area and schools, doctors, dentists hospitals, lack of pollution, safe access, lack of congestion should all be addressed. Brownfield sites should be used as an alternative to green belt

Soundness - Justified

The site is not justified on the grounds of: - no reasonable alternatives have been set out - there is no robust evidence to justify the site given SA scores and proposed monitoring framework indicate more negatives and unknowns - infrastructure is insufficient - schools, doctors, dentists, hospitals - congestion - Chain Bar Junction 26 - air pollution/noise pollution - access is unknown at present. There are 4 potential access points but a safe suitable access cannot be provided - the allocation does not prevent urban sprawl - schools are oversubscribed. The impact of school places in the SA scoring shows a minor negative which is incorrect - flooding - potentially will remove a natural drainage system - impact on wildlife - urban sprawl - infilling between Cleckheaton, Drub, Hunsworth. Social cohesion/ support networks will break down - the site lies in a high risk coal referral area - the SA has too many negatives and unknowns to justify the proposed development

Soundness - Consistent with National Policy

The site allocation is not consistent with national policy as it will not enable the delivery of sustainable development. It will not support reductions in gas emissions and reduce congestion

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The process for considering reasonable alternatives for development is outlined in SD5 Kirklees Sustainability Appraisal. The sustainability appraisal is an independent assessment of the likely social, environmental and economic impacts of the

plan carried out in accordance with an agreed methodology with the SA consultees. In assessing allocations/designations to be included in the local plan, a further assessment has been undertaken as outlined in the site selection methodology where consideration is given as to whether issues can be mitigated. The site allocation text sets out required mitigation measures and potential constraints. All allocations within the local plan will be subject to planning permission and tested against the policies in the plan to ensure that appropriate mitigation is in place to deliver the allocation. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **963444 Mr Steven Turner**

Agent:

Rep ID: **PDLP_AD684**

Soundness - Justified

The site is not justified on the grounds of: - air pollution one of the highest areas for air pollution in Kirklees, and noted high levels of adult respiratory issues in the local community. - traffic congestion - Unfeasible additional traffic congestion and the text with the site allocation states the traffic problems and implies that it will be difficult to develop the site until Highways England constructs a link from the M62 westbound to the M606 to take traffic from Chain Bar. - Lack of School places, GP's Dentists, and other essential health facilities. - Poor public transport. - Loss of wildlife and green spaces (no longer a rural area) - Poor on street parking and access to residential roads. - Also the number of houses will double the size of the village and no account has been made of the distinct local community which will be merged with Cleckheaton.

Proposed Change Requested

Delete allocation H69 from the Plan

Council Response

No ChangeA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.

Paragraph/Site: **H69**

Consultee: **963879 Mr Andrew Wright**

Agent:

Rep ID: **PDLP_AD821**

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Soundness - Justified	The site should be deleted as an allocation on the grounds of: - traffic congestion - air pollution - wildlife protection - school overcrowding
Proposed Change Requested	Delete allocation H69 from the Plan.
Council Response	No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H69**

Consultee: **963946**

Mrs Susan Parker

Agent:

Rep ID: **PDLP_AD3332**

Soundness - Justified	There is not the facilities - there are not enough school places for local children and there is no evidence of a new school being built. Local dentists are full. Hospitals and doctors are also a cause for concern. Over development of this site would have a huge impact on the character of the neighbourhood. Loss of views and overlooking of the site. An increase in traffic would add to already congested roads. Increase in air pollution and noise in the area. Impact on biodiversity and wildlife - herons, foxes, crested newts and buzzards. Part of the Spen Valley Heritage Trail would be lost to walkers/walking groups. Flooding - building on the site would takeaway a natural drainage system.
Council Response	No ChangeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69**

Consultee: **964047**

Mr Craig Halloway

Agent:

Rep ID: **PDLP_AD3585**

Soundness - Justified

This development will increase traffic around Hunsworth and Chain Bar roundabout which already has some of the worst air quality in West Yorkshire. It will contribute to increased traffic congestion in the local area. There is already a lack of facilities, such as schools, doctors and dentists to serve the community. There is not the infrastructure in place to support a further 300 homes. Will lose many popular public footpaths including the Spen Valley Trail.

Soundness - Consistent with National Policy

The loss of Merchant Fields as open land will incorporate Hunsworth into the same district as Cleckheaton

Proposed Change Requested

Removal of this site from the plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.

Paragraph/Site: **H69**

Consultee: **964350**

Mr P Davies

Agent:

Rep ID: **PDLP_AD822**

Soundness - Positively Prepared

Brownfield sites are not exhausted

Soundness - Justified

The site is not sound on the grounds of: - floodrisk - Merchants Field is a natural floodplain - impact on wildlife ecosystem - has a detailed survey been undertaken - traffic congestion - A58 is regularly gridlocked and the journey from Drub Lane to Junction 26 can often take 20 mins - air and noise pollution -

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the area is noted as being in an air pollution hotspot - Access routes are not fit for purpose - has a detailed site report been undertaken of access/egress. Drub Lane to mazedbrook is via a blind junction. Highway safety concerns.

Proposed Change Requested

The following modifications are required: - a completely revised road network - full, comprehensive public transport system is required - there are no schools within walking distance that do not involve crossing a road - consideration is required of the accessibility and capacity of schools, doctors and dentists - flood risk mitigation required. has an area been identified - access is only designed to serve 40-50 houses and are not capable of serving a larger development. Measures need to be identified - the site is unviable in all aspects - consider other options.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazedbrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.

Paragraph/Site: H69

Consultee: 964431

Mrs C Halloway

Agent:

Rep ID: PDLP_AD823

Soundness - Positively Prepared

The site should be deleted as an allocation on the grounds of: - Loss of green belt

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - Traffic congestion especially A58 and Chain bar, junction 26 - air pollution - Chain bar is known as the worst place for air pollution in West Yorkshire - impact on local services including schools, doctors, dentists, hospitals, health care - floodrisk - impact on Spen Heritage Trail - overdevelopment - merger of Hunsworth and Cleckheaton

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has

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been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage.

Paragraph/Site: **H69**

Consultee: **964502**

Mrs Rebecca Scholefield

Agent:

Rep ID: **PDLP_AD3614**

Soundness - Justified

Air pollution will increase Traffic congestion will increase. There are already issues with public transport. Road safety concerns. Loss of green belt would merge Cleckheaton with Drub and Hunsworth Fields flood - development will impact new and existing houses. Too many sites in this area.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69**

Consultee: **965299**

Mr Andrew Robinson

Agent:

Rep ID: **PDLP_AD824**

Soundness - Positively Prepared Use brownfield land instead of green belt land

Soundness - Justified The site should not be destroyed on the grounds of: - highway capacity - the roads are already overloaded without adding 400 houses - highway

safety/access - 3 accesses are very dangerous especially Mazebrook onto Drub Lane - air and noise pollution - an increase in 400 vehicles would exacerbate air/noise pollution in an area already listed as one of the worst for air pollution in the UK - schools are at capacity - impact on wildlife and walking opportunities.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. Environmental Health has raised the issue of potential impact of noise on residential amenity but considers that this can be addressed through the provision of a noise assessment at the planning application stage. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **965359**

Mr Harold Ibbotson

Agent:

Rep ID: **PDLP_AD3330**

Soundness - Positively Prepared

Encourage (insist) on the use of brownfield sites and leave the greenfields alone.

Soundness - Justified

The roads around Cleckheaton are already far too busy. Hospital, schools and GP's would find the increase in housing difficult to handle.

Soundness - Consistent with National Policy

Will create urban sprawl.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and

buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **966079 Mr T.W. Rankin**

Agent:

Rep ID: **PDLP_AD825**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - application for planning has previously been refused - unsatisfactory access - flood risk and drainage - impact on the environment - development would violate government initiative to maintain wetlands to help prevent flooding

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeA masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and

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could therefore be prominent.

Paragraph/Site: **H69**

Consultee: **966287**

Kenneth and Marion Alder

Agent:

Rep ID: **PDLP_AD826**

Soundness - Justified

The site is unsuitable for development on the grounds of: - Entrance to site too narrow - Main roads about too busy - Surrounding properties overwhelmed - Public footpaths on site used by many locals - Local schools already full

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeA masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The detailed design of the site will be dealt with at a planning application stage and will consider residential amenity. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H69**

Consultee: **966646**

Miss Nicola Sutcliffe

Agent:

Rep ID: **PDLP_AD827**

Soundness - Positively Prepared

- Loss of Green belt and impact on Hunsworth

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - Whitechapel School is at capacity - traffic congestion - particularly A58 - limited public transport - drainage - Spen Beck - site waterlogged 60% of time already - air pollution - Chain bar already has highest levels in West Yorkshire - traffic safety/access - access has not been confirmed and no safe options exist

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local

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Plan site allocation text for H69. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.

Paragraph/Site: **H69**

Consultee: **966776**

Phil Cook

Agent:

Rep ID: **PDLP_AD828**

Legally Compliant

The council proposals are set out in such a way that the legalese is incomprehensible to a solicitor/lawyer and is a deliberate ploy so that interpretation can be manipulated.

Soundness - Positively Prepared

No forum/time was set up to allow local residents to collate their collative interests/concerns. A clear case of "railroading". Residents cannot afford to fight proposals through legal channels which should be freely available to all. - Use brownfield sites first

Soundness - Justified

The following issues have been raised in relation to this site: - would access involve extending Mazebrook Avenue through to Brookfield View - loss of views and tranquillity - Old mine workings on site - Infrastructure - what consideration has been given to roads, vehicular and pedestrian access, schools, local amenities, the type of business on site, drainage/sewage - impact on public rights of way - flood risk - The whole area should be declared as a nature reserve to protect birds and animals - An environmentalist should be employed to survey whole of area.

Proposed Change Requested

Delete allocation H69 from the Plan. Development of H69 should be accommodated on a brownfield area Allocate as a nature reserve

Council Response

No Change The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. SD13 sets out the council's Statement of Publication Consultation. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 - H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. Part of the site is within a high risk coal mining area. This is acknowledged in the site allocation text box which also requires a coal risk assessment as part of a detailed planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement

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for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. No objections have been received from technical consultees in relation to wildlife, biodiversity. The allocation does recognise that Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **967282 Mr C Hardy**

Agent:

Rep ID: **PDLP_AD829**

Soundness - Positively Prepared Loss of green belt that improves the life of young and old.

Soundness - Justified The site should be deleted on the grounds of: - impact on quality of life - air/noise pollution - impact on health through overcrowding of the area and impact on health services - it will form a location for cheap housing for immigrants - infrastructure capacity - there is not enough schools, doctors, jobs and local amenities - highway capacity/traffic congestion - improvements at Chainbar demonstrate awareness of issue but will still not be sufficient to cope

Proposed Change Requested Delete allocation H69 from the Plan.

Council Response No Change The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69**

Consultee: **967316 Mr Stephen Leyland**

Agent:

Rep ID: **PDLP_AD830**

Soundness - Positively Prepared Loss of green belt

Soundness - Justified The site should be deleted on the grounds of: - Merchants Field provides green space on the boundary of Hunsworth - air and noise pollution from M62 and busy tributary roads - overdevelopment of compact village to city like sub-urban area - impact on quality of life and health and well-being - floodrisk - Spen Beck - impact of increased traffic and impact on Links Avenue, Hunsworth lane, Kilroyd Avenue impact of increased traffic on Chain bar - infrastructure capacity - schools, doctors, policing unable to cope - impact on waste collection - lack of public transport - Loss of wildlife

Proposed Change Requested Delete allocation H69 from the Plan.

Council Response No Change The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground,

including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **967423 Mrs K Jowett**

Agent:

Rep ID: **PDLP_AD831**

Soundness - Positively Prepared

Use non-green belt land first

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - inadequate access - Kilroyd Drive/Balmfields is too narrow - highway safety - Mazebrook Avenue on to Drub Lane on to Whitehall Road is dangerous - air pollution - already one of the worst areas for air pollution in West Yorkshire and an increase in cars would increase this - infrastructure capacity - schools, doctors, hospitals at capacity

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain

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the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **967607**

Kishor Mistry

Agent:

Rep ID: **PDLP_AD832**

Soundness - Positively Prepared

Loss of green belt

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - traffic congestion - school capacity - schools are full - over development - village will become a town

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan.

Paragraph/Site: **H69**

Consultee: **967815**

Judith & John Mason

Agent:

Rep ID: **PDLP_AD833**

Soundness - Positively Prepared

Use brownfield site at Westgate, Cleckheaton or Prospect Mill, Cleckheaton

Soundness - Justified

Opposed to the site allocation on the grounds of: - air and noise pollution - Chain bar is in top 10 polluted areas in UK. Impact on health (see NICE report) to government - Highway capacity - roads especially the A58 cannot cope with existing traffic and will not be able to cope with 800+ more cars limited public transport - Infrastructure capacity - local amenities are non existent - schools, doctors, dentists at capacity and there is nothing in the plan to address this - Concerned that access is inadequate and dangerous - Important gap between Hunsworth, Cleckheaton and Drub villages that should be protected - impact on wildlife - floodrisk from Beck - drainage issues - the site acts as a soakaway - alternative sites are available

Proposed Change Requested

Delete allocation H69 from the Plan. Use brownfield land firstRelocate development to Westgate, Cleckheaton or Prospect Mill, CleckheatonUse alternative

sites in an area with less congestion Consider alternative sites

Council Response

No Change Sites have been identified in the Local Plan for development at Westgate including MX3349 and E1825. Prospect Mill, Scholes has not been put forward by a site promoter for development. This does not preclude consideration of this site in the future and any proposed applications will be assessed against Local Plan policies. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The process for considering reasonable alternatives for development is outlined in SD5 Kirklees Sustainability Appraisal.

Paragraph/Site: **H69**

Consultee: **967822**

Rosemary Rankin

Agent:

Rep ID: **PDLP_AD835**

Soundness - Justified

The inclusion of Merchants Fields is a cursory exercise in meeting bureaucratic requirements. Issues with the site include: - air pollution and effect on the environment through increased traffic - floodrisk - drainage capacity is already inadequate - access inadequate to deal with further development - concern that the council is acting as an agency for commercial concerns

Proposed Change Requested

Delete allocation H69 from the Plan

Council Response

No Change A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69**

Consultee: **968030**

Mr Charles Wood

Agent:

Rep ID: **PDLP_AD836**

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Soundness - Justified	Issues with the site include: - Whitechapel school is oversubscribed/parking at school is a problem - healthcare capacity including doctors and dentists - highway capacity/traffic congestion - air pollution - Chain bar 5th in pollution statistics for the UK
Proposed Change Requested	Reduce the size of the developmentIdentify the location/impact of access roadsassess impact of development on infrastructure
Council Response	No ChangeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.

Paragraph/Site: **H69**

Consultee: **968466**

Mrs J L Heslop

Agent:

Rep ID: **PDLP_AD1437**

Soundness - Positively Prepared Loss of green belt when brownfield sites should be used first. Consultation forms are not easily understood and people feel disadvantaged. Information on infrastructure and sustainability of the site is not readily available on the website and is difficult to navigate therefore there is a lack of transparency. Number of homes has increased to 400+ without consultation

Soundness - Justified The site should be deleted as a housing allocation on the grounds of: - increased traffic congestion - impact on Chain bar which already has high levels of congestion and accidents - air pollution in already known area - flood risk - Merchant Fields is prone to flooding - local school is already at capacity - infrastructure should be place prior to any development - previous application by Asda refused on traffic congestion grounds - no specification regarding access. All options are via narrow roads which are unsuitable for additional traffic - impact on wildlife and ecosystem - impact on public footpaths and Spen Heritage Trail - cumulative impact of traffic from other proposed developments - overdevelopment - doubling the population of the village and increased density would impact on the character - merger of Cleckheaton and Hunsworth - loss of views - planners should visit site at rush hour to see impact

Proposed Change Requested Delete allocation H69 from the Plan.

Council Response No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needsThe Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority

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habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The detailed design of the site will be dealt with at a planning application stage and will consider residential amenity.

Paragraph/Site: **H69**

Consultee: **968469 Mr R T Heslop**

Agent:

Rep ID: **PDLP_AD1439**

Soundness - Positively Prepared

Loss of green belt when brownfield sites are available. No consultation on the increased numbers of housing on site

Soundness - Justified

The site is not justified on the grounds of: - increased traffic congestion of additional vehicles on Whitehall Road and Chain bar - increased pollution in already known high level area - local amenities are already oversubscribed and infrastructure should be put in place prior to development commencing - Flood risk from beck - inadequate access - narrow and hazardous - planners need to visit the site to properly assess

Proposed Change Requested

More detailed planning proposals on site access, land drainage and increased amenities, schools etc should be made available. More transport consultation and discussion should be available to residents affected by the proposal. Councillors should be familiar with and visit the proposed site at peak times so they can realistically assess the impact on the area these proposals will inflict.

Council Response

No Change. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **968639 Ms Paula McDonald**

Agent:

Rep ID: **PDLP_AD850**

Soundness - Positively Prepared

Loss of green belt and impact on wildlife

Soundness - Justified

The site is not justified on the grounds of: - over development - Hunsworth is a village and cannot sustain 400 houses - air pollution in an already area known for air pollution - traffic congestion which is growing daily - impact on infrastructure - impact on schools and public services - community centre is at the heart of the village which would be lost if Hunsworth merged with Cleckheaton.

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site

selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **969275**

Mrs Lauren Howe

Agent:

Rep ID: **PDLP_AD806**

Soundness - Positively Prepared

Green belt should be a last option for development and it should be in keeping with the local areas.

Soundness - Justified

The plan is not justified on the grounds of: - it does not meet infrastructure requirements as services in the area are oversubscribed. The surrounding commuter infrastructure is unable to support this degree of development and Chain Bar roundabout and the surrounding area has been highlighted as one of the worst traffic blackspots in Britain despite the development works. - air pollution - by building a large number of homes on the Merchant Fields area, the traffic issues will only increase; this was highlighted by one of the development companies who are interested in developing this land as being a significant concern. - the inordinate number of houses planned will join two separate areas into one and result in Hunsworth being subsumed into Cleckheaton. This would result in the destruction of borders between settlements. - building is not likely to be in keeping in the semi-rural nature of this settlement, instead turning it into a heavily urbanised area. - impact on local environment and existing residents.

Soundness - Consistent with National Policy

In the sustainability appraisal, approximately twelve categories were considered with nine of them resulting in an outcome of either negative or significantly negative with the only positives being new housing which is close to work opportunities. There is clearly no benefit to existing residents and, in fact, a significant detriment which goes against the basis of the NPPF.

Council Response

Delete allocation H69 from the Plan.

Paragraph/Site: **H69**

Consultee: **969275**

Mrs Lauren Howe

Agent:

Rep ID: **PDLP_AD1161**

Legally Compliant

H69 was originally rejected as an option in the draft Local Plan before being accepted as an option in the revised Plan. Because of this, consultation was not taken on the broader issues regarding this area; these issues had resulted in MX1914 being rejected - this is the same land at H69 but originally a mixed industrial and housing area. Due to the significant level of change of proposal, a duty to consult was not followed and the Council have not complied with their legal duty of care to residents. The Council have failed to engage constructively, actively and in an on-going manner with residents as detailed above. By

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failing to provide an opportunity to discuss H69 in detail as residents had been advised it had been rejected, the Council has breached their obligation to engage with residents and thus their Duty to Co-operate.

Soundness - Consistent with National Policy
Proposed Change Requested
Council Response

The soundness test is also not met due to a failure of the plan to meet National Planning Policy Framework standards regarding sensitive workings towards existing habitation and residents.

Delete allocation H69 from the Plan.

No ChangeThe council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. SD13 sets out the council's Statement of Publication Consultation. The Council produced a summary of main changes and a comprehensive list of changes at the Publication draft Local Plan consultation stage. Copies of this documents were available to view on-line, at deposit locations and at two drop in events held during the consultation period.The site has been assessed in accordance with the council's Local Plan Methodology Paper 2 and subject to consultation with technical and statutory consultees.The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: H69

Consultee: 969759

Mr Benjamin McDonald

Agent:

Rep ID: PDLP_AD851

Soundness - Justified

The site is not justified on the grounds of: - over development - Hunsworth is a village and cannot sustain 400 houses - air pollution in an already area known for air pollution - traffic congestion which is growing daily - impact on infrastructure - impact on schools and public services - community centre is at the heart of the village which would be lost if Hunsworth merged with Cleckheaton.

Proposed Change Requested
Council Response

Delete allocation H69 from the Plan.

No ChangeThe balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.The impact of development on

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school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **969771 Mr Charles McDonald**

Agent:

Rep ID: **PDLP_AD3474**

Soundness - Justified

Hunsworth Village needs to remain a village and cannot withstand another 400 houses. Air pollution is a problem around Chain Bar. Traffic congestion within the village is bad at peak times. Green belt and wildlife will be greatly endangered. The schools and public services are already greatly oversubscribed. The community centre is the heart of the village and if we merge it into Cleckheaton that would be totally lost.

Proposed Change Requested

Remove this site from the plan.

Council Response

No ChangeThe balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **970057 Mr Allan Forrest**

Agent:

Rep ID: **PDLP_AD838**

Soundness - Justified

The size of the site is not justified on the grounds of: - increase in traffic congestion in already congested area - increased in poor air quality and impact on health - floodrisk - which is increasing - impact on public footpaths - infrastructure capacity - schools oversubscribed and no capacity.

Proposed Change Requested

The size of H69 should be reduced to fit in with the surroundings and lessen impact on existing facilities.

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69

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within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **970338**

Mr Kenneth Johnson

Agent:

Rep ID: **PDLP_AD839**

Soundness - Justified

The site should be deleted as a housing allocation on the following grounds: - highway capacity/traffic congestion - impact on infrastructure - schools, doctors, dentists and hospitals at capacity.

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **972701**

Mrs Brenda Johnson

Agent:

Rep ID: **PDLP_AD841**

Soundness - Justified

The site is not justified on the grounds of: - Traffic congestion - Kilroyd Drive and Kilroyd Avenue currently have difficulties entering and exiting from A58 Whitehall Road especially at peak times and therefore has no capacity to deal with additional development - infrastructure capacity - schools, doctors, dentist are unable to cope with additional residents - increased air pollution in an already badly polluted area - lack of public transport - traffic safety - trying to cross A58

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit)

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visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.

Paragraph/Site: **H69**

Consultee: **977064**

Carolynn Cook

Agent:

Rep ID: **PDLP_AD840**

Soundness - Positively Prepared

While consultation with the council has been complied with, full consultation has not been undertaken with the communities in the area. Brooklyn residents were not advised of meetings for local residents. Use brownfield sites as an alternative to green belt.

Soundness - Justified

The site is not justified on the grounds of: - Floodrisk - Traffic congestion around Hunsworth - air pollution - Chain Bar - Traffic safety - there is no safe access from the site - infrastructure capacity - area cannot sustain any more development - planners should visit at rush hour to see congestion and potential damage to environment - build in Holmfirth which has more green fields

Proposed Change Requested

Delete H69Allocate an alternative site to H69 on a brownfield site

Council Response

No ChangeThe council’s Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council’s Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district’s housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by

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Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **977269**

J.L. Wilson

Agent:

Rep ID: **PDLP_AD843**

Soundness - Positively Prepared Loss of green belt leading to merger of Hunsworth and Cleckheaton

Soundness - Justified The site is not justified on the grounds of: - Overdevelopment - the allocation will double the size of the area - traffic congestion and air pollution - further increases on Chain Bar roundabout - lack of public transport - impact on infrastructure - schools, doctors, dentists, hospitals - loss of wildlife - increased flood risk from Spen Beck - lack of policing in area - is there a requirement for such a large development

Proposed Change Requested Reduce the size of allocation H69

Council Response

No Change The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69**

Consultee: **1043654**

Maureen Collings

Agent:

Rep ID: **PDLP_AD844**

Soundness - Justified

The site is not justified on the grounds of: - traffic congestion on Bradford Road or Hunsworth lane/Whitehall Road - increase in air pollution - infrastructure

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	capacity - school, doctors, dentists - allocate homes where services are not overstretched
Proposed Change Requested	Delete allocation H69 Allocate land for homes in areas where infrastructure is in place
Council Response	No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: H69	Consultee: 1044089 David Lee	Agent:	Rep ID: PDLP_AD845
Soundness - Justified	The size of the site is not justified on the grounds of: - flood risk and drainage issues- resulting from Mazebrook and Spen Becks - highway capacity/traffic congestion especially A58 and M62 - air pollution - lack of public transport - alternative sites exist - Westgate, Cleckheaton		
Proposed Change Requested	Build on Westgate, Cleckheaton which could accommodate 1,000 homes Build up to 50 houses alongside the Spen Beck with access only from Brooklyn area not Hunsworth Lane or Mazebrook. This would sort: pollution, drainage, flood risk, traffic congestion.		
Council Response	No Change The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. Sites have been identified in the Local Plan for development at Westgate including MX3349 and E1825.		

Paragraph/Site: H69	Consultee: 1044933 Trevor Holt	Agent:	Rep ID: PDLP_AD847
Soundness - Justified	The site is not justified and should be deleted as a housing allocation on the grounds of: - over development - the size of Hunsworth will double - lack of infrastructure to cope with development such as schools, doctors, dentists, healthcare and transport links - loss of valuable green space that provides peace and quiet - flood risk due to Spen Beck - highway capacity/traffic congestion arising from 500+ cars		
Proposed Change Requested	Delete allocation H69 from the Plan.		
Council Response	No Change The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this		

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location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69** Consultee: **1045848 Mrs Toni Rios** Agent: **1045846 Mr Christopher Yapp** Rep ID: **PDLP_AD378**

Soundness - Justified Site H69 shows a significant impact at M62 junction 26. This section of the strategic road network will benefit from the M62 Chain Bar committed scheme, due to start during the current Roads Period (2015/16-2019/20). However, the Highways England West Yorkshire Infrastructure Study (WYIS) identified a need for a further potential capacity enhancement scheme at the junction by 2030. For further correspondence relating to this representation see Core Document 'Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation'

Proposed Change Requested The following wording is proposed: "This development has the potential for a severe adverse impact on the operation of the Strategic Road Network and will require physical mitigation measures and travel plans in order to minimise the impact of the traffic generated. Highways England has a number of planned improvements to the Strategic Road Network funded as part of the government's Road Investment Strategy (RIS). These schemes will provide additional capacity at congested locations. Development proposals will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan or other appropriate schemes. Construction of the site should also be phased to take place following completion of the committed RIS improvements."

Council Response Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.

Paragraph/Site: **H69** Consultee: **1045990 Cllr Kath Pinnock** Agent: Rep ID: **PDLP_AD1165**

Soundness - Positively Prepared This allocation was formerly for a mixed use site MX1914. It subsequently became a wholly Housing site H69 in the Publication Plan, with no consultation with local residents.

Soundness - Justified Site allocation H69 is opposed on the grounds of: - it places too great a burden on the local community (i.e. Hunsworth), in that it is a huge increase in the local population - the consultation notes indicate considerable problems in the development of the site in relation to remediating the local highway network.

Soundness - Effective If Highways England do not come forward with a scheme for the M62/M606 question whether this site is financially viable if the developer has to pick up all the costs of remediating the local highway network.

Proposed Change Requested Delete allocation H69 from the Plan

Council Response

No Change The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. SD13 sets out the council's Statement of Publication Consultation. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69**

Consultee: **1048637 Mr Darren Wilds**

Agent:

Rep ID: **PDLP_AD321**

Soundness - Justified

The site is unsuitable for development for the following reasons: - loss of green belt which separates Cleckheaton, Drub and Hunsworth. - traffic congestion around the site and lack of public of public transport - impact on wildlife especially around Nann Hall brook - drainage issues - the open fields contribute to soaking up the rainfall reducing flooding -use brownfield, derelict sites around Cleckheaton

Council Response

No Change The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The site lies within flood zone 1. The council acknowledges

that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Paragraph/Site: **H69**

Consultee: **1048998 MRS ALISON HAIGH**

Agent:

Rep ID: **PDLP_AD1731**

Soundness - Justified

Overcrowded schools and local amenities. Land should be retained as green belt. Flood risk in fields to rear of Brookfield View - new development will increase flooding. Additional traffic will be dangerous and cannot be accommodated on Hunsworth Lane and Cliffe Lane. Loss of land for informal recreation.

Proposed Change Requested

Delete this allocation from the local plan.

Council Response

No Change The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage.

Paragraph/Site: **H69**

Consultee: **1049387 Miss Megan Logush**

Agent:

Rep ID: **PDLP_AD550**

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Soundness - Positively Prepared	No comments made
Soundness - Justified	No comments made
Soundness - Effective	No comments made
Soundness - Consistent with National Policy	No comments made
Proposed Change Requested	Delete allocation H69 from the Plan.
Council Response	No ChangeThe council considers that the allocation of site H69 is in conformity with the site allocation methodology.

Paragraph/Site: **H69** Consultee: **1049393 Cllr Andrew Pinnock** Agent: Rep ID: **PDLP_AD577**

Soundness - Positively Prepared	This allocation was formerly for a mixed use site MX1914. It subsequently became a wholly Housing site H69 in the Publication Plan, with no consultation with local residents.
Soundness - Justified	Site allocation H69 is opposed on the grounds of: - it places too great a burden on the local community (i.e. Hunsworth), in that it is a huge increase in the local population - the consultation notes indicates considerable problems in the development of the site in relation to remediating the local highway network.
Soundness - Effective	If Highways England do not come forward with a scheme for the M62/M606 question whether this site is financially viable if the developer has to pick up all the costs of remediating the local highway network.
Proposed Change Requested	Delete allocation H69 from the Plan.
Council Response	No ChangeThe council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. SD13 sets out the council's Statement of Publication Consultation.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.

Paragraph/Site: **H69** Consultee: **1049421 Mrs Sarah Carr** Agent: Rep ID: **PDLP_AD584**

Soundness - Positively Prepared	Loss of green belt land.
Soundness - Justified	The site should be deleted as an allocation on the grounds of: - Air pollution - this area is already one of the most air polluted areas in West Yorkshire - Traffic congestion - this area is already very congested at rush hour, and school pick up/drop off times. - Access roads are too narrow - emergency vehicles would struggle now - more so if these plans go ahead - Lack of school places already - The fields are a source of wildlife - herons, kingfishers and water voles are regularly spotted along the Nann Hall stream. - There are far too many houses planned in such a small area. - This land floods - badly. The stream adjacent bursts it banks in heavy rain. The field has frequently been under water. I have photographic evidence - but not currently available - can be if needed. - Emergency services already struggling to access homes in and around Brookfield View

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69**

Consultee: **1049422**

Miss Sarah Clarke

Agent:

Rep ID: **PDLP_AD603**

Soundness - Positively Prepared

The land outlined in the proposal is green belt land. This land has been enjoyed for a long time by local residents and wildlife. Green belt land is becoming very limited in the Batley and Spen area.

Soundness - Justified

This plan is unsound due to: - air pollution - Chain Bar already has one of the worst air pollution levels in West Yorkshire. A further 413 dwellings will only increase the levels, causing long term pollution related problems for current and future residents. - traffic congestion - The increase in traffic will also contribute to the congestion in the Chain Bar area, which is already at a high level. The current lane widening and traffic control measures that are being put in place will be a pointless task if the plans go ahead. - potentially serious adverse affect on our wildlife. This in turn has an affect on our ecosystem, which is a vital part of our future. - This land also keeps Hunsworth separate from Cleckheaton. To build on this land would take away their village status. - In relation to the access to the proposed site, the route through Brookfield View would essentially become a rat-run. The road is currently a quiet cul-de-sac, where children can play safely on the street. We moved to Brookfield View less than a year ago, and we chose this street due to its peaceful and safe location. Our children play out on the street all day in the summer, playing with other residents' children and riding their bikes. To build on the proposed site would take this freedom away from our children. They would no longer have a safe outside space to explore. Brookfield View would no longer be a safe and quiet street. - Equally, residents in the Kilroyd Drive area will also lose their cul-de-sac environment, their road would also be used for access for a high volume of vehicles. Both access points would see a high increase in traffic, but the access from the main roads is not suitable or capable of dealing with such an increase

in vehicles turning from the main Bradford Road and Whitehall Road. - flood risk - increased risk of flooding to existing properties. The land currently prevents water washing down the hills to the properties below. Building on this land would take away that protection. Over recent years we've seen a significant increase in flooding throughout West Yorkshire and the UK. There is already evidence that shows building on areas such as the proposed site would prevent the land from saturating, therefore building on this land would have a negative affect on the properties lower down the hill. This would also cause insurance prices to increase and property value to decrease. - There is also a serious lack of services in the Cleckheaton area. School's are at their intake limits, and doctors and dentists in the area are oversubscribed. There is now only one Post Office in the area, and the only supermarket in the town is small and has a limited choice. Parking within the town centre is also very limited, so accessing these facilities is already difficult. - All this information and evidence, along with the fact that there is a number of proposed sites in such a small area, proves that this proposed site is unsound for various reasons, and should be withdrawn.

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping section of the Publication Plan. This has informed the spatial strategy for the Plan.

Paragraph/Site: **H69**

Consultee: **1049456 Miss Catherine Walker**

Agent:

Rep ID: **PDLP_AD606**

Soundness - Justified

The plan is not justified on the grounds of: - it does not meet infrastructure requirements as there are already significant problems with traffic congestion and air quality in the Cleckheaton area, particularly at the chain bar junction 26 (in a recent article by the Spenborough Guardian Westbound M62 junction 26 with M606 junction 1 was listed on the UK's worst traffic hotspots). - Traffic congestion - the A58 and M62 both suffer from high levels of congestion; commuters travelling from Birkenshaw to the chain bar along the A58 Whitehall Road west are often queuing on a morning and evening and commuters travelling via the M62 are usually travelling at an average of 40 miles per hour due to the high volumes of traffic. The inclusion of site H69 will further impact on these issues which has been stated by Highways England unless significant road infrastructure takes place'. A further 413 dwellings will result in at least 200 plus vehicles and a recent indicative masterplan published by Harron Homes for site H69 details one of the main access points for vehicles to be from

Kilroyd Drive on to the A58 Whitehall Road. This will undoubtedly cause significant congestion problems and increase air pollution in an area already reported as above European Union safety guidelines of which the Government has a responsibility to reduce air pollution levels and is currently failing to do so. Research from Kirklees Council Health and Well Being Board states that '1 in every 20 deaths in Kirklees are caused by effects of air pollution.' The Green Belt acts as a carbon sink for this area and with the addition of sites H601, H218, H172 and H173 located in Birkenshaw this will add approximately a further 318 on top of the 413 dwellings in the Hunsworth area only adding to the problems relating to traffic congestion and air pollution. - Merger of Hunsworth and Cleckheaton - the 413 dwellings planned for site H69 will result in the village of Hunsworth being subsumed into Cleckheaton as the two separate areas are joined together changing the character or the village indefinitely. - The decision to include site H69 contradicts why another site; H240 was rejected. Site H240 was rejected with the following conclusion; 'Development of the site would fill the gap between housing on Mazebrook Avenue and the settlement of Drub to the east. This would lead to the coalescence of settlements contrary to the purpose of the green belt. Development would sever a stretch of Nann Hall Beck from its wider countryside setting and impact on important wildlife habitats.' Site H69, which is also bordered by Nann Hall Beck to the East, is located west of rejected site H240 and the removal of this land from the green belt would also cause two settlements (Hunsworth and Cleckheaton) to be joined, yet it was decided that in this case this was acceptable. - Loss of biodiversity and wildlife habitat network - Although the sites fields look to be managed very minimally and some are lightly grazed this has created an important habitat of rough grassland (disregarded by Harron Homes as 'scruffy fields') which isn't present in the surrounding farmland which is managed for livestock grazing and hay cutting. Within the last year at least one barn owl (possibly two as a disused stable block was being used during the breeding season) was recorded using the field's rough grassland habitat to hunt on a regular basis during spring and into summer at dawn and dusk. The barn owl could clearly be seen and positively identified from its markings and distinctive hunting style flying low and slowly, back and forth over the field. Other birds of prey can also be seen during summer hunting with sparrow hawks and kestrels recorded this year. The presence of birds of prey demonstrates the favourable condition of this land as a biodiverse area providing a beneficial habitat and wildlife corridor. Mitigating the loss of green belt on this scale will not be possible with the proposal of 413 dwellings as the majority of habitats will be lost resulting in a loss of species in the area as suitable habitats will have been significantly reduced.

Soundness - Consistent with National Policy

Kirklees local plan has disregarded 4 out of 5 Green belt purposes identified in NPPF in the case of site H69 by removing this land from the green belt and changing its boundary resulting in the village of Hunsworth being merged with the town of Cleckheaton, increasing urban sprawl, encroaching on the countryside and developing green belt before brownfield land.

Proposed Change Requested Council Response

Delete allocation H69 from the Plan.

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment

to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. In relation to the comments made about consistency with H240: The green belt review assessment at edge ref. CK10 (Green Belt Review April 2017 document ref SD19) concluded that the green belt in this area does not perform a strong green belt role. There are numerous field boundaries and other features that present opportunities to find a new green belt boundary so the risk of sprawl is very limited. The amount of existing built form on three sides limits its appearance as countryside. There is an extensive gap in this area between Cleckheaton and Gomersal and it is considered that Hunsworth has already merged with Cleckheaton along Hunsworth Lane. Site H240 has a border with a green belt edge constrained by the presence of Nann Hall Beck, which should H240 be released would have development on both sides. H240 would also merge Hunsworth with Drub, settlements which are not already joined. Watercourses can form strong green belt boundaries and H69 is large enough to accommodate a buffer with the stream to protect the important wildlife habitats. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **1050982 Michael Stead**

Agent:

Rep ID: **PDLP_AD1447**

Soundness - Positively Prepared

Consultation issues: - The forms are difficult to understand and to find information due to extensive and complex planning documents. - Many people believed that they made their objections earlier this year and do not know that they will not be allocated individually at this stage. - The change of site name from MX1914 to H69 has further complicated the system. - Short deadline to make comments. More time would have allowed public to seek help to understand impact and to complete forms. Alternatives not considered - brownfield sites. loss of green belt

Soundness - Justified

The site is not justified on the grounds of: - impact on already fragile infrastructure and greatly increased requirements if development goes ahead - lack of capacity - schools, doctors, dentists - high pollution rates - allocation contrary to sustainability appraisal which shows high % of negatives and unknowns - floodrisk

Soundness - Effective

Scale of investment required to address infrastructure to serve this site.

Soundness - Consistent with National Policy

Allocation is inconsistent with NPPF as development will destroy green belt and urbanise Cleckheaton and Hunsworth

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. SD13 sets out the council's Statement of Publication Consultation. The council held two drop in sessions where officers were available to assist the public respond either on-line or through paper submissions. Letters were also sent out to explain how to register on the on-line system and guidance notes provided on how to complete representations on the planning portal. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into

subsidising brownfield sites (brownfield fund) and infrastructure. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The sustainability appraisal is an independent assessment of the likely social, environmental and economic impacts of the plan carried out in accordance with an agreed methodology with the SA consultees. In assessing allocations/designations to be included in the local plan, a further assessment has been undertaken as outlined in the site selection methodology where consideration is given as to whether issues can be mitigated. The site allocation text sets out required mitigation measures and potential constraints. All allocations within the local plan will be subject to planning permission and tested against the policies in the plan to ensure that appropriate mitigation is in place to deliver the allocation.

Paragraph/Site: **H69**

Consultee: **1050986**

Martin Sandford

Agent:

Rep ID: **PDLP_AD848**

Soundness - Positively Prepared

Loss of green belt land when national and local government advocate the use of brownfield sites. Lack of transparency on factual information regarding impacts of development.

Soundness - Justified

The site is not justified on the grounds of: - social and environmental reasons - increased traffic congestion - increased air pollution in an already polluted area - previous application for an Asda was refused on grounds of traffic congestion - increased flood risk - impact of additional 400 homes on infrastructure - schools at capacity - the site should be visited at peak times to see huge impact development will have - the impact on walking and the Spen heritage trail - damage to unique character of the area

Proposed Change Requested

Delete allocation H69 as an allocation.

Council Response

No Change The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and

buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H69**

Consultee: **1050990 Margaret St Claire**

Agent:

Rep ID: **PDLP_AD849**

Soundness - Justified

The site is not justified on the grounds of: - capacity of doctors, hospitals which are already over subscribed - traffic volume - Whitehall Road junction into Drub Lane - a further increase will impact on safety - Inadequate access - Drub Lane into mazebrook is a blind, narrow junction which will impact on safety. It is also too narrow too accommodate further traffic - concerned about the future of existing public transport.

Proposed Change Requested

Provide further details to address access and infrastructure concerns

Council Response

No ChangeHealth issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Paragraph/Site: **H69**Consultee: **1050995 Marion Rhodes**

Agent:

Rep ID: **PDLP_AD846****Soundness - Positively Prepared** Green belt should be protected especially for wildlife**Soundness - Justified**

The site is not justified on the grounds of: - Infrastructure should be in place prior to development starting such as schools, doctors, dentists. This is unlikely to happen - Highway capacity and traffic congestion especially the A58 and Chain bar - air quality and pollution which would increase with further cars - ground stability - Mazebrook is built on a mine and further traffic may damage houses - drainage issues - Mazebrook is very boggy - inadequate access - this could not be via Mazebrook or Drub Lane as too narrow - highway safety - already a high level of accidents which would increase with further traffic - lack of public transport - over development - an additional 400 houses would spoil the character of Hunsworth, its village and country feel - loss of wildlife and habitats

Soundness - Effective

Infrastructure should be in place prior to development starting such as schools, doctors, dentists. This is unlikely to happen.

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. Part of the site is within a high risk coal mining area. This is acknowledged in the site allocation text box which also requires a coal risk assessment as part of a detailed planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69**Consultee: **1050999 Pamela Wilson**

Agent:

Rep ID: **PDLP_AD1473****Soundness - Justified**

The site should be deleted on the grounds of: - impact on wildlife and habitats - impact on public rights of way enjoyed by local people - traffic congestion in

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an already congested area - impact on local infrastructure - schools, doctors, dentists

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1051000 Dianne Wilson**

Agent:

Rep ID: **PDLP_AD2225**

Soundness - Positively Prepared

Loss of green belt. Alternative brownfield sites are available which should be used first. Lack of transparency and information which would make it seem that environmental, social and economic sustainability have not been considered.

Soundness - Justified

The site should be deleted on the grounds of: - loss of view from new development - impact on wildlife and habitats - impact on footpaths, walking, enjoyment of the countryside including impact on Spen Heritage Trail - increased air and noise pollution leading to health issues - access routes are impractical and do not have the capacity to accommodate additional traffic - Flood risk from Nann Beck - doctors and dental surgeries are at capacity - local schools are at capacity -

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Submission document SD5 Kirklees Sustainability Appraisal provides an assessment of all sites and reasonable alternatives. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed

from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spenningsdale Heritage Trail can be addressed at the detailed planning application stage. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1051002 Jack Bentley**

Agent:

Rep ID: **PDLP_AD2221**

Soundness - Positively Prepared

Use brownfield instead of green belt sites

Soundness - Justified

The site is not justified on the grounds of: - scale of development - approx. 400 houses will ruin the area including historical hedges - impact of additional cars - impact on wildlife and habitat around Nann Hall Beck - traffic congestion - land subsidence issues

Proposed Change Requested

Delete allocation H69 from the Plan

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites.The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document

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SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **1051004 Margaret Shaw**

Agent:

Rep ID: **PDLP_AD2222**

Soundness - Justified

The site is unjustified on the grounds of: - poor road infrastructure - limited access to schools and doctors - loss of a natural break between Cleckheaton and Hunsworth - flood risk as Merchants Fields is a flood plain

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69**

Consultee: **1051010 Bessie Holmes**

Agent:

Rep ID: **PDLP_AD2222**

Soundness - Justified

The site is not justified on the grounds of: - no indication of access/exit roads - busy Whitehall Road leading to M62/M606 at one side - development will generate more cars - no bus services - highway network - site is surrounded by country lanes which are unsuitable for additional traffic - shortage of local school places - no sports centre - impact on public footpath - planners should visit during peak times

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & DesignationsParagraph/Site: **H69**Consultee: **1051014 Dorothy Hirst**

Agent:

Rep ID: **PDLP_AD2228****Soundness - Positively Prepared**

The initial plans changed from 318 houses to 400 without consultation with our councillors

Soundness - Justified

The site is not justified on the grounds of: - insufficient information on access. All three are unsuitable as too narrow, residents parking and the access bus.

Proposed Change Requested

Consider the development of brownfield sites prior to green field.

Council Response

No ChangeThe council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation together with consultation on the draft Local Plan (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. SD13 Kirklees Statement of Publication Consultation sets out the consultation arrangements for this stage of the plan preparation. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Paragraph/Site: **H69**Consultee: **1051019 Mark Wilson**

Agent:

Rep ID: **PDLP_AD1461****Soundness - Positively Prepared**

Loss of green belt land when brownfield is available Consultation issues: - Information is not readily available on the website to inform the site and sustainability. - Website is difficult to navigate leading to a lack of transparency

Soundness - Justified

The site allocation is unsound on the grounds of: - impact on wide range of wildlife and natural habitat - impact on locals and ramblers and Spen Heritage Trail - the site forms a natural drainage system - access and parking problems due to narrow roads and impact on Chain Bar. Previous ASDA proposals dismissed on traffic grounds - increased traffic congestion - floodrisk from stream that runs through the sites - no specification for access provided - visit the site to assess impacts

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. The council held two drop in sessions where officers were available to assist the public respond either on-line or through paper submissions. Letters were also sent out to explain how to register on the on-line system and guidance notes provided on how to complete representations on the planning portal. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: H69	Consultee: 1051020 Jack Lambert	Agent:	Rep ID: PDLP_AD2230
Soundness - Justified	The site is not justified on the grounds of: - increased level of traffic generated from development - access to the area is poor especially as its adjacent to one of the busiest motorway junctions in the country		
Proposed Change Requested	Delete allocation H69 from the Plan.		
Council Response	No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.		

Paragraph/Site: H69	Consultee: 1051023 James Priestley	Agent:	Rep ID: PDLP_AD2229
Soundness - Positively Prepared	Loss of green belt		
Soundness - Justified	The site is not justified on the grounds of: - impact on public footpaths running through the site and impact on Spen Heritage Trail - loss of natural, open, scenic views which would be lost forever - impact on the character of the neighbourhood - the proposed road through Mazebrook will create a surge of vehicles travelling through the area and create a rat run - traffic congestion - Chain bar and Birkenshaw roundabout - increased noise and air pollution from additional traffic - current infrastructure with regard to schools, health and roads is at capacity and cannot accommodate growth		
Proposed Change Requested	Delete allocation H69 from the Plan		

Council Response No Change
 The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69** Consultee: **1051028 Margaret Haley** Agent: Rep ID: **PDLP_AD2231**

Soundness - Positively Prepared No consultation on the increased numbers on the site.

Soundness - Justified The site is not justified on the grounds of: - increased CO2 emissions in highly polluted area - loss of greenfields and trees which absorb CO2 - no plan for an access to the site - Flood plain - inadequate water and sewage services - local services such as education, health and transport are over subscribed - local health issues of chest problems and obesity will be adversely affected

Proposed Change Requested Devise a plan to decrease CO2 in the area
 Define access to the site and remove existing hazards
 Install a new water and sewage system not a patch up as problems occur
 Identify where flood water will be directed
 Increase provision for increased health and education prior to any building

Council Response No Change
 The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69

is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1051032**

Eleanor Chambers

Agent:

Rep ID: **PDLP_AD853**

Soundness - Positively Prepared

Loss of green belt and merger with Cleckheaton leading to urban sprawl. Use brownfield as an alternative.

Soundness - Justified

The site is not justified on the grounds of: - impact on the village life of Hunsworth - impact on wildlife and dog walking - impact on infrastructure - where will 600 children go to school. Whitechapel primary School is already at capacity - lack of public transport - traffic congestion already exists on the A58 to Chain bar and Birkenshaw - air pollution will increase with more cars - one of few green belt areas where children can play safely - use brownfield as an alternative - flood risk - road access - details have not been given to residents - social objections to the increase in residents

Proposed Change Requested

Delete allocation H69 from the Plan. Use brownfield sites as an alternative

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.The Nann Hall Beck a UK BAP

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priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69**

Consultee: **1051035 Trevor Hoggart**

Agent:

Rep ID: **PDLP_AD2233**

Soundness - Justified

The site is not justified on the grounds of: - Drub Lane has weight restrictions - ground stability - Mazebrook and surroundings are built on mining land - increased demand for school places will mean it is harder to get a school place - increase in accidents due to more traffic on narrow roads - shopper bus will be affected

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. Part of the site is within a high risk mining area. The site allocation text identifies that a coal risk assessment will be required as part of a detailed planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H69**

Consultee: **1051046 Alan Oldfield**

Agent:

Rep ID: **PDLP_AD1033**

Soundness - Positively Prepared

Brownfield land should be considered first.

Soundness - Justified

SA objectives 1, 3, 4, 7, 8, 9, 10 and 19 not achieved as no jobs created as a result of the development; new education opportunities will not be created; health and social care will not be improved; PROW will be lost; housing not necessary at this green belt site where there are significant other negatives; public transport is poor; and carbon emissions from buildings. There are concerns about the impact on school places and health and social provision, lack of public transport, flooding and impact on the natural beauty of the area.

Proposed Change Requested

Extra school places need to be created before new houses are considered. Need to ensure better public transport is put in places, review public services, including health and social care prior to any new development. Brownfield land should be used first.

Council Response

No Change The council's sustainability appraisal is set out in SD5. The sustainability appraisal is an independent assessment of the likely social, environmental and economic impacts of the plan carried out in accordance with an agreed methodology with the SA consultees. In assessing allocations/designations to be

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included in the local plan, a further assessment has been undertaken as outlined in the site selection methodology where consideration is given as to whether issues can be mitigated. The site allocation text sets out required mitigation measures and potential constraints. All allocations within the local plan will be subject to planning permission and tested against the policies in the plan to ensure that appropriate mitigation is in place to deliver the allocation. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.

Paragraph/Site: **H69**

Consultee: **1051050 David Harpin**

Agent:

Rep ID: **PDLP_AD2235**

Soundness - Justified

The site is not justified on the grounds of: - making a minor road into a major road - highway capacity - too much traffic on a narrow road, issues of parked cars - pedestrian safety especially children

Proposed Change Requested

Justify that road network has capacity to accommodate development safely.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: **H69**

Consultee: **1051054 Kyle Taylor**

Agent:

Rep ID: **PDLP_AD2237**

Soundness - Justified

The site is not justified on the grounds of: - the A58 is already overused causing additional pollution - not enough schools for children with the proposed development - makes streets more crowded leading to increase risk for childrens safety - noise pollution

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to

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ensure school places are available to meet the needs of future growth. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage.

Paragraph/Site: **H69**

Consultee: **1051057 Emma Bentley**

Agent:

Rep ID: **PDLP_AD2239**

Soundness - Positively Prepared Local opinions expressed through local councillors have been ignored

Soundness - Justified

The site is not justified on the grounds of: - A58 is already over used and this would be vastly increased - increase in air pollution from additional traffic - pedestrian safety increased risk to children crossing road to access local school - noise pollution sandwiched between A58 and the motorway - increased traffic congestion through Cleckheaton - lack of school/nursery places for increased population - lack of medical care for increased population - little NHS dentistry capacity - increased population causing anti social behaviours

Proposed Change Requested

Delete allocation h69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1051061 Carol Wright barker**

Agent:

Rep ID: **PDLP_AD2249**

Soundness - Justified

The site is not justified on the grounds of: - Traffic problems generated by additional development - unsafe for children to play out due to increase in traffic - more social service problems - lack of school, dentist, hospital and doctor capacity

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1051063 Dr Elizabeth Jane Bagley**

Agent:

Rep ID: **PDLP_AD3306**

Legally Compliant

There has been insufficient clarity and involvement with the local community and the language used is not easy for the general public to find and understand. Most feel intimidated by the terminology and therefore fail to voice objections.

Soundness - Positively Prepared

Growth within rural Kirklees should be relative to the character, role and function of the villages and their ability to absorb new development

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Soundness - Justified	The site is not justified on the grounds of: - uncertain access routes but all are narrow with parked cars - the scale of the development will double the population and impact on the settlement - no plans to have infrastructure in place prior to building - research has shown that there are 100s of empty homes which could be purchased or rented - the existing infrastructure cannot cope with increase in population - disagree with SA scores for the site - see other representation
Proposed Change Requested	Delete allocation H69 from the Plan.
Council Response	No ChangeThe balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.National planning policy requires each local authority to determine the extent of their housing market area and to meet their housing needs. Kirklees is a self-contained housing market area for local plan purposes and as such the Local Plan evidence base has assessed the housing needs for the district based on national household projections with consideration of local economic aspirations. The Local Plan seeks to meet such housing needs.In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average.

Paragraph/Site: **H69** Consultee: **1051064 Steven Wright Barker** Agent: Rep ID: **PDLP_AD2253**

Soundness - Justified	The site is not justified on the grounds of: - increase in traffic will lead to chaos, safety issues especially for young children playing outside and health issues for air pollution.
Proposed Change Requested	Delete allocation H60 from the Plan.
Council Response	No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.

Paragraph/Site: **H69** Consultee: **1051072 Dean Smith** Agent: Rep ID: **PDLP_AD2245**

Soundness - Justified	The site is not justified on the grounds of: - Traffic - Pollution - Schools full - doctors and dentists full - loss of a village feel due to volume of development
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Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.

Paragraph/Site: **H69**

Consultee: **1051073 Mrs Linda Riley**

Agent:

Rep ID: **PDLP_AD2254**

Soundness - Positively Prepared

lack of consultation on increased numbers of houses

Soundness - Justified

The site is not justified on the grounds of: - environmental and social impact - increased traffic congestion in an already congested area - no alternative public transport except for the access bus - cumulative impact of traffic from other developments in area - proposed Asda development was dismissed on traffic grounds - increase in air and noise pollution from increased traffic - flood risk - situation has got worse over 10 years. Additional development will have a further impact - no access is shown to the site. The three alternatives are all narrow roads with parked cars - impact on wildlife and habitats - impact on footpaths through the site - over development - the proposal will double the size of Hunsworth affecting the character of the area - loss of views - local schools are at capacity so a new school is required - lack of capacity at doctors and dentists - planners should visit the site at peak times to see how congested it is

Proposed Change Requested

Delete allocation H69 from the Plan If H69 is developed then a new school/more doctors/dentists etc must be put in place

Council Response

No Change SD5 sets out the council's sustainability appraisal for the site. The sustainability appraisal is an independent assessment of the likely social, environmental and economic impacts of the plan carried out in accordance with an agreed methodology with the SA consultees. In assessing allocations/designations to be included in the local plan, a further assessment has been undertaken as outlined in the site selection methodology where consideration is given as to whether issues can be mitigated. The site allocation text sets out required mitigation measures and potential constraints. All allocations within the local plan will be subject to planning permission and tested against the policies in the plan to ensure that appropriate mitigation is in place to deliver the allocation. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site

allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1051075 Jean Smith**

Agent:

Rep ID: **PDLP_AD2248**

Soundness - Justified

The site is not justified on the grounds of: - air pollution - traffic generation - merger of Hunsworth and Cleckheaton so no longer a village - lack of capacity at doctors - loss of view - impact on amenity and privacy

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised

by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: H69

Consultee: 1051080 Michelle Danby

Agent:

Rep ID: PDLP_AD2255

Soundness - Justified

The site is not justified on the grounds of: - Air pollution - Schools - Traffic - Wildlife - Double the size of Hunsworth village

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & DesignationsParagraph/Site: **H69**Consultee: **1051082 Barbara Danby**

Agent:

Rep ID: **PDLP_AD2247****Soundness - Justified**

The site is not justified on the grounds of: - over development - it would double the size of Hunsworth - air pollution - wildlife - schools - traffic

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69**Consultee: **1051084 Mrs Julia Pratt**

Agent:

Rep ID: **PDLP_AD854****Soundness - Positively Prepared**

Brownfield sites are available to built on. The number of houses has increased without consultation

Soundness - Justified

The site is not justified on the grounds of: - traffic congestion increase in an area that is already heavily congested and there is a lack of public transport - increase in air/noise pollution in one of worst polluted areas - increase in traffic on Chain bar which is already heavily congested and dangerous - a previous application for a supermarket was refused on grounds of traffic congestion - flood risk and drainage issues from watercourse through site. Development would prevent natural run off - inadequate access - too narrow to accommodate additional traffic, poor visibility and dangerous - impact on wildlife, habitats and eco system impact on public footpaths over development - the village would not feel like a village any more - local primary school is over subscribed - infrastructure should be in place prior to development - loss of views and walks on the doorstep - impact on neighbours

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes

through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. SD13 sets out the council's Statement of Publication Consultation.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. 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With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. 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This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Soundness - Justified	Traffic on the A58 is already high at peak times without the development		
Soundness - Effective	The road infrastructure is unable to support the development		
Proposed Change Requested	Delete allocation H69 from the Plan.		
Council Response	No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.		
Paragraph/Site: H69	Consultee: 1051089 Mrs J Priestley	Agent:	Rep ID: PDLP_AD3308
Legally Compliant	The website is difficult to use and obtain information. The procedure is difficult and time consuming and the jargon bewildering.		
Soundness - Positively Prepared	Loss of green belt. It should be protected for future generations		
Soundness - Justified	The site is not justified on the grounds of: - impact on the footpath which provides easy access for local people and encourages recreation - adverse impact on residents and the infrastructure - provision of school places, dentists and doctors - increase in traffic in an already congested area - access to the development is not specific. The three alternatives are all narrow roads and would increase risks to pedestrians - cumulative impact of other development on traffic - suggest a site visit		
Proposed Change Requested	Delete allocation H69 from the Plan.		
Council Response	No Change The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.		
Paragraph/Site: H69	Consultee: 1051092 Margaret Denny	Agent:	Rep ID: PDLP_AD855
Soundness - Justified	The site is not justified on the grounds of: - traffic congestion on A58		
Proposed Change Requested	Delete allocation H69 from the Plan.		
Council Response	No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.		

Paragraph/Site: **H69**

Consultee: **1051096 MAUAMA BAGJLE GIBBA**

Agent:

Rep ID: **PDLP_AD856**

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Soundness - Justified	The site should be deleted from the Plan on the grounds of: - over development - the size of the development will double Hunsworth so no longer a village - traffic concerns - concerns relating to school places.
Proposed Change Requested	Delete allocation H69 from the Plan.
Council Response	No ChangeThe balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H69** Consultee: **1051098 Jack Denny** Agent: Rep ID: **PDLP_AD857**

Soundness - Justified	The site should be removed as an allocation on the grounds of: - traffic congestion - Chain bar up to Birkenshaw.
Proposed Change Requested	Delete allocation H69 from the Plan.
Council Response	No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69** Consultee: **1051100 Mrs Joanne Cunniffe** Agent: Rep ID: **PDLP_AD858**

Soundness - Positively Prepared	All brownfield sites should be exhausted prior to using green belt/greenfield/scrub land particularly as flooding is a well documented problem. Infrastructure should be in place prior to commencement of development especially roads, decreasing congestion, education and health provision and leisure facilities. The protection of H69 for wildlife should be in council's vision
Soundness - Justified	The site is not justified on the grounds of: - floodrisk and drainage - development of this site will prevent it from being a natural run off and implications of Spen beck - impact on users of the Spen Heritage Trail and consequently impact on healthy lifestyles as many families try to walk to school - impact on character of the area and loss of views - traffic congestion especially A58, Hunsworth Lane and M62 Chain bar roundabout - increase in air and noise pollution - impact on infrastructure of 400 new homes. Lack of local schools will lead to increased travel and impact on community spirit - inadequate and unsuitable access to site - Kilroyd and Mazebrook Avenues - traffic safety - junction of Mazebrook and Drub Lane is already hazardous without further traffic - inadequate sewage system impact on wildlife and habitats - overdevelopment
Proposed Change Requested	Exhaust all brownfield sites in Kirklees before using green fieldPrior to development taking place, infrastructure should be put in placeProtection of H69 on wildlife grounds should be included in the council's vision and aspirations for the area.

Council Response

No Change The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. 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The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage.

Paragraph/Site: **H69**

Consultee: **1051104 Sheriffo gibba**

Agent:

Rep ID: **PDLP_AD1418**

Soundness - Justified

The site should be deleted from the plan on the grounds of: - air pollution traffic congestion - school places - loss of view

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Proposed Change Requested	Delete allocation H69 from the Plan.
Council Response	No ChangeA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The detailed design of the site will be dealt with at a planning application stage and will consider residential amenity.

Paragraph/Site: **H69**

Consultee: **1051107 Professor Carl Bagley**

Agent:

Rep ID: **PDLP_AD862**

Legally Compliant

Insufficient consultation with the local community to render the proposal legally compliant.

Soundness - Justified

The site is not justified in relation to the sustainability report: Sustainability Report unsound: Employment recorded as significant positive will only apply to construction workers as no plans for business development on the site. Education uncertain. The local schools clearly are oversubscribed with no plans for the situation to change in the future with 350 homes to be added. Health - mix of positive and negative - air pollution arising from CO2 adding to the problems of the area with the vast air quality in Kirklees - priority M62. Amenities - negative agree Sustainable Transport - positive - disagree - minimal public transport currently available Landscape negative uncertain- agree. Flooding minor negative - no major issue!!!

Proposed Change Requested

Address sustainability issues as addressed in section 5. A much stronger and systematic process of consultation with the local community is required.

Council Response

No ChangeThe council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. SD13 sets out the council's Statement of Publication Consultation.The sustainability appraisal is an independent assessment of the likely social, environmental and economic impacts of the plan carried out in accordance with an agreed methodology with the SA consultees. In assessing allocations/designations to be included in the local plan, a further assessment has been undertaken as outlined in the site selection methodology where consideration is given as to whether issues can be mitigated. The site allocation text sets out required mitigation measures and potential constraints. All allocations within the local plan will be subject to planning permission and tested against the policies in the plan to ensure that appropriate mitigation is in place to deliver the allocation.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69**

Consultee: **1051109 Liam Mort**

Agent:

Rep ID: **PDLP_AD865**

Soundness - Justified

The site is not justified on the grounds of: - traffic congestion/highway safety - the roads are too busy already - impact on the area - School provision - parents

will have to travel to get their children into a school - increase in air pollution - impact on wildlife - increased flood risk

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69**

Consultee: **1051110 Carole Robinson**

Agent:

Rep ID: **PDLP_AD868**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - Schools are already oversubscribed - Traffic congestion and highway safety - area will become a rat run - Increased flood risk - Health care capacity - will the council build more facilities as part of development - impact on Hunsworth and house buying - why build more homes when houses are for sale - loss of views impact on wildlife

Council Response

No Change The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure

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planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **1051114 Mrs Natalie Marshall**

Agent:

Rep ID: **PDLP_AD871**

Soundness - Justified

The site is not justified on the grounds of: - Flood risk/drainage - development will prevent natural drainage to the area - Capacity at local schools - Whitechapel Primary is over subscribed already. There is no capacity to accommodate the development.

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H69**

Consultee: **1051122 Mr Andrew Cook**

Agent:

Rep ID: **PDLP_AD877**

Soundness - Positively Prepared

Brownfield land in Cleckheaton should be used in preference to green belt

Soundness - Justified

The site is not justified on the grounds of: - impact on the pleasantness and quietness of the area - traffic congestion increased pollution from additional cars

Proposed Change Requested

Use brownfield land in Cleckheaton in preference to green belt>Delete allocation H69 from the Plan

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. Brownfield sites within Cleckheaton have been allocated for housing, mixed use and employment development.The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good

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design and a detailed planning application will be assessed against the criteria set out in this policy. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.

Paragraph/Site: **H69**

Consultee: **1051125 Douglas Barlow**

Agent:

Rep ID: **PDLP_AD880**

Soundness - Positively Prepared Green belt land should not be developed. Redevelop derelict land in Cleckheaton as an alternative

Soundness - Justified The site should be deleted as an allocation on the grounds of: - impact on wildlife and environmental benefits - flooding - impact on infrastructure - local schools are at capacity - lack of social facilities to support additional residents including swimming pools, libraries - traffic congestion - need more green space for sport and play - safety

Proposed Change Requested Green belt land should not be developed. Redevelop derelict land in Cleckheaton as an alternative

Council Response No Change The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Brownfield sites within Cleckheaton have been considered for housing, mixed use and employment allocations. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the

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impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: **H69**

Consultee: **1051129 Shane Barlow**

Agent:

Rep ID: **PDLP_AD878**

Soundness - Justified

The representation is on behalf of residents of Links Avenue. The site should be deleted as a housing allocation on the grounds of: - traffic congestion - the traffic on the A58 from Chainbar, Birkenshaw roundabout and Hunsworth Lane is at a standstill at peak times. The area cannot cope with an additional 700 cars. - increased air pollution from additional cars. - infrastructure capacity - all local schools are oversubscribed. No capacity to accommodate additional children. Doctors and dentists also have no capacity - impact on wildlife - increased flood risk - is there a need for additional houses in Hunsworth as there are many for sale - overdevelopment - the development will double the size of Hunsworth

Proposed Change Requested

Delete allocation h69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **1051133 Margaret Barlow**

Agent:

Rep ID: **PDLP_AD1042**

Soundness - Positively Prepared

No consultation from Kirklees about the development of this site.

Soundness - Justified

The site is not justified on the grounds of: - the impact has not been accurately assessed and current infrastructure is stretched to breaking point. - flood risk - open land acts as a natural soakaway - Plant more woods than houses to prevent flooding - access and traffic cannot be accommodated - highway safety - additional traffic will be a risk to children - impact on wildlife - lack of infrastructure, schools, amenities, dentists and doctors - traffic congestion - cars queuing on Chain bar roundabout

Soundness - Consistent with National Policy

Loss of green belt.

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward

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planning and investment including GP estates strategies and hospital infrastructure needs. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **1051136 Mrs Elaine Macleod**

Agent:

Rep ID: **PDLP_AD1043**

Soundness - Justified

Object to the site on the grounds of: - increased traffic congestion - the A58 to Chain bar - increased air pollution/noise - this has increased since Burnleys development and it is one of worst polluted areas already - lack of infrastructure - doctors, schools oversubscribed - inadequate access - narrow roads, dangerous for residents

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. Environmental Health has raised the issue of potential impact of noise on residential amenity but considers that this can be addressed through the provision of a noise assessment at the planning application stage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1051142 Jack Barlow**

Agent:

Rep ID: **PDLP_AD1040**

Soundness - Positively Prepared

Loss of green belt. No consultation from Kirklees about the development of this site.

Soundness - Justified

The site is not justified on the grounds of: - the impact has not been accurately assessed and current infrastructure is stretched to breaking point. - flood risk - open land acts as a natural soakaway - Plant more woods than houses to prevent flooding - access and traffic cannot be accommodated - highway safety - additional traffic will be a risk to children - impact on wildlife - lack of infrastructure, schools, amenities, dentists and doctors - traffic congestion - cars queuing on Chain bar roundabout

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes

through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation (SD12). This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. SD13 sets out the council's Statement of Publication Consultation.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **1051145 Anthony Haigh**

Agent:

Rep ID: **PDLP_AD1048**

Soundness - Justified

The site should be deleted on the grounds of: - traffic congestion, highway capacity and highway safety issues from increased traffic - lack of infrastructure - schools, doctors, dentists hospitals extremely full - impact on wildlife and protected species

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set

out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69**

Consultee: **1051146**

Nikki Anne Spear

Agent:

Rep ID: **PDLP_AD1038**

Soundness - Justified

The site is not justified on the grounds of: - air pollution in particular Chain bar roundabout. Additional traffic will increase this and impact on health and nearby schools - flooding - already subject to flooding due to beck - housing - agree for need for housing but should be in a location with appropriate environmental capacity - lack of infrastructure - schools, dentists, doctors. Increased pressure will impact on quality of life for existing residents - sense of community will be eroded with erosion of space and urban sprawl - road congestion and highway capacity inadequate to deal with increased traffic - inadequate access - Kilroyd on to A58, Mazebrook on to Drub Lane, links onto Hunsworth Road, Brookfields onto Bradford Road - question the need for business sheds when plenty are empty and available elsewhere

Proposed Change Requested

Delete allocation h69 from the Plan.

Council Response

No ChangeA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.Floodrisk/Drainage – Spen Beck The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. Air Pollution/Chain barA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of

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overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The site has been reallocated from a mixed use site (MX1914) to a housing allocation (H69).

Paragraph/Site: **H69**

Consultee: **1053401 Barry Mort**

Agent:

Rep ID: **PDLP_AD888**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - Traffic congestion - A58, A638 - Highway safety - increased level of accidents from more cars - New infrastructure - doctors, dentists - Loss of play space for children - Flooding - Impact on wildlife - Loss of village character

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: **H69**

Consultee: **1053402 Diane Lambert**

Agent:

Rep ID: **PDLP_AD892**

Legally Compliant

The consultation requires skills and access to information electronically so is therefore not accessible to all.

Soundness - Justified

The site is not justified on the grounds of: - Scale of the proposals - More detailed plans need to be accessible and viable - Retain green space

Proposed Change Requested

Detailed plans required which are accessible and viable

Council Response

No Change Copies of consultation documents were available on-line and in paper form at deposit locations together with paper copies of maps. Consultation responses were accepted on the on-line system, by e-mail and by post. Drop in sessions were held where officers were available to assist complete forms either on-line or on paper. Guidance notes were also produced. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: **H69**

Consultee: **1053403 David Webster**

Agent:

Rep ID: **PDLP_AD896**

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Soundness - Positively Prepared	The allocation of this site is in direct conflict with the Noise Act 1996
Soundness - Justified	Concerns raised about the site include: - increased noise due to construction of the site in conflict with Noise Act 1996 - increased road traffic with no plans to improve road/structures - flood risk - as development would remove natural drainage - increased crime rate during and after construction - insufficient services to meet needs
Proposed Change Requested	Reduce number of houses built by half or delete allocation H69Identify measures to address traffic issuesClear plans to increase public services to meet development needs
Council Response	No ChangeThere is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1053404**

Richard Mitchell

Agent:

Rep ID: **PDLP_AD897**

Soundness - Justified	The site is not justified on the grounds of: - impact on the area and residential amenity though loss of green area, quietness and impact of increased traffic - air/noise pollution - traffic congestion/highway capacity - poor infrastructure which is unable to cope with additional 300/400 cars and lead to gridlock - highway safety - impact of increased vehicles
Proposed Change Requested	Delete allocation H69 from the Plan.
Council Response	No ChangeThe balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application.The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality

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Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage.

Paragraph/Site: **H69**

Consultee: **1053406 Christopher Annetts**

Agent:

Rep ID: **PDLP_AD889**

Soundness - Justified

The site is not justified on the grounds of: - Traffic congestion/highway capacity - Highway safety - hazardous bend - Noise pollution - Impact on infrastructure - capacity of schools, doctors, dentists

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1053407 Janice Walton**

Agent:

Rep ID: **PDLP_AD898**

Soundness - Justified

Some of the issues relating to the site are: - traffic congestion - already heavy traffic on the A58 leading to Chain Bar roundabout - no local amenities - schools are already full - no local transport - only access bus due to narrow roads - the last proposal locally for Asda was rejected due to increase of traffic around Chain Bar - floodrisk - Merchant Fields floods - no obvious access to proposed development, narrow turning onto Mazebrook - where are all cars going - with 400 additional cars proposed - develop alternative site off Westgate - inadequate access - access to the site is too narrow for emergency vehicles impact on public footpaths on site already proposed development further up A58 so more congestion highway capacity - the A58 can only accommodate so much traffic at peak times

Proposed Change Requested

Consider development off Westgate as an alternative

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.

Paragraph/Site: **H69**

Consultee: **1053409 Carol and Keith Walker**

Agent:

Rep ID: **PDLP_AD899**

Soundness - Justified

Insufficient infrastructure to deal with increase in population including schools, doctors and transport. Concerns about impact on the environment and residential amenity.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69

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within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: **H69**

Consultee: **1053410 Robert Jensen**

Agent:

Rep ID: **PDLP_AD901**

Soundness - Justified

The site is not justified on the grounds of: - traffic congestion/highway capacity which will worsen with the development - loss of wildlife and walks - loss of views - impact on infrastructure including schools which are already struggling.

Proposed Change Requested

Delete allocation H69 from the Plan.Consider alternatives to H69 away from Chain Bar and the A58, M606 link roads.

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1053411 Neil Barnard**

Agent:

Rep ID: **PDLP_AD902**

Soundness - Positively Prepared

Object to the use of green belt when brownfield sites are available. Brownfield should be developed first.

Soundness - Justified

The site is not justified on the grounds of: - increase in traffic congestion - air and noise pollution - potential for increased flood risk on/from Merchants Field - disruption of wildlife and habitats - disruption of footpaths and Spen Heritage Trail - disruption of utility services - loss of existing views overlooking the site

Proposed Change Requested

Delete allocation H69 from the Plan and retain as green beltDevelop on an alternative site which is brownfield

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and

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Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: H69	Consultee: 1053412 Marie Russell	Agent:	Rep ID: PDLP_AD903
Soundness - Positively Prepared	Loss of green belt.		
Soundness - Justified	The site should be rejected on the grounds of: - no safe access from any point - increase in traffic congestion - A58 and Chain Bar already bad - no need for an extra 400+ homes on such a small site. Where is the evidence to prove this development is necessary - increase in flood risk		
Proposed Change Requested	Delete allocation H69 from the Plan.		
Council Response	No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.		

Paragraph/Site: H69	Consultee: 1053414 Lee Myers	Agent:	Rep ID: PDLP_AD904
Soundness - Justified	The proposed development is unsound on the grounds of: - Schools - local schools are oversubscribes and have no capacity resulting in children being placed in schools out of the local area - traffic congestion/highway capacity - roads around Cleckheaton are already congestion and cannot cope with further development		
Proposed Change Requested	Delete allocation H69 from the Plan.		
Council Response	No Change The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two		

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accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69**

Consultee: **1053415 Simon Priestley**

Agent:

Rep ID: **PDLP_AD905**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - drainage/flood risk - the site is sodden permanently - inadequate access - it is already difficult to get in and out of Links Avenue, how will hnew homes get safe access and egress - traffic congestion - Hunsworth Lane, A58 and Chain Bar are already congested and have no capacity to accommodate additional traffic - merger of Cleckheaton and Hunsworth and loss of last green space between them

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.

Paragraph/Site: **H69**

Consultee: **1053416 Philip Smith**

Agent:

Rep ID: **PDLP_AD906**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - Hunsworth needs to remain a village and cannot withstand another 400 houses - increase in pollution which is already worst in the area - traffic congestion - already bad at peak times and queues growing daily causing pollution - the green belt areas and wildlife inhabitants will be greatly endangered - lack of infrastructure capacity including schools and public services oversubscribed - the community centre is at the heart of the Hunsworth which would be lost if village merged with Cleckheaton.

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeThe balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application.The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road

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will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1053417 Liam Phelan**

Agent:

Rep ID: **PDLP_AD907**

Soundness - Justified

The site should be deleted from the Plan on the grounds of: - traffic congestion is bad already and additional housing would increase the problem - safe access and egress has not been considered. Links Avenue is already a problem - school capacity - construction of development will impact on health - vibration has not been taken into account - ground stability - existing houses are on a hill so building on soft flooded ground could cause damage - loss of views

Proposed Change Requested

Delete allocation H69 from the allocation.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy. The site allocation box acknowledges that part of the site lies within a high risk mining area.

Paragraph/Site: **H69**

Consultee: **1053418 Sally Danskin**

Agent:

Rep ID: **PDLP_AD909**

Soundness - Justified

The site is not justified on the grounds of: - traffic congestion/volume around the area and resulting pollution - lack of public transport as alternative to the car - school capacity - insufficient school places currently - will people move to an area without required facilities - loss of view and impact on house prices on Kilroyd Drive, Kilroyd Avenue and surrounding areas - impact on Hunsworth and Cleckheaton

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69

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within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: **H69**

Consultee: **1053420 Claire Boon**

Agent:

Rep ID: **PDLP_AD911**

Soundness - Positively Prepared

Loss of green belt

Soundness - Justified

The site should be deleted from the plan on the grounds of: - damage to village of Hunsworth and impact on quality of life - impact on wildlife and environment - highway capacity/traffic congestion/highway safety - hard enough already to cross Whitehall Road - inadequate and unsafe access via Kilroyd Avenue - traffic congestion - Chain Bar leading to more pollution - resident safety - impact on children playing out on Kilroyd and Links Avenue - school capacity - alternative sites available in and around Cleckheaton such as old Tesco site and Moorend School - noise pollution -

Proposed Change Requested

Remove this site from any housing plans.The allocation should have a separate access road not on Kilroyd or Links Avenue and/or a new crossing for the road.No building on weekends or after 6pmConstruction another first or nursery school to serve the area.

Council Response

No ChangeThe green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The process for considering reasonable alternatives for development is outlined in SD5 Kirklees Sustainability Appraisal.There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage.

Paragraph/Site: **H69**

Consultee: **1053422 Andrew Mcdonald**

Agent:

Rep ID: **PDLP_AD914**

Soundness - Justified

This site is not justified on the grounds of: - pollution - traffic congestion - loss of wildlife - no room in schools - Traffic on Kilroyd Avenue

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Proposed Change Requested	New schoolsSeparate access pointRemove this site from any housing plans
Council Response	No ChangeA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H69** Consultee: **1053423** **Craig Boon** Agent: Rep ID: **PDLP_AD915**

Soundness - Justified The site should be deleted from the Plan on the grounds of: - Pollution - Too much traffic - Loss of wildlife - No room in schools - Traffic on Kilroyd Avenue

Proposed Change Requested Delete allocation H69 from the Plan.

Council Response No ChangeA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application.

Paragraph/Site: **H69** Consultee: **1053424** **Karl Denby** Agent: Rep ID: **PDLP_AD916**

Soundness - Justified The site should be deleted from the Plan on the grounds of: - traffic congestion around Barm Road, Cliff Lane which is already bad and queues to Chain bar roundabout.

Proposed Change Requested Delete allocation H69 from the Plan.

Council Response No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69** Consultee: **1053425** **Beata Knefel-Kruszelnicka** Agent: Rep ID: **PDLP_AD918**

Soundness - Justified The site should be deleted as an allocation on the grounds of: - air pollution - traffic congestion and the site text already implies that the site will be difficult to

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develop until Highways England constructs a link from M62 westbound to the M606 to take traffic from Chain bar - overdevelopment - the proposal will double the size of Hunsworth - merger with Cleckheaton will lead to loss of unique character of Hunsworth

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.

Paragraph/Site: **H69**

Consultee: **1053426 Jaroseaw Kruszelnicka**

Agent:

Rep ID: **PDLP_AD926**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - air pollution - traffic congestion and the site allocation text implies that will be difficulties until Highways England construct a link from M62 to M606 to take traffic from Chain Bar. - over development - the proposal will double the size of the village and no account has been taken of distinct local community which will be lost if merged with Cleckheaton

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent.

Paragraph/Site: **H69**

Consultee: **1053427 Adrian Laycock**

Agent:

Rep ID: **PDLP_AD3623**

Soundness - Justified

Traffic Schools Doctors

Proposed Change Requested

Remove site

Council Response

No ChangeRequired mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.The impact of development on school place planning has been assessed through the infrastructure planning work between

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the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1053428 Jolene Riley**

Agent:

Rep ID: **PDLP_AD927**

Soundness - Justified

The site should be deleted from the Plan on the grounds of traffic congestion which is already a problem in relation to A58.

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69**

Consultee: **1053430 Simon Bilton**

Agent:

Rep ID: **PDLP_AD928**

Soundness - Positively Prepared

Loss of green belt

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - number of cars in concentrated area and impact of additional 500+ extra vehicles - air pollution - traffic congestion - A58, A638, M62, M606 Chain Bar - exit from new development will cause huge tail backs - exit from Kilroyd Drive/Drub Lane onto A58 already a bottleneck, no capacity - multiple access roads will create rat runs - on Kilroyd Drive there is no room for additional traffic due to restricted on street parking - impact on quiet community which will no longer thrive - devaluation of property due to concentrated, modern houses - lack of amenities - schools, buses, shops and parking

Proposed Change Requested

Delete allocation H69 from the Plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: **H69**

Consultee: **1053431 Christopher Bentley**

Agent:

Rep ID: **PDLP_AD929**

Soundness - Justified

The site should be deleted as an allocation on the grounds of: - access- already difficult to access A58 from upper part of village - traffic congestion - road from East Bierley is already used as a cut through for traffic due to congestion. Increased number of vehicles will negatively affect the centre of the village. A58 is already overused. - government's noise and pollution targets will be exceeded - Cleckheaton town centre cannot accommodate additional traffic - no capacity at local schools, dentists or GP services - increased danger to children to cross A58 and Lower Cleckheaton road from Chain Bar

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Proposed Change Requested	Delete allocation H69 from the Plan.
Council Response	No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage.

Paragraph/Site: **H69** Consultee: **1053432 Shirley Bilton** Agent: Rep ID: **PDLP_AD930**

Soundness - Justified The site should be deleted as an allocation on the grounds of: - traffic congestion - 360 houses is likely to generate an extra 720 cars needing access. Kilroyd Drive is already regularly congested especially at peak times. A58 regularly has cars queuing on it back to Birkenshaw and cannot accommodate any more cars. - access - 2 accesses are required and this would create a rat run and a danger to children

Proposed Change Requested	Delete allocation H69 from the Plan.
Council Response	No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69** Consultee: **1053434 Mr Ian Smith** Agent: Rep ID: **PDLP_AD1045**

Soundness - Positively Prepared	Build on brownfield sites such as Westgate nearer the town centre. Initial plan was for 318 houses which has risen to 400 without consultation
Soundness - Justified	The site is not justified on the grounds of: - traffic congestion on the A638 is increasing on a daily basis when there are incidents on the M62, M606, Chain bar roundabout and traffic cuts through A58 and Drub Lane - highway safety - there are many elderly residents in the village and also a children's playground which will suffer from increased traffic - air pollution - development will increase this. previous Asda application refused due to similar conditions Flood risk - Merchants fields is prone to flooding impact on wildlife -impact on public footpaths and the Spen heritage Trail - overdevelopment - the development will double the size of the area and impact on its character - detrimental to residential amenity - lack of infrastructure - schools, doctors, dentists - the site should be visited at peak time
Proposed Change Requested	Delete allocation h69 from the Plan.
Council Response	No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled

sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The site has been reallocated from a mixed use site (MX1914) to a housing allocation (H69). Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The site lies within flood zone 1. The council acknowledges that there is some risk of surface water drainage and that some land may be required within the site allocation to address this. With regard to surface water flood risk, some land may be required. A requirement for a flood risk assessment as part of a detailed application is required within the Local Plan site allocation text for H69. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. Environmental Health has raised the issue of potential impact of noise on residential amenity but considers that this can be addressed through the provision of a noise assessment at the planning application stage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: H69	Consultee: 1058570 Cllr John Lawson	Agent:	Rep ID: PDLP_AD1170
Soundness - Positively Prepared	This allocation was formerly for a mixed use site MX1914. It subsequently became a wholly Housing site H69 in the Publication Plan, with no consultation with local residents.		
Soundness - Justified	Site allocation H69 is opposed on the grounds of: - it places too great a burden on the local community (i.e. Hunsworth), in that it is a huge increase in the local population - the consultation notes indicates considerable problems in the development of the site in relation to remediating the local highway network.		
Soundness - Effective	If Highways England do not come forward with a scheme for the M62/M606 question whether this site is financially viable if the developer has to pick up all the costs of remediating the local highway network.		
Proposed Change Requested	Delete allocation H69 from the Plan.		
Council Response	No ChangeThe council’s Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council’s Statement of Pre-Consultation (SD12). This document provides full details on the consultation		

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process and how comments were considered as part of the preparation of the Publication draft Local Plan. SD13 sets out the council's Statement of Publication Consultation. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue.

Paragraph/Site: **H69**

Consultee: **1059421 B and N Taylor**

Agent:

Rep ID: **PDLP_AD1273**

Soundness - Justified

The traffic in the area is bad enough as it is, without the addition of another 500 plus cars. The pollution from this is bad enough without more vehicles. The children have to walk to school through all this traffic, as there are no bus service up Hunsworth Lane, this isn't doing them any good breathing in all the fumes. The local schools had places for 60 pupils this year, and they had applications from over 100, and there is no plans to build a new school. The access to this site is very limited, and could cause some accidents.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H69**

Consultee: **1059965 Andrew Egglestone**

Agent:

Rep ID: **PDLP_AD1721**

Soundness - Justified

There are concerns about the increase in traffic which could cause gridlock in an already busy area; increase in pollution levels which are already amongst the highest in the area and natural drainage is already a problem which will worsen if the houses are built. The fields are regularly used by walkers and the local wildlife is enjoyed by many. Building on this land would reduce people's ability to exercise and to enjoy the wildlife. There are not enough facilities for many new houses, particularly schools and GPs. This proposal will change the semi-rural nature of the area and could negatively affect the value of the property.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes

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creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H69**

Consultee: **1059968 Nicholas Whewall**

Agent:

Rep ID: **PDLP_AD1723**

Soundness - Justified

The area is already gridlocked at rush hour and it takes 20 minutes to drive from Barm Road to Chain Bar on a morning. There is not enough parking in Cleckheaton Town Centre. We go walking on the site with kids and the development, noise and dirt from construction will affect our quality of life.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application. There is a potential impact of noise on residential amenity but this can be addressed through the provision of a noise assessment at the planning application stage. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: **H69**

Consultee: **1067295 K D Hill**

Agent:

Rep ID: **PDLP_AD3383**

Legally Compliant

Standard form is too difficult to fill in. Website is too complicated to navigate.

Soundness - Justified

Traffic is already congested in the area - Chain Bar roundabout. Access is via narrow roads. Cumulative impact of neighbouring allocations will increase congestion. Road safety issues in area. Merchant Fields is prone to flooding. Wildlife will be affected - herons, foxes, crested newts, buzzards and bats. Loss of recreational space. PROW cross the site. Village will double in size and impact on character of area. Views will be lost for existing residents. Primary school is at capacity.

Proposed Change Requested

Remove H69 from the plan.

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the

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determination of a planning application. The masterplan considers potential pedestrian routes through the development to connect to the wider network. The masterplan states that development would be designed to face onto to these routes creating high levels of natural surveillance. It is considered that the relationship of the site to the Spen Heritage Trail can be addressed at the detailed planning application stage. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: **H69**

Consultee: **1068352 Mr Mark Butterfield**

Agent:

Rep ID: **PDLP_AD3615**

Soundness - Justified

Roads are already congested. Traffic problems mean that it will be difficult to develop the site until Highways England constructs a link from M62 to M606 to take the traffic from chain bar. Development will double the size of the village. Loss of green belt loss of distinct local community due to merging with Cleckheaton. Loss of open space Negative impact on wildlife

Council Response

No Change Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4. A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will require 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. The Nann Hall Beck a UK BAP priority habitat flows down the east side of the site. The site also includes hedgerows a UK BAP priority habitat. An area of 0.28ha has been removed from the developable area retaining 11.84ha. Further the Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity which will be used in the determination of a planning application. The site promoter has provided a masterplan SS6_H69 to promote good design of the site. Policy PLP24 seeks to promote good design and a detailed planning application will be assessed against the criteria set out in this policy.

Paragraph/Site: **H69**

Consultee: **1068387 Mr Ben Yates**

Agent:

Rep ID: **PDLP_AD3616**

Soundness - Justified

Loss of green belt, merging of towns - loss of natural boundary between sites. Use brownfield first. Congestion will increase. Increase in air pollution.

Proposed Change Requested

Remove the site from the plan

Council Response

No Change The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into

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subsidising brownfield sites (brownfield fund) and infrastructure. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – section of the Publication Plan. BP17 Settlement Appraisal Paper considers opportunities for development. This has informed the spatial strategy for the Plan. The site selection process as set out in the Local Plan methodology statement Part 2 identifies the process for assessing the suitability of individual sites. The site has been allocated as part of meeting the council's objectively assessed needs and the suitability of the site has been assessed in accordance with the council's local Plan methodology. The numbers identified for the site are indicative and may change subject to a detailed planning application. The green belt in this location forms part of a reasonably extensive area separating Cleckheaton and Gomersal. The existing settlement form and land use pattern presents numerous opportunities for rounding off and infilling without significant detriment to the purposes of the green belt. H69 is a contained area which is well related to the existing settlement and presents an opportunity for rounding off. The site follows features on the ground, including the line of Nann Hall Beck to the east. The size of the site presents opportunities to retain the setting of the beck and its associated important wildlife habitats. The site is agricultural but its containment and the degree of overlooking by existing development limits its appearance as countryside, particularly at its western extent. The north east of the site is on rising ground and could therefore be prominent. Required mitigation measures to address impact on the operation of the Strategic Road Network was outlined in the site allocation text to H69 within the Kirklees Publication Draft Local Plan. Following further consultation with Highway England the following Proposed Modification AD-MM32 is set out in Submission document SD4.A masterplan has been submitted by the site promoters SS6 – H69 which identifies access points off Kilroyd Drive and Hunsworth Lane. Technical consultees support that two accesses are required. Access off Hunsworth Road will required 2.4m x 43m (30mph speed limit) visibility splays with a secondary access obtained from Brookfield View or Kilroyd Drive or Mazebrook Avenue. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The site box for H69 refers to the requirement for an Air Quality Impact Assessment at the time of a planning application.

Paragraph/Site: **H508** Consultee: **942469 Messrs Brierley, Hirst and Nevin** Agent: **941849 Iain Bath** Rep ID: **PDLP_AD1969**

Council Response Support noted.

Paragraph/Site: **H508** Consultee: **943957 Mr Ian Smith** Agent: Rep ID: **PDLP_AD3733**

Soundness - Justified By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development.

Soundness - Consistent with National Policy Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

Proposed Change Requested An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of this Listed Building and what impact the loss of this undeveloped site and its subsequent development might have upon its significance.

Council Response No ChangeCorrespondence 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).

Paragraph/Site: **H509** Consultee: **942142 unknown** Agent: **950095 Mr Jonathan Dunbavin** Rep ID: **PDLP_AD1831**

Soundness - Justified The Fieldhead Farm site performs better than this site. The promotion of unsustainable sites that contribute to Green Belt purposes or poor performance in the SA are not justified in preference to release of this site

Council Response No ChangeFull consideration of the likely impacts of the Local Plan’s strategv. policies and individual site allocations has been considered as part of the

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Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district’s housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.

Paragraph/Site: **H509** Consultee: **942409** Agent: **950095** **Mr Jonathan Dunbavin** Rep ID: **PDLP_AD1809**

Soundness - Justified The Lower Blacup Farm site (H366) performs better than this site. The promotion of unsustainable sites that contribute to Ggreen Belt purposes or poor performance in the SA are not justified in preference to release of this site.

Council Response The allocation should be deleted. It performs less well than alternatives such as site H366

Paragraph/Site: **H509** Consultee: **961779** **Mr Mark Woodall** Agent: Rep ID: **PDLP_AD2508**

Soundness - Justified In the Sustainability Appraisal Report for the Draft Kirklees Local Plan, the notes for this site state that a flood zone runs from the south to north of the site. The comment is that this risk of flooding is “therefore a significant negative”. Any future homeowners on this site will have a risk of their homes being affected by floodwater. The winter of 2015/2016 did have flooding on this land.

Proposed Change Requested Remove this site from housing allocation.

Council Response No ChangeIt is acknowledged that parts of the site lie within Flood risk zone 2 and 3. Modelling may be required to identify site specific flooding characteristics. Ideally development should be confined to Flood zone 1. Further mitigation messages can be put in place at the time of a detailed planning application.

Paragraph/Site: **H509** Consultee: **965359** **Mr Harold Ibbotson** Agent: Rep ID: **PDLP_AD3331**

Soundness - Positively Prepared Encourage (insist) on the use of brownfield sites and leave the greenfields alone.

Soundness - Justified The roads around Cleckheaton are already far too busy. Hospital, schools and GP's would find the increase in housing difficult to handle.

Soundness - Consistent with National Policy Will create urban sprawl.

Council Response No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district’s housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The site is bordered by residential development to the west and north on Brookfield View and is part Brownfield and part Greenfield. No significant constraints have been identified which could not be mitigated against at the detail planning application stage. The site has not been protected as a priority employment site (PEA) as it is considered that there are sufficient and available industrial premises of equivalent quality or better that would compensate for the loss of the site. A considerable area is allocated as a PEA to the west and north west of the site. Site access can be achieved from Brookfield Road. No other issues have been identified by transport technical consultees.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees

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and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: H509	Consultee: 1048637	Mr Darren Wilds	Agent:	Rep ID: PDLP_AD320
Soundness - Justified	The site is unsuitable for development for the following reason/s: - Floodrisk from Nann Hall beck.			
Council Response	No ChangeIt is acknowledged that parts of the site lie within Flood risk zone 2 and 3. Modelling may be required to identify site specific flooding characteristics. Ideally development should be confined to Flood zone 1. Further mitigation messages can be put in place at the time of a detailed planning application.			
Paragraph/Site: H509	Consultee: 1049421	Mrs Sarah Carr	Agent:	Rep ID: PDLP_AD593
Soundness - Justified	The site should be deleted from the Plan on the grounds of: This land floods - badly. The stream adjacent bursts it banks in heavy rain. The field has frequently been under water. Photographic evidence - is available if required The stream and fields are an area for wildlife - including water voles, kingfishers and herons. Air pollution - one of the worst areas in West Yorkshire already. Adding to an already congested traffic area. Emergency services already struggling to access homes in and around Brookfield View Lack of school places currently.			
Proposed Change Requested	Delete allocation H509 from the Plan.			
Council Response	No ChangeIt is acknowledged that parts of the site lie within Flood risk zone 2 and 3. Modelling may be required to identify site specific flooding characteristics. Ideally development should be confined to Flood zone 1. Further mitigation messages can be put in place at the time of a detailed planning application.The Nann Hall Beck and associated mixed deciduous woodland, UK BAP priority habitats run down the side of this proposed allocation. An area of 0.26 ha has been removed from the site area to accommodate mitigation measures.Site access can be achieved from Brookfield Road. No other issues have been identified by transport technical consultees.No objections have been received from environmental health in relation to air quality. However, a contaminated land report phase 1 report would be required.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.			
Paragraph/Site: H509	Consultee: 1059968	Nicholas Whewall	Agent:	Rep ID: PDLP_AD1724
Soundness - Positively Prepared	We go walking on the site with kids and the development, noise and dirt from construction will affect our quality of life.			
Soundness - Justified	Objection to H509 as the area is already gridlocked at rush hour and it takes 20 minutes to drive from Barm Road to Chain Bar on a morning. There is not enough parking in Cleckheaton Town Centre. We go walking on the site with kids and the development, noise and dirt from construction will affect our quality of life.			
Council Response	No ChangeThe site is bordered by residential development to the west and north on Brookfield View and is part Brownfield and part Greenfield. No significant constraints have been identified which could not be mitigated against at the detail planning application stage. Site access can be achieved from Brookfield Road. No other issues have been identified by transport technical consultees.No objections have been received from environmental health in relation to air quality. However, a contaminated land report phase 1 report would be required.			
Paragraph/Site: H640	Consultee: 1045990	Cllr Kath Pinnock	Agent:	Rep ID: PDLP_AD1983
Soundness - Effective	I do not consider that this is a sensible use of this site at the present time. It is currently a live industrial site and there have been no indications that the users wish to relocate			
Council Response	No ChangeThe site has a willing landowner and is consistent with national policy.			
Paragraph/Site: H640	Consultee: 1049393	Cllr Andrew Pinnock	Agent:	Rep ID: PDLP_AD579
Soundness - Effective	I do not consider that this is a sensible use of this site at the present time. It is currently a live industrial site and there have been no indications that the users wish to relocate			

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Council Response	No changeThe site has a willing land owner and is consistent with national policy.
Paragraph/Site: H640	Consultee: 1058570 Cllr John Lawson Agent: Rep ID: PDLP_AD1996
Soundness - Effective	I do not consider that this is a sensible use of this site at the present time. It is currently a live industrial site and there have been no indications that the users wish to relocate
Council Response	No ChangeThe site has a willing landowner and is consistent with national policy.
Paragraph/Site: H708	Consultee: 943957 Mr Ian Smith Agent: Rep ID: PDLP_AD3734
Soundness - Justified	By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of these Listed Buildings or what harm might result to those elements which contribute to their significance by its eventual development.
Soundness - Consistent with National Policy	Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.
Proposed Change Requested	An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.
Council Response	No changeCorrespondence 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).
Paragraph/Site: H783	Consultee: 943957 Mr Ian Smith Agent: Rep ID: PDLP_AD3737
Soundness - Justified	By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of these Listed Buildings or what harm might result to those elements which contribute to their significance by its eventual development.
Soundness - Consistent with National Policy	Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.
Proposed Change Requested	An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.
Council Response	No changeCorrespondence 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

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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).

Paragraph/Site: **H198** Consultee: **943957** **Mr Ian Smith** Agent: Rep ID: **PDLP_AD3739**

Soundness - Justified By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development

Soundness - Consistent with National Policy Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

Proposed Change Requested An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of this Listed Building and what impact the loss of this undeveloped site and its subsequent development might have upon its significance.

Council Response No ChangeCorrespondence within BP28 (dated 24th 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).

Paragraph/Site: **H442** Consultee: **942144** **unknown** Agent: **941843** **Mr James Hobson** Rep ID: **PDLP_AD1973**

Council Response No ChangeSupport noted

Paragraph/Site: **H442** Consultee: **942548** **Colin Lenk** Agent: Rep ID: **PDLP_AD1117**

Soundness - Justified The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested Retain as green belt.

Council Response No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442** Consultee: **942554** **Mrs Janet Worthington** Agent: Rep ID: **PDLP_AD1034**

Soundness - Justified The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances

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for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested

Retain as green belt.

Council Response

No changeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.It is not considered that there will be a major impact on the mainline network.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **942574**

Allan & Eileen Smith

Agent:

Rep ID: **PDLP_AD1254**

Soundness - Positively Prepared

- No evidence of exceptional circumstances allowing for change from green belt. - Booklet refers to support for rejection of housing development at Roberttown if influenced decision how has this been overturned by Strata homes.

Soundness - Justified

- Footpath across site shows importance of open area to well-being of local community. - Uninterrupted views, no tree boundary surrounding proposed site. - Trees growing across land sustain wildlife. - Challenge Strata homes claim that there is an uninterrupted row of housing down Roberttown Lane on the opposite side of the road to the proposed development. - Strata homes submission not showing true picture, what site means to community and detrimental impact. - Tan Hall Beck half a mile to north east would not help run off. Good number of houses would use drains in Richmond Park Avenue, already been issues when there is excessive rainfall. - Primary school in village and secondary Spen Valley Academy are full - Traffic assessments done when large amount of traffic not prevalent. Safety of children, Spen Valley Academy, Police deployed to ensure Roberttown not gridlocked. - Roberttown village road used as rat run, dramatic increase in road usage.

Proposed Change Requested

- Site removed from housing allocation and put back to Green Belt.

Council Response

No ChangeExceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district.No objections have been received from West Yorkshire Ecology Service on this site.No objections have been received from technical consultees on drainage.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.No safety issues have been raised.

Paragraph/Site: **H442**

Consultee: **942574**

Allan & Eileen Smith

Agent:

Rep ID: **PDLP_AD288**

Soundness - Justified

Area will be left without open space. Area already experiences a large influx of traffic through Roberttown. Local primary schools could not accommodate this potential influx of inhabitants. Area would see a deterioration in "village life" as we become part of urban sprawl.

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Council Response No Change This site is proposed as an accepted housing allocation. It formed a rejected housing allocation in the draft Local Plan (November 2015). While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Access is achievable from Roberttown Lane and possibly part of the site from Richmond Park Avenue and Stanley Road. Provision of a pedestrian footway along Roberttown Lane site frontage will be required. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H442**

Consultee: **942582**

Christopher J Wooller

Agent:

Rep ID: **PDLP_AD575**

Soundness - Positively Prepared Loss of green belt.

Soundness - Justified The site is not justified on the grounds of: - the council's suggestion that the reason for including H442 is because Roberttown and Liversedge "merge to some extent" is insufficient justification and contrary to advice contained in NPPF paragraphs 79 and 80. The council has not outlined "special circumstances in accordance with NPPF paragraph 87. Notwithstanding the green belt issues, in terms of character assessment, the site is within an Urban Fringe Character Area and is identified as a green area and should remain undeveloped. The allocation will diminish the openness and harm the visual amenities of the green belt contrary to Section 9 of NPPF. The site is in an unsustainable location as future residents will need to rely on private motorised forms of transport to reach facilities. The "Green Belt Analysis" submitted by Strata Homes/Smeeden Foreman does not acknowledge Lowfold Hall a grade II * listed building in close proximity to the site. The document submitted by Signet Planning considers Lowfold Hall presence in relation to the site "not part of its immediate setting". It is considered that Lowfold Hall will be hugely affected. In order to preserve the setting of the listed building, the historical estate should be maintained. The proposal to amend the green belt boundary would obliterate the green space on the frontage of Lowfold Hall contrary to the requirement to preserve the setting of a listed building under the Planning (Listed Buildings and Conservation Area) Act 1990 S 62(1). The allocation is contrary to point 13 of the SA objective to conserve and enhance the historic environment, heritage assets and their settings" Question why the council changed the allocation to housing in the Publication draft Plan.

Soundness - Consistent with National Policy The allocation is contrary to NPPF paragraph 80 bullet point 1 and 2 regarding restricting the sprawl and merging of urban areas/neighbouring towns. Roberttown is surrounded by green belt to the north, east and south east and there are only a few existing dwellings along Roberttown Lane that overlook the site which cannot be described as a ribbon development. In addition, Roberttown Lane should not automatically be regarded as a natural boundary for the purposes of planning allocation as roads running through the middle of the green belt is common elsewhere. The allocation is contrary to bullet points 3 and 4 - while it is acknowledged that there may not be sufficient brownfield sites, other more appropriate urban sites are available.

Proposed Change Requested Delete allocation H442 and retain as green belt.

Council Response No Change While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. A heritage impact assessment has been carried out for this site. (LE72)

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & DesignationsParagraph/Site: **H442**Consultee: **943216****Mr Robert Berry**

Agent:

Rep ID: **PDLP_AD1159****Soundness - Justified**

The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested

Retain as green belt.

Council Response

No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**Consultee: **943520****Ms Kath Knott**

Agent:

Rep ID: **PDLP_AD1118****Soundness - Justified**

The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested

Retain as green belt.

Council Response

No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**Consultee: **943789****Miss Jane Douglas**

Agent:

Rep ID: **PDLP_AD1409****Soundness - Justified**

- Over 200 homes will generate over 60 children at primary level and over 20 children at secondary level. Local primary school is full, cannot accommodate extra children generated by the site. The local secondary school does not have the capacity to accommodate the additional children this site will generate. There is not adequate infrastructure plan which shows how the additional school places can be delivered in a realistic and achievable way. -No detailed analysis of the highways impact. Developers contention that local road network can accommodate additional road traffic is not supported by an in depth traffic analysis, does not take into account the poor public transport system that services the village. Capacity to move around without a car is severely limited, additional housing at this location would undermine a sustainable approach.

Soundness - Consistent with

- Failure to provide a sustainable plan means this allocation is in breach of the NPPF and its commitment to sustainable development. -Review of the

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National Policy	Greenbelt to include this site as significant development sites breaches obligations within the NPPF to retain the Greenbelt except in exceptional circumstances. This plan does not show where those exceptional circumstances exist and as such the Plan cannot comply with the NPPF section on preservation of the Greenbelt. -		
Council Response	No ChangeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.		
Paragraph/Site: H442	Consultee: 943836 Cllr David Hall	Agent:	Rep ID: PDLP_AD1711
Soundness - Justified	The plan will not be judged sound, as the evidence on which the developer based his submission (and the council based its revised judgment) was not justified. In particular, the green belt study carried out by the council had judged the site to be necessary to stop urban spread, ie to stop the settlement of Roberttown merging with that of Liversedge. The settlement of Roberttown is extremely clearly defined from an aerial view. It crosses the A62 between Child Lane and Lumb Lane, and actually only touches Liversedge at the corner of Norristhorpe Lane and the A62, apart from some ribbon development along the A62. Site H442 provides a very clear boundary between the two settlements which should not be removed. This simple fact is not referred to in the submission which was used for evidence by the council. The developer's submission claimed that there is much more built-up land along Roberttown Lane than actually exists, only acknowledging a "green gap". This does not take into account that if viewed from an aerial photo, it is quite apparent that the ribbon development is only continuous along the border of the cricket ground. Below that on Roberttown Lane, the buildings are more sporadic, and include Lowfield Hall, an historic house and its outbuildings. The original estate of this house included site H442. The ribbon development along Roberttown Lane is not a near-continuous physical boundary as claimed in the developer's submission.		
Proposed Change Requested	The greenbelt should remain continuous across Roberttown Lane and into site H442, to preserve the setting of Lowfield Hall.		
Council Response	No ChangeWhile the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl.		
Paragraph/Site: H442	Consultee: 943957 Mr Ian Smith	Agent:	Rep ID: PDLP_AD3742
Soundness - Justified	By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of these Listed Buildings or what harm might result to those elements which contribute to their significance by its eventual development.		
Soundness - Consistent with National Policy	Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, national policy guidance makes it clear that Grade I and II* Listed Buildings are regarded as being in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional.		
Proposed Change Requested	An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.		
Council Response	No changeCorrespondence within BP28 (dated 24th 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		

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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).

Paragraph/Site: **H442**

Consultee: **944446**

Christine Thorburn

Agent:

Rep ID: **PDLP_AD1207**

Soundness - Positively Prepared This is a Greenbelt site allocated for housing. This allocation is not legally compliant as there is no realistic and achievable plan that will make the site a sustainable one.

Soundness - Justified The proposal suggests over 200 homes which will generate over 60 children at the primary level and over 20 children at secondary level. The local primary school is presently full and cannot accommodate the extra children generated by the site. The local secondary school does not have the capacity to accommodate the additional children this site will generate. There is not adequate infrastructure plan which shows how the additional school places can be delivered in a realistic and achievable way. There is also no detailed analysis of the highways impact of this housing allocation.

Soundness - Consistent with National Policy The review of the Greenbelt to include this site as significant Development sites breaches obligations within the NPPF to retain the Greenbelt except in exceptional circumstances. This plan does not show where those exceptional circumstances exist and as such the Plan cannot comply with the NPPF section on preservation of the Greenbelt. The failure to provide a sustainable plan means this allocation is in breach of the NPPF and its commitment to sustainable development and as such makes this allocation legally none compliant.

Council Response No ChangeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11).The Council has strategically modeled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **944581**

Mrs Angela McDonald

Agent:

Rep ID: **PDLP_AD1280**

Soundness - Positively Prepared The Council has failed in its duty to cooperate by reversing its original decision to reject this housing allocation. There appears to be a deliberately misleading attempt by Kirklees to ignore local involvement in decision making. The wording in the document "Commenting on the Publication Draft of the Kirklees Local Plan" is portraying that there was support for the reversal of the decision on this site when there was in fact considerable support for the original rejection.

Soundness - Justified The Plan shows no realistic, achievable or sustainable plan to support the local Schools (Education), Doctors and Dentists (Health and Welfare) and Roads (Transport). The existing infrastructure is unable to support further housing development. Exceptional circumstances have not been demonstrated to justify removing the site from the green belt.

Soundness - Consistent with National Policy The housing allocation and consequential changes to the green belt boundary contravenes the guidance in the NPPF which promotes the fundamental aim of Green Belt policy which is to prevent urban sprawl. Roberttown is distinct from Liversedge and this is evident from Roberttown Lane. The site is a natural barrier and its loss will merge Roberttown with the sprawl of Mirfield and Liversedge.

Proposed Change Requested To make the Local Plan legally compliant and sound, the site (H442) should be removed from the housing allocation and the Greenbelt Boundary redrawn to include site H442.

Council Response No ChangeThe differences between the draft and publication draft Local Plan are as a result of consultation, the changes are identified in SD12, Statement of

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Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11). While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **945211**

Mrs K A Aveyard

Agent:

Rep ID: **PDLP_AD1120**

Soundness - Justified

The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested

Retain as green belt.

Council Response

No Change The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **946804**

Mark Overend

Agent:

Rep ID: **PDLP_AD1020**

Soundness - Justified

The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested

Retain as green belt.

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Council Response	No changeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.It is not considered that there will be a major impact on the mainline network.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.		
Paragraph/Site: H442	Consultee: 948246 Cherry Shiel	Agent:	Rep ID: PDLP_AD1099
Soundness - Justified	The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.		
Soundness - Consistent with National Policy	The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.		
Proposed Change Requested	Retain as green belt.		
Council Response	No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.		
Paragraph/Site: H442	Consultee: 948259 Leanne Atack	Agent:	Rep ID: PDLP_AD1316
Soundness - Justified	The plan is unsound because it is unrealistic and unachievable. This is a Greenbelt site allocated for housing and there is no plan that will make the site a sustainable one. The local primary and secondary schools cannot accommodate extra children generated by the site and there is no adequate infrastructure plan which shows how the additional school places can be delivered in a realistic and achievable way. There is no detailed analysis of the highways impact. There is no in-depth traffic analysis and the poor public transport system that presently services the village is not taken into account. Housing at this site would undermine a sustainable approach. The current road network is already under huge pressure at peak times, in addition to the direct impact of motorway problems, with people using the A62 and Roberttown Lane to travel between junctions of the M62. This has a severe impact on the village and surrounding roads regardless of the time of day. Residents on Roberttown Lane and Richmond Park Avenue already have significant issues during school drop-off and pick-up times, with visibility and movement severely limited. The impact of the potential hundreds of additional traffic movements during this time would have a huge effect on a situation that residents feel is already dangerous.		
Soundness - Consistent with National Policy	The failure to provide a sustainable plan means this allocation is in breach of the NPPF and its commitment to sustainable development. The plan is unsound because it is not compliant with NPPF to retain green belt in exceptional circumstances and cannot comply with the section on preservation of the Greenbelt as this land is currently serving the intended purpose of Greenbelt land in that it is keeping separate the areas of Roberttown and Liversedge.		
Proposed Change Requested	Removal this site as a housing allocation and retain the land as green belt.		
Council Response	No ChangeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is		

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explained in the Infrastructure Technical Paper (Nov 2016) (BP11).The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: H442	Consultee: 948261	Mr Richard McDonald	Agent:	Rep ID: PDLP_AD1049
Legally Compliant	Nothing has changed either in the geography or nature of the site, but the site has been reclassified (as an accepted option) and its importance as Green Belt downgraded. Kirklees has failed to recognise the intended spirit of NPPF with regard to involving communities.			
Soundness - Justified	Nothing has changed either in the geography or nature of the site, but the site has been reclassified (as an accepted option) and its importance as Green Belt downgraded. The local primary and secondary school would be unable to accommodate the growth arising from this development. The local highways infrastructure around Roberttown can't cope with current levels of traffic. The allocation of the site for housing will add to this.			
Soundness - Consistent with National Policy	The council review of the green belt to include this site breaches obligations within the NPPF to retain green belt except in exceptional circumstances. This plan does not show where those exceptional circumstances exist and as such the plan cannot comply with the NPPF.			
Council Response	No changeThe differences between the draft and publication draft Local Plan are as a result of consultation, the changes are identified in SD12, Statement of Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.			

Paragraph/Site: H442	Consultee: 948270	Linda & Michael Brown	Agent:	Rep ID: PDLP_AD972
Legally Compliant	Were unaware that this site had now been accepted. The consultation should be extended to allow the community more time to make comments.			
Soundness - Positively Prepared	Brownfield land should be used first.			
Soundness - Justified	The land has recreational and visual amenity value. Traffic in Roberttown leading to A62 and then M62.			
Proposed Change Requested	Remove the site from the plan.			
Council Response	No ChangeThe council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact			

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on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district.

Paragraph/Site: **H442**

Consultee: **969663**

Mrs Lynette Stone

Agent:

Rep ID: **PDLP_AD1174**

Soundness - Justified

Schools are at capacity, not infrastructure plan to show how additional school places will be created. No in depth transport analysis to show additional traffic can be accommodated. Poor public transport links serve the village. Exceptional circumstances have not been shown

Council Response

No changeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **969722**

Dr and Mrs Andrew Smith

Agent:

Rep ID: **PDLP_AD1279**

Soundness - Positively Prepared

The council has not given sufficient weight to previous objections from the local community. The site was rejected for housing development in the draft local plan and this decision received over 300 comments in support which demonstrates the strength of local feeling. There have been no material changes that should have caused this decision to be reversed now. Brownfield sites should be redeveloped before allocating Green Belt sites for housing.

Soundness - Justified

Following the exclusion of this site from the Draft Local Plan, Signet planning submitted a representation (on behalf of Strata homes). The representation included an assessment of housing need. It is argued that Signet has overestimated the projected housing need. The council has, inappropriately, attached too much weight to the assessment of housing need produced by Signet Planning (on behalf of Strata Homes). There has been no consultation based on the conclusions reached by Signet and their analysis should not be used to inform the planning process. The Local Plan does not provide for anticipated increase in demand for local school places. The Local Plan does not address issues of inadequate transport infrastructure.

Soundness - Consistent with National Policy

The Local Plan contravenes the principles set out in NPPF paragraph 17, which include taking account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it. The plan contravenes NPPF paragraphs 79 and 80. The plan fails to safeguard the countryside from encroachment and fails to protect the openness of the land. The fact that Roberttown and Liversedge already 'merge' to some extent is insufficient reason to justify the removal of the site from the Green Belt. No 'very special circumstances' have been put forward to justify the removal of this site from the Green Belt. The allocation of this site constitutes inappropriate development under NPPF Paragraph 87. The site is located unsustainably in terms of its connectivity and access to local services.

Proposed Change Requested

There should be no change to the green belt boundary and site H422 should be rejected for housing development.

Council Response

No ChangeThe differences between the draft and publication draft Local Plan are as a result of consultation, the changes are identified in SD12, Statement of Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward

brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.National planning policy requires each local authority to determine the extent of their housing market area and to meet their housing needs. Kirklees is a self-contained housing market area for local plan purposes and as such the Local Plan evidence base has assessed the housing needs for the district based on national household projections with consideration of local economic aspirations. The Local Plan seeks to meet such housing needs.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: H442

Consultee: 973609

Jan Leighton

Agent:

Rep ID: PDLP_AD1309

Soundness - Positively Prepared

Brown field sites should always be used before green belt is considered. The continuation of urban sprawl will ensure no delineation between areas from Dewsbury right through to Hartshead; green belt land is there to ensure this does not happen.

Soundness - Justified

The proposal suggests over 200 homes which will generate over 60 children at the primary level and over 20 children at secondary level. The local primary school is presently full and cannot accommodate the extra children generated by the site. The local secondary school does not have the capacity to accommodate the additional children this site will generate. There is not adequate infrastructure plan which shows how the additional school places can be delivered in a realistic and achievable way. There is also no detailed analysis of the highways impact of this housing allocation. The local road network can not accommodate this additional road traffic is not supported by an in depth traffic analysis and does not take into account the poor public transport system that presently services the village. Traffic is already unsustainable along the A62 corridor to Roberttown Lane; a residential increase will only exacerbate the situation. Parking outside Spen Valley High School is a danger to all road users (cars, pedestrians and local transport), an increase in school population would again exacerbate the situation. Green open spaces positively contribute to people's mental health (ability to walk the dog, catch a glimpse of the local wildlife) Developing the site will exacerbate the water run-off and drainage issues.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF and its commitment to sustainable development. The review of the Greenbelt to include this site as significant development sites breaches obligations within the NPPF to retain the Greenbelt except in exceptional circumstances. This plan does not show where those exceptional circumstances exist and as such the Plan cannot comply with the NPPF section on preservation of the Greenbelt.

Proposed Change Requested

The removal of this site as a housing allocation and its retention as Greenbelt.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result

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of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. No objections raised from drainage consultees. The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **1040916 Mrs Helen Pearson**

Agent:

Rep ID: **PDLP_AD67**

Soundness - Justified

The information about this site does not include the objections that were made at the draft stage and gives the impression that there have been no objections when there were many. I wish to reinstate those objections

Proposed Change Requested

Inset the information as above.

Council Response

No change. While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl. Access is achievable from Roberttown Lane and possibly part of the site from Richmond Park Avenue and Stanley Road. 2.4m x 43m (30mph speed limit) visibility splays would be required on Roberttown Lane including the provision of a pedestrian footway along Roberttown Lane site frontage. No objections have been received from technical consultees on drainage. An air quality impact assessment would be required as part of a detailed planning application and mitigation measures could be addressed as part of the planning application process. No objections have been received from West Yorkshire Ecology Service on this site. There are no immediate needs for school places but it is acknowledged that this is increasing. This can be dealt with through ongoing discussions with School Place Planning colleagues and the Infrastructure Delivery Plan. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district. There is not sufficient housing capacity on brownfield sites to meet the local plan housing requirement.

Paragraph/Site: **H442**

Consultee: **1040953 mr Gary E Smith**

Agent:

Rep ID: **PDLP_AD69**

Soundness - Effective

Roberttown is overpopulated. Services are overstretched. Increased traffic will not be accommodated. Not enough local industry.

Proposed Change Requested

Employment rather than residential needed in the area.

Council Response

No change. The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – Publication Plan. This has informed the spatial strategy for the Plan. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The plan has identified a range of sites to ensure employment opportunities exist for the local workforce. Employment allocations have taken into account the proximity of the site to the workforce and the sites accessibility to public transport. Priority Employment Areas have also been designated to ensure existing employment stock – which is serving the local and wider economy - is protected to enable business growth and support the needs of local people.

Paragraph/Site: **H442**

Consultee: **1042412 Mr Craig McIntosh**

Agent:

Rep ID: **PDLP_AD2502**

Soundness - Justified

The site has changed from rejected to accepted since DLP, without any evidence base drawing a different conclusion or material changes to the site or its physical surroundings. The Green Belt Review for the site contains a number of significant omissions to the assessment of site H442. There are no exceptional

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or very special circumstances identified that apply to site H442 which justify releasing it from green belt. In addition to the Constraints identified in the document, the site is crossed by High Voltage Overhead Lines and Pylons The site also holds in a large catchment of surface water, which if developed will contribute to flooding of Spen Beck

Soundness - Consistent with National Policy

NPPG guidance on housing and economic land availability assessment states unmet housing need is likely to outweigh harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt. There are no exceptional or very special circumstances identified that apply to site H442 which justify releasing it from green belt.

Council Response

No changeThe differences between the draft and publication draft Local Plan are as a result of consultation, the changes are identified in SD12, Statement of Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt. The council has consulted National Grid on this housing option and no objections have been raised. The council’s site specific assessment indicates that there are no fundamental constraints to the delivery of housing on this site as set out in the Accepted Options Technical Paper (BP29). No objections raised from drainage consultees.

Paragraph/Site: **H442**

Consultee: **1043842 Mrs Vicky Foley**

Agent:

Rep ID: **PDLP_AD884**

Soundness - Justified

Objects on the following grounds: Traffic - speed and volume of traffic, Beauty of the area spoiled, School and medical centre is over subscribed, No NHS dentists, Noise and light pollution.

Council Response

No changeThe connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. There are no immediate needs for school places but it is acknowledged that this is increasing. This can be dealt with through ongoing discussions with School Place Planning colleagues and the Infrastructure Delivery Plan. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. No objections have been raised from Environmental Health with regard to noise pollution. The allocation of the site confirms the principle of development. Details of the design and site layout and impact on adjoining residential properties will be addressed as part of a detailed planning application.

Paragraph/Site: **H442**

Consultee: **1045684 Mr Ian Fitton**

Agent:

Rep ID: **PDLP_AD122**

Soundness - Positively Prepared

Unsound due to the lack of infrastructure to support any further housing development in the Roberttown area. Both the nearest local primary schools are at capacity and doctors and dentists are also full. Roads in the area especially Roberttown Lane, Child Lane and through the village are gridlocked at rush hour. Leeds Road which at present is not able to accommodate the traffic without adding a further 250 commuters. There is a Public Footpath across the proposed site.

Soundness - Justified

There are many Brownfield sites available without losing even more Greenbelt areas.

Council Response

No changeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication

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Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. It is not considered that there will be a major impact on the mainline network. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs.

Paragraph/Site: **H442**

Consultee: **1045848 Mrs Toni Rios**

Agent: **1045846 Mr Christopher Yapp**

Rep ID: **PDLP_AD380**

Soundness - Justified

This site does not have a significant individual traffic impact on the motorway network but, by virtue of its location or proximity to other proposed developments, it may need to contribute to additional schemes identified in the Infrastructure Delivery Plan if committed schemes will not provide sufficient capacity. For further correspondence relating to this representation see Core Document 'Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation'

Proposed Change Requested

The 'constraints' section of the site description does not indicate that any additional mitigation on the wider highway network will be required. It is considered that the cumulative effect in combination with other proposed allocations may necessitate additional highway mitigation. A statement should be added saying that "development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity". For further correspondence relating to this representation see Core Document 'Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation'

Council Response

No Change Highways England intend to retract their comments on the publication draft at the earliest opportunity to reflect their current position. These matters have been subsequently addressed within Highways England's letter to Kirklees Council dated 12th April 2017 (BP28). Further to this correspondence, the 'site specific considerations' (in relation to individual site and cumulative site impacts upon the Strategic Road Network) have either been removed or modified in accordance with Highways England's expressed position (see SD4 and BP28). Highways England's recommendations within BP28 were informed by LE141 and their latest Network Analysis Tool modelling. Highways 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).

Paragraph/Site: **H442**

Consultee: **1045890 Mr & Mrs William & Stephanie Hellewell**

Agent:

Rep ID: **PDLP_AD1123**

Soundness - Positively Prepared

The Council has been inconsistent as it was originally decided that the site should remain within the green belt despite already having seen the submission from the site promoters. The Council must have decided that a change to the green belt boundary was not warranted. The change has been made at a very late date and the council has changed its mind despite having received no published new information from the site promoter.

Soundness - Justified

The plan is unsound as it fails to give proper weight and/or fails to give due observance to the loss of green belt land and impact on the landscape, on Lowfold Hall (grade 2* listed building), transport and local facilities. The site is green belt and together with land to the north of Roberttown Lane constitutes a single area albeit with Roberttown Lane running between. The existence of a road cannot of itself be a barrier to pieces of land being considered as a whole or provide an excuse to chop off pieces of the green belt on either side. The site promoter claims that the site is partly screened by "a ribbon of high density housing but this is not agreed with. The housing in question is relatively low density which contrasts with the unsuitable high density housing proposed to be built along the southern boundary of the site. Local residents have enjoyed the benefit of the site as green space for centuries. The two PROWs crossing the site link with other PROWs on the other side of Roberttown Lane and this demonstrates that the site has great continuity, amenity and visual and practical value as green belt and that the current openness of the site clearly justifies maintaining the current green belt boundary. The proposal would impact on Lowfold Hall, a Grade 2* listed building as the green space across the frontage of Lowfold Hall and beyond would be obliterated. This would be a failure by the Council to observe the requirement to have special regard to the desirability of preserving the setting of a listed building under the Planning (Listed Buildings and Conservation Areas) Act 1990 S62 (1). The proposal would impact on transport. At school times and the beginning and end of the working day Roberttown Lane grinds to a halt with stop start traffic. The existing local road network cannot cope with a huge increase in traffic of 500 vehicles. Residents of the proposed new homes will not cycle to railway stations as suggested by the site promoters and there has been a failure by the council to recognise this.

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There are also concerns about the impact on local facilities, such as small local shops which have limits to expansion and local schools and doctors surgeries have limited or no capacity. The council claims that "Exceptional Circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district." This is not logical. A "circumstance" (namely the need for more housing) which applies to every piece of land in the district cannot possibly be "exceptional" to only one. The Council has clearly misdirected itself to reach its conclusion.

Soundness - Consistent with National Policy
Proposed Change Requested
Council Response

The proposal would fail to prevent sprawl and neighbouring towns of Roberttown and Norristhorpe merging into each other contrary to the NPPF. Roberttown would not be physically separated and it would lose its physical identity being swamped by around 1000 more people.

Retain the green belt boundary in its present position.

No ChangeThe differences between the draft and publication draft Local Plan are as a result of consultation, the changes are identified in SD12, Statement of Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt. A heritage impact assessment has been carried out for this site. (LE72)The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H442**

Consultee: **1049012 mr glenn marshall**

Agent:

Rep ID: **PDLP_AD360**

Soundness - Positively Prepared

This site was initially rejected but the council now thinks it's a good idea to put up to 250 houses on a green belt site. Many local residents have previously expressed objection to re-allocation of this site, yet none of those views are carried forward and residents wanting to be heard have had to do it all again. The computer system is difficult to navigate and use and it is difficult to get to the relevant page.

Soundness - Justified

This is a greenbelt site in a location which has over-subscribed schools and heavily congested roads. No special circumstances have been demonstrated to remove this site from the green belt.

Soundness - Consistent with National Policy

This site is in breach of NPPF green belt guidelines.

Proposed Change Requested

Remove this housing site from the plan and retain as green belt.

Council Response

No ChangeThe differences between the draft and publication draft Local Plan site allocations are as a result of consultation, the changes are identified in SD12, Statement of Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council has strategically modeled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway

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network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **1049033 Mr Tristan Tristan Wooller**

Agent:

Rep ID: **PDLP_AD738**

Soundness - Justified

There is insufficient justification for the inclusion of this green belt site on the grounds that Roberttown and Liversedge “merge to some extent”. The site is within the green belt and serves the green belt purposes of checking unrestricted sprawl and preventing neighbouring towns merging into one another. Roberttown is surrounded by Green Belt and is not ribbon development. Roberttown Lane is not a natural green belt boundary. The Green Belt roles restricting encroachment into countryside and encouraging the regeneration of brownfield sites are ignored as other more appropriate urban sites are available. The Council has not stated “special circumstances” for release of this site from the green belt. The site is within an Urban Fringe Landscape Character Area and is identified as a green area and, as such, should remain undeveloped. The location is unsustainable due to reliance on private motorised transport and distance from education, employment, leisure and retail uses. Lowfold Hall, a Grade 2* listed building will be hugely affected by the development but is not acknowledged by the site promoter. When originally constructed the building’s estate included this site and in order to preserve the setting of the listed building the historical estate should be maintained as such and not developed. Amendment of the green belt boundary would result in the obliteration of the green space on the frontage of Lowfold Hall and would fail the requirement to have special regard to the desirability of preserving the historic environment and setting of a listed building under the Planning (Listed Buildings and Conservation Areas) Act 1990 S 62(1).

Soundness - Consistent with National Policy

Inclusion of this site on the grounds Roberttown and Liversedge “merge to some extent” is contrary to NPPF. The site, if developed, will have a more urban character, will diminish the openness and harm the visual amenities of the Green Belt, and conflict with the purposes of including land in the green belt contrary to Section 9 (Protecting Green Belt Land) of NPPF.

Proposed Change Requested Council Response

There should be no change to the green belt boundary and site H442 should be rejected for housing development.

No change While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt. A Heritage Impact Assessment has been carried out for this site. (LE72)

Paragraph/Site: **H442**

Consultee: **1049325 Mr Chris Ellis**

Agent:

Rep ID: **PDLP_AD1355**

Soundness - Positively Prepared

By retaining its green belt status developers are guided toward using brownfield and/or recycling derelict or other sites.

Soundness - Justified

Concerns that this proposal does not go anywhere near to provide sufficient infrastructure analysis for the plan and surrounding areas. Schools and Roads are already at maximum capacity and adding 200+ properties will only compound this problem. It is widely recognised that the A62 Huddersfield-Leeds is a bottle neck between Mirfield and Birstall. Impact it will have on a Grade II Listed Building. The council review of the green belt to include this site breaches obligations within the NPPF to retain green belt except in exceptional circumstances. This plan does not show where those exceptional circumstances exist and as such the plan cannot comply with the NPPF.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this housing allocation is in breach of the NPPF and its commitment to sustainable development and so makes this housing allocation legally non-compliant. Green Belt Sprawl and Merging - Roberttown is separated from the surrounding settlements to the North, East and South East by the areas of Green Belt to either side of Roberttown Lane. By building on this site it will effectively join Norristhorpe/Liversedge and Roberttown together, thus, creating sprawl and making Roberttown lose its true identity as a semi rural village with a genuine village/community feel.

Preserve the setting and special character - Roberttown Village is a small settlement with a Church, Community Centre, 2 Pubs, a Cricket Club and a Working Man's club. The hall on Roberttown Lane is a grade 2 listed building and the thought of having 200+ modern properties built opposite something with great heritage is wrong and we should protect green belt sites around it. Assisting in urban regeneration - By retaining its green belt status developers are guided toward using brownfield and/or recycling derelict or other sites. It is inaccurate to say that Roberttown is already merged with Liversedge. Roberttown is actually a part of Liversedge but a village in its own right and the merging referred to is minor and at the pinch point at the junction of Huddersfield Road and Lumb Lane/Norrishorpe Lane which is in fact Norrishorpe.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11).The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **1049459 Mr John Williamson**

Agent:

Rep ID: **PDLP_AD607**

Soundness - Positively Prepared

It is crazy to build 2-300 houses on land that is so beautiful, in this day and age where green land is getting rarer and that there must be a better place to build some houses.

Soundness - Justified

Roberttown Lane dangerous and an estate with 3-400 cars will add to the traffic and pollution. The local schools can't take extra pupils. There isn't the infrastructure to cope with more people and traffic.

Council Response

No changeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. (Document Ref BP12)The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016)

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where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11).

Paragraph/Site: **H442**

Consultee: **1049540 Mr Steven Garcia**

Agent:

Rep ID: **PDLP_AD1476**

Soundness - Positively Prepared Brownfield sites should be redeveloped before allocating Green Belt sites for new housing. Scale of proposed development is disproportionate to the size of the village.

Soundness - Justified Insufficient infrastructure analysis. Particular concerns around existing school and road capacities.

Soundness - Consistent with National Policy The inclusion of reference number H442 represents inappropriate development in the Green Belt for which no very special circumstances have been demonstrated. It will result in the site having a more urban character, will diminish the openness and harm the visual amenities of the Green Belt, and conflict with the purposes of including land within it. It is therefore contrary to Section 9 (Protecting Green Belt Land) of the Government's National Planning Policy Framework 2012. (NPPF). The fact that Roberttown and Liversedge already 'merge to some extent' is insufficient reason to justify the removal of the site from the Green Belt. The site is in an unsustainable location.

Proposed Change Requested Retain the site as Green Belt.

Council Response No changeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11).The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **1049592 Mr Neil Shackleton**

Agent:

Rep ID: **PDLP_AD645**

Soundness - Positively Prepared There appears to be a complete disregard for the national policy of avoiding unrestricted sprawl and the potential merging of villages through removal of green belt areas.

Soundness - Justified The inclusion of 240 homes in this area is a huge weight on an already small but crowded village. There is a single road connecting the majority of Roberttown, Roberttown Lane, where the proposed dwellings will feed into. This carries 3 connection points to Huddersfield Road and access to motorways in

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either direction but is already over congested. It takes 30mins in either direction during peak times to travel to either in what is less than a couple of miles. In school periods the road is essentially gridlocked as parents drop off and collect at Spen Valley and at peak times Huddersfield Road itself stagnates. I fail to see any logic in how another 240-350 vehicles can work in this area. There is also the continued question on overcrowding for education. The infant schools or Roberttown, Norristhrope & Headlands are all at maximum capacity, Spen Valley High is also at full capacity. Roberttown is a small village community, It has a small village infrastructure of shops that caters to the village but would not see benefit from further housing. There is also no further room to expand the retail side of Roberttown so provides no opportunities to grow with an expanding size.

Proposed Change Requested

In effect the development causes overcrowding and a huge burden on Roberttown Lane & the surrounding link roads. Please conduct a full survey on the traffic situation as a minimum to see the reality of the situation - once you have this you will not need to go any further.

Council Response

No Change While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H442**

Consultee: **1049681 Clare Bamforth**

Agent:

Rep ID: **PDLP_AD1176**

Soundness - Justified

Schools are at capacity, not infrastructure plan to show how additional school places will be created. No in depth transport analysis to show additional traffic can be accommodated. Poor public transport links serve the village. Exceptional circumstances have not been shown. GP's are over subscribed. Lack of children's services at local hospital puts children at risk.

Council Response

No Change The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H442**

Consultee: **1057384 Mr Matthew Walker**

Agent:

Rep ID: **PDLP_AD936**

Soundness - Justified

Local highway network cannot cope with the increase in traffic. There are no places in local schools for additional residents.

Proposed Change Requested

Remove the site.

Council Response

No change The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. It is not considered that there will be a major impact on the mainline network. The impact of development on school place planning has been assessed through the infrastructure planning work between

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the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H442**Consultee: **1057952 Mr Gregory Armitage**

Agent:

Rep ID: **PDLP_AD1021****Soundness - Justified**

The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested

Retain as green belt,.

Council Response

No ChangeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.It is not considered that there will be a major impact on the mainline network.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**Consultee: **1058238 Mrs Amy Imeson**

Agent:

Rep ID: **PDLP_AD1094****Soundness - Justified**

The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested

Retain as green belt.

Council Response

No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**Consultee: **1058245 Mr Stephen Imeson**

Agent:

Rep ID: **PDLP_AD1096****Soundness - Justified**

The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested

Retain as green belt.

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Council Response	No changeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.		
Paragraph/Site: H442	Consultee: 1058249 Mr Craig Battye	Agent:	Rep ID: PDLP_AD1097
Soundness - Justified	The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.		
Soundness - Consistent with National Policy	The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.		
Proposed Change Requested	Retain as green belt.		
Council Response	No changeThe impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.		
Paragraph/Site: H442	Consultee: 1058275 Miss Joanna Sarah Wilkinson	Agent:	Rep ID: PDLP_AD1104
Soundness - Justified	The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.		
Soundness - Consistent with National Policy	The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.		
Proposed Change Requested	Retain as green belt.		
Council Response	No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of		

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the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **1058281 Mrs Mary Wilkinson**

Agent:

Rep ID: **PDLP_AD1107**

Soundness - Justified

The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested

Retain as green belt.

Council Response

No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **1058374 Mrs Catherine Scott**

Agent:

Rep ID: **PDLP_AD1119**

Soundness - Justified

The local schools are full. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Soundness - Consistent with National Policy

The failure to provide a sustainable plan means this allocation is in breach of the NPPF. Exceptional circumstances for development in the Green Belt can't be demonstrated.

Proposed Change Requested

Retain as green belt.

Council Response

No ChangeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.

Paragraph/Site: **H442**

Consultee: **1059591 Jean and Graham McRobb**

Agent:

Rep ID: **PDLP_AD1385**

Soundness - Positively Prepared

Green belt land should not be used. There are plenty of brownfield sites around Kirklees to develop but developers prefer green belt land as brownfield sites cost more money to clear.

Soundness - Justified

There are concerns about the amount of traffic that will be added to an already dangerous area outside Spen Valley High School where vehicles park on yellow lines and pavements and at times causes mayhem for other road uses. This area of green belt should be kept or the urban sprawl will continue.

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Proposed Change Requested	Keep this site as green belt.
Council Response	No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl.

Paragraph/Site: **H442** Consultee: **1059637 Mrs Eileen Smith** Agent: Rep ID: **PDLP_AD1399**

Soundness - Justified No exceptional circumstances to remove the site from the green belt. The local schools are full. Traffic congestion on Roberttown Lane, Roberttown village and Child Lane all leading to Leeds Road will be exacerbated by development. Drainage issues on Richmond Park Avenue will increase

Proposed Change Requested Remove the site from the plan.

Council Response No changeExceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.No objections raised from drainage consultees.

Paragraph/Site: **H442** Consultee: **1060207 David Hall** Agent: Rep ID: **PDLP_AD1802**

Soundness - Positively Prepared Other more appropriate urban sites are available without eroding land within Green Belt such as site reference H442

Soundness - Justified The Council recognise that the site is an area of open land within the Green Belt but to suggest that the reason for including this site is because Roberttown and Liversedge "merge to some extent" is insufficient justification and is contrary to advice contained in NPPF. Contrary to Strata Homes rep, the site fulfils the role and function of the Green Belt in separating Roberttown and Liversedge. The site is within an Urban Fringe Character Area and is identified as a green area and should remain undeveloped. The site is poorly located in terms of access to education, employment, leisure and retail. Poor bus connections due to traffic congestion. Lack of parking at Mirfield station and poor cycling connectivity to local train stations. Proposal would result in a cramped form of development and the urbanisation of this Green Belt site. This would be detrimental to the openness and visual amenity of the Green Belt. Traffic congestion in Roberttown Village and on A62. The three local primary schools and two secondary schools are over-subscribed.

Soundness - Consistent with National Policy The Council recognise that the site is an area of open land within the Green Belt but to suggest that the reason for including this site is because Roberttown and Liversedge "merge to some extent" is insufficient justification and is contrary to advice contained in NPPF. Exceptional circumstances have not been demonstrated to remove the site from the Green Belt.

Proposed Change Requested Remove the site from the plan.

Council Response No changeFull consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the

published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district’s housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. While the strategic role of this parcel of green belt is not strong, as Roberttown and Liversedge are already merged to some extent south of the site, the green belt overwashes Roberttown Lane in order to include this area of open land within the green belt. This is a well contained site bounded by the existing settlement, Roberttown Lane and the cricket ground and so there is no risk of sprawl. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt. The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11). The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: H489	Consultee: 961687 Diane Porritt	Agent:	Rep ID: PDLP_AD2223
Soundness - Positively Prepared	Site H489 can be taken out of the Kirklees Local Plan due to the great number of other sites that are up for development in Church Lane. Alternative brown field sites can be found in the area e.g. Highrove Beds and Maccess sites which have been granted permission for a large number of houses. The former Whiteley’s Mill has been derelict for a large number of years since Tesco purchased it in Cleckheaton and is adjacent to a new school.		
Soundness - Justified	Visibility Splays on Church Lane outside of 7 Church Lane (if building on the land commences): The Department of Trade Manual for Streets requires Visibility Splays on Church Lane and this would be very close to Gomersal Hill Top traffic lights. The site is too close to Hill Top for adequate visibility splays when building on the land. Gomersal Middle School at Hill Top : Excerpt from the Kirkees Plan : ‘ ...the access layout shall be in accordance with section 10 above. Significant congestions can be caused by the setting down and picking up of pupils and adequate facilities for this activity shall be provided in the form of a lay-by with a turning area if necessary’. OBJECTiON: There is no room for a layby in Church Lane. Congestion is caused by parents parking on the pavement outside of my driveway to walk to the school and collect their children. Buses cannot get past as there is always a queue of traffic at the lights. There are many ambulance and disabled access markings on the road outside of properties in Church Lane, including my own. Church Lane has now become dangerous due to more traffic from the new housing estate on the old Burnleys Mill site.		
Soundness - Effective	The Local Plan in respect of this site is unsound due to the land being unfit to build upon. The reasons being: The Coal Authority Environ All-In-One Report I had commissioned on my property 15 Church Lane, backing onto Site H489 states that the ground stability at the location in respect of nearby past Coal Mining at Gomersal Colliery is subject to subsidence: ‘ 5.7 Natural Ground Subsidence: ...there is some potential for natural ground movement to occur but that is only likely to be of concern if significant changes are made to the ground or use of it. For example, this could include planting trees, changing drainage or building work ... *The term “Subsidence” refers to ground movement that could cause damage to foundations in domestic or other properties.’ Subsidence in the Hallway of my property . Enclosed photograph of evidence of subsidence in the hallway of my bungalow. Building on Site H489 may affect the ground stability on my own property and those of my neighbours. (Copy photograph of subsidence in my Hallway at 15 Church Lane, Gomersal – APPENDIX III).		
Proposed Change Requested	Remove H489 from the plan.		
Council Response	No ChangeSite access is achievable from Church Lane and highways consultees have confirmed local links are acceptable. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the		

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proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper BP12. Less than 1% of the site is in a high risk mining area. Sites with planning permission are already considered as part of the housing numbers. Reasonable alternatives have been assessed through the Sustainability Appraisal SD5. Whiteleys Mill was considered as a housing allocation. However, it was rejected on the basis of flood risk. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper BP12. Whiteleys Mill was considered as a housing allocation but was rejected on the basis of flood risk.

Paragraph/Site: **H489**

Consultee: **961687 Diane Porritt**

Agent:

Rep ID: **PDLP_AD164**

Soundness - Justified

Suitable site access cannot be achieved. Site is too low lying to be developed, there is a natural spring on the site and subsidence is an issue due to the close proximity of the former Gomersal Pit. Further development here would also result in increased noise and light pollution.

Proposed Change Requested

Removal of site H489

Council Response

No Change Responses from technical consultees have confirmed the suitability of the site for development subject to mitigation which can be addressed at the detailed planning application stage. Site access is achievable from Church Lane and highways consultees have confirmed local links acceptable. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper BP12. document ref - LE118). No objections were raised by Environmental Health in relation to this site option. No objections have been raised from consultees on flood risk, drainage, biodiversity and historic environment.

Paragraph/Site: **H489**

Consultee: **961687 Diane Porritt**

Agent:

Rep ID: **PDLP_AD68**

Soundness - Justified

Department of Trade Manual for Streets requires Visibility Splays on Church Lane. Church Lane is already dangerous with too much traffic queuing at the lights at Hill Top. This site is too close to Hill Top to have adequate Visibility Splays. New residential development in this area will result in noise pollution affecting residents of the new housing over the longer term. Parents already park on the pavement all the way down Church Lane to walk and collect their child from Gomersal Middle School. This is dangerous and buses nor other traffic can get past. Ambulance and disabled access markings are up and down Church Lane. More housing and traffic is unsustainable in Church Lane. Conveyance Plan to 15 Church Lane in my possession shows this land is subject to subsidence from nearby Gomersal Pit. There is also a spring in the middle of the field which slopes down. Land is too low lying with a spring to build upon. Thought has not been given to the light pollution.

Proposed Change Requested

Removal of site H489. This particular plot can be taken out of The Local Plan (18 dwellings) with no cost to the Local Plan.

Council Response

No Change Site access is achievable from Church Lane and highways consultees have confirmed local links acceptable. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper BP12. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. Part of the site is within a high risk coal mining area. This is acknowledged in the site allocation text box as a constraint to development and a coal mining risk assessment will be required at the time of a detailed planning application. The site lies within flood risk zone 1. No objections have been received from technical consultees in relation to surface water flood risk

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and surface water drainage.

Paragraph/Site: **H489**

Consultee: **961687 Diane Porritt**

Agent:

Rep ID: **PDLP_AD138**

Soundness - Justified

A suitable site access cannot be achieved. Road is already congested. HGV's will be unable to approach the site entrance from either the left or right without crossing the centre line. School related parking down the left hand side of Church Lane from Hill Top Traffic lights is problematic and dangerous for other road users. There is nowhere for parents to park to collect their children in Church Lane. There are also many yellow boxes outside of private residences on Church Lane at the top of the hill in particular due to so many cars queuing at the traffic lights. There is no room for a Lay-By. Another housing development in Church Lane will create noise, pollution and grid lock on the roads. Another 18 houses will bring at least another 60 people to a small village and possibly more crime. Light pollution from the new build will affect the area. Insufficient capacity at the local GP to cope with additional housing. There is problems with drainage - see attached conveyance deed for my property - and subsidence - due to former Gomersal Pit - on the proposed housing site. Land is too low lying for development and the natural spring will cause problems. Site supports local wildlife including foxes and birds. Fatal road accident occurred directly outside my home.

Proposed Change Requested

None proposed

Council Response

No ChangeSite access is achievable from Church Lane and highways consultees have confirmed local links acceptable. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper BP12.Environmental health technical consultees require a contamination report (phase 1) at the time of a planning application. No other constraints have been identified in relation to pollution.No comments were received from technical consultees in relation to wildlife and biodiversity.

Paragraph/Site: **H489**

Consultee: **972734 Mr Derek Allan**

Agent:

Rep ID: **PDLP_AD1349**

Soundness - Positively Prepared

A lot of development is proposed in a small area of Gomersal.

Soundness - Justified

Cumulative traffic impacts of H591, H489, H2667, H2627 and sites with planning permission in the Gomersal area. Pollution from additional traffic would be dangerous. Impacts on wildlife.

Council Response

No ChangeSite access is achievable from Church Lane and highways consultees have confirmed local links acceptable. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper BP12.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option.No comments were received from technical consultees in relation to wildlife and biodiversity.

Paragraph/Site: **H489**

Consultee: **1045738 Mr John Hirst**

Agent:

Rep ID: **PDLP_AD125**

Soundness - Justified

Congestion is already a huge problem at peak times and building will add to this problem. The land has been used as a small farm and development will effect the quality of life of neighbours and the community.

Proposed Change Requested

Build elsewhere.

Council Response

No Change Site access is achievable from Church Lane and highways consultees have confirmed local links acceptable. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would

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have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper BP12. Although the overall area in which this site lies is a restricted area of green belt separating Gomersal and Liversedge, the site itself is small in relation to the size of the strategic gap and is well related to the settlement. The site is entirely bounded by trees which separates the site from its wider setting and its degree of containment means there is no risk of sprawl or encroachment and impact on openness would be limited. Responses from technical consultees have confirmed the suitability of the site for development subject to mitigation which can be addressed at the detailed planning application stage.

Paragraph/Site: **H567**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3744**

Soundness - Justified

By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development.

Soundness - Consistent with National Policy

Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that "special regard" should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess

Proposed Change Requested

An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of this Listed Building and what impact the loss of this undeveloped site and its subsequent development might have upon its significance.

Council Response

No Change 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).

Paragraph/Site: **H591**

Consultee: **943298 Linda & Robert Smith**

Agent:

Rep ID: **PDLP_AD411**

Soundness - Justified

The plan is unsound with regard to H591. There are concerns about whether the required visibility splays can be achieved, highway safety, sewage capacity and primary school provision in Gomersal. Housing capacity has also increased since last year from 115 to 135.

Proposed Change Requested

Consider, plan and carry out improvements to primary school provision in Gomersal, sewage capacity down Cliffe Lane or alternative route, and road improvement/widening along Cliffe Lane (west of the public footpath to the west of H591). The infrastructure work should be planned before this large scale development could be considered sound.

Council Response

No Change The council applied a revised density rate to all sites following the consultation on the draft local plan increasing the density from 30 dph to 35 dph and providing a capacity of 135 dwellings. This figure is only indicative and the site will be subject to a detailed planning application. The site promoter has prepared a scheme for the site which is set out in their representation at PDLP_AD1947 for 100 dwellings (see Appendix 1) but outlines at 3.1 of their submission that their "client would be amenable to providing 135 dwellings on site" and do not see any constraints to prevent this. The site promoter has provided the following evidence to support the site allocation: Appendix 1 Indicative Masterplan Appendix 2 Transport Appraisal with Access Layout Appendix 3 Green Belt Review Appendix 4 Heritage Impact Appraisal Appendix 5 Preliminary Ecological Appraisal Appendix 6 Arboricultural Pre-Development Report Appendix 7 Drainage and Flood Risk Assessment Appendix 8 Geo-Environmental Desk Study Report including Coal Authority Report Appendix 9 Noise Assessment. The site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this. Appendix 1 Indicative Masterplan outlines the proposed access. Appendix 2 Transport Appraisal with Access Layout provides additional evidence to support the site allocation. Highways assessments show that wider links to the network are acceptable subject to some local improvements. This is acknowledged in the site allocation text box. No objections received from technical consultees on surface water drainage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the

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local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H591**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3746**

Soundness - Justified

By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development.

Soundness - Consistent with National Policy

Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay "special attention" to "the desirability of preserving or enhancing the character or appearance" of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.

Proposed Change Requested

An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.

Council Response

No Change 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).

Paragraph/Site: **H591**

Consultee: **944644 Sylvia Carr**

Agent:

Rep ID: **PDLP_AD1243**

Soundness - Justified

This proposal should be carefully considered as the area is already under stress with less than adequate schools and choked up minor roads and the infrastructure of Latham Lane leading to Cliffe Lane is already stretched. There are concerns about how the minor roads will cope, the cost to the community and the effect on residents of the surrounding area from more noise, more pollution and loss of community spirit.

Council Response

No change. The allocation of this site for housing is considered consistent with the council's Site Allocation Methodology. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this. If access is provided from Ferrand Lane, improvements would be required to the junction of Latham Lane / Ferrand Lane / West Lane. Improvements would also be required to the road width on Ferrand Lane and the provision of a pedestrian footway between the site and Latham Lane. Ferrand Lane is also a PROW and is a private road and would need to be made up to adoptable standards. A noise assessment has been submitted which the council considers supports the allocation of the site. The site is not near an area of poor air quality. Air quality emissions from this site has been considered and recommendations have been made to safeguard sustainability of development with the aim to aid with the reduction of pollutants in the district within the air quality report.

Paragraph/Site: **H591**

Consultee: **947223 B Knox**

Agent:

Rep ID: **PDLP_AD1245**

Legally Compliant

Adding housing capacity to sites without consultation.

Soundness - Positively Prepared

Use brownfield sites first.

Soundness - Justified

Overdevelopment of the area. Site capacity has increased without consultation. Road infrastructure cannot cope - negative impact on existing traffic congestion on Cliffe Lane and associated air pollution. This includes lorries from local industry. Schools oversubscribed and insufficient health facilities to accommodate the development. Negative impact on wildlife. Flood risk issues will be made worse and already affect existing properties.

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Proposed Change Requested

Site should be rejected. They are fields and should remain so.

Council Response

No ChangeThe density figure of 30 dwellings per hectare (outlined in the draft Local Plan was increased to 35 to reflect the average density previously delivered on housing sites within the district. Each allocation has an indicative capacity, final capacities will be established at the detailed planning application stage.The Publication Draft Local Plan Accepted Site Options – Technical Appraisal (BP29 page 40) sets out the site appraisal for this site.The site is contained by existing buildings on three sides and by Ferrand Lane to the north which would present a strong new green belt boundary. The containment provided by strong boundaries and existing development presents no risk of sprawl. This is an area of countryside but while visually linked to the wider countryside beyond Ferrand Lane to the north the strength of existing containment limits the relationship. The western extent of the option would begin to consolidate with the area of urban fringe where there is existing residential and other development at Throstle Nest, which could lead to pressure for further encroachment.The site is available and the site promoters have agreement to bring the site forward for development. Highways assessments show that wider links to the network are acceptable subject to some local improvements. This is acknowledged in the site allocation text box. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper (BP12).The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.West Yorkshire Ecology do not have any objection to the development of the site. The Arboriculture Pre-Development Report submitted by the site promoter has been assessed by the Kirklees Tree Officer. It is considered that the site is suitable as an allocation although there are some tree conflicts which would require to be addressed at the Planning application stage. No objections have been received from technical consultees in relation to surface water flood risk and drainage. The site promoter has submitted a drainage and flood risk assessment to support the allocation (Appendix 7 of PDLP_AD1947). The requirement for a flood risk assessment at a detailed planning application stage is acknowledged in the site allocation text box.

Paragraph/Site: **H591**

Consultee: **947469**

James Robertson

Agent:

Rep ID: **PDLP_AD1411**

Soundness - Justified

The increase in traffic movement and resulting air pollution will have a negative impact on Gomersal. The three old mining works under the Cliffe Lane site need further examination. The proposed narrowing of Cliffe Lane at the site entrance, if this were the only method of achieving a legal sight line, is unacceptable. Gomersal has only two primary schools not three as the developers put in the proposal. Both schools are at capacity.

Council Response

No ChangeThe site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this. Highways assessments show that wider links to the network are acceptable subject to some local improvements. This is acknowledged in the site allocation text box.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper (BP12). Part of the site lies within a high risk coal referral area. This is acknowledged in the site allocation text box. The site promoter has provided additional evidence to support the allocation in this respect (Appendix 8 Geo-Environmental Desk Study Report including Coal Authority Report). The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H591**

Consultee: **950082**

mr gary hutchinson

Agent:

Rep ID: **PDLP_AD105**

Soundness - Positively Prepared

The methodology used for the sustainability appraisal heatmap admits (2.30) it's based on "subjective assessments " and assumptions.

Soundness - Justified

The plan still has brownfield in rejected sites close to h591. Also it h591 cannot be considered the most appropriate site with having 300+ houses on cliffe

lane in recent years,without further road infrastructure, the alternative brownfield sites in Gomersal will deliver sufficient housing for this village.

Council Response

No ChangeThe site is proposed as an accepted housing allocation. It formed an accepted housing allocation in the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this.The Local Plan has been subject to transport modelling to consider the cumulative impact of development (BP12 Transport Model Technical Paper).

Paragraph/Site: **H591**

Consultee: **963550 Mrs Angela Heslop**

Agent:

Rep ID: **PDLP_AD768**

Soundness - Justified

Initially, the proposed allocation was for a policy compliant scheme for 100 dwellings retaining trees and hedgerows, but this has been increased to 135, these additional houses are not shown on the site plan drawing, where is the documentation allowing this increase and where are they intending to be sited?. A major point of concern are the roads supplying access to this site – West End/Latham Lane and Cliffe Lane (below site access) are extremely narrow and I question meeting the required visibility splays due to the winding of the roads and often allowing single file traffic only. The development is likely to result in a material impact of the operation of the local highway. Conservation concerns - The main landscape features are to be retained including the hedgerows which house wildlife, specifically H2 and H3. With regard to H2, there is only a slight gap, so I question the access to the top of the field. I can submit photographic evidence of this particular hedgerow continuing across the borderline. Retaining the protected trees and not damaging the roots will also have a large impact on proposed building. I also firmly believe that this is an intrusion into greenbelt. There are protected bats in the area, which has been addressed in the report, but it wasn't apparent where the actual habitat is. We certainly have them in very close proximity to our property, we have also had newts in the garden. There is insufficient education provision for such a number of dwellings as the schools are full and over subscribed. There has not been due consideration of local facilities i.e., schools, doctors, dentists.

Proposed Change Requested

Site should be retained as green belt.

Council Response

No ChangeThe council applied a revised density rate to all sites following the consultation on the draft local plan increasing the density from 30 dph to 35 dph and providing a capacity of 135 dwellings. This figure is only indicative and the site will be subject to a detailed planning application.The site promoter has prepared a scheme for the site which is set out in their representation at PDLP_AD1947 for 100 dwellings (see Appendix 1) but outlines at 3.1 of their submission that their "client would be amenable to providing 135 dwellings on site" and do not see any constraints to prevent this. The site promoter has provided the following evidence to support the site allocation:Appendix 1 Indicative Masterplan Appendix 2 Transport Appraisal with Access Layout Appendix 3 Green Belt Review Appendix 4 Heritage Impact Appraisal Appendix 5 Preliminary Ecological Appraisal Appendix 6 Arboricultural Pre-Development Report Appendix 7 Drainage and Flood Risk Assessment Appendix 8 Geo-Environmental Desk Study Report including Coal Authority Report Appendix 9 Noise Assessment.The site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this. Appendix 1 Indicative Masterplan outlines the proposed access. Appendix 2 Transport Appraisal with Access Layout provides additional evidence to support the site allocation.West Yorkshire Ecology do not have any objection to the development of the site. The Arboriculture Pre-Development Report submitted by the site promoter has been assessed by the Kirklees Tree Officer. It is considered that the site is suitable as an allocation although there are some tree conflicts which would require to be addressed at the Planning application stage. It is proposed that additional text is incorporated into allocation box to reflect this. The site promoter has submitted an heritage impact assessment. The council is supportive of its conclusions and consider that in designing the final layout of the site, it will be important to ensure the 'agricultural' nature of the treatment to Ferrand Lane is maintained and supplemented. It is proposed that additional text is included in the allocation box to reflect this.The impact of development on school place planning has been assessed through

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the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H591**

Consultee: **964676**

Margaret Taylor

Agent:

Rep ID: **PDLP_AD3304**

Soundness - Positively Prepared There are many brownfield sites in Cleckheaton and surrounding areas which should be developed before green belt land

Soundness - Justified

The site is not justified on the grounds of: - inadequate access - the only access to the site is via Ferrand Lane and Cliffe Lane. Ferrand Lane is currently unadopted and joins Latham Lane at its junction with West Lane which is narrow with poor sight lines. Cliffe Lane is also very narrow at the access site and is already a very busy road with private cars and heavy goods vehicles. - Gomersal is becoming over developed with 260+ houses on the old Burnley site and development at Roundhill which adds to the volume of traffic - schools are oversubscribed

Proposed Change Requested

Use brownfield sites as an alternative to H591 and the use of green belt land

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **H591**

Consultee: **967378**

Mr James D F Robertson

Agent:

Rep ID: **PDLP_AD982**

Legally Compliant

The number of proposed houses for the site has been increased since the first consultation without any further consultation or opportunity for objections to be made.

Soundness - Justified

The land is adjacent to a number of protected trees, development will impact on wildlife. Access constraints, Cliffe Lane is a narrow road. Impact on character of Gomersal. Local schools are full

Soundness - Effective

Third party land to gain visibility splays understood to be unavailable.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district 's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this. Highways assessments show that site access is achievable and that wider links to the

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network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The site is not near an area of poor air quality. Air quality emissions from this site has been considered and recommendations have been made to safeguard sustainability of development with the aim to aid with the reduction of pollutants in the district. No objections have been raised from West Yorkshire Ecology or Natural England. The density figure of 35 dwellings per hectare reflects the average density previously delivered on housing sites within the district. Each allocation has an indicative capacity, final capacities will be established at the detailed planning application stage.

Paragraph/Site: **H591**

Consultee: **967524**

Mr Richard Morton

Agent: **967517**

Mr Stephen Courcier

Rep ID: **PDLP_AD1947**

Soundness - Positively Prepared

Evidence has been submitted to demonstrate that a number of the constraints outlined are not applicable. No third party land is required to achieve the visibility splays. No improvements are required to the local highway network. No protected trees will be impacted by the potential access point on to Cliffe Lane and there are no significant noise sources near the site. Additional information has been submitted to demonstrate that the site has no constraints to development: - indicative masterplan, Transport appraisal with access layout, green belt review, heritage impact appraisal, preliminary ecological appraisal, arboricultural pre-development report, drainage and flood risk assessment, geo-environmental desk study report including Coal Authority Report and noise assessment.

Proposed Change Requested

Remove a number of the 'constraints' from the site policy box for H591 'Land to the west of Cliffe Mount, Ferrand Lane, Gomersal'.

Council Response

No Change. Support for the allocation from the site promoter is noted. It is acknowledged that the site promoter (PDLP_AD1947) has provided the following information to support the site allocation: Appendix 1 Indicative Masterplan, Appendix 2 Transport Appraisal with Access Layout, Appendix 3 Green Belt Review, Appendix 4 Heritage Impact Appraisal, Appendix 5 Preliminary Ecological Appraisal, Appendix 6 Arboricultural Pre-Development Report, Appendix 7 Drainage and Flood Risk Assessment, Appendix 8 Geo-Environmental Desk Study Report including Coal Authority Report, Appendix 9 Noise Assessment. It is considered appropriate to retain reference in the Site allocations text box to potential constraints to ensure clarity of information requirements at the detailed planning application stage.

Paragraph/Site: **H591**

Consultee: **967962**

Mrs Helen Saville

Agent:

Rep ID: **PDLP_AD1393**

Soundness - Positively Prepared

There are far better suited brownfield sites that could be used instead of losing this area of attractive green space. With other more suited developments proposed in Gomersal this would certainly be a stretch too far.

Soundness - Justified

This development is far too big for the location and would cause numerous problems for the road infrastructure which simply could not cope with the amount of extra traffic this would create.

Council Response

No Change. SD5 Sustainability Appraisal sets out an assessment of reasonable alternatives for development. PC11 Kirklees Local Plan Rejected Sites Option Report also sets out an assessment of alternative sites considered for development which have been rejected. The site is contained by existing buildings on three sides and by Ferrand Lane to the north which would present a strong new green belt boundary. The containment provided by strong boundaries and existing development presents no risk of sprawl. This is an area of countryside but while visually linked to the wider countryside beyond Ferrand Lane to the north the strength of existing containment limits the relationship. The western extent of the option would begin to consolidate with the area of urban fringe where there is existing residential and other development at Throstle Nest, which could lead to pressure for further encroachment. The Publication Draft Local Plan Accepted Site Options – Technical Appraisal (BP29 page 40) sets out the site appraisal for this site. The density figure of 30 dwellings per hectare (outlined in the draft Local Plan) was increased to 35 to reflect the average density previously delivered on housing sites within the district. Each allocation has an indicative capacity, final capacities will be established at the detailed planning application stage. The site is available and the site promoters have agreement to bring the site forward for development. Highways assessments show that wider links to the network are acceptable subject to some local improvements. This is acknowledged in the site allocation text box. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise

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cannot be adequately mitigated against. See Transport Model Technical Paper (BP12).

Paragraph/Site: **H591**

Consultee: **972433 Anne Croasdell**

Agent:

Rep ID: **PDLP_AD1160**

Soundness - Positively Prepared Don't build on Green Belt land when there are brownfield sites in close proximity. Gomersal already has more than its fair share of large commuter houses, and doesn't need anymore.

Soundness - Justified Local schools and other amenities in Gomersal do not have the capacity to cope with another increase in population. Cliffe Lane, is not able to cope with the amount of traffic which would be generated.

Council Response

No ChangeThe Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through:the use of Local Development Orders on brownfield sites;the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate;the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate;preparation of a brownfield land strategy and masterplans for key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.The site is contained by existing buildings on three sides and by Ferrand Lane to the north which would present a strong new green belt boundary. The containment provided by strong boundaries and existing development presents no risk of sprawl. This is an area of countryside but while visually linked to the wider countryside beyond Ferrand Lane to the north the strength of existing containment limits the relationship. The western extent of the option would begin to consolidate with the area of urban fringe where there is existing residential and other development at Throstle Nest, which could lead to pressure for further encroachment.The site promoter (PDLP_AD1947) has provided an Indicative Masterplan for the site (Appendix 1 of their submission which indicates the proposed access and Appendix 2 Transport Appraisal with Access Layout. The council considers that the site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this.Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H591**

Consultee: **972734 Mr Derek Allan**

Agent:

Rep ID: **PDLP_AD1336**

Soundness - Positively Prepared A lot of development is proposed in a small area of Gomersal. Consideration should be given to brownfield sites and Urban Green Space before green belt.

Soundness - Justified Housing capacity has increased without further consultation. Additional traffic would be generated on the already crowded Cliffe Lane by development of H591. Cumulative traffic impacts of H591, H489, H2667, H2627 and sites with planning permission in the Gomersal area. Pollution from additional traffic would be dangerous. Cliffe Lane would need to be narrowed to achieve sufficient sight lines for the access to H591 and the access is not suitable for a site of this size. The proposed developer may not have control over the access to achieve visibility splays, the proposed access is adjacent to an already established public right of way and there is no right of access using Ferrand Lane to the north. Impact emergency services access. Houses will be used by commuters. The site currently floods at the western side. Mine shafts on the site (plans attached with representation). Lack of primary school places and lack of health facilities. Impacts on wildlife.

Proposed Change Requested The land is already used for agriculture and should be kept as such.

Council Response No ChangeThe density figure was increased from 30 dwellings per hectare to 35 dph to reflect the average density previously delivered on housing sites within the district. Each allocation has an indicative capacity, final capacities will be established at the detailed planning application stage.The Local Plan seeks

to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The site is contained by existing buildings on three sides and by Ferrand Lane to the north which would present a strong new green belt boundary. The containment provided by strong boundaries and existing development presents no risk of sprawl. This is an area of countryside but while visually linked to the wider countryside beyond Ferrand Lane to the north the strength of existing containment limits the relationship. The western extent of the option would begin to consolidate with the area of urban fringe where there is existing residential and other development at Throstle Nest, which could lead to pressure for further encroachment. The site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The site promoter (PDLP_AD1947) has provided an Indicative Masterplan for the site (Appendix 1 of their submission which indicates the proposed access and Appendix 2 Transport Appraisal with Access Layout. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. A drainage and flood risk assessment, noise assessment and geo environmental report have been submitted which the council considers supports the allocation of the site. West Yorkshire Ecology do not have any objection to the development of the site. The Arboriculture Pre-Development Report submitted by the site promoter has been assessed by the Kirklees Tree Officer. It is considered that the site is suitable as an allocation although there are some tree conflicts which would require to be addressed at the Planning application stage. It is proposed that additional text is incorporated into allocation box to reflect this. The site promoter has submitted an heritage impact assessment. The council is supportive of its conclusions and consider that in designing the final layout of the site, it will be important to ensure the 'agricultural' nature of the treatment to Ferrand Lane is maintained and supplemented. It is proposed that additional text is included in the allocation box to reflect this. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The site is not near an area of poor air quality. Air quality emissions from this site has been considered and recommendations have been made to safeguard sustainability of development with the aim to aid with the reduction of pollutants in the district

Paragraph/Site: H591

Consultee: 972864

Mrs Kathleen Robinson

Agent:

Rep ID: PDLP_AD1379

Soundness - Positively Prepared

As changes have been made to the Draft Local Plan since the end of the first consultation I feel that those affected should be able to comment freely on all aspects. In this case I am referring principally to H591. When this site was first mooted the number of homes was to be 115. now this has risen to 135 an increase of 17%.

Soundness - Justified

The plan is not 'sound' for safety reasons: There is only one entry/exit point to H591 which would present a huge problem if an incident rendered it unusable

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Traffic speed, volume and safety issues in this area have not been considered appropriately. Education. The local primary schools are full. Flood/drainage. I highlight the concerns that there is no available option for surface water drainage as the land does become spongy when wet and extremely muddy at the lower end. It is known that the site contains 3 old mine shafts. Consequently there will be old workings also.

Council Response

No Change The density figure increased from 30 in the draft Local Plan to 35 dwellings per hectare to reflect the average density previously delivered on housing sites within the district. Each allocation has an indicative capacity, final capacities will be established at the detailed planning application stage. The site is available and the site promoters have agreement to bring the site forward for development. Highways assessments show that wider links to the network are acceptable subject to some local improvements. This is acknowledged in the site allocation text box. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper (BP12). The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. No objections have been received from technical consultees in relation to surface water flood risk and drainage. The site promoter has submitted a drainage and flood risk assessment to support the allocation (Appendix 7 of PDLP_AD1947). The requirement for a flood risk assessment at a detailed planning application stage is acknowledged in the site allocation text box. Part of the site lies within a high risk coal referral area. This is acknowledged in the site allocation text box. The site promoter has provided additional evidence to support the allocation in this respect (Appendix 8 Geo-Environmental Desk Study Report including Coal Authority Report).

Paragraph/Site: **H591**

Consultee: **1046000 Mrs Lois Taber**

Agent:

Rep ID: **PDLP_AD1427**

Soundness - Positively Prepared

The number of houses has increased to 135 since the first consultation without further public discussion and this will exacerbate school provision problems as there are insufficient school places available to cope with the existing families in the area. Brownfield sites should be used first before green belt which should only be used under exceptional circumstances when there is no alternative. There is plenty of brownfield land available in the area, i.e. on Spen Lane.

Soundness - Justified

Objection to the soundness of the plan due to the inclusion of H591. There are concerns about only one access point via Cliffe Lane that serves a public right of way. There is no right of access over Ferrand as a section of it is a privately owned at Latham Lane/West Lane. Only one access point would be dangerous in emergencies for residents. It also compounds the amount of resident traffic going in and out of the same access point. The required visibility splay would require the removal of the boundary wall on our land which we do not agree to and both front and side boundary walls abut lines of trees under a preservation order. There has already been substantial new housing in the immediate area, including 250 houses built on the former Thomas Burnley Mill site which accesses Cliffe Lane. An additional 135 houses would create excessive vehicle movements onto busy Cliffe Lane which has already had traffic calming measures as a result of additional housing on Cliffe Lane. Creating more commuter traffic and children travelling further afield for schooling will only add to this problem. The company WS Bentley (Commercial Growers) nearby already generates 14 HGV movements daily on Cliffe Lane, passing the proposed site entrance and a planning application to extend the site which would further increase the amount of daily HGV traffic here. There are concerns about drainage as there is no available option for surface water drainage and flooding could impact our adjacent property and land. The land is green belt and is being used for agriculture. There are known deep mine shafts underground. There are insufficient school places for existing families and insufficient places available at dentists and doctors surgeries in the area. Diverse wildlife would be affected, including herons, hawks, newts and starlings and swallows and a colony of bats, some of which are protected or on the RSPB endangered list. There is a visiting barn owl, a woodpecker and rarely seen bullfinches.

Proposed Change Requested

The site should be kept as green belt land.

Council Response

No Change

Paragraph/Site: **H591**

Consultee: **1049453 Mr Gary Jones**

Agent:

Rep ID: **PDLP_AD608**

Soundness - Justified

Although this land is not greenbelt, it is a significant area of natural beauty in the area and one of the few local walks along public footpaths to take our children safely. Not only would we lose this but, the increase in local traffic on an already unsafe road would increase the risk for our children and significant numbers of elderly residents. There is also a considerable risk of flooding on this land for any potential new residents and I would consider the risk

unacceptable from their perspective. I have lived in the area for 10 years and that area of land is in an area of significant flooding. Kirklees Council will also tell you that it is simply not possible or financially viable to increase the level of public transport in this area and therefore the outcome would be a significant increase in the number of cars in the area contributing to pollution and road hazards. Many school children attending local schools walk on this road, which has zero traffic controls (road crossings, traffic lights etc...). The top of Cliffe lane is particularly dangerous because it is on the brow of a hill with very poor visibility for drivers. An increase in traffic will ultimately increase the dangers on this road. Local residents along Cliffe lane already park their cars on the road, which affects traffic flow during peak times, this will vastly increase with the additional residents. The increase in traffic would also considerably increase the noise pollution along Cliffe Lane. The top of Ferrand Lane is also the location for the historic Methodist church and Cliffe Lane where the entrance to the site would be is the location for historic buildings which would be ruined by the construction of new properties.

Soundness - Effective

The infrastructure on Cliffe Lane is currently very poorly maintained as it is. The access to this site would be on Cliffe Lane and would increase the cost of infrastructure maintenance considerably for Kirklees Council. The roads around this site are not suitable for the current level of traffic and the significant increase in traffic from years of building work and eventual new residents are not possible and make this development untenable. The area is entirely unsuitable for additional development. Most significantly the investment that would be required in local infrastructure to support such a development is simply not physically or monetarily possible.

Council Response

No ChangeThe site promoter (PDLP_AD1947) has provided the following information to support the site allocation:Appendix 1 Indicative Masterplan Appendix 2 Transport Appraisal with Access Layout Appendix 3 Green Belt Review Appendix 4 Heritage Impact Appraisal Appendix 5 Preliminary Ecological Appraisal Appendix 6 Arboricultural Pre-Development Report Appendix 7 Drainage and Flood Risk Assessment Appendix 8 Geo-Environmental Desk Study Report including Coal Authority Report Appendix 9 Noise Assessment. The Publication Draft Local Plan Accepted Site Options – Technical Appraisal (BP29 page 40) sets out the site appraisal for this site. CIL1 Kirklees Local Plan and Community Infrastructure Levy Viability Study 2015 and the Viability Study Addendum (CIL2) set out infrastructure requirements for cumulative impact of development. The site is contained by existing buildings on three sides and by Ferrand Lane to the north which would present a strong new green belt boundary. The containment provided by strong boundaries and existing development presents no risk of sprawl. This is an area of countryside but while visually linked to the wider countryside beyond Ferrand Lane to the north the strength of existing containment limits the relationship. The western extent of the option would begin to consolidate with the area of urban fringe where there is existing residential and other development at Throstle Nest, which could lead to pressure for further encroachment.The site is available and the site promoters have agreement to bring the site forward for development. Highways assessments show that wider links to the network are acceptable subject to some local improvements. This is acknowledged in the site allocation text box. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper (BP12).No objections have been received from technical consultees in relation to surface water flood risk and drainage. The site promoter has submitted a drainage and flood risk assessment to support the allocation (Appendix 7 of PDLP_AD1947). The requirement for a flood risk assessment at a detailed planning application stage is acknowledged in the site allocation text box.The site promoter has submitted an heritage impact assessment. The council consider that in designing the final layout of the site, it will be important to ensure the ‘agricultural’ nature of the treatment to Ferrand Lane is maintained and supplemented.

Paragraph/Site: **H591**

Consultee: **1049954 Pickles**

Agent:

Rep ID: **PDLP_AD803**

Soundness - Justified

The assessment has not been sufficiently thorough to inform the plan. The fact that this is stated to be an area of urban fringe within the green belt should indicate that development should be stopped. There are inconsistencies in the report that state both that the site is bounded by the footpath but that there is likely to be further encroachment. The transport assessment has failed to assess the impact of traffic on the wider area. Cliffe Lane is already busy despite being substandard and there is a blind corner at Roundhill Mill. Fusden Lane is busy and restricted by parked cars and also has blind bends. The alternative route via Woodlands Road is also inadequate. Adding traffic to the road network is negligent and will make the roads unsafe. An additional 270 cars will have a detrimental impact on air pollution levels which are already high because of the proximity of the M62. Gomersal is close to Hunsworth which is acknowledged as having one of the worst areas in the district for respiratory problems. The secondary school has recently been closed so there are fewer school places available. Traffic congestion and air pollution will increase near the primary schools. Modern residential development is not in keeping with the

conservation area.

Proposed Change Requested

Carry out wider impact assessments. Re-assess brownfield sites. Don't build on H591 or at least halve the number of houses proposed and put them closer to Cliffe Lane than Ferrands Lane so that they have a smaller impact.

Council Response

No Change Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy. The actual number of homes to be delivered on sites will be a matter for individual planning applications. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. The site is contained by existing buildings on three sides and by Ferrand Lane to the north which would present a strong new green belt boundary. The containment provided by strong boundaries and existing development presents no risk of sprawl. This is an area of countryside but while visually linked to the wider countryside beyond Ferrand Lane to the north the strength of existing containment limits the relationship. The western extent of the option would begin to consolidate with the area of urban fringe where there is existing residential and other development at Throstle Nest, which could lead to pressure for further encroachment. The site promoter (PDLP_AD1947) has provided an Indicative Masterplan for the site (Appendix 1 of their submission which indicates the proposed access and Appendix 2 Transport Appraisal with Access Layout. The council considers that the site access is achievable from Cliffe Lane with required visibility splays. The site promoter has confirmed control over the required land to achieve this. Highways assessments show that site access is achievable and that wider links to the network are acceptable. Assessment of the local highway network links has shown that a site of this size would not represent a significant intensification of use on the local highway network. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The site promoter has submitted an heritage impact assessment. The council is supportive of its conclusions and consider that in designing the final layout of the site, it will be important to ensure the 'agricultural' nature of the treatment to Ferrand Lane is maintained and supplemented. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **H591**

Consultee: **1059605 Mrs Heather Allan**

Agent:

Rep ID: **PDLP_AD1390**

Soundness - Positively Prepared

The number of houses on site H591 has increased to 135 since the first consultation of the local development plan, without the council allowing any further consultation or objection about this. Other sites in Gomersal for housing have been added to the local plan, also without any consultation.

Soundness - Justified

The development may cause flooding There are disused mine shafts on site There are no school places available in the vicinity The site is adjacent to protected trees/wildlife Uncertain whether suitable access can be achieved The local road network is congested and dangerous in the context of nearby employment uses and other recent development.

Proposed Change Requested

The land is already used for agriculture and should be kept as such.

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Council Response No ChangeThe density figure was increased from 30 dwellings per hectare to 35 dph to reflect the average density previously delivered on housing sites within the district. Each allocation has an indicative capacity, final capacities will be established at the detailed planning application stage. New sites were put forward for consideration as part of the consultation on the draft local plan.A drainage and flood risk assessment, noise assessment and geo environmental report have been submitted which the council considers supports the allocation of the site.Part of the site lies within a high risk coal mining area. A coal assessment report will be required at the time of a detailed planning application.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.West Yorkshire Ecology do not have any objection to the development of the site. The Arboriculture Pre-Development Report submitted by the site promoter has been assessed by the Kirklees Tree Officer. It is considered that the site is suitable as an allocation although there are some tree conflicts which would require to be addressed at the Planning application stage. It is proposed that additional text is incorporated into allocation box to reflect this. The site promoter has submitted an heritage impact assessment. The council is supportive of its conclusions and consider that in designing the final layout of the site, it will be important to ensure the 'agricultural' nature of the treatment to Ferrand Lane is maintained and supplemented. It is proposed that additional text is included in the allocation box to reflect this.

Paragraph/Site: **H2159** Consultee: **942142 unknown** Agent: **950095 Mr Jonathan Dunbavin** Rep ID: **PDLP_AD1836**

Soundness - Justified The Fieldhead Farm site performs better than this site. The promotion of unsustainable sites that contribute to Green Belt purposes or poor performance in the SA are not justified in preference to release of this site.

Council Response No changeThe sustainability appraisal is an independent assessment of the likely social, environmental and economic impacts of the plan carried out in accordance with an agreed methodology with the SA consultees. In assessing allocations/designations to be included in the local plan, a further assessment has been undertaken as outlined in the site selection methodology where consideration is given as to whether issues can be mitigated. The site allocation text sets out required mitigation measures and potential constraints. All allocations within the local plan will be subject to planning permission and tested against the policies in the plan to ensure that appropriate mitigation is in place to deliver the allocation.

Paragraph/Site: **H2159** Consultee: **942409** Agent: **950095 Mr Jonathan Dunbavin** Rep ID: **PDLP_AD1811**

Soundness - Justified The Lower Blacup Farm site (H366) performs better than this site. The promotion of unsustainable sites that contribute to Green Belt purposes or poor performance in the SA are not justified in preference to release of this site.

Proposed Change Requested The allocation should be deleted. It performs less well than alternatives such as site H366

Council Response No changeThe sustainability appraisal is an independent assessment of the likely social, environmental and economic impacts of the plan carried out in accordance with an agreed methodology with the SA consultees. In assessing allocations/designations to be included in the local plan, a further assessment has been undertaken as outlined in the site selection methodology where consideration is given as to whether issues can be mitigated. The site allocation text sets out required mitigation measures and potential constraints. All allocations within the local plan will be subject to planning permission and tested against the policies in the plan to ensure that appropriate mitigation is in place to deliver the allocation.

Paragraph/Site: **H2159** Consultee: **1049533 Mrs Jocelyn Singleton** Agent: Rep ID: **PDLP_AD638**

Soundness - Justified The area has at least three deep mine shafts which could cause subsidence. These shafts are also the home to many wildlife including bats. The land is contaminated with spoil from the pit which stood on the land. The land and the surrounding area support a large amount of local wildlife with many tree providing shelter and residences for many varieties of birds. Owls, foxes, squirrels and many other species depend on the wooded area for food and homes. The local schools are fully subscribed and it is difficult for many parents to get a place in them. Headlands School especially has major problems with traffic and parking at the start and the end of the day. Access, as suggested, would be very difficult. Both Darley Road and Lower Hall Close are not suitable for the use of large vehicles. They're both narrow residential roads where children play and residents park their cars. Darley Road is very steep in places and there is a

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

great difference in the height of it and the proposed development. Lower Hall Close has a right angled bend and also very narrow roads unsuitable for large vehicles. At the end of Darley Road there is a public footpath from Halifax Road to Bradford Road. During periods of high rainfall large volumes of water run down Darley Road and Denby Close adding to the water in the River Spen. Water also runs off the designated area but much is soaked up by the vegetation. Should houses be built there this water will run off hard surfaces adding to the flood risks in the area.

Soundness - Effective

This area is not suitable for the building on as it will cause increased risks of flooding, loss of wildlife, lack of school places. The presence of the old mine workings could cause future risks of land slips and sink holes. Any builder would have to work with the coal board which can be expensive.

Council Response

No change A coal mining risk assessment is required as part of a detailed planning application. Lowland mixed deciduous woodland covers part of this site, site is adjacent to disused railway corridor - 0.64ha has been removed from the developable area. no other objections from West Yorkshire Ecology, The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Site Access Achievable. Access can be achieved from Lower Hall Close and Darley Road both of which are adopted. No highways safety issues have been raised. No objections raised to surface water flood risk or surface water drainage from drainage consultees.

Paragraph/Site: **H2159**

Consultee: **1050097 Mrs Raheela Afzaal-Khan**

Agent:

Rep ID: **PDLP_AD793**

Soundness - Justified

The access to this proposed site is through streets which are already congested, The added burden of extra traffic would be dangerous.

Council Response

No Change The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. Site access is achievable from Lower Hall Close and Darley Road. No issues have been raised with local connecting road networks or highways safety issues.

Paragraph/Site: **H2537**

Consultee: **968351 Mrs Heather Banham**

Agent:

Rep ID: **PDLP_AD623**

Legally Compliant

Elderly residents who do not have access to the internet are unaware of the proposal, as are many residents who are directly affected.

Soundness - Positively Prepared

The green belt should be retained on this site. There are other sites in Gomersal which should be used.

Soundness - Justified

The schools in Gomersal are full to capacity and although the plan mentions road improvements there is no evidence of how the already over-crowded roads around Cliffe Lane will cope with the extra volume of traffic. Development would impact on the adjoining scout camp and on local wildlife.

Proposed Change Requested

Retain H2537 as green belt.

Council Response

No Change The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. This is an area of green belt that appears contained by settlement form and land use features. It slopes upwards towards the north so any development on the northern extent could be prominent. This appears to be in part a brownfield site with fixed surface infrastructure from its use as a car park. National planning guidance allows for the redevelopment of such sites provided that openness is maintained but given the lack of buildings on this site this would be unlikely to be achievable as appropriate development in the green belt. The site is different in character from the agricultural land to its west and appears as a underused parcel of land on the edge of the urban area well contained and screened by trees. As such it could be removed from the green belt with little impact on openness and without undermining the role and function of the green belt in this area. The existing green belt boundary in this location is poorly defined leaving adjacent land vulnerable to encroachment. The site would be an improvement to the existing situation if amended to follow landlines on its southern boundary. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway

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network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.

Paragraph/Site: **H2627**

Consultee: **972734 Mr Derek Allan**

Agent:

Rep ID: **PDLP_AD1351**

Soundness - Positively Prepared A lot of development is proposed in a small area of Gomersal.

Soundness - Justified Cumulative traffic impacts of H591, H489, H2667, H2627 and sites with planning permission in the Gomersal area. Pollution from additional traffic would be dangerous. Impacts on wildlife.

Council Response No changeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). A full Air Quality Impact Assessment is required at application stage.No objections raised from West Yorkshire Ecology.

Paragraph/Site: **H2667**

Consultee: **943274 Mrs Jane Woodward**

Agent:

Rep ID: **PDLP_AD1733**

Legally Compliant The communication of your proposals has been lacking, announced discreetly to avoid objections The plans have not reached enough residents and many are not even aware The online process to object is too complicated and lengthy

Soundness - Positively Prepared Loss of green belt

Soundness - Justified The site is not justified on the grounds of: - The land should be used for recreation, such as Sports Clubs for weekend and evening use, other areas of Kirklees have far superior facilities. Gomersal & Cleckheaton is desperate for a Club House and permanent pitch, the former Early years Unit and ground would be ideal and enable them to have facilities that compared with other teams eg. Dewsbury Rangers - the road infrastructure could not cope with extra traffic at peak times when traffic is already backed up along Oxford Road to Hilltop lights - The schools are already at fully capacity and an influx of families would mean a new school had to be built - There are local listed buildings which would look out of place in a residential area and are far more appearing with rural land around them - effect on value of property

Proposed Change Requested Delete allocation H2667 from the Plan.

Council Response No changeThe council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements.The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.A heritage impact assessment has been carried out for this site. (LE97)

Paragraph/Site: **H2667**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3749**

Soundness - Justified There has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area, or to the special architectural or historic interest of the Listed Buildings, or what harm might result to those elements which contribute to the significance of these designated assets by its eventual development.

Soundness - Consistent with National Policy Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay "special attention" to "the

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	<p>desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p>
Proposed Change Requested	<p>An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Conservation Area and the Listed Buildings in its vicinity and what impact the loss of this site and its subsequent development might have upon their significance.</p>
Council Response	<p>No changeCorrespondence within BP28 (dated 24th 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).</p>
Paragraph/Site: H2667	<p>Consultee: 965590 Dave McGuire Agent: Rep ID: PDLP_AD3827</p>
Soundness - Positively Prepared	<p>This site includes former school playing fields. Sport England object to this allocation until its development parameters are amended to reflect the need to replace the playing field resource.</p>
Proposed Change Requested	<p>Amend development parameters for Site H2667 to reflect the need to replace the playing field resource.</p>
Council Response	<p>ChangeModification ADMM35:Text added to Other site specific considerations “Replacement playing pitch provision or mitigation measures of equivalent value will be required to meet local needs having regard to the most up-to-date evidence for sport and recreational needs”. See submission document SD4</p>
Paragraph/Site: H2667	<p>Consultee: 972734 Mr Derek Allan Agent: Rep ID: PDLP_AD1350</p>
Soundness - Positively Prepared	<p>A lot of development is proposed in a small area of Gomersal.</p>
Soundness - Justified	<p>Cumulative traffic impacts of H591, H489, H2667, H2627 and sites with planning permission in the Gomersal area. Pollution from additional traffic would be dangerous. Impacts on wildlife.</p>
Council Response	<p>No changeThe Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). A full Air Quality Impact Assessment is required at application stage.No objections raised from West Yorkshire Ecology.</p>
Paragraph/Site: H2667	<p>Consultee: 1049278 MRS jane woodward Agent: Rep ID: PDLP_AD473</p>
Legally Compliant	<p>Local residents have not been contacted by council regarding allocation H2667.</p>
Soundness - Positively Prepared	<p>Loss of green belt.</p>
Soundness - Justified	<p>The site is not justified on the grounds of: - Traffic congestion - Oxford Road is already congested with traffic backed up to Hilltop lights with no room for emergency services to pass through - infrastructure capacity - schools are already full to capacity and could not accommodate additional demand - urban sprawl - impact on the village from the development - loss of further green space - impact on footpath which will require re-routing - impact of overlooking.</p>
Proposed Change Requested	<p>Delete allocation H2667 from the Plan.The land should be used for recreational space for the community e.g. sports facilities for local clubs</p>
Council Response	<p>No changeThree early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF</p>

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paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The local plan is supported by the Infrastructure Delivery Plan (Oct 2015) and Infrastructure Delivery Plan Addendum (Nov 2016) where the current capacity and future delivery of infrastructure to support growth is assessed. Development options in the local plan have also been assessed for their specific impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11). The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. The location, configuration and degree of containment of this site means that it could be released without undermining the strategic role of this area of green belt. It is bounded to the north and west by existing development and to the east and south by strong boundary features, meaning that there is no risk of further sprawl or encroachment. The allocation of the site confirms the principle of development. Details of the design and site layout and impact on adjoining residential properties will be addressed as part of a detailed planning application.

Paragraph/Site: **H2667**

Consultee: **1049940 Mrs Dellamarie Jackson**

Agent:

Rep ID: **PDLP_AD805**

Legally Compliant

The consultation process is confusing, deceiving and unfair. The site was not included in the general consultation and sites have been re-numbered and accepted after initially being rejected.

Soundness - Positively Prepared

The primary and secondary schools in Gomersal and the surrounding villages are already oversubscribed and have a pupil:teacher ratio among the highest in the country, with performance already suffering. New homes should not be added to an under-resourced area. The proposals put thousands of homes into a small area where the local road network is already one of the most congested in the country. There are no proposals to upgrade the roads. Health services, doctors and dentists are oversubscribed, there is pressure to close local hospitals and recreational and community facilities are being disposed of.

Soundness - Justified

The school building must not be demolished as this would cause significant harm to the conservation area and surrounding listed buildings. It should be renovated and re-used. Development will cause significant disturbance to the adjacent mixed deciduous woodland UK BAP priority habitat. There are no exceptional circumstances to justify the removal of this site or any part of this site from the green belt. This is a high risk mining area and a flood risk area. The road regularly floods after heavy rainfall.

Soundness - Consistent with National Policy

Development is inappropriate in the green belt as it is not infill and will result in further encroachment into the green belt from the expansion of gardens and the tipping of rubbish. There will be significant impact on visual openness.

Proposed Change Requested

Re-use the existing school building for housing and do not build 48 houses on the green belt part of this site. A fair and clear consultation opportunity on sites, without 'sneaking' them in after emailing to say other sites were rejected (incorrectly).

Council Response

No change. The differences between the draft and publication draft Local Plan are as a result of consultation, the changes are identified in SD12, Statement of Pre-Submission Consultation. The Publication Draft Local Plan is subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. No objections from West Yorkshire Ecology. Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt. A coal mining risk assessment will be required at the detailed planning application stage. No objections raised from drainage consultees.

Paragraph/Site: **H2667**

Consultee: **1059639 Nigel Barker**

Agent:

Rep ID: **PDLP_AD1400**

Soundness - Positively Prepared Loss of green belt

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Soundness - Justified	The site is not justified on the grounds of: - adverse impact on residential amenity due to noise and loss of views - over development of 48 houses on a small site - adverse impact on local highways and infrastructure, traffic issues at Hilltop - highway safety - junction onto Oxford Road near to Gomersal Primary School will be a danger to young children and families walking to school - out of character with the area and impact on a listed building - impact on footpath adjacent to the site - the site could be better used to provide sports facilities to local groups
Proposed Change Requested	Delete allocation H2667 from the PlanThe site could be better used for sports facilities to meet local needs
Council Response	No changeNo objections raised from Environmental Health.The balance of strengths and opportunities for growth and the challenges to growth are identified under the Place shaping – Publication Plan. This has informed the spatial strategy for the Plan.The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.No highways safety issues have been raised.A heritage impact assessment has been carried out on this site option. (LE97)The Local Plan contains policies which require new housing development to provide or contribute towards open space, sport and recreation facilities in the district.

Paragraph/Site: **H213**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3709**

Soundness - Justified	18 and 21 Waingate are Grade II Listed Buildings. The site also lies within the Linthwaite Conservation Area. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of these assets. However, there has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area, or to the special architectural or historic interest of the Listed Buildings, or what harm might result to those elements which contribute to the significance of these designated assets by its eventual development.
Soundness - Consistent with National Policy	Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.
Proposed Change Requested	Before allocating this site for development:- (1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Conservation Area and the Listed Buildings in its vicinity and what impact the loss of this site and its subsequent development might have upon their significance.
Council Response	Historic England now fully acknowledge that the selection of sites which have been put forward as allocations in the 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 Plan and this has involved full consultation with, and considerable input from, Historic England throughout. Historic England have also confirmed that the 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).This site has planning permission (2015/93867) so the principle of development has been established.

Paragraph/Site: **H221**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3712**

Soundness - Justified	This site adjoins the boundary of the Slaithwaite Town Centre Conservation Area. The loss of this currently-open area and its subsequent development could also harm elements which contribute to its significance. By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development.
Soundness - Consistent with National Policy	Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage