

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

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

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assets, such as Conservation Areas, can be harmed through development within their setting. In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, 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 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. 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). The site has permission (2010/92767) and is under construction, therefore the principle of development is already established.

Paragraph/Site: **H356**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3715**

Soundness - Justified

Low Wood Farm and barn, and Nos 21 to 31 Lower Wood Farm are Grade II Listed Buildings. The loss of this area and its subsequent development could harm elements which contribute to the significance of these buildings. 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. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually be developed.

Proposed Change Requested

Before allocating this site for development 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 change. 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 outline planning permission (2014/93946) so the principle of development is established.

Paragraph/Site: **H356**

Consultee: **969134 Mr Merlin Ash**

Agent:

Rep ID: **PDLP_AD3834**

Legally Compliant

Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. For

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further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Soundness - Justified

Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. 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 advise Allocations should be screened through the Appropriate Assessment stage.

Council Response

Change.Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28).Add text - "Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30." to site allocations box - reports required: see AD-MM43 in SD4.

Paragraph/Site: **H738**

Consultee: **943957**

Mr Ian Smith

Agent:

Rep ID: **PDLP_AD3720**

Soundness - Justified

23 to 27A Slades Road are Grade II Listed Buildings. The loss of this area and its subsequent development could harm elements which contribute to the significance of these buildings. 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. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.

Proposed Change Requested

Before allocating this site for development 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 changeHistoric 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).A Heritage Impact Assessment has been prepared for the site.

Paragraph/Site: **H738**

Consultee: **968315**

Ms Wendy Abbott

Agent:

Rep ID: **PDLP_AD559**

Soundness - Justified

This development would reduce the green corridor between settlements. The densely populated area of Golcar cannot support the extra demand on local infrastructure, road network, schools and doctors. This proposed development does not include any provisions to create extra jobs, therefore the extra traffic from the developments would be required to travel to other areas, increasing traffic congestion and adding to carbon emissions. Golcar is an historic village – building more housing in the area would be in conflict with Council guidelines to ensure there's a balance between development in sustainable locations and protecting the character of places and the environment. This development would adversely impact on the setting of nearly listed buildings. Bats are regularly

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present in this area. The proposed development could adversely impact on them and their habitat.

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. A heritage impact assessment is required to consider the contribution which site makes to elements which contribute to significance of the listed buildings. No objections have been received from technical consultees in terms of biodiversity. It is considered that the site access is acceptable in terms of the local highway network subject to highway improvements in context with the scale of the development and the local highway network.

Paragraph/Site: **H763**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3722**

Soundness - Justified

The Wesleyan Methodist School and. Former Wesleyan Chapel adjacent to this site and Providence Baptist Chapel on the opposite site of Hollins Row are Grade II Listed Buildings. This site also adjoins the boundary of the Slaithwaite Town Centre 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. 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 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

No change. 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). A Heritage Impact Assessment has been prepared for the site.

Paragraph/Site: **H1776**

Consultee: **968015 Mr Roberts**

Agent: **941947 Mr Andy Rushby**

Rep ID: **PDLP_AD12**

Council Response

No change. Support noted.

Paragraph/Site: **H2649**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3723**

Soundness - Justified

This site lies within the Marsden Conservation Area. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of this area. When the Conservation Area was originally designated, there must have been an acceptance that this open area contributed towards the character or appearance of the area. Therefore, one might conclude that the loss of this space would be likely to harm an element which contributes towards the significance of the Conservation Area. 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 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. 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

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	pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.
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	Before allocating this site for development 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	No change. 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).A Heritage Impact Assessment (LE96) has been produced for this site.

Paragraph/Site: **H2652** Consultee: **1049286 Mr Nicholas Willock** Agent: **1049237 Mr Nicholas Willock** Rep ID: **PDLP_AD469**

Proposed Change Requested	No change proposed.
Council Response	No change. Support noted.

Paragraph/Site: **H17** Consultee: **968632 Mrs Dawn Gemmell** Agent: Rep ID: **PDLP_AD235**

Soundness - Justified	This employment site is being allocated for housing, when adjacent green belt is being allocated for employment. Inconsistent application of green belt and transport policies. Tourism hub not considered.
Proposed Change Requested	Retain site as employment.
Council Response	No change. This site is not an employment site. If the site was not allocated for housing it would be removed from the Green Belt as a consequential change of Green Belt releases to the east of the site.

Paragraph/Site: **H39a** Consultee: **942647 Rob Ellis** Agent: Rep ID: **PDLP_AD716**

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: **H39a** Consultee: **945214 Mr and Mrs J Ryden** Agent: Rep ID: **PDLP_AD304**

Soundness - Justified	The site does not take into account the highways issues involved in increasing road traffic entering Station Road and having to join the main road network either through the busy junction with Commercial Road or via narrow Park Gate. Both are unable to deal with current traffic levels. Does not provide the improvements in infrastructure, school size and medical facilities required for an increased population. Would add to the danger of flooding from Park Dike already being experienced.
Proposed Change Requested	Allow no further development which increased traffic on Station Road.
Council Response	No change.Access arrangements for east of the site made in approved planning application. This layout allows access to the land to this site; Access could also be taken from Strike Lane, subject to widening and provision of footway.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-

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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: **H72**

Consultee: **944135 Mr Anthony Clifton**

Agent:

Rep ID: **PDLP_AD1073**

Soundness - Justified

Site is one of many that will generate traffic which in varying degrees will gravitate onto Penistone Road. Disruption of natural drainage could lead to new problems with Fenay Beck

Council Response

No change.The allocation of the site is not considered to have a detrimental impact on the wider highway network.

Paragraph/Site: **H72**

Consultee: **945214 Mr and Mrs J Ryden**

Agent:

Rep ID: **PDLP_AD306**

Soundness - Justified

The site does not take into account the highways issues involved in increasing road traffic entering Station Road and having to join the main road network either through the busy junction with Commercial Road or via narrow Park Gate. Both are unable to deal with current traffic levels. Does not provide the improvements in infrastructure, school size and medical facilities required for an increased population. Would add to the danger of flooding from Park Dike already being experienced.

Proposed Change Requested

Allow no further developments which add to traffic using Station Road.

Council Response

No change.Access is achievable provided visibility splays can be provided on Station Road.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: **H72**

Consultee: **967197 Mr Stuart Cole**

Agent:

Rep ID: **PDLP_AD656**

Soundness - Positively Prepared

Development here has previously been disregarded and it has been labelled as Green Belt, so what has changed and why is it now suitable to be classed as safeguarded? Skelmanthorpe has seen a huge amount of development in the last few years relative to the size of the village.

Soundness - Justified

The way the development map has been labelled in a very misleading fashion. The change of green belt label shows only the length of road alongside which the field will potentially be developed. Instead the whole field area that is to be changed from Green Belt to safeguarded should be highlighted. This would demonstrate much more clearly just how much open green space Skelmanthorpe would be losing. The Kirklees Light Railway provides an ideal boundary line for the expansion of Skelmanthorpe and in order to maintain its appeal it should be kept free of development in its immediate area. There is also a public footpath that runs along the north edge of this field. Development of the field would tarnish the openness and appeal of this walk.

Proposed Change Requested

Labelling and highlighting of the change in Green Belt should be made more clear. The whole field / area should be highlighted, not just the length of road that runs along side it.

Council Response

No change.The site was included in the Publication Local Plan after reconsideration of how development needs can be met in Skelmanthorpe, due to the rejection of a previously accepted site in the vicinity. The role and function of Skelmanthorpe has been considered in the Settlement Appraisal Technical Paper and the place shaping strategy in SD1 Strategy and Policies document considers the constraints and opportunities in this area.

Paragraph/Site: **H222**

Consultee: **942154 unknown**

Agent: **941891 Paul Leeming**

Rep ID: **PDLP_AD1987**

Council Response

No ChangeSupport noted

Paragraph/Site: **H222**

Consultee: **942647 Rob Ellis**

Agent:

Rep ID: **PDLP_AD708**

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.

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Council Response	No Change The continued co-operation with Wakefield on school place planning is acknowledged and supported		
Paragraph/Site: H222	Consultee: 944135	Mr Anthony Clifton	Agent: Rep ID: PDLP_AD1082
Soundness - Justified	Site is one of many that will generate traffic which in varying degrees will gravitate onto Penistone Road. Disruption of natural drainage could lead to new problems with Fenay Beck		
Council Response	No change. This site has planning permission for 200 dwellings (application reference: 2013/93441) therefore the principle for the development of this site has been established. It is acknowledged that part of the site is within flood zone 3.		
Paragraph/Site: H222	Consultee: 1049391	Miss Lucie Jennings	Agent: Rep ID: PDLP_AD765
Soundness - Justified	There is too much green field at stake here to be lost. It will add to the existing infrastructure pressures also.		
Proposed Change Requested	To remove H222 from the plan.		
Council Response	No change. This site has planning permission for 200 dwellings (application reference: 2013/93441) therefore the principle for the development of this site has been established.		
Paragraph/Site: H222	Consultee: 1049950	Mrs Elizabeth Willoughby	Agent: Rep ID: PDLP_AD737
Soundness - Justified	This area is liable to flooding and is generally very boggy. Concreting over it will adversely affect the water flow in the river and cause flooding. This is also against the rural character of the area and will increase traffic on the already busy Denby Dale road.		
Proposed Change Requested	Don't build on flood plain.		
Council Response	No change. This site has planning permission for 200 dwellings (application reference: 2013/93441) therefore the principle for the development of this site has been established. It is acknowledged that part of the site is within flood zone 3. Any development would be subject to policy PLP28 (Drainage) of the Local Plan, which requires proposals on greenfield sites to not exceed typical greenfield run-off rates.		
Paragraph/Site: H233	Consultee: 943055	Mr Steve Patterson	Agent: Rep ID: PDLP_AD539
Soundness - Positively Prepared	This is greenfield and development will urbanise a rural community.		
Soundness - Justified	Development will exacerbate flood risk from surface water run-off and the local infrastructure of roads, schools, health services, power utilities, sewerage etc cannot support the increased population.		
Council Response	No change. It is considered that the allocation, alongside the adjacent H634, can be contained into part of the village by Barnsley Road and woodland. 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. Any development on the site would have to be compliant with the drainage policy in the Local Plan which requires development to not exceed typical Greenfield run-off rates, through the use of Sustainable Drainage Systems. The current level of traffic is not seen as a reason for development not to take place on this site, nor is the traffic that could be generated from the development seen as significant enough to have a severe adverse impact on the surrounding highway network.		
Paragraph/Site: H233	Consultee: 949563	mr John Jordan	Agent: Rep ID: PDLP_AD43
Soundness - Justified	There is no associated infrastructure within the village to cope with the proposed growth in terms of roads, schooling and public transport.		
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 site is considered to be acceptable in terms of its		

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impact on the wider highway network.

Paragraph/Site: **H233**

Consultee: **963939 Mr Stewart Imeson**

Agent:

Rep ID: **PDLP_AD308**

Soundness - Justified

No explanation is provided that proves that the reallocation of green belt in site H233 to housing. I would ask also where the responses to the scores of specific objections to H233 proposal can be found? Without these responses being provided to each point raised, there has not been a consultation worthy of the name. It is simply a unsupported decision that is not supported by any valid feedback to the concerns raised.

Proposed Change Requested

The proof that allocating the green belt in H233 to housing demonstrates 'Special circumstances' needs to be supplied, otherwise how can the Kirklees decision be testedThe responses to each of the original objections raised, providing reasons why the reasons why Kirklees are choosing to ignore them, should be supplied if this process is to be a valid consultation.

Council Response

No change.The land is designated as green belt land in the UDP. The green belt boundaries have largely remained the same since 1980, but there has been an increase in development pressure since then as other opportunities have been exhausted. A green belt review has been undertaken to identify the most appropriate locations where green belt land can accommodate development.The Consultation Statement set out the responses to comments made at the Draft Local Plan. The plan has been subject to the consultation arrangements set out in the Council's Statement of Community Involvement. The proposals will be considered by an independent planning inspector who will lead a series of public hearings as part of the Examination in Public.

Paragraph/Site: **H233**

Consultee: **966587 Mrs Susan Imeson**

Agent:

Rep ID: **PDLP_AD310**

Soundness - Justified

Neither my concerns nor those on the other objections have been answered in any way. How was this latest decision arrived at and why were the objections raised seemingly dismissed as invalid. Where is the consultative response required to make this process valid? The reallocation of green belt to housing requires 'special circumstances' to be demonstrated. Exactly how has this been demonstrated in the case of site H233?

Proposed Change Requested

Requires the Council's commentary in response to the concerns raised in the original objections, otherwise how is this process a consultationA compelling argument as to how the allocation of green belt in H233 to housing satisfies the 'special circumstances' requirement needs to be provided to prove the validity of the decision which is as yet unsupported.

Council Response

No change.The Consultation Statement set out the responses to comments made at the Draft Local Plan. The plan has been subject to the consultation arrangements set out in the Council's Statement of Community Involvement. The proposals will be considered by an independent planning inspector who will lead a series of public hearings as part of the Examination in Public.The green belt boundaries have largely remained the same since 1980, but there has been an increase in development pressure since then as other opportunities have been exhausted. A green belt review has been undertaken to identify the most appropriate locations where green belt land can accommodate development.

Paragraph/Site: **H233**

Consultee: **967110 Karen Bedford**

Agent:

Rep ID: **PDLP_AD1381**

Soundness - Positively Prepared

the 'official' form which has been suggested for us to use is grossly unfair for the following reasons:- It was difficult to find the correct section in the first place, having to scroll through pages and pages to find it. The language used in the questions was not straightforward; there was use of long sentences, double negatives and 'legal jargon' There were no spaces for extra sort of comments. The re-designation of the greenbelt status of the site is not justified. There is an adequate supply of non-greenbelt land across Kirklees that could be used to meet the housing requirements of the region without destroying the character of a long established rural community.

Soundness - Justified

Infrastructure is not sufficiently in place and this will have a significant impact on local schools and other services in the area. Development will increase flooding risk to areas on the downward slope.

Soundness - Effective

The entrance road to the proposed development is a busy fast road. There will be a significant amount of traffic coming in and out of the estate. Concern is for the safety of home owners and cars users in the area. The site has a significant slope. The new development will 'tower over' the existing properties leading to a loss of privacy.

Council Response

No change.The plan has been subject to the consultation arrangements set out in the Council's Statement of Community Involvement. The proposals will be considered by an independent planning inspector who will lead a series of public hearings as part of the Examination in Public.The green belt boundaries have largely remained the same since 1980, but there has been an increase in development pressure since then as other opportunities have been exhausted. A

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green belt review has been undertaken to identify the most appropriate locations where green belt land can accommodate development. There are insufficient non-green belt sites in Kirklees. 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 considered to be acceptable in terms of its impact on the wider highway network. The detailed design of the site will be considered at planning application stage.

Paragraph/Site: **H233**

Consultee: **967733**

MR Gavin Adamson

Agent:

Rep ID: **PDLP_AD655**

Soundness - Justified

Greenbelt status can only be removed in "exceptional circumstances." The local schools are already full. The local GP Practice is also full. Parking is very difficult in Denby Dale. The only access to the site is via a small section of the A635 Barnsley Road, which is also one of the fastest stretches - a previous proposal was rejected because of potential safety issues. Existing sewage systems cannot cope and causes flooding. Additional houses will cause an increase in surface water leading to a risk of flooding. Houses built on this site will overlook adjacent houses on Inkerman Way and Broomhouse Close - the privacy of these houses will be impaired, particularly if 2 or even 3 storey houses are approved.

Proposed Change Requested

Other sites that are more appropriate for housing development in the wider area and which are not in greenbelt land have been rejected for reasons that are not clear. Properly reconsidering these sites for development would make it unnecessary to reclassify greenfield sites like H233.

Council Response

No change. The green belt boundaries have largely remained the same since 1980, but there has been an increase in development pressure since then as other opportunities have been exhausted. A green belt review has been undertaken to identify the most appropriate locations where green belt land can accommodate development. 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 considered to be acceptable in terms of its impact on the wider highway network. Any development on the site would have to be compliant with the drainage policy in the Local Plan which requires development to not exceed typical Greenfield run-off rates, through the use of Sustainable Drainage Systems. The density on the site proposed in the Local Plan is indicative and may be higher or lower when more detailed development proposals are submitted.

Paragraph/Site: **H233**

Consultee: **968702**

Mr Roger Bedford

Agent:

Rep ID: **PDLP_AD498**

Soundness - Positively Prepared

There is an adequate supply of non-greenbelt land across Kirklees that could be used to meet the housing requirements of the region without destroying the character of a long established rural community. This does not meet the exceptional justification required for land re-designation.

Soundness - Justified

The capacity of housing proposed will have a significant impact on local schools and other services. -The site is often saturated; any building development will increase flooding risk to areas on the downward slope No account has been taken of the topography and geographic location of the site in assessing its suitability for the level of housing proposed. The site is on the south side of the valley (north facing) and has a significant slope. The new development will 'tower over' the existing properties leading to a loss of privacy and blocking natural light. Planning regulations require the development to ensure that there are adequate spaces between the new buildings and existing buildings to prevent overlooking and loss of privacy. It should be noted that the existing estate to the north of the site has a much lower density of development and so avoids these issues.

Proposed Change Requested

The current greenbelt designation of the site should be maintained and no development undertaken.

Council Response

No change. The spatial strategy sets out the approach to using green belt land. There is an insufficient amount of non-green belt land to meet housing requirements in the district. 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. Any development on the site would have to be compliant with the drainage policy in the Local Plan which requires development to not exceed typical Greenfield

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run-off rates, through the use of Sustainable Drainage Systems. The density on the site proposed in the Local Plan is indicative and may be higher or lower when more detailed development proposals are submitted.

Paragraph/Site: **H233**

Consultee: **969286**

MRS Wendy Adamson

Agent:

Rep ID: **PDLP_AD673**

Soundness - Positively Prepared There are numerous other sites that are more appropriate for housing development in the area, which are not in greenbelt land. Thus, there is no need to remove greenbelt designation from Site H233

Soundness - Justified •Flooding has taken place in the past on Dearnside Road as a result of the sewerage systems not being capable of removing water quickly enough so water flooded out of the drains at the bottom of the hill at Dearnside Road. Surface water will increase if houses are built on site H233 as the field (H233) currently helps absorb excess water. The combination of building 72 new houses and the increases in rainfall over the past few years means that the risk of major flooding will increase. Parking is already very difficult in Denby Dale during the day. The local school in Denby Dale is full. Scissett Middle School and Shelly High School are also running close to their capacities. The local GP practice will also face similar issues.

Soundness - Effective The only access to site H233 from a public road is via a small section of the A635 Barnsley Road, which is also one of the fastest stretches. My understanding is that a previous proposal was rejected because of potential safety issues. Given that there are now more vehicles on the road, this will create a real hazard. Site H233 is higher than the land to the north of it. This means that houses built on this site will overlook adjacent houses on Inkerman Way and Broomhouse Close. Thus, the privacy of these houses will be dramatically impaired, if housing development is approved.

Council Response No change. The spatial strategy (6.1 in SD1) sets out the approach to using green belt land. There is an insufficient amount of non-green belt land to meet housing requirements in the district. Any development on the site would have to be compliant with the PLP28 which requires development to not exceed typical Greenfield run-off rates, through the use of Sustainable Drainage Systems. 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 considered to be acceptable in terms of its impact on the wider highway network. The detailed design of the site will be considered at planning application stage.

Paragraph/Site: **H233**

Consultee: **973598**

Agent: **973596**

Nigel J Chambers

Rep ID: **PDLP_AD2366**

Proposed Change Requested Amend H233 Transport Appraisal (PDLP Accepted Site Options - Technical Appraisals) to 'Green'.

Council Response No change. Support welcomed. It is considered that the transport assessment is a fair assessment of the site that recognises that the two sites are in different ownerships. This assessment has not precluded the site being accepted in the draft plan.

Paragraph/Site: **H233**

Consultee: **1046287**

Mr William Lyne

Agent:

Rep ID: **PDLP_AD197**

Legally Compliant Lack of public consultation. This has been a very rushed process with little public consultation and no public enquiry.

Soundness - Positively Prepared The land has repeatedly been designated Green Belt and rightly so. There are other brownfield sites within Denby Dale that have not been developed. Surely it would make sense to develop these first. The parcels of land under review are not 'in-fill' land, they never have been and cannot be described as such.

Soundness - Justified The land has repeatedly been designated Green Belt and rightly so. There are other brownfield sites within Denby Dale that have not been developed. Surely it would make sense to develop these first. The parcels of land under review are not 'in-fill' land, they never have been and cannot be described as such.

Proposed Change Requested A public enquiry needs to be held within the village as a matter of urgency. There has been very little publicity given to these very destructive plans. The council need to reaffirm their commitment to using brownfield sites over green belt sites.

Council Response No change. The plan has been subject to the consultation arrangements set out in the Council's Statement of Community Involvement. The proposals will be considered by an independent planning inspector who will lead a series of public hearings as part of the Examination in Public. The land is designated as green belt land in the UDP. The green belt boundaries have largely remained the same since 1980, but there has been an increase in development pressure since then as other opportunities have been exhausted. A green belt review has been undertaken to identify the most appropriate locations where green belt land can accommodate development. The approach to brownfield land is set out in section 6.6 of the Strategies and Policies document

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Paragraph/Site: H233	Consultee: 1048605	Mr Ged Keaveney	Agent:	Rep ID: PDLP_AD317
Soundness - Positively Prepared	There are many other suitable sites in the area that have the infrastructure to support some additional growth however it appears that Denby Dale, Skelmanthorpe and Clayton West in particular are required to take the burden of the required extra housing yet other villages have little or no sites at all.			
Soundness - Justified	No justification has been given for the removal of Green Belt on this site. We have been informed that the removal of Green Belt requires special circumstances to be demonstrated in each case but none have been demonstrated for this site and the issue is just being ignored. The removal of Green Belt without justification or demonstration of special circumstances combined with the excessive allocation of housing to certain areas with no clear plans on how the schools, roads and services will be improved to support the increase mean that this site allocation is unsound			
Proposed Change Requested	Provide details of the special circumstances that justify the removal of Green Belt on this site Provide details of why some areas have significant housing and commercial expansion yet others have none. Why can't the burden be spread more evenly.			
Council Response	No change.The green belt boundaries have largely remained the same since 1980, but there has been an increase in development pressure since then as other opportunities have been exhausted. A green belt review has been undertaken to identify the most appropriate locations where green belt land can accommodate development. 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 considered to be acceptable in terms of its impact on the wider highway network.			
Paragraph/Site: H233	Consultee: 1048793	Cllr Graham Turner	Agent:	Rep ID: PDLP_AD3279
Soundness - Justified	Site should remain as green belt. They will deliver very few houses and better sites exist within the Denby Dale ward. These sites are outside the current village centre and would have no direct link in to the village, and would add little to the village, and its development as a community.			
Proposed Change Requested	Remove site from the plan.			
Council Response	No change.It is considered that this site and the adjacent site H634 are well-contained by trees and Barnsley Road and could be connected to Denby Dale, on foot, via Kenyon Bank and Inkerman Way.			
Paragraph/Site: H233	Consultee: 1049286	Mr Nicholas Willock	Agent: 1049237	Mr Nicholas Willock Rep ID: PDLP_AD1100
Soundness - Consistent with National Policy	Comparing the merits of rejected options H322a/H322/H475 (Cumberworth Lane, Denby Dale) and accepted options H233/H634 (Inkerman): Cumberworth Lane has a more defensible boundary and development on three sides but Inkerman only has development on one side. The Inkerman sites would not result in a satisfactory settlement rounding off. Both areas of land have been assessed as requiring third party land to achieve visibility. Cumberworth Lane sites are in a more accessible location If the exceptional circumstances exist for the release of the Inkerman sites from the green belt they must also exist for the Cumberworth Lane sites.			
Proposed Change Requested	If the exceptional circumstances exist for the release of the Inkerman sites (H233/H634) from the green belt they must also exist for the Cumberworth Lane sites (H322a/H322/H475).			
Council Response	No change.It is considered that the site, together with the adjcant site will be contained by Tanner Wood, Barnsley Road and woodland.			
Paragraph/Site: H358	Consultee: 942154	unknown	Agent: 941891	Paul Leeming Rep ID: PDLP_AD1988
Council Response	No Change - Support for this site allocation noted.			
Paragraph/Site: H358	Consultee: 942647	Rob Ellis	Agent:	Rep ID: PDLP_AD707
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			

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possible impacts on education provision can be considered and mitigation suggested, if necessary.

Council Response

SUPPORT - No change, the continued co-operation with Wakefield Council on school place planning is acknowledged and supported.

Paragraph/Site: H358

Consultee: 949802

Mr Richard Jones

Agent:

Rep ID: PDLP_AD20

Soundness - Justified

There is simply no capacity for 44 more houses in the village, and particularly not in this area of Emley. Traffic and road safety constraints, lack of school places, poor internet speed, water pressure, impact on Millennium Green.

Council Response

No change. The site is proposed as an 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. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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: H358

Consultee: 949802

Mr Richard Jones

Agent:

Rep ID: PDLP_AD18

Soundness - Justified

Public right of way across the land, local road infrastructure and parking constraints. Impact on Millennium Green.

Council Response

No change. The site is proposed as an 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. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.

Paragraph/Site: H358

Consultee: 958854

Mr Martin Rhodes

Agent:

Rep ID: PDLP_AD953

Legally Compliant

The plan has not been prepared with hard facts or evidence, and without participation of the villagers.

Soundness - Justified

Does not meet local needs - village shops, schools and general facilities. Emley First School is already oversubscribed and there are no plans to increase school places. Drainage in and around Emley is inadequate. Access roads to the plot of land are unsuitable for increased traffic volumes - Warburton is a single track. The Millennium Green will become an isolated feature in the village.

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. The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.

Paragraph/Site: H358

Consultee: 960068

Mr Stephen Brough

Agent:

Rep ID: PDLP_AD983

Soundness - Positively Prepared

The plan has not been prepared with the participation of the community.

Soundness - Justified

The plan is not justified on the grounds of: - it has not been prepared using facts. - Schools - Emley School is already oversubscribed. There are no plans to expand the school and the addition of 44 houses would exacerbate the problem leading to children being schooled out of the area (Scisset and Flockton are already over subscribed) and additional car journeys due to lack of public transport - traffic congestion due to increased traffic which is already challenging due to size, construction and parked vehicles. Impact of increased traffic on the village and its capacity to accommodate it - access - Warburton is currently identified as a secondary access but if this is waived at planning application stage and becomes main access, it is single track, subject to parked cars and inadequate for additional vehicles. - pedestrian safety - conflict with children playing at playground and football and additional traffic - Millennium Green - currently this is accessed from Green Acres Close and across H358. Concerned that the development will impact on access rights. - impact on green spaces - H358 is the largest green space left

Proposed Change Requested

Delete allocation H358 from the Plan.

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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.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.The site is adjacent to the Millennium Green and the recreation ground.			
Paragraph/Site: H358	Consultee: 964742	Mr John Clarkson	Agent:	Rep ID: PDLP_AD2183
Soundness - Justified	Highway infrastructure cannot cope now. Increase in traffic will exacerbate this. - Wentworth, Upper Lane and Warburton. Schools are at capacity			
Proposed Change Requested	Further consultation and surveys by education, drainage and highways to establish whether services are fit for purpose.			
Council Response	No change.The site is proposed as an 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.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Kirklees Strategic Drainage have been consulted as part of the Local Plan process and have no objections to the proposal, subject to mitigation measures.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: H358	Consultee: 965522	Mr Roger Wood	Agent:	Rep ID: PDLP_AD970
Soundness - Justified	The site is not justified on the grounds of: - is there a need for 38 houses on a site with no proper access - school is at capacity with children having to travel to schools elsewhere and no plans to extend - access roads are dangerous and unsuitable - Warburton Road is single track, no pavement and a children's playing field on one side - highway safety is a concern -			
Proposed Change Requested	Delete allocation H358 from the Plan.Use unsightly, derelict, old mill and factory sites first.			
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.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.			
Paragraph/Site: H358	Consultee: 966685	Mr Nigel Metcalfe	Agent:	Rep ID: PDLP_AD999
Soundness - Positively Prepared	The plan has not been prepared with the participation of the community.			
Soundness - Justified	The plan is not sound on the grounds of: - it does not meet local needs for community facilities, shops, infrastructure or education - inadequate road systems - the main road through Emley is already a rat run for many commuters. Roads cannot cope with additional traffic. Upper Lane cannot accommodate further traffic, Warburton is a single track road. Woodhouse Lane/A636 Denby Dale Road is too narrow. Savile Street, School Lane, Church Street are used to avoid heavy traffic. - inappropriate development near the Millennium Green - it will be isolated from the rest of the village and community facilities - affect on wildlife - impact on ecology - impact on highway safety - impact on recreational amenities - inadequate drainage and sewage facilities in the village and low water pressure - impact on safe footpaths - impact on walkers, runners, cyclists, dog walkers - impact on public rights of way - impact on first school - Emley First School is already at capacity. Wakefield Council raised concerns at draft stage. - inadequate public transport links - additional development will destroy the vistas - the village has seen a growth in housing of over 60% since 1960 with no improvement in highway access or public service - inadequate access Wentworth Drive or Green Acres Close due to ransom strip and volume of traffic, cars parked at junction of Beaumont Street - Traffic calming in Flockton has impacted on traffic in Emley - Flood risk - additional housing will further reduce available bandwidth.			

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Proposed Change Requested	Delete allocation H358 from the Plan.
Council Response	No change.The consultation was undertaken in accordance with the Council’s Statement of Community Involvement (SD16). 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.Whilst Wakefield Council previously raised concerns about this sites possible impact on school place provision, cooperation has occurred and should continue to occur and data on school place planning is being shared between the two authoritiesIt is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper.The site was assessed in accordance with BP23 Local Plan Methodology Part 2 – no concerns were identified from technical consultees with respect to wildlife and ecology.

Paragraph/Site: **H358** Consultee: **966689 Sophie Metcalfe** Agent: Rep ID: **PDLP_AD993**

Soundness - Positively Prepared	The plan has not been prepared with the participation of the community.
Soundness - Justified	The plan is not sound on the grounds of: - it does not meet local needs for community facilities, shops, infrastructure or education - inadequate road systems - the main road through Emley is already a rat run for many commuters. Roads cannot cope with additional traffic. Upper Lane cannot accommodate further traffic, Warburton is a single track road - inappropriate development near the Millennium Green - it will be isolated from the rest of the village and community facilities - affect on wildlife - impact on ecology - impact on highway safety - impact on recreational amenities - inadequate drainage and sewage facilities in the village - impact on safe footpaths - impact on walkers, runners, cyclists, dog walkers - impact on public rights of way - impact on first school - Emley First School is already at capacity. Wakefield Council raised concerns at draft stage. - inadequate public transport links

Proposed Change Requested	Delete allocation H358 from the Plan.
Council Response	No change.The consultation was undertaken in accordance with the Council’s Statement of Community Involvement (SD16). 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.Whilst Wakefield Council previously raised concerns about this sites possible impact on school place provision, cooperation has occurred and should continue to occur and data on school place planning is being shared between the two authoritiesIt is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper.The site was assessed in accordance with BP23 Local Plan Methodology Part 2 – no concerns were identified from technical consultees with respect to wildlife and ecology.

Paragraph/Site: **H358** Consultee: **966692 Jill Metcalfe** Agent: Rep ID: **PDLP_AD990**

Soundness - Positively Prepared	The plan has not been prepared with the participation of the community.
Soundness - Justified	The plan is not sound on the grounds of: - it does not meet local needs for community facilities, shops, infrastructure or education - inadequate road systems - the main road through Emley is already a rat run for many commuters. Roads cannot cope with additional traffic. Upper Lane cannot accommodate further traffic, Warburton is a single track road - inappropriate development near the Millennium Green - it will be isolated from the rest of the village and community facilities - affect on wildlife - impact on ecology - impact on highway safety - impact on recreational amenities - inadequate drainage and sewage facilities in the village - impact on safe footpaths - impact on walkers, runners, cyclists, dog walkers - impact on public rights of way - impact on first school - Emley First School is already at capacity. Wakefield Council raised concerns at draft stage. - inadequate public transport links

Proposed Change Requested	Delete allocation H358 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

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School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Whilst Wakefield Council previously raised concerns about this sites possible impact on school place provision, cooperation has occurred and should continue to occur and data on school place planning is being shared between the two authorities. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper. The site was assessed in accordance with BP23 Local Plan Methodology Part 2 – no concerns were identified from technical consultees with respect to wildlife and ecology.

Paragraph/Site: **H358**

Consultee: **972647 K Wood**

Agent:

Rep ID: **PDLP_AD971**

Soundness - Justified

The site should be deleted on the grounds of: - traffic - traffic on Warburton Road is one lane and lots of parked cars - pedestrian safety - there are no pavements on the road up to Greenacres Close and the children use the road to walk to school and catch the bus - School is only just coping to accommodate children and with additional children from proposed development could not cope - sewers - would they be able to cope Millennium Green would be spoilt and left out of a limb

Proposed Change Requested

Delete allocation H358 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. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.

Paragraph/Site: **H358**

Consultee: **972767 Rachel J Evans**

Agent:

Rep ID: **PDLP_AD809**

Soundness - Positively Prepared

The plan has not been positively prepared with the needs of the local community considered. It does not consider or meet the need for further community facilities, schooling, improved local infrastructure or shops. The plan has not been prepared with consultation or participation of the local community. Concerns raised re health and safety of the residents of Emley, which were raised at the Public Consultation phase have been ignored and that there has been a disregard of objections made regarding site H358.

Soundness - Justified

The Plan is not justified on the grounds of: - it is not founded on clear evidence Emley is a small village within a rural area. - local facilities are already stretched and the infrastructure of the community would be unable to support a development of this number of dwellings. - Antiquated drainage struggles to cope with current residential development in the area and the water pressure is already significantly lower than ideal due to old infrastructure which prevents an increase in pressure. - Highways access to site H358 is crucially very limited. Warburton is a narrow road which in places has no footpath and due to on-road parking is in places a single track road. The access for large vehicles, in particular emergency vehicles, is impossible and a development of 44 dwellings would increase the problem - Highway safety - Access from the other side of the site is also dangerous due to junction at the bottom of Wentworth Drive where it meets Upper Lane. Visibility is very poor at this junction due to the persistent problems of on road parking on the junction and road layout. A development of 44 dwellings would increase the demands on the highways infrastructure of both village and surrounding areas. These roads were designed and built many years ago and are not suitable for current levels of traffic. There is no provision for updating highways infrastructure within the plan. - the local school is already oversubscribed and a development of this nature would create added pressure for school places which the plan has failed to address in terms of school places provision.

Proposed Change Requested

Delete allocation H358 from the Plan.

Council Response

No change. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). 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 facilities and accessibility of Emley have been considered in BP17

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Settlement Appraisal Technical Paper. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**

Consultee: **973343 Paula Kemp**

Agent:

Rep ID: **PDLP_AD1455**

Duty to Co-operate

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

Soundness - Positively Prepared

The entire exercise has been rushed and contains many inaccuracies, a sizeable majority of Kirklees Rural residents are unaware of what the Local Plan is and the consequences to their communities. Sustainable development should be at the core of any Plan. The allocated locations, topography and road networks throughout this area are totally unsuitable and the proposed developments unsustainable.

Soundness - Justified

Emley village is a small settlement, already used as a cut through for traffic from Kirkburton and Huddersfield consequently the roads are always highly congested. Access roads to the site are mainly single track as residents have little or no car parking. Footpaths are non-existent along Warburton and one side of Upper Lane. The small village school is vastly oversubscribed. No mention at all has been made of the impact to the Millennium Green or that the only designated Archaeological Site in Denby Dale Ward AS6686/2 and Scheduled Monument SM30961 lie within 40 metres of the site. Drainage throughout Emley Moor and Emley is a significant problem.

Soundness - Consistent with National Policy

The Plan is inconsistent with or directly contravenes National Planning Policy Framework.

Council Response

No change. The site is proposed as an 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 is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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 Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper. The site was assessed in accordance with BP23 Local Plan Methodology Part 2 – no concerns were identified from technical consultees with respect to wildlife and ecology. 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. DTC Response: The DTC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues.

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Paragraph/Site: **H358**Consultee: **973700****Mrs Linda Gregory**

Agent:

Rep ID: **PDLP_AD968****Soundness - Justified**

The site is not justified on the grounds of: - it does not meet local needs for community facilities, access to schools are over subscribed, GP access is difficult - Highway capacity - the roads cannot support additional traffic in the centre of the village and on roads approaching the proposed site - access concerns - Warburton does not have any pavements leading to concerns relating to safety especially as it passes a playground. Parking narrows road and access for delivery and emergency vehicles is already problematic - local sewage would struggle to cope - impact on wildlife - impact on tranquillity of the area and on residents - access from both sides of the site will create a rat run and impact on safety.

Proposed Change Requested

Delete allocation H358Reallocate H358 as green space or allotments or extend the Millennium green.

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.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.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 Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.

Paragraph/Site: **H358**Consultee: **975062****Mr Frank Batty**

Agent:

Rep ID: **PDLP_AD989****Soundness - Positively Prepared**

The plan has not been prepared with the participation of the community.

Soundness - Justified

The plan is not justified on the grounds of: - it is not clearly founded on evidence - it does not meet local needs for community facilities, shops, infrastructure or education - pedestrian safety - small village school is over subscribed. Wakefield has raised this as an issue the Millennium Green will be isolated from the rest of the village and community facilities - inadequate drainage system - access roads to the site are dangerous and unsuitable for further traffic. Warburton is a single track road, no footpaths and road cannot be widened. Emergency and delivery vehicles already have difficulties reaching the properties - there is a ransom strip to Wentworth Drive. Upper Lane is congested, single track due to parking and single footpath - safety concerns have been ignored for financial gain.

Proposed Change Requested

Delete allocation H358 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.Whilst Wakefield Council previously raised concerns about this sites possible impact on school place provision, cooperation has occurred and should continue to occur and data on school place planning is being shared between the two authoritiesIt is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.The site is adjacent to the Millennium Green and the recreation ground.

Paragraph/Site: **H358**Consultee: **975093****H Brough**

Agent:

Rep ID: **PDLP_AD967****Soundness - Positively Prepared**

The plan has not been prepared with the participation of the community.

Soundness - Justified

The plan is not justified on the grounds of: - it has not been prepared using facts. - Schools - Emley School is already oversubscribed. There are no plans to expand the school and the addition of 44 houses would exacerbate the problem leading to children being schooled out of the area and additional car journeys due to lack of public transport - traffic congestion due to increased traffic which is already challenging due to size, construction and parked vehicles. Impact of increased traffic on the village and its capacity to accommodate it - access - Warburton is currently identified as a secondary access but if this is waived at planning application stage and becomes main access, it is single track, subject to parked cars and inadequate for additional vehicles. - pedestrian safety -

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conflict with children playing at playground and football and additional traffic - Millennium Green - currently this is accessed from Green Acres Close and across H358. Concerned that the development will impact on access rights.

Proposed Change Requested

The site is not justified.

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. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**

Consultee: **976189**

Mr Roger Starkey

Agent:

Rep ID: **PDLP_AD621**

Soundness - Justified

The site should be deleted on the grounds of: - impact on the village, it has very few amenities and a poor transport system - traffic congestion would be worse with extra traffic generated from 44 new houses - highway capacity - all local roads through Emley are generally of limited width. In the case of access into the village from Woodhouse Lane / A636 Denby Dale Road, at some points the road is only 14 feet wide with poor road surfaces (edge erosion), necessitating single file traffic in places. In the case of Upper Lane, single file traffic is caused by on street parking for most of the day and traffic is particularly heavy at work times in the morning and evening. This is caused by traffic from other local villages and towns using Emley as a short cut to access the M1 North at Wakefield (J39) and South at Haigh (J38). The additional road traffic from 44 new dwellings would make this problem worse. No plans exist for road improvements. - access - the proposed site has access from Wentworth Drive or Green Acres Close. The entrance to Wentworth is from Beaumont Street (which is a continuation of Upper Lane). Cars parked on the street at the junction of Beaumont Street and Wentworth Drive cause traffic entering or leaving the village to be single file. The junction to Wentworth Drive has seen many accidents, and near misses. The sight line for traffic leaving Wentworth Drive is extremely poor due to the vehicles parked at the bottom of Wentworth Drive, the cars parked across the road together with vehicles frequently being parked on the pavement on Beaumont Street to the East of Wentworth Drive. The parked vehicles also create a hazard when traffic leaving and entering Wentworth Drive at the same time. Additional hazards are traffic coming onto this road from Outlane at this junction and also traffic parked by visitors to the White Horse Inn. There is also a further junction within 20 metres where Tyburn Lane joins Chapel lane. - The second proposed access to the site is from Green Acres Close, a small housing development, off Warburton, which leads into the Millennium Green. The entrance to the Green and the proposed site is currently used for disabled vehicles entering and using the Green and for mechanical equipment used for maintaining the Green. Warburton is a road that again leads off Upper Lane, the main road through the village. Warburton has housing to both sides for its entire length punctuated only by a small piece of land on which are children's slides and playing area. This is an Urban Green Space. Warburton is a heavily trafficked road populated with over 60 properties. It can only be accessed from Upper Lane. It has no footpaths on either side and is single carriageway at the point where it is adjacent to the playing fields. Access from the children's playing area is straight onto the road, with no footpath or protection area. Large delivery vehicles have problems negotiating this road. - Emergency vehicles trying to access the proposed site would have difficulty using this road, and due to their size would be delayed until parked vehicles could be moved. - Upper Lane has junctions with Church Street and then Warburton and Savile Street. Traffic from the A636 Denby Dale Road/Woodhouse Lane has to negotiate a very narrow twisty winding road before entering the village. Heavy goods vehicles use this road regularly, despite signs restricting them, which not only causes heavy wear to the road surfaces, but also causes delay to other road users due to their size. The local farm vehicles also need to use these narrow roads. Traffic calming measures in Flockton have resulted in some traffic now re-routing through Emley to reach surrounding villages, and also access the A636 then M1 North and South. Older roads have recently been subject to flooding with Clough Road being blocked for road traffic. Chapel Lane at its entry into the village also floods regularly (and was blocked only last month). This then overflows into the beck at the bottom of Outlane and continues, to where it enters Clough Road via the road bridge which then floods the road. Locally to Wentworth Drive there have been a number of sewerage blockages caused by the additional effluent from the additional housing; again this will be exacerbated by the proposed additional housing connected into the already over used system. Water pressure is another problem caused by the numbers connecting into the system; this pressure has steadily reduced over the years. The system is old and cannot cope with the existing demands made upon it. From an amenities point of view, Site H358 is located just East of the Millennium Green, which is now an area of outstanding beauty and tranquillity for the benefit of all that use it. The Green sits well with the local cricket and football clubs, together with hard surfaced sports areas for children nearby and is accessed by a public footpath which runs through the proposed Site H358. Additional housing in the area proposed will split this band of green recreational facilities into two separate areas, will diminish this amenity (which is central to the village) and will destroy the current vistas experienced by all users of the Millennium Green. Communications and Internet Access in the area are also

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of very poor quality. Additional housing will further reduce the available bandwidth

Proposed Change Requested

Delete allocation H358 from the Plan.

Council Response

No change. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). 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. Whilst Wakefield Council previously raised concerns about this sites possible impact on school place provision, cooperation has occurred and should continue to occur and data on school place planning is being shared between the two authorities. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper. The site was assessed in accordance with BP23 Local Plan Methodology Part 2 – no concerns were identified from technical consultees with respect to wildlife and ecology.

Paragraph/Site: **H358**

Consultee: **976819 M Higher**

Agent:

Rep ID: **PDLP_AD969**

Soundness - Positively Prepared

The allocation of H358 has had no input from the local community.

Soundness - Justified

The site should be deleted from the Plan on the grounds of: - access - via Wentworth Drive or Green Acres Close via Warburton Road is dangerous and unsuitable for further traffic. Warburton Road is single track, has no footpaths, has no capacity to be widened and there is a children's playground. Emergency and delivery vehicles already have difficulty accessing properties. Wentworth Drive has ransom strips preventing access and the junction has been subject to many accidents. - sewerage blockages already a problem - school is at capacity and oversubscribed. This is an issue raised by Wakefield Council. - Millennium Green to south of H358 is well used by local residents and has vehicle access from Green Acres Close for maintenance and to allow disabled access - a well used designated footpath crosses the site - local needs for infrastructure, community facilities and education at Emley School are not being met

Proposed Change Requested

Delete allocation H358 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. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. 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 Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.

Paragraph/Site: **H358**

Consultee: **977278 Ms Ruth Aspinall**

Agent:

Rep ID: **PDLP_AD3320**

Duty to Co-operate

Wakefield Council are concerned that Emley School is full and over subscribed.

Soundness - Justified

Does not meet local needs - Infrastructure and education. The road infrastructure cannot cope with the amount of traffic at present, any increase will make things worse. Warburton has no pavements and on street parking which makes 2 cars passing impossible. Upper Lane is congested and is a single track due to parking. Emley School is full and oversubscribed. Safety concerns the village is used as a rat run and with limited pavements people and school children have to walk on the road. Drainage systems not able to cope.

Proposed Change Requested

Further consultation and more surveys are needed with highways and the Education Authority, as to whether the existing road networks are fit for purpose. Guarantees that the drainage system in the area will be able to cope with the proposed demand.

Council Response

No Change The site is proposed as an 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. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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 Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper. The site was assessed in accordance with BP23 Local Plan Methodology Part 2 – no concerns were identified from technical consultees with respect to wildlife and ecology. DTC Response: Wakefield previously raised concerns about this sites possible impact on school place provision within the district. However cooperation has occurred and will continue to occur and data on school place planning is being shared between the two authorities. Wakefield Council consider this allocation to be sound and legally compliant. Wakefield Council have also confirmed that they consider Kirklees to have complied with the duty to cooperate.

Paragraph/Site: **H358**

Consultee: **1042420 Mr Lex Olutayo**

Agent:

Rep ID: **PDLP_AD75**

Soundness - Justified

The plan is not justified and has not been prepared with the participation of the local community. Parking and congestion issues, particularly close to play area. No capacity at school. Community safety and concerns not considered in the plan.

Proposed Change Requested

Remove the site from the plan.

Council Response

No change. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). The Accepted Site Options Technical Appraisal (BP29) provides further information on the assessment of the site. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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: **H358**

Consultee: **1042800 Miss Leza Wade**

Agent:

Rep ID: **PDLP_AD78**

Soundness - Positively Prepared

I do not believe the plan for 44 new dwellings on the land adjacent to the Millennium Green is sound, or complies with the duty to co-operate. School and Doctors are oversubscribed, Wakefield Council raised issue of school in consultation process. The highways and access roads are small and congested. Access roads are potentially dangerous. The drainage system currently serving Emley and Emley Moor is inadequate. The Millennium Green will be left isolated from the majority of the village. Emergency services are sometimes hours away.

Soundness - Justified

I do not believe the plan for 44 new dwellings on the land adjacent to the Millennium Green is sound, or complies with the duty to co-operate. School and Doctors are oversubscribed, Wakefield Council raised issue of school in consultation process. The highways and access roads are small and congested. Access roads are potentially dangerous. The drainage system currently serving Emley and Emley Moor is inadequate. The Millennium Green will be left isolated from the majority of the village. Emergency services are sometimes hours away.

Proposed Change Requested

Remove the site from the plan.

Council Response

No change. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). The Accepted Site Options Technical Appraisal (BP29) provides further information on the assessment of the site. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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 Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. Whilst Wakefield Council previously raised concerns about this sites possible impact on school place provision, cooperation has occurred and should continue to occur and data on school place planning is being

Paragraph/Site: **H358**

Consultee: **1043326 Mrs Margaret Brown**

Agent:

Rep ID: **PDLP_AD86**

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Soundness - Effective	The plan does not cover the needs of the local or wider infrastructure or community facilities.		
Proposed Change Requested	Remove the site from the plan.		
Council Response	No change.The site is proposed as an 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.		
Paragraph/Site: H358	Consultee: 1043361	Ms Katie Raby	Agent: Rep ID: PDLP_AD90
Soundness - Effective	The plan has not been prepared with the participation of the community. The local infrastructure cannot support such a plan		
Proposed Change Requested	Remove the site from the plan.		
Council Response	No change.The site is proposed as an 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.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 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 considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.		
Paragraph/Site: H358	Consultee: 1043363	Mr Ian Smith	Agent: Rep ID: PDLP_AD89
Soundness - Justified	Additional traffic through Warburton, where there is no footpath, few parking spaces and a children's play area, it would be highly detrimental to the village to take recreational land or part of the playground for access purposes. Impact on water systems. Impact on Millennium Green. School is oversubscribed.		
Proposed Change Requested	Remove the site from the plan.		
Council Response	No change.The site is proposed as an 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.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Kirklees Strategic Drainage have been consulted as part of the Local Plan process and they have no objections to the proposal subject to a drainage plan and mitigation measures.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: H358	Consultee: 1043365	Mrs Andrea Peaker	Agent: Rep ID: PDLP_AD91
Soundness - Positively Prepared	The plan is not positively prepared. It has not met the local needs for community facilities.		
Proposed Change Requested	Remove the site from the plan.		
Council Response	No change.The site is proposed as an 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		

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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. 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.

Paragraph/Site: **H358**

Consultee: **1043491 Mrs Christine Moizer**

Agent:

Rep ID: **PDLP_AD875**

Soundness - Justified

The allocation does not meet the needs of the local community with regard to infrastructure or other facilities. The drainage system in Emley and Emley Moor is already antiquated and cannot cope with existing usage - there are no indications in the Plan for additional sufficient additions to this. Also the access roads to H358 are dangerous and inadequate.

Proposed Change Requested

The Removal of Site H358.

Council Response

No change. The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.

Paragraph/Site: **H358**

Consultee: **1043835 Mr James Teale**

Agent:

Rep ID: **PDLP_AD97**

Soundness - Justified

There are no safe access roads to this site. Warburton already has too many road side vehicles and traffic is one way only due to the width of the road and has no pathpaths, despite a childrens park adjoining it. Added additional volume to Warburton will just bring further chaos to the already very busy street. Warburton has the only childrens park in the village, again not a great place to be increasing traffic volume. Emley First School is already over subscribed - where schooling will new residents use? Wakefield Council have already raised this as a concern.

Proposed Change Requested

Removal of H358.

Council Response

No change. The allocation of this site for housing is considered to be consistent with the council's Local Plan Site Allocation Methodology. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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: **H358**

Consultee: **1046002 Mr Barry Brook**

Agent:

Rep ID: **PDLP_AD165**

Legally Compliant

No proper participation with the community to gather and observe facts.

Duty to Co-operate

Lack of evidence about consultation with Wakefield Council regarding school provision,

Soundness - Justified

The information is inaccurate and misleading and there is a lack of objective evidence or proper factual observations. Information on local schools (over subscribed at present) ignores highway safety concerns, including road congestion, dangerous driving at peak times along Upper Road, impact on cyclists travelling west affected by easterly traffic, constant traffic and lack of crossing points for pedestrians. There is a lack of information about broadband. The telephone exchange is already overloaded with broadband speeds which are slower than the rest of country. Access is from dangerous unsuitable roads which are reduced to single roads by parking. The risk of accidents is high and there are existing access problems for emergencies and deliveries. On Upper Lane the easterly is almost permanently closed by parked cars. Extra traffic will exacerbate these problems. There is no plan for the required site traffic through narrow or single file roads which are full at peak times and include pedestrians. The westerly track of Upper Lane is the only available access but is now seriously damaged. There is a lack of evidence about flooding, drainage, mining risks and risk assessment generally. The plan obscures access to the Millennium Green.

Proposed Change Requested

Hold or withdraw allocation H358 until a proper assessment on all the points raised has been undertaken. Road safety issues need to be taken into consideration, such as parking, double yellow lines, speed limits, crossings, road widening and safe zones.

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

Council Response No change. The site is proposed as an 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 is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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 Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper. The site was assessed in accordance with BP23 Local Plan Methodology Part 2 – no concerns were identified from technical consultees with respect to wildlife and ecology. 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. DTC Response: Wakefield Council have confirmed through their response to the Regulation 19 consultation that they consider this site allocation to be sound and legally compliant and that Kirklees Council has complied with the Duty to Cooperate. Wakefield previously raised concerns about this site's possible impact on school place provision within the district. However cooperation has since occurred and will continue to occur and data on school place planning is being shared between the two authorities. Wakefield Council will be consulted as planning applications are submitted on this allocation so possible impacts on education provision can be considered and mitigated if necessary.

Paragraph/Site: **H358** Consultee: **1046030 Miss Linda Fairbank** Agent: Rep ID: **PDLP_AD163**

Soundness - Justified The plan has not met the local needs for community facilities, shops, infrastructure or education. It is not justified and as not been prepared with the participation of the community.

Proposed Change Requested The removal of site H358 is necessary to make the Local Plan sound.

Council Response No change. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). 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 facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper.

Paragraph/Site: **H358** Consultee: **1046680 Mr Frank Spivey** Agent: Rep ID: **PDLP_AD182**

Legally Compliant The Local Plan has not been prepared with participation of the community

Soundness - Positively Prepared The plan in my opinion is not positively prepared as it has not met the needs for community facilities, shops infrastructure and education

Soundness - Justified The Local Plan is not justified as it clearly isn't founded on evidence-backed by facts: -The local plan does not take into account the shortage of places for children at the local school - Surrounding highways network can not accommodate additional traffic generated by the proposed increase in housing. There are also accident hotspots within the area and achieving a suitable access would be difficult. - Issues in relation to pedestrian safety, particularly due to lack of footpaths and close proximity of children's play area, - Land ownership issues due to ransom strip - Evidence of subsidence in the area due to mining legacy - The drainage system is old and antiquated and cannot currently cope with the sewage system, blocks are a normal occurrence, and the land is waterlogged. - As an original Trustee and currently the secretary of the Green we are concerned that this area of outstanding beauty which we have spent many hours and money will become isolated from the centre of the village - Land previously used for allotments.

Proposed Change Requested Removal of site H358

Council Response No change. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). The consultation was undertaken

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

in accordance with the Council's Statement of Community Involvement (SD16).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 facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper.The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.The Site Allocations Box identifies that the site has is within a high risk coal mining area. This would need to be resolved at planning application stage.

Paragraph/Site: **H358**

Consultee: **1047004 Mr Michael Hall**

Agent:

Rep ID: **PDLP_AD1992**

Soundness - Justified

- Local drainage has not been addressed. The last building development in the Wentworth area led to the collapse of Wentworth Drive adjacent to No1. Apart from repairs no improvement were made - Water pressure is at the legal minimum.Without additional investment in the water supply additional housing is not supportable. - Access to the site is acknowledged to be poor. Wentworth Drive is designated as the main access but the junction with Upper Lane has previously been designated as unsuitable. The whole road and transport access to the village is inadequate for additional housing but no plans or provision for improvement has been put forward. - The proposed development will separate the two major 'green spaces' in the village, namely the Sportsfield and the Millennium Green. The Millennium Green, a communal 'Green Open Space' will become isolated from the village. No consideration has been given to this although it was considered as important in the rejected plan.

Proposed Change Requested

Plan should be rejected and only reconsidered when detailed responses with remedies to all the above have been submitted.

Council Response

No change.The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.Consideration will be given to the PROW that crosses the site and links the recreation ground to the Millennium Green.

Paragraph/Site: **H358**

Consultee: **1047452 Mrs Helen Care**

Agent:

Rep ID: **PDLP_AD226**

Legally Compliant

The plan has not been prepared with the participation of the local community.

Soundness - Positively Prepared

The plan is not positively prepared as it has not met the local needs for community facilities, shops, infrastructure or education.

Soundness - Justified

The plan is not justified. Existing roads are unsuitable to serve a development of this size. There are highway safety concerns associated with parked cars on Warburton and Upper Lane which are single track roads. Wentworth Drive has a ransom strip and road surface quality issues linked to the proximity of a High Risk Coal Referral Area. The village first school is full and oversubscribed. Wakefield Council raised this as a concern at the Public Consultation stage. The development will result in families driving to schools outside the village, creating an increase in car journeys on roads that struggle to cope with current volumes of traffic. Development of the site would isolate the Millenium Green from the rest of the village and community facilities. The drainage system cannot cope with the existing number of dwellings in the community and site H358 has limited drainage options - the northern side is the village's cricket pitch.

Proposed Change Requested

Remove site H358 from the plan.

Council Response

No change.The site is proposed as an 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.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.It is considered that the proposed

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development would not result in any significant detriment to the efficiency and safe use of the local highway network. Kirklees Strategic Drainage have been consulted as part of the Local Plan process and they have no objections to the proposal subject to a drainage plan and mitigation measures. 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: **H358**

Consultee: **1048028 Mr Andrew Gilbert**

Agent:

Rep ID: **PDLP_AD264**

Soundness - Justified

1 :- site access is very limited, access from Warburton / Green Acres is narrow with no footpath and access from Wentworth Drive is narrow with parked cars on the road particularly on the junction with Beaumont Street. The main road Upper Lane / Beaumont Street is already incredibly busy at peak times as it serves as a cut through to the motorway and as there is no footpath on one side and parked cars on the other and no safe crossing point. There is no plan for the road layout and how these issues are going to be approached seems available. 2 :- the water pressure at the top half of Emley village is diabolical and adding a further 44 dwellings to this is only going to exasperate the problem. 3:- same goes for the drainage which can't cope with the current volume without another 44 dwellings being added. I can't imagine Yorkshire Water are going to put in any significant investment to rectify the situation in either points 2 or 3 4:- The village school is already over subscribed and parking down church street with parents dropping off and picking up is appalling making it difficult for the buses to get up and down church street adding another 44 dwellings will only add to the strain the school is already under. 5:- The broadband speeds at the south side of the village are diabolical adding more load to the network will worsen the situation.

Proposed Change Requested

The proposed development H358 should be withdrawn until such time as all the points above have been addressed with particular attention being brought to the proposals for Beaumont street /upper lane and what yorkshire water propose to do with the drainge and the mains pressure.

Council Response

Third party land required to access site. Wentworth Drive suitable as primary access and Green Acres Close s a minor secondary access. Potential ransom strips exist. Limited options for surface water drainage, drainage plan with adjacent site would be beneficial. 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: **H358**

Consultee: **1048038 mrs janet spivey**

Agent:

Rep ID: **PDLP_AD1060**

Soundness - Positively Prepared

- Plan does not meet the needs for community facilities, shops infrastructure or education, jobs or the potential for home growing/ allotments. - Has not been prepared with cooperation/participation of the community,

Soundness - Justified

- Not founded on evidence backed by facts. Comments on the accepted site options technical appraisals show scant regard e.g. decreasing trends for primary and modest increase for secondary education is an obvious error of judgement. Increasing poulation in and around the village of emley where the local school is oversubscribed with a waiting list. Where will children from new houses go? The nearest infant school is a 20 bus ride away with a very limited public bus service. - No jobs will be created, no shops built and no provision for allotments

Proposed Change Requested

- Removal of site H358- Roads cannot cope with more new houses in the village. Any access by vehicles would further restrict access and parking by mobility vehicles which use the green, thereby restricting access to the disabled. Millennium Green, open space currently accessed and used by a number of disabled persons, who because of their disability have difficulty accessing Green Areas.- Site would isolate this area of outstanding beauty from the main village. - Extensive mining in this area, unidentified shafts found. - Provision for food growing and allotments should be made. - Area prone to flooding with inadequate drainage

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. The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper. The site was assessed in accordance with BP23 Local Plan Methodology Part 2

Paragraph/Site: **H358**

Consultee: **1048319 mr colin leech**

Agent:

Rep ID: **PDLP_AD287**

Legally Compliant

The plan has not been prepared with participation of the community.

Soundness - Positively Prepared

The plan is not positively prepared. It has not met the local needs for community facilities, shops, infrastructure or education.

Soundness - Justified

The plan is not justified as it is not clearly founded on evidence backed by fact.

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

Proposed Change Requested	The removal of site H358.		
Council Response	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: H358	Consultee: 1049045 mr frank spivey	Agent: 1049043 Secretary Emley Millennium Green Emley Millennium Green	Rep ID: PDLP_AD1070
Legally Compliant	- Sustainability appraisal as whole is fundamentally flawed as underlying methodology is too broad-brush, crude, lacking evidence of technical appraisal been undertaken as a consequence lacking objectivity. This is exposed in Para 2.30 of the Report which states (it) "...inevitably relies on an element of subjective judgement". Para 2.35 states "it is a requirement of the SEA Regulations that consideration is given to any data limitations...." There is no evidence that this has taken place.		
Soundness - Justified	- Plan complete fabrication of points, no negative points have been raised on a plan than intends to increase housing stock by 44 houses, in an area that is subject to flooding, has high incidence of subsidence caused by previous mining from Emley Moor Colliery. - Education facilities at the local school are oversubscribed with waiting list and next local school with vacancies is over a 20 minutes bus ride with a transport service through the village. - Traffic management into Wentworth was built in 1975 to facilitate 30 houses, with car density far less than it is now, Original 30 houses is currently 80 houses, with a traffic flow exceeding 180 cars twice a day into a road that carries over 200 cars in a morning between 7.00am and 8.30., for most of the day single file traffic flows through the village due to parking of cars on Upper Lane. - Wentworth access is restricted where proposed site enters the allocated land to be built on. It includes a ransom strip, and a maximum width of 9 feet. Only other access to this site is from Green Acres Close a cul de sac of 10 houses that feeds onto Warburton, a road with no footpath, single file traffic for most of the day and restricted access after 6.00pm, This road passes a childrens play area. - Millennium Green lies adjacent to the proposed site H358, will become isolated from the main village if the development goes ahead. The entrance to site is also restricted the millennium green owns the land and right of way. Entrance also used for access by disabled vehicles and scooters, it allows for the vehicles to be parked and turn and for the large gate to be opened in order that they access with disabled motoring devices. This access to the green could be restricted and cause disabled access to be cancelled.		
Proposed Change Requested	- Complete removal of site reference H358, as happened with site reference H685 which was rejected. - These two sites are identical only for the small change in total land used. How can H685 be rejected and H358 be accepted? The negative comments applied to H685 are the same negative point to be applied to H358.		
Council Response	No changeThe Kirklees Local Plan: Publication Draft Sustainability Appraisal Report – Schedule of Responses (April 2017) (SD8), addresses the issues raised on pages 11, 12, 20 and 21. Any development would have to have regard to the PROW crossing the site. 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 Allocations Box identifies that the site has is within a high risk coal mining area and has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.		
Paragraph/Site: H358	Consultee: 1049105 Ms Judith Baulch	Agent:	Rep ID: PDLP_AD1244
Soundness - Justified	Warburton would serve as an access road to the new development, this route is totally unsuited to an increase in traffic. Warburton has no pavement and is single track for much of its' length due to the lack of off-street parking for residents. The increase in through traffic would greatly add to the congestion on the road and increase the problems delivery and emergency vehicles already have accessing properties. Warburton is also the site of the village recreation field and playground and has horses stabled at the top of the road. The combination of large numbers of children, horse-riders and increased car numbers would lead to accidents. The infrequency of public transport and school transport means cars are an inevitable consequence of more houses. Emley has already seen road-traffic accidents involving pedestrians in the last couple of years and the roads in and out of the village are already congested and in poor		

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condition. Parking problems, particularly around the school have increased dramatically since the development of the Green Dragon site. The addition of extra residents, deliveries and visitors would increase traffic levels beyond capacity. The influx of families would increase pressure on an already over-subscribed first school, which has no room to extend.

Council Response

No change. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. 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 facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper.

Paragraph/Site: **H358**

Consultee: **1049174 miss paula jones**

Agent:

Rep ID: **PDLP_AD425**

Soundness - Positively Prepared

The plan has not been prepared with the participation of the local community. It is a green belt site.

Soundness - Justified

The plan is clearly not justified on the grounds of: - it is not founded on actual evidence or facts which reflect the accurate local needs for community facilities, shops, infrastructure and education that an extra 44 dwellings would require. - a public right of way runs directly across the site which could be lost and severely disrupted as a result of a housing development. This public right of way provides direct access to the Millennium Green which would become isolated from the rest of the village and community resulting in a significant negative impact on services and facilities. - The currently peaceful retreat would be severely affected by the increased noise and intrusion of these extra dwellings overlooking the area. Nearby existing properties in close proximity will be affected by the noise and inconvenience during the construction phase; then by the extra traffic and noise of future residents, and the intrusion of 44 dwellings overlooking these properties - Vehicular access to site H358 is both dangerous and unsuitable for further traffic. Access to Wentworth Drive/Avenue is restricted due to parked cars, resulting in single track access. Parked vehicles on Chapel Lane opposite the access to Wentworth Drive/Ave create a dangerous junction. Beaumont street between the proposed access to site H358 via Wentworth drive and Warburton is already a very busy commuter route to the M1 and is basically a free for all due to the sheer number of parked vehicles. extra construction traffic and subsequent residential traffic from the proposed 44 dwellings will add to this already dangerous area and will have a negative impact on safety issues. - Wentworth Ave has recently been resurfaced causing significant access and parking issues. - Warburton Road cannot be widened. extra traffic would significantly impact pedestrian safety. emergency service and delivery vehicles already have great difficulty reaching the existing properties on both Wentworth drive/ave and Warburton, let alone an extra 44 dwellings. - Drainage system in Emley is already under severe strain and access into the village has been restricted several times after heavy rain. an extra 44 dwellings will certainly have a negative impact on this growing concern. - Water pressure is poor at the best of times and internet speeds are infuriatingly slow and an extra 44 dwellings will only make these problems worse. - the village school is already full and oversubscribed and availability places to serve an extra 44 dwellings is unknown at present. - serious safety concerns and the objections of the local community have been ignored and that financial gain is the overriding factor in the acceptance of site H358

Proposed Change Requested

Delete allocation H358 from the Plan.

Council Response

No change. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). 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 facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper. The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**

Consultee: **1049263 Mr Roger Schofield**

Agent:

Rep ID: **PDLP_AD454**

Legally Compliant

I feel the plan has been prepared with out the participation of the local community and therefore as not met local needs for facilities schools shops or infrastruture.

Soundness - Justified

I feel the plan has been prepared with out the participation of the local community and therefore as not met local needs for facilities schools shops or

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	infrastructure.
Soundness - Effective	The site proposed does not have suitable access. Warburton is without footpaths and reduced to single lane due to resident parking. Wentworth Drive would require the navigation of one junction on the estate and exit at a congested busy junction close to the centre of the village.
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 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: H358	Consultee: 1049338 Mr Andrew Kemp Agent: Rep ID: PDLP_AD1278
Soundness - Positively Prepared	The plan has not been prepared with participation of the community and it is NOT clearly founded on evidence - backed by facts. The safety concerns of village residents have not been adequately listened to and the communication of plan developments inadequate also.
Soundness - Justified	It has not met the needs of the local community, facilities, shops, infrastructure or education. The village school is full and over subscribed, it would isolate The Millennium Green from the rest of Emley and its facilities, the drainage infrastructure in Emley and Emley Moor was deployed during the Victorian era which causes repeated problems and can not cope with the existing housing stock, the roads into Emley are at capacity during peak hours. Upper Lane and Warburton are effectively reduced to single track roads. Emergency, delivery and service vehicles have difficulty gaining access based on current usage.
Council Response	No change. The site was assessed in accordance with BP23 Local Plan Methodology Part 2. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). 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. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.
Paragraph/Site: H358	Consultee: 1049415 Mrs Julia Jones Agent: Rep ID: PDLP_AD571
Soundness - Positively Prepared	The plan is not sound. It is not positively prepared. The plan is not justified and has not been prepared with the participation of the community.
Soundness - Justified	The plan is not justified on the grounds of: - The school is oversubscribed. - Roads are dangerous. No footpaths for children. - Money has been the driving force in the decision. - The village cannot cope with 44 more houses and 44 or 88 more cars. - Drainage, roads, water, broadband cannot cope. - Unsound, illegal, unfounded, poorly researched.
Proposed Change Requested	Delete allocation H358 from the Plan.
Council Response	No change. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). 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 facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper. The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.
Paragraph/Site: H358	Consultee: 1049445 MR Nick Bean Agent: Rep ID: PDLP_AD605
Soundness - Positively Prepared	The proposed allocation does nothing to meet local infrastructure requirements. The allocation will isolate Millennium Green from the rest of the village. The motivation for site allocation is site-owner profit, rather than for the good of the local community.
Soundness - Justified	There is a lack of evidence to justify the allocation, particularly with regard to drainage, school places and highways/access issues.
Soundness - Effective	The deliverability of the site is questionable, due to the presence of a 'ransom strip'.
Proposed Change Requested	Remove Site H358 from the Local Plan

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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.The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**

Consultee: **1049606 Mrs Louise O'Hara**

Agent:

Rep ID: **PDLP_AD1319**

Soundness - Positively Prepared Towns and larger villages have brownfield sites which should be developed and this is a social and economic priority. We should not be building on unsustainable rural sites.

Soundness - Justified The infrastructure cannot withstand any increase in road traffic on the grounds of road safety for the residents. The lack of pavements is hazardous to the safety of pedestrians. Many vehicles park at the junctions, especially Wentworth Drive. This narrows the road making access for emergency vehicles difficult. Increased commuter travel would have a considerable negative impact on the carbon footprint. Drainage is inadequate and the history of mining and the underlying geology would make the problem worse. Broadband coverage is inadequate. A public right of way crosses the site.

Proposed Change Requested The removal of site H358. Much more consideration should be given to brownfield sites.

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.The Site Allocations Box identifies that the site has is within a high risk coal mining area and has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.Any development would have to have regard to the PROW crossing the site.

Paragraph/Site: **H358**

Consultee: **1049774 Mr Edward Snell**

Agent:

Rep ID: **PDLP_AD1310**

Soundness - Positively Prepared There appears to have been little or no consultation with the community and certainly no real attempt made to inform them or consult with them about the plan. Many are unaware of proposals, website is too complex.

Soundness - Justified Road safety issues and parking issues on Wentworth Drive or Green Acres Close. Roads often become single file due to parking. School is at capacity. Development will create water and sewerage difficulties on a already struggling infrastructure. recent drainage blockages have cause issues with water pressure, No suggestions in the plan that these issues will be addressed.

Proposed Change Requested Remove proposal from the plan.

Council Response No change.The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16).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 facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical PaperThe Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**

Consultee: **1049950 Mrs Elizabeth Willoughby**

Agent:

Rep ID: **PDLP_AD744**

Soundness - Positively Prepared This is the first consultation I am aware of with the residents. It does not meet the local needs of the community and will exacerbate some of the problems

Soundness - Justified There is not the capacity for another 44 houses in Emley. The school is already over subscribed. Is there capacity at the part time GP surgery? The drainage is inadequate as it is and an extra 44 houses will be detrimental to the system. The water pressure is low as it is. The broadband is extremely slow particularly on the side furthest from Flockton. The roads are already busy with parked cars reducing he main road to single track . Getting out onto the main road at peak

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times can often require a long wait. The access from the site in the village will be down already congested roads through a housing estate onto the main road or down Warburton that has no pavement. The roads are very narrow and dangerous to cycle on and the bus is only hourly. The road Ash lane is narrow to go towards Wakefield and the M1 and there are often hold ups if there is a van or a tractor coming the other way with cars having to back up , another 44/88 cars going down there will make things worse. The site has a public footpath running though it and is a buffer between the housing and the cricket ground and village play ground.

Council Response

No change.The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16).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 facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.The Site Allocations Box identifies that the site has is within a high risk coal mining area. This would need to be resolved at planning application stage.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: **H358**

Consultee: **1050079 mr mick willoughby**

Agent:

Rep ID: **PDLP_AD782**

Soundness - Positively Prepared

Kirklees Rural is one of the 4 character areas of Kirklees identified. More extensive housing infill will add to the degeneration of a rural area. You have ignored our very grave concerns & objections & financial gain has been the driving factor for H358 acceptance.

Soundness - Justified

Our small village school is full & over subscribed. Wakefield council also raised this as a concern in the Public Consultation stage. The Health Centre which has a surgery at Emley would not welcome another prospective influx of new patients. The Millennium Green will be isolated from the rest of the village & community facilities & a new housing estate next door will spoil the peace & tranquillity available on the Village Green. The drainage system in Emley & Emley Moor is antiquated & cannot cope with the existing housing. H358 has limited options, the northern side is our village cricket pitch. There would be a risk from balls from the cricket pitch causing injury or damage to the new inhabitants. Access roads to H358 are dangerous & unsuitable for further traffic. Warburton is single track for the majority of the time due to parked cars. there are no footpaths & the road cannot be widened unless the children's playground is used. Emergency Service & delivery vehicles & have great difficulty in reaching the existing properties. Parking & road width is also a problem outside the school which would be made worse if any further attempts were made to increase the school capacity. Upper Lane is congested, single track due to vehicle parking & has a footpath on one side only. School children have to stand on the highway waiting for the school bus. Entry form the estate to Upper Lane would further add to the traffic which is already heavy at peak times.

Soundness - Effective

There is a ransom strip to the Wentworth Drive end of the site.

Proposed Change Requested

The removal of site H358.

Council Response

No change.The Local Plan seeks to deliver the objectively assessed housing need for the district as a whole. The suitability for Kirklees Rural and Emley to accommodate development is considered in Section 5 of SD1 – Strategy and Policies document and in BP17 Settlement Appraisal 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.The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**

Consultee: **1050083 Mrs Natalie West**

Agent:

Rep ID: **PDLP_AD783**

Soundness - Positively Prepared

The plan has not been prepared with participation of the community. It has not met the local needs for community facilities, shops or infrastructure.

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Soundness - Justified The plan is not justified on the grounds of: - the school is oversubscribed - a concern raised by Wakefield Council. - access roads to H358 are mostly single track. There are large parts with no footpaths and any widening would cross the only children's playground in Emley. The roads in the village are already over congested - H358 access roads are already dangerous and unsuitable for further traffic. - pedestrian safety - safety concerns for local residents, especially children and the elderly have been ignored.

Proposed Change Requested Delete allocation H358 from the Plan.

Council Response No change.The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16).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 facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper.Whilst Wakefield Council previously raised concerns about this sites possible impact on school place provision, cooperation has occurred and should continue to occur and data on school place planning is being shared between the two authorities.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**

Consultee: **1050121 Miss Claire Normally**

Agent:

Rep ID: **PDLP_AD807**

Soundness - Justified The site should be deleted from the Plan on the grounds of: - Infrastructure Most of the roads in Emley village are single track, either because the roads are narrow, because of parked cars or both. Warburton is no exception. An additional 44 houses would only overload the road more. - Emergency Services- Potentially blocked roads at peak times 5pm to 6am when most people are home, cars would block access to the new homes. - Traffic -Emley village is a rat run village for commuters wanting quick access to the M1. The village is busy at peak times an additional housing estate would only overload and increase the burden. - impact on footpaths - there are footpaths only on one side of the road. On Upper Lane commuters have to stand on the highway to catch to the bus. - Schools - The village school is already over prescribed, What measures are in place to provide a school place for all local children? - Internet - Broadband speeds are dire with no immediate future plans of being updated. Additional homes accessing this would only help to slow the current speeds. - Benefits- I fail to see what benefit the development of these houses would bring to the area

Proposed Change Requested Delete allocation H358 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.The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper.It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**

Consultee: **1050165 H Fawthrop**

Agent:

Rep ID: **PDLP_AD1026**

Soundness - Positively Prepared The Plan has not been prepared with participation of the community.

Soundness - Justified The Plan is not justified on the grounds of: - it has not met the local needs for community facilities, shops, infrastructure or education - it is not backed up by evidence - school is over subscribed. Wakefield Council raised a concern at the draft stage - the Millennium Green will be isolated from the rest of the village and community facilities - drainage system is inadequate - access roads to H358 are dangerous and unsuitable for further traffic. Warburton is a single track for the majority of the time, there are no footpaths, road can only be widened if children's playground used. Emergency and delivery vehicles currently have difficulty accessing properties - There is a ransom strip to the Wentworth end of the site. Upper Lane is congested - safety concerns have been ignored for financial gain

Proposed Change Requested Delete allocation H358 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.Any development would have to have regard to the PROW crossing the site.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 Allocations Box

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identifies that the site has is within a high risk coal mining area and has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**Consultee: **1056449 John & Margaret Spacey**

Agent:

Rep ID: **PDLP_AD864****Soundness - Justified**

The main problem is an increase in traffic on Warburton and Upper Lane, Warburton is a single track all the time. Emergency services have no chance of driving up there when all residents and their cars are at home evenings and weekends. There are no pavements on one side of Upper Lane and no pavements on Warburton. Other problems include, lack of services in Emley; village school is over prescribed; inadequate drainage system.

Proposed Change Requested

Remove site H358 from the plan.

Council Response

It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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: **H358**Consultee: **1056477 Sandra Griffiths**

Agent:

Rep ID: **PDLP_AD867****Soundness - Justified**

This build will isolate the rest of the village from our Millennium Green. The village school is already over subscribed. The drainage system in Emley is inadequate. Warburton is a single track road with no pavement. Access to this site is limited on all angles and it would not support the level of traffic this build would bring with it.

Proposed Change Requested

Remove site from the plan.

Council Response

No change. The site is proposed as an 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 is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Kirklees Strategic Drainage have been consulted as part of the Local Plan process and they have no objections to the proposal subject to a drainage plan and mitigation measures. 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: **H358**Consultee: **1056542 Alison Chambers**

Agent:

Rep ID: **PDLP_AD879****Soundness - Justified**

The current infrastructure of the village is not able to meet the demands of so many new houses in terms of sewerage, road access and school.

Council Response

It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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: **H358**Consultee: **1056557 Irina Schick**

Agent:

Rep ID: **PDLP_AD881****Legally Compliant**

The community has not been consulted or prepared for this plan.

Soundness - Justified

Plan not sound because Emley does not have an adequate amount of shops or sewers to cope. The roads are crumbling even without the increased traffic. The one school is full and there are not enough parking spaces. Upper Lane is congested and emergency vehicles have trouble getting through.

Proposed Change Requested

Remove the site from the plan.

Council Response

It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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: **H358**Consultee: **1057365 Ms Jane Auty**

Agent:

Rep ID: **PDLP_AD933**

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Soundness - Justified	Warburton cannot cope with an increase of traffic due to the current congested nature of the road.
Council Response	No change. The site is proposed as an 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. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.

Paragraph/Site: **H358** Consultee: **1058029 Mr John Wardley** Agent: Rep ID: **PDLP_AD1051**

Soundness - Justified	The Millennium Green and village cricket club which is an important asset to the village and important green space will be isolated. Roads - concerns over the existing road system, the volume of traffic, over sized trucks entering and leaving the village along very narrow lanes and the total disregard of the speed limit. Footpaths - the above make the single footpath along Upper Lane one of the most dangerous in the area. Some roads have no footpath at all. Health of pedestrians - fumes from vehicles have a detrimental effect on the respiratory system.
Proposed Change Requested	Remove this site from the plan.
Council Response	No change. The site was assessed in accordance with BP23 Local Plan Methodology Part 2. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.

Paragraph/Site: **H358** Consultee: **1059276 Lisa Littlefair** Agent: Rep ID: **PDLP_AD1210**

Soundness - Positively Prepared	Safety concerns and objections have been raised by Emley residents.
Soundness - Justified	There are concerns about the amount of traffic build-up over the years, development of Green Belt land and impact on public services in the village. Warburton is already well used on a daily basis and there are problems with cars waiting to pass as the roads is single track and because of the amount of cars parked on the street. Delivery vans have problems using this access too. More traffic using this access will create havoc. Another 100 plus cars on the narrow roads in Emley will create additional traffic, particularly on the main road through the village, creating more unnecessary congestion and a further decline in the condition of the roads. The local school is full and over-subscribed and children will need to travel to other schools out of the area. There is poor internet connection. There will be problems with water usage and pressure and the drainage system cannot cope with extra houses.
Council Response	No change. The allocation of this site for housing is considered to be consistent with the council's Site Allocation Methodology. The site is not within the green belt but was identified as Provisional Open Land in the council's Unitary Development Plan (March 1999). Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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 in flood zone 1, with limited options for surface water drainage. Detailed matters, such as drainage issues, will be dealt with at the planning application stage and development would have to be compliant with the Local Plan drainage policy (policy PLP 28).

Paragraph/Site: **H358** Consultee: **1059378 Stephen and Beryl Turner** Agent: Rep ID: **PDLP_AD1242**

Soundness - Justified	Objection to site H358 as the needs for road safety, local facilities, extra school places, shops, employment, community facilities and amenities have not been taken into account. The roads in Emley are already dangerous and unsuitable for an extra 88 cars and are already struggling with an increase in traffic and reduced parking. Upper Lane is virtually a one way system, as one side is used for resident's parking and the public car park is full. There are concerns about the safety of adults with young children crossing the roads. The village school is already oversubscribed and schools in the surrounding areas are also struggling. The Millennium Green will not be easily accessible to people living in Emley village. The drainage system in Emley is already struggling to cope and extra housing will add extra pressure on the system. There must be more suitable places in the area to build houses.
Council Response	No change. The allocation of this site for housing is considered to be consistent with the council's site allocation methodology. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of 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

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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: **H358**

Consultee: **1059388 Julie Oxley**

Agent:

Rep ID: **PDLP_AD1246**

Legally Compliant

The consultation should be transparent and open to scrutiny.

Soundness - Positively Prepared

I feel ignored and that the safety concerns we have raised have been swept to one side in order that you make financial gains.

Soundness - Justified

The proposal will cut off the Millenium Green from the rest of the village and would interfere with the natural and safe haven which has been created for all the community to enjoy. Any proposed development should be based on factual evidence that there is a need in that specific area. Challenges already facing the community have been ignored. The Primary School and Playschool are oversubscribed and people who live in Emley are unable to get their children into the school. This was raised by Wakefield Council in the Public Consultation Stage but has been ignored. Other local primary schools at Clayton West, Scissett and Denby Dale are in similar situations. The infrastructure is poor. Emley has basic transport provision public transport is expensive and unreliable. The bus stop where children catch the bus to school has no pavement and a child was knocked down last year after exiting the bus. Emley has existing problems with traffic as some commuters trying to get to the M1 using Upper Lane as a rat run. This road is narrow and from the cross to just before Warburton it is usually single track due to parked vehicles. This creates a bottle neck where drivers take risks because they do not want to wait for other cars to pass safely. A review of the roads, traffic calming and pavement provision is a priority before any consideration is given to introducing even more traffic to the narrow roads of Emley. The existing sewerage system is old and cannot cope with the current community demands. In heavy rain the drains cannot cope which leads to inevitable flooding and associated problems.

Proposed Change Requested

Site H358 should be removed from the plan and other areas explored which are more suitable.

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. The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper. The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**

Consultee: **1059415 Alison Matthewman**

Agent:

Rep ID: **PDLP_AD1262**

Soundness - Justified

Concerns about increased traffic up and down Warburton, where many residents have no off road parking, so making the road difficult to navigate as it is. Concerns about Children going in/out of the playing field/playground with parked cars and no pavement. Concern about the local infrastructure, including drainage/water supply. The village is remote with poor internet connection currently. The small local school is also already overly subscribed. Concern about the open, green, community space of the Millennium Green becoming either cut off from the village or misused and damaged (as it will be cut off) and that it will be mistreated by dog walkers who would have usually used the land in question for development.

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. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to

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access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded.

Paragraph/Site: **H358**

Consultee: **1059504 Brian Westerby**

Agent:

Rep ID: **PDLP_AD1299**

Soundness - Justified

Increased traffic on nearby roads, especially on Warburton where currently there is only single line traffic due to the narrowness, residents' parked vehicles, delivery traffic, and no footways. The main road through the village is always clogged because of residents' parking and the use of the village as a "rat run" between the main Denby Dale / Wakefield road and Shelley to Holmfirth. The provision of some 50 houses will bring around 70 cars and children for whom there is little space at the local school, and a doctors' practice which is only open part of the week, so new patients would use cars to travel to Middlestown. There is no parking for local shops. Take the opportunity to carry out traffic surveys, at all times of the day and week.

Soundness - Effective

Providing access and egress for a large number of dwellings would be unsustainable.

Council Response

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. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. The facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper.

Paragraph/Site: **H358**

Consultee: **1059648 Jane Scott**

Agent:

Rep ID: **PDLP_AD1404**

Soundness - Positively Prepared

I am disappointed that as a member of the community I have not been openly invited to participate in the proposal and concerns raised by others at the public consultation have been ignored.

Soundness - Justified

Emley is a small community without the local facilities, school places and infrastructure to support such a development. The proposed site is currently open space with a public right of way that is enjoyed by the residents and allows access to the Millennium Green (recreational area). A development in this area will isolate the Green from the rest of the community facilities and will ruin this green space. The proposed access road to the site, particularly Warburton, is already congested with inadequate parking. The majority is single track and there is no pavement. Increased traffic will worsen this congestion and increase the risk to pedestrians. School children waiting for their bus on Upper Lane are already having to wait on the road which is putting them in danger. I am also unsure how it is thought that the trucks required for a build of this scale will be able to access the site.

Proposed Change Requested

The site H358 is removed from the plan.

Council Response

No change. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). 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 facilities and accessibility of Emley have been considered in BP17 Settlement Appraisal Technical Paper. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: **H358**

Consultee: **1059957 Andrew Healey**

Agent:

Rep ID: **PDLP_AD1714**

Soundness - Justified

Access roads are already dangerous and will be even more with increased traffic. The village school is already oversubscribed. The drainage system is antiquated and cannot cope with existing housing. The Millennium Green would be isolated from the rest of the village.

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. The Site Allocations Box identifies that the site has limited surface water drainage options. This would need to be resolved at planning application stage. Policy PLP28 states that typical greenfield run-off rates should not be exceeded. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network. Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom

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strip. Green Acres Close only suitable for a minor secondary access.

Paragraph/Site: H358	Consultee: 1075783	Mr D Sanders	Agent:	Rep ID: PDLP_AD3812
Soundness - Justified	- Access via Warburton very tight - poor condition of Upper Lane plus parked cars making travel difficult at busy times - no way to pass up Warburton when cars travelling in opposite directions. - building below Summer Lane would allow access from main road directly either side of road and would not encroach on the only open space we have up top of Warburton.			
Council Response	No change.The site is proposed as an 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.Third party land is required to access the site from Wentworth Drive, which may be subject to a ransom strip. Green Acres Close only suitable for a minor secondary access. It is considered that the proposed development would not result in any significant detriment to the efficiency and safe use of the local highway network.			
Paragraph/Site: H454a	Consultee: 942405	unknown	Agent: 941854	Mr Mark Johnson
Council Response	No change. Support welcomed			
Paragraph/Site: H454a	Consultee: 942647	Rob Ellis	Agent:	Rep ID: PDLP_AD710
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: H454a	Consultee: 942768	Mr Andrew Wood	Agent:	Rep ID: PDLP_AD1788
Soundness - Positively Prepared	Cumulatively with other sites in Clayton West there would be very substantial growth of the small settlement.			
Council Response	No change.It is considered that the level of growth in the settlement is commensurate with the spatial strategy.			
Paragraph/Site: H454a	Consultee: 949796	Mr Mark Firth	Agent:	Rep ID: PDLP_AD1668
Soundness - Justified	The Cricket Club is an extremely precious asset for the local community and for the wider Kirklees community. It needs to be afforded the very highest level of protection by the Local Plan. Development would lead to the loss of the cricket club. The club does not own the ground. The club relies on the planning system for a high level of protection to ensure the ground is retained for the benefit of the local community. Building immediately adjacent to the cricket ground will create conflict, the case of Miller v Jackson [1977] QB 966 emphasised that planning authorities should not allow houses to be built too close to cricket grounds. In the recent High Court case of R (East Meon Forge and Cricket Ground Protection Association) v East Hampshire District Council [2014] EWHC 3543 (Admin), planning permission for residential development near to a village cricket ground was quashed on the basis that the local planning authority should not have rejected Sport England's advice. The judge concluded that situating a house close to the cricket ground created unacceptable risks for the future occupiers and the club in terms of liabilities. There is an indirect threat arising from the loss of grazing land. If H454a is developed the farmer would not need to apply to the Council for planning permission for change of use from cricket ground to grazing land in lieu of grazing land lost.			
Soundness - Consistent with National Policy	Given their proximity to the cricket ground, sites H454a and H498 are neither 'deliverable' nor 'developable', as required by paragraph 47 of the NPPF. The sites are not 'deliverable' because they would not obtain planning permission for the reasons stated above. They are not 'developable' because they are not suitable sites for housing for the reasons stated above. Allocating the site is inconsistent with para 70, which requires planning policies and decisions to 'guard against the unnecessary loss of valued facilities ... particularly where this would reduce the community's ability to meet its day to day needs'.			
Proposed Change Requested	Allocate the sites as urban green space.			
Council Response	No change.Detailed design issues on the site would be identified at planning application stage, however the site allocation in the Local Plan requires protective measures will be required to ensure an appropriate relationship between the adjoining cricket ground and the development. The site is adjacent to the cricket ground, but it's allocation for housing is not predicated by losing the cricket ground. National planning policy would require			

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replacement of equal or enhanced provision in any event.

Paragraph/Site: **H454a**

Consultee: **949816 Mr Steve Scott**

Agent:

Rep ID: **PDLP_AD5**

Soundness - Justified

This proposal is a direct contradiction of points 4, 7 & 8 of the SA stated objectives on page 9 of the Draft Plan. Should this go ahead, Clayton West Cricket Club will have to close due to being evicted from the 1/3 of the cricket field currently owned by the local farmer, who will require that particular piece of the cricket field for grazing purposes.

Proposed Change Requested

A significant gap between any housing boundary and the Cricket boundary to allow matches to be played safely, together with appropriate netting to prevent serious injury (or damage to properties) from the hundreds of cricket balls that will go over the boundary.

Council Response

No change. Detailed design issues on the site would be identified at planning application stage, however the site allocation in the Local Plan requires protective measures will be required to ensure an appropriate relationship between the adjoining cricket ground and the development. The site is adjacent to the cricket ground, but it's allocation for housing is not predicated by losing the cricket ground. National planning policy would require replacement of equal or enhanced provision in any event.

Paragraph/Site: **H454a**

Consultee: **968659 Mrs Lynn Hardy**

Agent:

Rep ID: **PDLP_AD110**

Soundness - Justified

If Kirklees let this development take place, technically they will be creating a farm within a housing estate. Surely this cannot go ahead.

Council Response

No change. Development on the site will be subject to the Development Management process which will seek to ameliorate any impacts on the farm on the proposed residential use and vice versa.

Paragraph/Site: **H454a**

Consultee: **1048793 Cllr Graham Turner**

Agent:

Rep ID: **PDLP_AD3278**

Soundness - Justified

This site unduly impacts on Clayton West CC. Any development that is carried out on site that causes closure of the cricket club would be in direct contradiction of the council's playing pitch strategy and health and wellbeing agenda.

Proposed Change Requested

Remove the site from the plan.

Council Response

No change. Detailed design issues on the site would be identified at planning application stage, however the site allocation in the Local Plan requires protective measures will be required to ensure an appropriate relationship between the adjoining cricket ground and the development. The site is adjacent to the cricket ground, but it's allocation for housing is not predicated by losing the cricket ground. National planning policy would require replacement of equal or enhanced provision in any event.

Paragraph/Site: **H454a**

Consultee: **1049391 Miss Lucie Jennings**

Agent:

Rep ID: **PDLP_AD745**

Soundness - Justified

This proposal will force the Cricket Club to close which would certainly not benefit the people as set out in Point 4. The very small number of housing proposed to be squashed here would have an adverse effect on the locality and on the local residents.

Proposed Change Requested

To remove site H454a from the Local Plan blueprint.

Council Response

No change. The site is adjacent to the cricket ground, but it's allocation for housing is not predicated by losing the cricket ground. National planning policy would require replacement of equal or enhanced provision in any event.

Paragraph/Site: **H498**

Consultee: **942647 Rob Ellis**

Agent:

Rep ID: **PDLP_AD709**

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: **H498**

Consultee: **949796 Mr Mark Firth**

Agent:

Rep ID: **PDLP_AD1669**

Soundness - Justified

The Cricket Club is an extremely precious asset for the local community and for the wider Kirklees community. It needs to be afforded the very highest level of

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protection by the Local Plan. Development would lead to the loss of the cricket club. The club does not own the ground. The club relies on the planning system for a high level of protection to ensure the ground is retained for the benefit of the local community. Building immediately adjacent to the cricket ground will create conflict, the case of Miller v Jackson [1977] QB 966 emphasised that planning authorities should not allow houses to be built too close to cricket grounds. In the recent High Court case of R (East Meon Forge and Cricket Ground Protection Association) v East Hampshire District Council [2014] EWHC 3543 (Admin), planning permission for residential development near to a village cricket ground was quashed on the basis that the local planning authority should not have rejected Sport England's advice. The judge concluded that situating a house close to the cricket ground created unacceptable risks for the future occupiers and the club in terms of liabilities. There is an indirect threat arising from the loss of grazing land. If H454a is developed the farmer would not need to apply to the Council for planning permission for change of use from cricket ground to grazing land in lieu of grazing land lost.

Soundness - Consistent with National Policy

Given their proximity to the cricket ground, sites H454a and H498 are neither 'deliverable' nor 'developable', as required by paragraph 47 of the NPPF. The sites are not 'deliverable' because they would not obtain planning permission for the reasons stated above. They are not 'developable' because they are not suitable sites for housing for the reasons stated above. Allocating the site is inconsistent with para 70, which requires planning policies and decisions to 'guard against the unnecessary loss of valued facilities ... particularly where this would reduce the community's ability to meet its day to day needs'.

Council Response

No change. Detailed design issues on the site would be identified at planning application stage, however the site allocation in the Local Plan requires protective measures will be required to ensure an appropriate relationship between the adjoining cricket ground and the development. The site is adjacent to the cricket ground, but it's allocation for housing is not predicated by losing the cricket ground. National planning policy would require replacement of equal or enhanced provision in any event.

Paragraph/Site: **H498**

Consultee: **949816 Mr Steve Scott**

Agent:

Rep ID: **PDLP_AD196**

Soundness - Justified

This proposal is a direct contradiction of points 4, 7 & 8 of the SA stated objectives on page 9 of the Draft Plan. Should this go ahead, Clayton West Cricket Club will have to close due to being evicted from the 1/3 of the cricket field currently owned by the local farmer, who will require that particular piece of the cricket field for grazing purposes.

Proposed Change Requested

A significant gap between any housing boundary and the Cricket boundary to allow matches to be played safely, together with appropriate netting to prevent serious injury (or damage to properties) from the hundreds of cricket balls that will go over the boundary.

Council Response

No change. Detailed design issues on the site would be identified at planning application stage, however the site allocation in the Local Plan requires protective measures will be required to ensure an appropriate relationship between the adjoining cricket ground and the development. The site is adjacent to the cricket ground, but it's allocation for housing is not predicated by losing the cricket ground. National planning policy would require replacement of equal or enhanced provision in any event.

Paragraph/Site: **H498**

Consultee: **1060788 Mr & Mrs Hardy**

Agent: **941854 Mr Mark Johnson**

Rep ID: **PDLP_AD2062**

Soundness - Effective

In order for the long-term future of the Cricket Club to be secured and for the housing to be built, the text to the allocation of H498 needs to recognise the need to re-locate the existing riding stables business.

Proposed Change Requested

Amend text in the site allocation box.

Council Response

No change. The site is allocated based on its merits as a housing option, the relocation of the existing business would need to be considered at an advanced stage.

Paragraph/Site: **H502**

Consultee: **942647 Rob Ellis**

Agent:

Rep ID: **PDLP_AD715**

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 Change the continued co-operation with Wakefield Council on school place planning is acknowledged and supported.

Paragraph/Site: **H502**

Consultee: **942768 Mr Andrew Wood**

Agent:

Rep ID: **PDLP_AD1787**

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Soundness - Consistent with National Policy	The site breaches into open country when viewed from the main road.		
Proposed Change Requested	Reduce the number of dwellings by not developing the southern strip of the site. This area could be used for the acces road.		
Council Response	No change.The design, visual impact and capacity will be considered in more detail at planning application stage.		
Paragraph/Site: H502	Consultee: 944135 Mr Anthony Clifton	Agent:	Rep ID: PDLP_AD1074
Soundness - Justified	Site is one of many that will generate traffic which in varying degrees will gravitate onto Penistone Road. Disruption of natural drainage could lead to new problems with Fenay Beck		
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.		
Paragraph/Site: H502	Consultee: 945214 Mr and Mrs J Ryden	Agent:	Rep ID: PDLP_AD307
Soundness - Justified	This proposal is unsound because it fails to take account of the highways issues which would be caused by upto 400 more vehicles having to enter and exit the site by way of Commercial Road or Cumberworth Road. Both lead to narrow choke points in Skelmanthorpe village, Kirkburton village and Lower Cumberworth. Commercial Road itself has been made very unsafe in darkness by the provision of new street lights which fail to illuminate the road properly and make it impossible to see pedestrians or parked cars when blinded by oncoming car headlights. Health and safety is therefore not being met and accidents will occur.		
Proposed Change Requested	No development to be allowed which will lead to extra traffic on Commercial Road, Skelmanthorpe. Providing revised full coverage street lighting on Commercial Road.		
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.		
Paragraph/Site: H634	Consultee: 943055 Mr Steve Patterson	Agent:	Rep ID: PDLP_AD540
Soundness - Positively Prepared	This is greenfield and development will urbanise a rural community.		
Soundness - Justified	Development will exacerbate flood risk from surface water run-off and the local infrastructure of roads, schools, health services, power utilities, sewerage etc cannot support the increased population.		
Council Response	No change.It is considered that the allocation, alongside the adjacent H634, can be contained into part of the village by Barnsley Road and woodland. 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.Any development on the site would have to be compliant with the drainage policy in the Local Plan which requires development to not exceed typical Greenfield run-off rates, through the use of Sustainable Drainage Systems.The current level of traffic is not seen as a reason for development not to take place on this site, nor is the traffic that could be generated from the development seen as significant enough to have a severe adverse impact on the surrounding highway network.		
Paragraph/Site: H634	Consultee: 949563 mr John Jordan	Agent:	Rep ID: PDLP_AD2
Soundness - Justified	There is no associated infrastructure within the village to cope with the proposed growth in terms of roads, schooling and public transport.		

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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. The site has been assessed in accordance with the Part 2 of the Local Plan Methodology (BP23).

Paragraph/Site: **H634**

Consultee: **968005 Mr Joel Collins**

Agent:

Rep ID: **PDLP_AD293**

Soundness - Positively Prepared The plan is unsound. Apart from consultation on the council's website, there is no evidence of engagement with the Denby Dale residents regarding sites H1784, H233, H634, H689 and H690. This level of development will change the character of the village so co-operation in the form of active engagement with residents is necessary.

Soundness - Justified The plan is unsound. H634 is marked as a rejected option as part site H304 on the rejected policies map (November 2016). Ashwell Beck flows into a culvert which has failed on at least one occasion, causing damage to some of the properties in Kenyon Bank. Building on the site would increase surface water run-off. There is already a strong belt boundary and removal of this site and H233 would change and spoil the green belt boundary.

Proposed Change Requested Remove housing allocation H634 and retain as green belt.

Council Response No change. Two site options covering the site were assessed in accordance with Part 2 of the Local Plan Methodology (BP23). One option on the site was accepted and another was accepted. Two options cannot be accepted on the same site. Any development on the site would have to comply with policy PLP28 which states that typical greenfield run-off rates should not be exceeded. It is considered that the boundary for this site and H233 provide containment and would not lead to sprawl eastwards. The site is contained by Barnsley Road to the south and woodland to the west, along with the adjacent site to the east can form a defensible green belt boundary. 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.

Paragraph/Site: **H634**

Consultee: **1046287 Mr William Lyne**

Agent:

Rep ID: **PDLP_AD285**

Legally Compliant The lack of public consultation. This has been a very rushed process with little public consultation and no public enquiry.

Soundness - Positively Prepared The land has repeatedly been designated Green Belt and rightly so. It falls between two tracts of mature woodland and is thriving with wildlife. There are other brownfield sites within Denby Dale that have not been developed. Surely it would make sense to develop these first. The parcels of land under review are not 'in-fill' land, they never have been and cannot be described as such.

Soundness - Justified The new estates would emerge via dangerous uphill exits onto a very fast moving Barnsley road. There is not enough infrastructure in the village to support a sudden influx of hundreds more people. Schools and medical facilities are struggling to cope as it is. The use of Kenyon Bank and Inkerman Way as conduits / shortcuts into the village from the new estates would cause unwanted noise and disruption to residents there. There is a threat of flooding to houses downhill from these new developments, caused by tarmacking over land that up to now had acted as a natural sponge.

Proposed Change Requested The local plan should use brownfield sites first for development, and not greenbelt. Changing Green Belt status should be an action of last resort. The local plan is not making its presence known in the communities whose lives it will so greatly affect. There should be a well publicised public enquiry into each and every greenbelt change so that locals can have a real say.

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 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

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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.

Paragraph/Site: **H634**

Consultee: **1048605 Mr Ged Keaveney**

Agent:

Rep ID: **PDLP_AD318**

Soundness - Positively Prepared There are many other suitable sites in the area that have the infrastructure to support some additional growth however it appears that Denby Dale, Skelmanthorpe and Clayton West in particular are required to take the burden of the required extra housing yet other villages have little or no sites at all.

Soundness - Justified No justification has been given for the removal of Green Belt on this site. We have been informed that the removal of Green Belt requires special circumstances to be demonstrated in each case but none have been demonstrated for this site and the issue is just being ignored. The removal of Green Belt without justification or demonstration of special circumstances combined with the excessive allocation of housing to certain areas with no clear plans on how the schools, roads and services will be improved to support the increase mean that this site allocation is unsound.

Proposed Change Requested Provide details of the special circumstances that justify the removal of Green Belt on this site Provide details of why some areas have significant housing and commercial expansion yet others have none. Why can't the burden be spread more evenly.

Council Response No change. The site was assessed in accordance with Part 2 of the Local Plan Methodology (BP23). It is considered that the boundary for this site and H233 provide containment and would not lead to sprawl eastwards. The site is contained by Barnsley Road to the south and woodland to the west, along with the adjacent site to the east can form a defensible green belt boundary. The green belt boundaries have remained the same since 1980, but there has been an increase in development pressure since then as other opportunities have been exhausted. The Place Shaping chapter in the Strategies and Policies document (SD1) considers the strengths and opportunities for different settlements across the district (section 5.4). The 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.

Paragraph/Site: **H634**

Consultee: **1048793 Cllr Graham Turner**

Agent:

Rep ID: **PDLP_AD3280**

Soundness - Justified Site should remain as green belt. They will deliver very few houses and better sites exist within the Denby Dale ward. These sites are outside the current village centre and would have no direct link in to the village, and would add little to the village, and its development as a community.

Council Response No change. The site's contribution to the role and function of the Green Belt has been assessed in accordance with Part 2 of the Local Plan Methodology (BP23). The site could be connected to Denby Dale, on foot, via Kenyon Bank and Inkerman Way.

Paragraph/Site: **H634**

Consultee: **1049286 Mr Nicholas Willock**

Agent: **1049237 Mr Nicholas Willock**

Rep ID: **PDLP_AD1101**

Soundness - Consistent with National Policy Comparing the merits of rejected options H322a/H322/H475 (Cumberworth Lane, Denby Dale) and accepted options H233/H634 (Inkerman): Cumberworth Lane has a more defensible boundary and development on three sides but Inkerman only has development on one side. The Inkerman sites would not result in a satisfactory settlement rounding off. Both areas of land have been assessed as requiring third party land to achieve visibility. Cumberworth Lane sites are in a more accessible location. If the exceptional circumstances exist for the release of the Inkerman sites from the green belt they must also exist for the Cumberworth Lane sites.

Proposed Change Requested If the exceptional circumstances exist for the release of the Inkerman sites (H233/H634) from the green belt they must also exist for the Cumberworth Lane sites (H322a/H322/H475).

Council Response No change. The sites have been assessed in accordance with Part 2 of the Local Plan Methodology (BP23). It is considered that the boundary for this site and H233 provide containment and would not lead to sprawl eastwards. The site is contained by Barnsley Road to the south and woodland to the west, along with the adjacent site to the east can form a defensible green belt boundary.

Paragraph/Site: **H634**

Consultee: **1049391 Miss Lucie Jennings**

Agent:

Rep ID: **PDLP_AD749**

Soundness - Justified This proposal would lead to loss of Public Right of Way which contradicts Point 4 of being beneficial to people's health. The local infrastructure cannot cope with more housing and there are no methods in place to improve this. This is green field land which I don't feel should be built on as it will adversely affect

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	the local area and wildlife.
Proposed Change Requested	To remove H634 from the Local Plan.
Council Response	No change. The site was assessed in accordance with Part 2 of the Local Plan Methodology (BP23), following consultation with infrastructure providers. The site assessment considers of biodiversity on the site. Policy PLP23 protects the core walking and cycling network which includes this PROW.
Paragraph/Site: H688	Consultee: 942647 Rob Ellis Agent: Rep ID: PDLP_AD713
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: H688	Consultee: 943957 Mr Ian Smith Agent: Rep ID: PDLP_AD3724
Soundness - Justified	This site adjoins the boundary of the Skelmanthorpe Conservation Area. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of this area. 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	Before allocating this site for development 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.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 (2014/91628) and development has commenced on the site.
Paragraph/Site: H688	Consultee: 944135 Mr Anthony Clifton Agent: Rep ID: PDLP_AD1075
Soundness - Justified	Site is one of many that will generate traffic which in varying degrees will gravitate onto Penistone Road. Disruption of natural drainage could lead to new problems with Fenay Beck
Council Response	No change.This site has planning permission (2014/91628) and development has commenced on the site.
Paragraph/Site: H689	Consultee: 943055 Mr Steve Patterson Agent: Rep ID: PDLP_AD541
Soundness - Positively Prepared	This is greenfield and development will urbanise a rural community.
Soundness - Justified	Development will exacerbate flood risk from surface water run-off and the local infrastructure of roads, schools, health services, power utilities, sewerage etc cannot support the increased population.
Council Response	No change.The site has planning permission for 29 dwellings (application reference: 2013/93721) therefore the principle for the development of this site has

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been established.

Paragraph/Site: **H689**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3725**

Soundness - Justified

The Denby Dale Wesleyan Methodist Church adjacent to this site is a Grade II Listed Building. The loss of this area and its subsequent development could harm elements which contribute to the significance of this building. 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. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.

Proposed Change Requested

Before allocating this site for development 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. 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). The site has planning permission for 29 dwellings (application reference: 2013/93721) therefore the principle for the development of this site has been established.

Paragraph/Site: **H689**

Consultee: **949563 mr John Jordan**

Agent:

Rep ID: **PDLP_AD42**

Soundness - Justified

There is no associated infrastructure within the village to cope with the proposed growth in terms of roads, schooling and public transport.

Council Response

No change. The site has planning permission for 29 dwellings (application reference: 2013/93721) therefore the principle for the development of this site has been established.

Paragraph/Site: **H689**

Consultee: **1034451 Mr John Clayton**

Agent:

Rep ID: **PDLP_AD10**

Soundness - Justified

Additional houses on Cumberworth Lane would increase the amount of traffic on the mainly single track Top Road which is used as a cut-through. Top Road should be made either a cul-de-sac or one-way.

Proposed Change Requested

Top Road should be made either a cul-de-sac or one-way.

Council Response

No change. The site has planning permission for 29 dwellings (application reference: 2013/93721) therefore the principle for the development of this site has been established.

Paragraph/Site: **H689**

Consultee: **1047137 Dr Neil Denby**

Agent:

Rep ID: **PDLP_AD204**

Soundness - Positively Prepared

Unsustainable development contrary to the NPPF.

Soundness - Justified

The proposed development is not sustainable as the need for it is not demonstrated in the Draft Plan. Also adverse impacts (increased road traffic; loss of amenity; loss of green belt; reduction in biodiversity; impact on public rights of way) clearly outweigh any benefits.

Soundness - Effective

Threat to wildlife, ecology and biodiversity contrary to the NPPF. Threats to the rural and open nature of existing public rights of way. NPPF Paragraphs 114

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	and 119 – The site contravenes UK BAP Priority Habitats. NPPF Paragraphs 120 and 121 – the site is in a 'high coal risk' location.
Soundness - Consistent with National Policy	This site runs counter to the NPPF including paragraphs; 14, 54, 55, 69, 114, 119, 120, 121.
Proposed Change Requested	This site, clearly chosen as an 'infill' site, should be protected from development and removed from the plan.
Council Response	No change. The site has planning permission for 29 dwellings (application reference: 2013/93721) therefore the principle for the development of this site has been established.

Paragraph/Site: H690	Consultee: 943055	Mr Steve Patterson	Agent:	Rep ID: PDLP_AD542
Soundness - Positively Prepared	This is greenfield and development will urbanise a rural community.			
Soundness - Justified	Development will exacerbate flood risk from surface water run-off and the local infrastructure of roads, schools, health services, power utilities, sewerage etc cannot support the increased population.			
Council Response	No change. This site has been assessed against the methodology set out in BP23 - Local Plan Methodology part 2. Any future development will have to have regard to PLP28 that seeks to maintain greenfield run-off rates. The proposed development is unlikely to result in any significant detriment to the efficiency and safe use of the local highway network. Given the scale of the development, a Transport Assessment will be required at planning application stage to look at more detailed issues / junctions. 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: H690	Consultee: 943957	Mr Ian Smith	Agent:	Rep ID: PDLP_AD3729
Soundness - Justified	This site lies opposite Denby Dale Wesleyan Methodist Church which is a Grade II Listed Building. The loss of this area and its subsequent development could harm elements which contribute to the significance of this building. 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	Before allocating this site for development 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. 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). A Heritage Impact Assessment has been prepared for the site.			

Paragraph/Site: H690	Consultee: 949563	mr John Jordan	Agent:	Rep ID: PDLP_AD41
Soundness - Justified	There is no associated infrastructure within the village to cope with the proposed growth in terms of roads, schooling and public transport			
Council Response	No change. The site has been assessed in accordance with the Site Allocations Methodology Part 2: BP23. The impact of development on school place			

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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: **H690**

Consultee: **968924**

Mr David Turnbull

Agent:

Rep ID: **PDLP_AD368**

Soundness - Justified

Infrastructure and Access • The exit of Leak Hall Road onto the main Wakefield Road is entirely unsuitable for the volume of traffic. • The road is very narrow and has limited vision when pulling out. • There is a bus stop three meters to the side of the junction and opposite the junction is parking for residents, the Doctor's Surgery, village pharmacy and local shops/restaurants. • It is an incredibly busy section of road and adding further traffic would increase the risk of accidents. • Leak Hall Road is narrow with sections of narrow or no pavement and would not be suitable for the volume of traffic that the proposed volume of houses would bring. • One of the other suggestions is onto Cumberworth Road, but again this is, in our view, a dangerous place. Existing houses would make the entrance narrow and visibility when pulling onto Cumberworth would be very limited and not acceptable for the amount of cars that would require access to this proposed development. There is a narrow pavement at this point and no scope for widening the road to make a safe access and egress. Local services • Doctors. Denby Dale Surgery is part of Skelmanthorpe Family Doctors. In the last year the services at the Denby Dale surgery have been scaled back due to financial savings being required. • For a routine appointment at Skelmanthorpe one can wait up to three weeks and this wait is even longer if you want to be seen in Denby Dale so we reiterate the above point, the local surgeries struggle to cope with current demands and would be over burdened with new, large developments. • The recent proposals to remove the A&E provision at Huddersfield put in question the ability of the health service to deliver its key services to the current population, let alone a further 30,000 houses and the increase in population that brings. • Schools. The local plan does not appear to cater for the significant increase in school places that will be required. Schools are full and it is not simply a case of building another classroom; the school halls and kitchens are not large enough to cater for the increasing demand. There appears to be no plans to build new schools locally which is of paramount importance if Kirklees Council look to increase population numbers. Environmental Concerns • The land in proposed area H690 is a natural soakaway for surface water and hosts a number of trees and large bushes that retain water. There is a small brook that constantly runs through the field and this naturally increases with intensity with prolonged wet weather – which this area is increasingly seeing more and more of. • The history of this land is that of mining. It poses potential danger and would take costly measures to rectify before safely building on it. • There is also an array of wildlife, including bats, which would lose its natural habit.

Council Response

No change. This site has been assessed against the methodology set out in BP23 - Local Plan Methodology part 2. Any future development will have to have regard to PLP28 that seeks to maintain greenfield run-off rates. There was no objections from technical consultees regarding biodiversity. The proposed development is unlikely to result in any significant detriment to the efficiency and safe use of the local highway network. Given the scale of the development, a Transport Assessment will be required at planning application stage to look at more detailed issues / junctions. 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: **H690**

Consultee: **969376**

Mrs Sarah Turnbull

Agent:

Rep ID: **PDLP_AD370**

Soundness - Positively Prepared

This site has still been put forward for future development despite reasonable objections and reservations in the Local Plan. No consideration has been given to points raised in the consultation and the consultation was no more than an exercise rather than a proper consultation.

Soundness - Justified

There are highway safety concerns about infrastructure and access to the site. Leak Hall Road and its junction with Wakefield Road are unsuitable for the volume of traffic. Leak Hall Road is narrow, already heavily used and very busy with parents and children walking to school. Access from Cumberworth Road would be dangerous as the entrance is narrow and visibility limited, the pavement is narrow and there is no scope for widening the road. Local services are already reduced and failing to serve the existing population. Doctors cannot cope with more residents and the impact of the closure of Huddersfield A&E on

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	surrounding districts has not been considered. Schools are full and the plan fails to cater for the significant increase in school places that will be required. There are concerns about environmental impact, including flooding, the potential danger from mining and the stability of the land as a sinkhole has recently opened up on the land. There is an array of wildlife, including bats, which would lose its natural habit. The character of the local landscape will be ruined and small villages are losing their charm.
Proposed Change Requested	Do not consider this land for future development.
Council Response	No change. This site has been assessed against the methodology set out in BP23 - Local Plan Methodology part 2. Any future development will have to have regard to PLP28 that seeks to maintain greenfield run-off rates. The proposed development is unlikely to result in any significant detriment to the efficiency and safe use of the local highway network. Given the scale of the development, a Transport Assessment will be required at planning application stage to look at more detailed issues / junctions. 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: H690	Consultee: 1034451 Mr John Clayton Agent: Rep ID: PDLP_AD11
Soundness - Justified	Additional houses on Cumberworth Lane would increase the amount of traffic on the mainly single track Top Road which is used as a cut-through. Top Road should be made either a cul-de-sac or one-way.
Proposed Change Requested	Top Road should be made either a cul-de-sac or one-way.
Council Response	No change. The site has been assessed in accordance with the Site Allocations Methodology Part 2: BP23. Further consideration will be given to access arrangements at planning application stage.
Paragraph/Site: H690	Consultee: 1047137 Dr Neil Denby Agent: Rep ID: PDLP_AD205
Soundness - Positively Prepared	Unsustainable development contrary to the NPPF. Inappropriate development of green land contrary to the NPPF.
Soundness - Justified	The site is not justified in the context of NPPF economic, social and environmental considerations. The proposed development is not sustainable as the need for it is not demonstrated in the Draft Plan. Also adverse impacts (increased road traffic; loss of amenity; loss of green belt; reduction in biodiversity; impact on public rights of way) clearly outweigh any benefits.
Soundness - Effective	NPPF Paragraphs 114 and 119 – The site contravenes UK BAP Priority Habitats. NPPF Paragraphs 120 and 121 – the site is in a ‘high coal risk’ location.
Soundness - Consistent with National Policy	This site runs counter to the NPPF including paragraphs; 14, 54, 55, 69, 80, 100, 114, 119, 120, 121.
Proposed Change Requested	As a priority, prevent the formation of an urban corridor of housing from Cumberworth Lane to Leak Hall Lane by limiting this site.
Council Response	No change. This site has been assessed against the methodology set out in BP23 - Local Plan Methodology part 2. It is considered that the allocation of the site is in conformity with NPPF.
Paragraph/Site: H690	Consultee: 1057821 Agent: 1057794 Mrs Tessa Fletcher Rep ID: PDLP_AD980
Council Response	No change. Support noted.
Paragraph/Site: H768	Consultee: 943957 Mr Ian Smith Agent: Rep ID: PDLP_AD3738
Soundness - Justified	The Church of St Aidan adjacent to this site is a Grade II Listed Building. The loss of this area and its subsequent development could harm elements which contribute to the significance of this building. 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

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	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	Before allocating this site for development 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.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).A Heritage Impact Assessment (LE90) has been prepared for this site.

Paragraph/Site: H768	Consultee: 1049391 Miss Lucie Jennings	Agent:	Rep ID: PDLP_AD759
Soundness - Justified	This is not a sound proposal as there is a great potential impact on the existing listed building - St Aidan’s church. This area is already under pressure in terms of people and traffic as well as the flood risk.		
Proposed Change Requested	To remove site H768 from the plan.		
Council Response	No change.It is considered that a heritage impact assessment is required to consider the contribution which site makes to elements which contribute to significance of the heritage assets.Options for surface water drainage would need to be given further consideration when an application is submitted.Access achievable from Willow Close and Beechfield Avenue and would be acceptable in terms of its impact on the local highway network.		

Paragraph/Site: H1784	Consultee: 943055 Mr Steve Patterson	Agent:	Rep ID: PDLP_AD543
Soundness - Positively Prepared	This is greenfield and development will urbanise a rural community.		
Soundness - Justified	Development will exacerbate flood risk from surface water run-off and the local infrastructure of roads, schools, health services, power utilities, sewerage etc cannot support the increased population.		
Council Response	No change.The net area of the site is predominantly brownfield. 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.It is considered that site access is achievable and would be acceptable in terms of the local highway network. No objections have been raised from technical consultees in terms of flood risk and drainage.		

Paragraph/Site: H1784	Consultee: 1047137 Dr Neil Denby	Agent:	Rep ID: PDLP_AD207
Soundness - Positively Prepared	The proposed development is not sustainable (NPPF para 7)		
Soundness - Justified	Also adverse impacts (increased road traffic; loss of amenity; loss of green belt; reduction in biodiversity; impact on public rights of way) clearly outweigh any benefits. (Para 14).		
Soundness - Effective	NPPF Paragraphs 114 and 119 – The site contravenes UK BAP Priority Habitats. NPPF Paragraphs 120 and 121 – the site is in a in ‘high coal risk’ location.		
Soundness - Consistent with National Policy	This site runs counter to the NPPF paragraphs; 7,14,114,119,120,121		

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Proposed Change Requested	Remove the site from housing allocations and retain as green land.
Council Response	No change.The site is unallocated in the UDP so is not protected from development by planning policy.The net area of the site has been reduced to reduce impact on BAP Priority Habitat, maintaining links between the two blocks of ancient woodland. The site is within a coal referral area and a coal mining risk assessment will be required prior to development of the site.
Paragraph/Site: H1784	Consultee: 1049391 Miss Lucie Jennings Agent: Rep ID: PDLP_AD755
Soundness - Justified	I object to this proposal near Denby Dale station as it will have an adverse effect on the local ecology. It is a green field site and the loss of yet more of these areas is detrimental to the villagers and to the wildlife. Part of this site lies within a UK BAP priority habitat so I disagree with buildings being erected here.
Proposed Change Requested	To remove H1784 from the Plan.
Council Response	No change.The net area of the site is reduced to reduce impact on BAP Priority Habitat, maintaining links between the two blocks of ancient woodland. The net area of the site is predominantly brownfield.
Paragraph/Site: H3325a	Consultee: 943042 Phil Grosvenor Agent: Rep ID: PDLP_AD1370
Soundness - Justified	H3225a is currently the Adare factory, a very successful employer providing around 200 well paid jobs. There is apparently a shortage of employment land in Rural Kirklees, so this site should certainly not be considered for housing. The loss of employment sites for housing is one of the biggest challenges identified by the council, and as such the use of this site is totally unjustified. There is no proven need for housing in this area. There are no plans indicated for infrastructure improvements in the Denby Dale ward despite over 1000 houses being in the plan. The plan takes no account of what they describe as windfall build, which actually makes up a large proportion of the houses completed in this area, and are mainly the affordable houses that are required.
Soundness - Consistent with National Policy	The site is against many of the clauses of the NPPF, which is the government policy which is supposed to be the framework for local plan design. The plan is aspirational but not realistic as required by the NPPF.
Council Response	No change.The site has been submitted to the council for consideration as a housing option. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The site was assessed for its suitability as Priority Employment Area as set out in LE4 the Rejected Site Option report. The Green Belt impact was assessed through the site allocations process based on the Green Belt Review (SD19). Evidence submitted by the site owner (through the Call for Sites process and in representatives PDLP_AD3139) provided a critique of the Priority Employment Area site and its suitability for continued business and employment use. This demonstrated that it was unlikely that the site would be re-used for intensification / extension of the existing employment use due to operational issues and potential conflict with adjacent residential area.The Local Plan seeks to deliver the objectively assessed housing need for the district as a whole. The suitability for Clayton West to accommodate development is considered in Section 5 of SD1 – Strategy and Policies document and in BP17 Settlement Appraisal Technical Paper.A windfall allowance of 450 per annum is assumed in the Local Plan for the later years of the plan period. Policy PLP11 requires 20% affordable housing to be provided on development sites.Site E2333a has been allocated for employment in Clayton West.
Paragraph/Site: H3325a	Consultee: 943162 Mr Frank Dolan Agent: Rep ID: PDLP_AD1420
Legally Compliant	It does not meet the criteria for legal compliance. It is not based on robust and credible evidence. It is not the most appropriate strategy when considered against alternatives. It has not considered cross boundary/inter authority issues. It has not consulted widely and community engagement has been limited.
Duty to Co-operate	Residents in the nearby villages of West Bretton and Calder Grove have not been made aware of the proposals. Both are within the Wakefield MC area and the former is also the home of the internationally recognised Yorkshire Sculpture Park. Traffic exiting the M1 at exits 38 and 39 already chokes these villages especially for 2 to 3 hours in both early morning and early evening.
Soundness - Positively Prepared	The Vision and Objectives Section of the KMC Strategies and Policies Document recognises the natural beauty and heritage of this area, yet these plans would ultimately lead to it's destruction There has been only minimal if any involvement of the local communities. Two information sessions, neither of which was widely publicised, were held in Huddersfield and Dewsbury, a tedious journey, especially for those using public transport. Access to the plans via the Internet is also bad practice being predicated on the flawed assumption that this is available to all and that they have the skills to access and negotiate an unusually difficult and unwelcoming site.
Soundness - Justified	Over 5,000 new houses are planned for Kirklees Rural adding to the many hundreds of houses recently built, or undergoing construction. Infrastructure and

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the facilities essential for public health are already compromised; the proposals are therefore unsustainable. Notably it does not; Improve the health of local people, Secure an effective transport network, Protect and enhance the character of the landscape. Protect and enhance recreation facilities and areas of open space Provide the housing that meets local demand. Provide start up opportunities for local entrepreneurs.

Soundness - Consistent with National Policy

The Plans do not ensure sustainable development for either Kirklees or Kirklees Rural and are therefore unsound, particularly with regard to National Policy, (para 182, NPPF).

Proposed Change Requested

This would be more appropriate as an industrial site.

Council Response

No change. The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues. Wakefield Council did not comment on this site. The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). The Local Plan seeks to deliver the objectively assessed housing need for the district as a whole. The suitability for Clayton West to accommodate development is considered in Section 5 of SD1 – Strategy and Policies document and in BP17 Settlement Appraisal Technical Paper.

Paragraph/Site: **H3325a**

Consultee: **943612 Helen France**

Agent:

Rep ID: **PDLP_AD2014**

Soundness - Positively Prepared

- Policies, implementation, delivery and land allocations will not deliver the noble statements at the beginning of the document - Change of commercial land to housing is not the most appropriate strategy for the area when considered against alternatives - This is a large employment site. The Council's own Strategies and Policies document says large employment sites are needed - The allocation exacerbates an existing issue in the area (again identified by the Council) of commercial land consistently being reallocated to housing - Site is next to an area of green belt proposed for release - Allocation contravenes the Council's own policies PLP9 and PLP10 - Loss of 200 skilled jobs to neighbouring authority

Soundness - Justified

- Change from commercial land to housing is unjustified - Reasonable alternatives have not been properly evaluated - Site was previously rejected in the first Draft Local Plan. Unclear as to what has changed making the allocation unjustified and not part of a considered strategic approach - Allocation is not needed. There will be an overprovision of housing allocations in the Dearne Valley - Overprovision of housing will lead to more commuter dormitories. Allocations are too large and unsustainable for existing communities and infrastructure

Soundness - Consistent with National Policy

- Allocation contravenes Paragraph 182 of NPPF

Council Response

No change. The site has been submitted to the council for consideration as a housing option. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The site was assessed for its suitability as Priority Employment Area as set out in LE4 the Rejected Site Option report. The Green Belt impact was assessed through the site allocations process based on the Green Belt Review (SD19). Evidence submitted by the site owner (through the Call for Sites process and in representatives PDLP_AD3139) provided a critique of the Priority Employment Area site and its suitability for continued business and employment use. This demonstrated that it was unlikely that the site would be re-used for intensification / extension of the existing employment use due to operational issues and potential conflict with adjacent residential area. The Local Plan seeks to deliver the objectively assessed housing need for the district as a whole. The suitability for Clayton West to accommodate development is considered in Section 5 of SD1 – Strategy and Policies document and in BP17 Settlement Appraisal Technical Paper. Site E2333a has been allocated for employment in Clayton West.

Paragraph/Site: **H3325a**

Consultee: **943973 Mr David Newby**

Agent:

Rep ID: **PDLP_AD996**

Soundness - Justified

The site is currently occupied by a company who have a significant number of employees. It is understood company is relocating to Ossett. The site should be

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retained as an employment allocation, there is insufficient justification for additional housing in Clayton West.

Proposed Change Requested

The site should be allocated for employment.

Council Response

No change. The site has been submitted to the council for consideration as a housing option. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The site was assessed for its suitability as Priority Employment Area as set out in LE4 the Rejected Site Option report. Evidence submitted by the site owner (through the Call for Sites process and in representatives PDLP_AD3139) provided a critique of the Priority Employment Area site and its suitability for continued business and employment use. This demonstrated that it was unlikely that the site would be re-used for intensification / extension of the existing employment use due to operational issues and potential conflict with adjacent residential area. Site E2333a has been allocated for employment in Clayton West.

Paragraph/Site: **H3325a**

Consultee: **944899**

Mr Ian Hutchinson

Agent:

Rep ID: **PDLP_AD1407**

Duty to Co-operate

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

Soundness - Positively Prepared

The consultation methodology is flawed. Most of the proposed development sites are included on the plan simply because they were put forward by the land owner and this is not a sound basis for selection and for planning the future of our communities. The Council has done little or nothing to examine the proposed sites to check for suitability in terms of location, access, condition and surroundings. It has simply plotted the sites on a plan. No serious effort has been made to inform the public about 'the public consultation' as there has been no leaflet drop and the plans have not been displayed publicly in local areas. The deadline for comments was around Christmas time, when most members of the public have other things on their minds. There are many more appropriate sites that have not been selected, including many brownfield sites that will be left as eyesores if not re-developed. These should automatically be considered first for inclusion in the plan but some have been rejected for unknown reasons.

Soundness - Justified

Allocation of site H3325a for housing will result in the loss of green belt land and loss of an existing employment site (factory) which employs a lot of local people. There will be a loss of jobs in the area and the replacement warehouse jobs will be unskilled and minimal in numbers. Additional housing is unnecessary and unwelcome in this area as there has already been a new development of 95 homes by Persimmon (in Scissett) and a further estate of 200 homes by Redrow Homes (also in Scissett) is in the pipeline, as well as numerous other large and small developments. The effect of this has been to transform our community from a pleasant village into a large sprawl of identical looking establishments with no individual character.

Council Response

No change. 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. The site has been submitted to the council for consideration as a housing option. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The site was assessed for its suitability as Priority Employment Area as set out in LE4 the Rejected Site Option report. Site E2333a has been allocated for employment in Clayton West. The Green Belt impact was assessed through the site allocations process based on the Green Belt Review (SD19). The consultation was undertaken in accordance with the Council's Statement of Community Involvement (SD16). 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. The Place Shaping chapter in the Strategies and Policies document (SD1) considers the strengths and opportunities for different settlements across the district (section 5.4). Evidence submitted by the site owner (through the Call for Sites process and in representatives PDLP_AD3139) provided a critique of the Priority Employment Area site and its suitability for continued business and employment use. This demonstrated that it was unlikely that the site would be re-used for intensification / extension of the existing employment use due to operational issues and potential conflict with adjacent residential area.

Paragraph/Site: **H3325a**

Consultee: **946109**

R T Jackson

Agent:

Rep ID: **PDLP_AD3587**

Soundness - Justified

This site should be kept as industrial land and not used for housing. We don't need anymore houses in Clayton West.

Council Response

No change. The site has been submitted to the council for consideration as a housing option. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The site was assessed for its suitability as Priority Employment Area as set out in LE4 the Rejected Site Option report. Evidence submitted

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by the site owner (through the Call for Sites process and in representatives PDLP_AD3139) provided a critique of the Priority Employment Area site and its suitability for continued business and employment use. This demonstrated that it was unlikely that the site would be re-used for intensification / extension of the existing employment use due to operational issues and potential conflict with adjacent residential area. The Local Plan seeks to deliver the objectively assessed housing need for the district as a whole. The suitability for Clayton West to accommodate development is considered in Section 5 of SD1 – Strategy and Policies document and in BP17 Settlement Appraisal Technical Paper.

Paragraph/Site: **H3325a**

Consultee: **969350**

Mrs Charlotte McKay

Agent: **969343**

Mrs Charlotte McKay

Rep ID: **PDLP_AD717**

Duty to Co-operate

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

Soundness - Positively Prepared

We do not consider that the identified housing and employment needs are based on objectively assessed development requirements. We consider that there has been an over estimation of the “objectively assessed housing need”; an under estimation of the brownfield land supply; an over estimation of the necessity for green field land allocations; and over estimation of the necessary industrial land allocations; and an over estimation of the necessary green belt land release. The council have identified the loss of employment land as an issue in Kirklees Rural, so why is allocation of this site for housing appropriate?

Soundness - Justified

The proposed allocation would not serve an economic role as the site is not located within the right place to support growth. The Site is within a rural area which lacks infrastructure. There is insufficient infrastructure already and it could not cope with the proposed developments. There appears to be no proposal to improve infrastructure. The loss of Site H3325a as an employment site would have a significant negative impact on the economy with the loss of circa 200 jobs. The proposed allocation would not serve a social role. The proposed allocations are not well serviced and the allocation would not assist in supporting the health, social or cultural wellbeing of current or future occupiers of the area. The proposed allocation would also not serve an environmental role. The allocation would fail to protect or enhance the natural, built and historic environment. In fact we consider that the proposed allocations would have a negative impact on the natural, built and historic environment. Part of the site is located within flood zone 3. The site is located within the wildlife habitat network. Part of the site within a high risk coal referral area

Soundness - Effective

The Local Plan does not appear to be effective and we question the deliverability of the plan over the plan period. The plan makes no case for improvements to roads. The A636 should be a key route with its access to the M1 from the Dearne and Holme valleys

Soundness - Consistent with National Policy

The proposed Local Plan is aspirational but not realistic as required by the NPPF. The proposed allocations of site H3325a would not represent sustainable development in accordance with the NPPF.

Council Response

No change. At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate. Wakefield Council were consulted on the publication draft Local Plan and commented in detail, however they did not comment on Site H3325a specifically. The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. The evidence for objectively assessed development required is set out in SD22 Employment Technical Paper and SD23 Housing 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. The site has been submitted to the council for consideration as a housing option. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2 and is considered to be sustainable development. The area within UK BAP Priority Habitat and Flood Zone 3 has been removed from the net area. This would need to be given further consideration at application stage. Site E2333a has been allocated for employment in Clayton West.

Paragraph/Site: **H3325a**

Consultee: **973343**

Paula Kemp

Agent:

Rep ID: **PDLP_AD1454**

Duty to Co-operate

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

Soundness - Positively Prepared

Objections at Public Consultation stage have been ignored. The entire exercise has been rushed and contains many inaccuracies, a sizeable majority of

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Soundness - Justified	Kirklees Rural residents are unaware of what the Local Plan is and the consequences to their communities. Sustainable development should be at the core of any Plan. The allocated locations, topography and road networks throughout this area are totally unsuitable and the proposed developments unsustainable.
Soundness - Consistent with National Policy	Increase in traffic.
Council Response	The Plan is inconsistent with or directly contravenes National Planning Policy Framework.
	No change.The Local Plan seeks to deliver the objectively assessed housing need for the district as a whole. The suitability for Clayton West to accommodate development is considered in Section 5 of SD1 – Strategy and Policies document and in BP17 Settlement Appraisal Technical Paper.The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues. Wakefield Council did not comment on this site.

Paragraph/Site: **H3325a**

Consultee: **1045848 Mrs Toni Rios**

Agent: **1045846 Mr Christopher Yapp**

Rep ID: **PDLP_AD385**

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". 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

'Highways England intend to retract these comments to reflect their current position at the earliest opportunity. 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 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). Highways England's recommendations within BP28 were informed by LE141 and their latest Network Analysis Tool modelling'

Paragraph/Site: **H3325a**

Consultee: **1048793 Cllr Graham Turner**

Agent:

Rep ID: **PDLP_AD3277**

Soundness - Justified

There is a shortage of industrial land within the plan in Denby Dale ward. This has been an industrial site for many years and should remain so. It sits at the edge of the village and is ideally placed for industrial use as it is away from existing homes and allows traffic movements to be kept out of the village and gives good access to the motorway network.

Proposed Change Requested

Retain as employment land.

Council Response

No change.The site has been submitted to the council for consideration as a housing option. The site has been assessed in accordance with BP23 - Local Plan

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Methodology Part 2. The site was assessed for its suitability as Priority Employment Area as set out in LE4 the Rejected Site Option report. Evidence submitted by the site owner (through the Call for Sites process and in representatives PDLP_AD3139) provided a critique of the Priority Employment Area site and its suitability for continued business and employment use. This demonstrated that it was unlikely that the site would be re-used for intensification / extension of the existing employment use due to operational issues and potential conflict with adjacent residential area. Site E2333a has been allocated for employment in Clayton West.

Paragraph/Site: **H3325a**Consultee: **1049391 Miss Lucie Jennings**

Agent:

Rep ID: **PDLP_AD763****Soundness - Justified**

This proposal is not sound as it is within a wildlife priority zone and also on a flood plain. The local infrastructure is already under extreme pressure and there are no measures in place to help this or to safeguard the wildlife here.

Proposed Change Requested

To remove site H3325a.

Council Response

No change. The site has been submitted to the council for consideration as a housing option. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The area within UK BAP Priority Habitat and Flood Zone 3 has been removed from the net area. This would need to be given further consideration at application stage.

Paragraph/Site: **H3325a**Consultee: **1053492 c/o agent**Agent: **998185 Mrs Emma Lancaster**Rep ID: **PDLP_AD3139****Proposed Change Requested**

The site is supported, but the rejected site including green belt to the east of this site should be allocated. See reps made against the rejected site.

Council Response

No change. Support noted. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The Green Belt impact was assessed through the site allocations process based on the Green Belt Review (SD19). Consideration of Green Belt Impact for the accepted site is set out in BP29 Accepted Site Options - Technical Appraisals and for in LE4 Rejected Site Options for site H3325.

Paragraph/Site: **H116**Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3740****Soundness - Justified**

The site adjoins the boundary of the Longwood Edge Conservation Area. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of this area. 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

Before allocating this site for development 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. 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). The site has planning permission (2014/92021) so the principle of development has been established.

Paragraph/Site: **H199**Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3743****Soundness - Justified**

The allocation of this area would bring development to within 40 metres of the former Church of St Luke and up to the curtilage of its vicarage. Both of these

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are Grade II Listed Buildings. The loss of this area and its subsequent development could harm elements which contribute to the significance of these buildings. 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. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.

Proposed Change Requested

Before allocating this site for development 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 change. 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: **H549**

Consultee: **968315**

Ms Wendy Abbott

Agent:

Rep ID: **PDLP_AD552**

Soundness - Justified

The densely populated area of Golcar cannot support the extra demand on local infrastructure, road network, schools and doctors. This proposed development does not include any provisions to create extra jobs, therefore the extra traffic from the developments would be required to travel to other areas, increasing traffic congestion and adding to carbon emissions. Golcar is an historic village – building more housing in the area would be in conflict with Council guidelines to ensure there’s a balance between development in sustainable locations and protecting the character of places and the environment. Bats are regularly present in this area. The proposed development could adversely impact on them and their habitat.

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. No objections have been raised by technical consultees in relation to biodiversity and the historic environment. The proposal is considered to be acceptable in terms of its impact on the wider highway network.

Paragraph/Site: **H550**

Consultee: **943957**

Mr Ian Smith

Agent:

Rep ID: **PDLP_AD3745**

Soundness - Justified

The loss of this area and its subsequent development could harm elements which contribute to the significance of a number of Grade II Listed Buildings in its vicinity. These include 54, 54A, 56, and 58 Brook Lane at the southeastern corner of this area and 27 and 29 Clay Well and the adjoining factory at its north-eastern corner. This site also lies within the boundary of the Golcar Conservation Area. The loss of this currently-open area and its subsequent development could also harm elements which contribute to the significance of this area. By allocating this site for mineral extraction, 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 to the special architectural or historic interest of the Listed Buildings, or what

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	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 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	No change.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 (2014/90450) therefore the principle of development has been established.

Paragraph/Site: **H550** Consultee: **948223 Janet Morton** Agent: Rep ID: **PDLP_AD26**

Soundness - Effective	The access roads (Victoria Lane, Clay Well and Small Lane) are narrow and single track in places, it is in a conservation area and the extension of Fullwood Drive would exacerbate current traffic problems.
Proposed Change Requested	The development should not be allowed.
Council Response	No change.This site has planning permission for 8 dwellings (application reference:2014/90450) therefore the principle for the development of this site has been established.

Paragraph/Site: **H779** Consultee: **943957 Mr Ian Smith** Agent: Rep ID: **PDLP_AD3748**

Soundness - Justified	278, 280 and 282 Leymoor Road are Grade II Listed Buildings. The loss of this area and its subsequent development could harm elements which contribute to their 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 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. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.
Proposed Change Requested	Before allocating this site for development 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 change.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

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harm to a designated heritage asset (and whose allocation, therefore, would be likely to conflict with national policy guidance).The site has planning permission (2014/92878) and development has begun on the site, therefore the principle of development on the site has been established.

Paragraph/Site: **H814**

Consultee: **1056442 Mr Peter Faulkner**

Agent:

Rep ID: **PDLP_AD874**

Soundness - Justified

Concerned that there appears to be no attention being given to infrastructure needs, along with local schools, shops and medical services. Roads (Church Street, Longwood and Longwood Gate) can become very congested at times. The route into Huddersfield should also be improved - notably the access from the Lower Paddock area through Longroyd Bridge. A mix of property types should be available including social housing.

Proposed Change Requested

Improvement of infrastructure - public transport and roads. Inclusion of 'social housing', a mix of property types.

Council Response

No change. This site has planning permission for 12 dwellings (application reference: 2013/90715) therefore the principle for the development of this site has been established.

Paragraph/Site: **H3395**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3750**

Soundness - Justified

This site lies within the Golcar Conservation Area. The loss of this area and its subsequent development could harm elements which contribute to the significance of this area. When the Conservation Area was originally designated, there must have been an acceptance that this open area contributed towards the character or appearance of the area. Therefore, one might conclude that the loss of this space would be likely to harm an element which contributes towards the significance of the Conservation Area. 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 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

Before allocating this site for development 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 changeHistoric 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).The site has planning permission (2017/91173) therefore the principle of development on the site has been established.

Paragraph/Site: **H3395**

Consultee: **948223 Janet Morton**

Agent:

Rep ID: **PDLP_AD27**

Soundness - Effective

Carr Top Lane and Brook Lane are currently busy and narrow. This is a conservation area and a wildlife habitat, also it includes a dog walking route which has been used as such for over 20 years.

Proposed Change Requested

The development should not be allowed.

Council Response

No change.The principle of development on the site was established through the granting of planning permission 2015/90507.

Paragraph/Site: **H67**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3751**

Soundness - Justified

The allocation of this area would bring development to within 40 metres of the Grade II Listed Craddin Cottage. The loss of this area and its subsequent development could harm elements which contribute to the significance of these buildings. 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

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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. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually be developed.

Proposed Change Requested

Before allocating this site for development 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. 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). Much of the site has planning consent (2014/93959) and is under construction.

Paragraph/Site: **H67**

Consultee: **969134**

Mr Merlin Ash

Agent:

Rep ID: **PDLP_AD3830**

Legally Compliant

Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. For further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Soundness - Justified

Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. 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 advise Allocations should be screened through the Appropriate Assessment stage.

Council Response

Change. Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28). Change site allocation box - reports required in accordance with SD4 AD-MM41 "Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30." The majority of the site has planning permission, therefore the principle of development has been established. (2014/93959)

Paragraph/Site: **H129**

Consultee: **942491**

C Kekwick and S England

Agent: **941932**

Mr Bradley Stankler

Rep ID: **PDLP_AD1182**

Council Response

No change. Support noted.

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Paragraph/Site: H129	Consultee: 942768	Mr Andrew Wood	Agent:	Rep ID: PDLP_AD1795
Soundness - Justified	This site provides very significant landscape openness along a heavily developed road corridor.			
Council Response	No change.The principle of development on the site frontage was established from the granting of planning permission 2013/93373.			
Paragraph/Site: H178	Consultee: 942735	Mr Darren Oldham	Agent:	Rep ID: PDLP_AD1653
Soundness - Justified	We are keen to ensure that there is no pressure to allow our site H178 and H584 to be considered as part of a larger development in the future. When on site the obvious natural boundary for the site and indeed for the extent of the green belt is at the bottom of the slope adjacent to site H178. By amending the plan to reflect this, the following is achieved:- The site H178 can be adequately accessed without the need for substantive earthworks , and ensuring that the site is viable and the anticipated housing numbers can be achieved for this site . An area of land that is steeply sloping and has no agricultural value, that can be used for facilitating development. The extension of the site would have no detrimental impact on amenity or long distance views as any development would be below the ridge line of the area above it already proposed for residential development . That a defendable boundary would be set not just for this plan period but for the future to clearly denote by reference to land use type and topography an appropriate green belt and development boundary .			
Proposed Change Requested	Amend the boundary for the site and green belt at the bottom of the slope adjacent to site H178.			
Council Response	No change. The Local Plan does not state that H178 and H584 should be considered as part of a larger development. Between the Draft Local Plan and Publication Draft Local Plan additional land was added to the option to ensure a more defendable green belt boundary and is in accordance with the site allocations methodology. This has also improved the access to this site from Southwood Avenue.			
Paragraph/Site: H200	Consultee: 969134	Mr Merlin Ash	Agent:	Rep ID: PDLP_AD3831
Legally Compliant	Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. For further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.			
Soundness - Justified	Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. 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 advise Allocations should be screened through the Appropriate Assessment stage.			
Council Response	Change.Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28).Add to reports required - "Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30."			
Paragraph/Site: H2586	Consultee: 943957	Mr Ian Smith	Agent:	Rep ID: PDLP_AD3752
Council Response	No change required.Support noted.			
Paragraph/Site: H342	Consultee: 963362	Mrs Rachel Tookey	Agent:	Rep ID: PDLP_AD28
Soundness - Justified	The constraints should include proximity to unmarked cross roads at Leygards Bridge. This site, and the others surrounding it, will inevitably increase traffic			

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and the cross roads are already dangerous with drivers not realising they are driving over an unmarked cross roads. There is also no footpath making the junction very dangerous for pedestrians too and the area is used frequently by walkers.

Council Response

No change. More detailed highway issues will be dealt with at application stage, but no objections have been received from Highways. It is considered that access can be gained to the site and that links to the local highway network are acceptable. The provision of a footway across the site frontage would be required when the site is developed.

Paragraph/Site: **H342**

Consultee: **969134**

Mr Merlin Ash

Agent:

Rep ID: **PDLP_AD3832**

Legally Compliant

Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. For further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Soundness - Justified

Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. 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 advise Allocations should be screened through the Appropriate Assessment stage.

Council Response

Change. Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28). Add text to Site Allocation box - reports required: "Assessment required for presence of habitats that are important for off-site foraging by South Pennine Moors SPA qualifying bird species (i.e. functionally connected land.) Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30."

Paragraph/Site: **H343**

Consultee: **943957**

Mr Ian Smith

Agent:

Rep ID: **PDLP_AD3753**

Soundness - Justified

This allocation would bring development to within 120 metres of the Helme Conservation Area. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of this area. 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

Before allocating this site for development 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. 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

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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). The site has outline planning permission (2016/93411) - so the principle of development is already established.

Paragraph/Site: **H343**

Consultee: **969134**

Mr Merlin Ash

Agent:

Rep ID: **PDLP_AD3833**

Legally Compliant

Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. For further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Soundness - Justified

Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. 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 advise Allocations should be screened through the Appropriate Assessment stage.

Council Response

No change. Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28). Add text to reports required in site allocations box: "Avoidance and mitigation measures may be required to address any identified impacts in line with para 13.10 (as revised) and Policy PLP30." The site has outline planning permission (2016/93411) - so the principle of development is already established.

Paragraph/Site: **H584**

Consultee: **943957**

Mr Ian Smith

Agent:

Rep ID: **PDLP_AD3754**

Soundness - Justified

30 and 32 Gynn Lane 40 metres to the west of this area are Grade II Listed Buildings. The loss of this area and its subsequent development could harm elements which contribute to the significance of these buildings. 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

Before allocating this site for development 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 change. A Heritage Impact Assessment has been undertaken for this site (LE75). 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).

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Paragraph/Site: H584	Consultee: 959267	Mr Matthew Ingram	Agent:	Rep ID: PDLP_AD160	
Legally Compliant	The sustainability appraisal results for this site are incorrect, therefore as a result the site is not legally compliant.				
Soundness - Justified	The site's inclusion is not justified because the SA assessment of the site is inaccurate for a number of SA Objectives including; SA Objectives 1, 3, 4, 5, 6, 8, 11 and 12.				
Proposed Change Requested	Expressly remove Site H584 from the Local Plan as being allocated for development given the decision making process used in allocating it for development was clearly unsound and therefore not legally compliant.				
Council Response	No change. The site has been proposed as a housing allocation in accordance with the Local Plan site allocations 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. The response to the Sustainability Appraisal representations can be found in SD13 (Kirklees Local Plan: Publication Draft Sustainability Appraisal Report - Schedule of Responses, page 20).				
Paragraph/Site: H584	Consultee: 1062241	Landowner	Agent: 941773	Mr Rob Moore	Rep ID: PDLP_AD2509
Proposed Change Requested	No change (support noted).				
Council Response	No change.Support noted for the allocation of site H584.				
Paragraph/Site: H664	Consultee: 942234	unknown	Agent: 941775	Mr Paul Butler	Rep ID: PDLP_AD2497
Council Response	No change. Support noted.				
Paragraph/Site: H664	Consultee: 943957	Mr Ian Smith	Agent:	Rep ID: PDLP_AD3755	
Soundness - Justified	This area includes Clitheroe Farmhouse and barn which are Grade II Listed Buildings. The loss of this area and its subsequent development could harm elements which contribute to the significance of these buildings. 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. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed				
Proposed Change Requested	Before allocating this site for development 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	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				

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designated heritage asset (and whose allocation, therefore, would be likely to conflict with national policy guidance). A Heritage Impact Assessment has been prepared for this site.

Paragraph/Site: **H664**

Consultee: **976064 R Alexander**

Agent:

Rep ID: **PDLP_AD270**

Soundness - Positively Prepared - Green belt area building is not permitted where other land and buildings are left unoccupied.

Soundness - Justified

- Insufficient services for the Honley area. Sewage system overloaded, prone to leakage. Any underground water, gas and sewage services will cause major disruption. - Roads are too narrow on Scotgate and Grasscroft road, Lea Lane etc.. - Footpath is required for pedestrians, road is too narrow for two cars to pass - Flood water is a major problem. Drainage is not available or possible on the north and east sides of the plot. When it rains heavy, unmade road is washed down Scotgate road into Sheardale - Loss of open space within the local area. Insufficient communal area for housing. - Previous applications refused because it is a conservation area - Impact on wildlife - Litter is already a great problem - Already no room to park in village, delivery vehicles cause severe obstruction

Council Response

No change. Development on the site would be subject to achieving access from Grasscroft Road, it is acknowledged this will need improvement to footways and junctions - which would be considered in more detail at application stage. The site is in flood zone 1 but has limited options for surface water drainage. The site is in agricultural use and therefore does not offer a formal recreational use. The site is adjacent to a conservation area. No objections have been raised by technical consultees relating to biodiversity.

Paragraph/Site: **H664**

Consultee: **1049407 Mr Paul Hadin**

Agent:

Rep ID: **PDLP_AD1392**

Soundness - Justified

Road safety - Road access via Thirstin Road, Grasscroft Road and Scotgate Road, Netherton, is very narrow. In some points on all three roads, the road is too narrow for two vehicles to pass each other in opposing directions. These three roads are already dangerously busy and are struggling to accommodate the existing traffic. A footpath at each side of the road is essential for safety reasons. Drainage/Flooding - The banking above the old Thirstin Mill, is very unstable and is affected by water run off from the field on the proposed site. Any building activity is likely to be detrimental to this site, with the potential to make the banking even more unstable, putting existing housing at risk of subsidence. Wildlife - It will adversely affect wildlife currently in habiting this site and surrounding areas. Infrastructure - What provision has therefore been made to increase the size of the local infant and junior school, increase capacity at Honley surgery?

Council Response

No change. Development on the site would be subject to achieving access from Grasscroft Road, it is acknowledged this will need improvement to footways and junctions - which would be considered in more detail at application stage. The site is in flood zone 1 but has limited options for surface water drainage. The site has been assessed in accordance with BP23 - Local Plan Methodology Statement Part 2. No objections have been received from technical consultees in respect of biodiversity. 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: **H786**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3756**

Soundness - Justified

This site adjoins the boundary of the Honley Conservation Area. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of this area. 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

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	assets, such as Conservation Areas, can be harmed through development within their setting.
Proposed Change Requested	Before allocating this site for development 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. 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). A heritage impact assessment has been prepared for the site.

Paragraph/Site: **H786** Consultee: **967673 Mr John Case** Agent: Rep ID: **PDLP_AD33**

Soundness - Justified	More emphasis should be given to the amenity value of this site in relation to the adjoining conservation area and the density of the nearby houses in Westcroft. There can be no justification on planning grounds for a housing density exceeding that of the adjoining houses in Westcroft.
Proposed Change Requested	The net area for future development should be reduced. The indicative capacity of 15 houses should be reduced accordingly.
Council Response	No change. A Heritage Impact Assessment has been prepared for the site. The density is indicative, based on those delivered on past completions. This is set out in SD23 – the Housing Technical Paper.

Paragraph/Site: **H786** Consultee: **976064 R Alexander** Agent: Rep ID: **PDLP_AD273**

Soundness - Positively Prepared	- Green belt area building is not permitted where other land and buildings are left unoccupied.
Soundness - Justified	- Insufficient services for the Honley area. Sewage system overloaded, prone to leakage. Any underground water, gas and sewage services will cause major disruption. - Access from Scotgate is unsuitable, Grasscroft Road too narrow for normal traffic. The roads are too narrow in the whole of the Scotgate area, dangerous to walk up the road, mostly no footpath - There is a tree preservation order for a large tree on this site - Flood water is a major problem. Drainage is not available on the north and east sides of the plot. When it rains heavy, unmade road is washed down Scotgate road into Sheardale. Flash flooding make occur. Drains already inadequate for existing properties. - Loss of open space within the local area. Insufficient communal area for housing. - Previous applications refused because it is a conservation area - Impact on wildlife - Litter is already a great problem - Already no room to park in village, delivery vehicles cause severe obstruction
Proposed Change Requested	
Council Response	No change. The site has been assessed in accordance with part 2 of the Local Plan Methodology (BP23). No objections were raised from technical consultees regarding drainage or biodiversity. The Site allocations box recognises protected trees are on the site and states an arboricultural assessment is required. Any development on the site would be required by policy PLP28 to maintain greenfield runoff rates.

Paragraph/Site: **H47** Consultee: **943847 Mrs Sally Barber** Agent: Rep ID: **PDLP_AD2337**

Soundness - Positively Prepared	Housing in this area is located away from employment opportunities.
Soundness - Justified	The size and density of the developments have no regard for the size, character, and setting of the village. Local highway infrastructure has long being acknowledged to be poor. Concerns regarding capacity of utilities. Development would exacerbate flooding in the area. Local schools are full. Loss of agricultural land. Impact on tourism.
Soundness - Consistent with National Policy	Impact on highways and character is contrary to policies set out in NPPF.
Proposed Change Requested	Remove the site from the plan
Council Response	No change. This site now has planning permission for residential development (application number: 2016/93458, decision date: 21/03/17) therefore the

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principle for the development of this site has been established. The site is proposed as an accepted housing allocation. Its allocation is considered consistent with the council's site allocation methodology. Site access achievable and other constraints are expected to be overcome to allow the delivery of new homes on this site during the plan period. Comments on this site noted but the site has planning permission for housing as set out above therefore relevant planning issues were considered in determining the application.

Paragraph/Site: **H47**Consultee: **968336 Holme Valley Vision**

Agent:

Rep ID: **PDLP_AD2514****Soundness - Justified**

There is no rational justification for accepting this site but rejecting other sites nearby.

Council Response

No change. This site now has planning permission for residential development (application number: 2016/93458, decision date: 21/03/17) therefore the principle for the development of this site has been established. The site is proposed as an accepted housing allocation. Its allocation is considered consistent with the council's site allocation methodology. Site access achievable and other constraints are expected to be overcome to allow the delivery of new homes on this site during the plan period. Comments on this site noted but the site has planning permission for housing as set out above therefore relevant planning issues were considered in determining the application.

Paragraph/Site: **H47**Consultee: **969145 Mr Jon Rust**

Agent:

Rep ID: **PDLP_AD1671****Legally Compliant**

It has not been possible in the time available to access the on-line comments forms.

Soundness - Positively Prepared

Over development will lead to a reduction in landscape value which is essential for physical, spiritual and natural refreshment.

Soundness - Justified

Development will have a negative impact on roads, transport, schools and health facilities etc which are already stretched. Local roads are steep and narrow with blind bends and therefore cannot cope with additional traffic.

Proposed Change Requested

New developments should include provision for adequate off road parking.

Council Response

No change. This site now has planning permission for residential development (application number: 2016/93458, decision date: 21/03/17) therefore the principle for the development of this site has been established. The site is proposed as an accepted housing allocation. Its allocation is considered consistent with the council's site allocation methodology. Site access achievable and other constraints are expected to be overcome to allow the delivery of new homes on this site during the plan period. Comments on this site noted but the site has planning permission for housing as set out above therefore relevant planning issues were considered in determining the application.

Paragraph/Site: **H50**Consultee: **967601 Mrs Rachel Hogley**

Agent:

Rep ID: **PDLP_AD192****Soundness - Justified**

Bridge Mills is an effective home for businesses with 26 local businesses within it. These all provide local employment opportunities and by changing Bridge Mills into housing, the community will become less sustainable as people will have to travel further afield to their relocated businesses and this will create more traffic and encourage more commuting with its associated environmental and social consequences. If the mill was not being effectively utilised, then it would be a viable proposal but it is currently an important economic base in the Holme Valley and should not be forced to change into residential housing. It is also an old textile mill and one of the few remaining in the valley as a reminder of our industrial heritage and should not therefore be vulnerable to demolition and replacement with housing.

Proposed Change Requested

Commitment to support local businesses and not force them to move to enable more housing to be built instead of a thriving business hub.

Council Response

No change. The site is proposed as an accepted housing allocation. Its allocation is considered consistent with the council's site allocation methodology. This site has not been identified as a Priority Employment Area within the Local Plan and provides the opportunity for the delivery of new homes.

Paragraph/Site: **H50**Consultee: **968336 Holme Valley Vision**

Agent:

Rep ID: **PDLP_AD2515****Soundness - Justified**

The site is currently used by around 40 businesses. The change of use also places at risk one of the few remaining iconic mill buildings tomorrow.

Council Response

No change. The site is proposed as an accepted housing allocation. Its allocation is considered consistent with the council's site allocation methodology. This site has not been identified as a Priority Employment Area within the Local Plan and provides the opportunity for the delivery of new homes.

Paragraph/Site: **H50**Consultee: **978506 Cllr Nigel Patrick**

Agent:

Rep ID: **PDLP_AD3604**

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Soundness - Justified	Bridge Mills (H50) in Holmfirth remains allocated for housing. These strategic sites are the best sites in the locality for businesses to use as they occupy good land and offer good access to the road network. Any future extension of employment in future plans cannot be accommodated outside the Green Belt
Proposed Change Requested	Remove the housing allocation and allocate for employment.
Council Response	No change.The site is proposed as an accepted housing allocation. Its allocation is considered consistent with the council’s site allocation methodology. This site has not been identified as a Priority Employment Area within the Local Plan and provides the opportunity for the delivery of new homes.Highways have indicated that site access can be achieved and that the local links are acceptable. A Transport model has been commissioned to assess the cumulative impacts of development.

Paragraph/Site: **H50** Consultee: **1050803 Cllr Kenneth Sims** Agent: Rep ID: **PDLP_AD3686**

Soundness - Justified	Bridge Mills (H50) in Holmfirth remains allocated for housing. These strategic sites are the best sites in the locality for businesses to use as they occupy good land and offer good access to the road network. Any future extension of employment in future plans cannot be accommodated outside the Green Belt
Proposed Change Requested	Remove the housing allocation and allocate for employment.
Council Response	No change.The site is proposed as an accepted housing allocation. Its allocation is considered consistent with the council’s site allocation methodology. This site has not been identified as a Priority Employment Area within the Local Plan and provides the opportunity for the delivery of new homes.Highways have indicated that site access can be achieved and that the local links are acceptable. A Transport model has been commissioned to assess the cumulative impacts of development.

Paragraph/Site: **H50** Consultee: **1050805 Cllr Donald Firth** Agent: Rep ID: **PDLP_AD3685**

Soundness - Justified	Bridge Mills (H50) in Holmfirth remains allocated for housing. These strategic sites are the best sites in the locality for businesses to use as they occupy good land and offer good access to the road network. Any future extension of employment in future plans cannot be accommodated outside the Green Belt
Proposed Change Requested	Remove the housing allocation and allocate for employment.
Council Response	No change.The site is proposed as an accepted housing allocation. Its allocation is considered consistent with the council’s site allocation methodology. This site has not been identified as a Priority Employment Area within the Local Plan and provides the opportunity for the delivery of new homes.Highways have indicated that site access can be achieved and that the local links are acceptable. A Transport model has been commissioned to assess the cumulative impacts of development.

Paragraph/Site: **H130** Consultee: **943957 Mr Ian Smith** Agent: Rep ID: **PDLP_AD3757**

Soundness - Justified	The allocation of this area would bring development to within 200 metres of the boundaries of the Oldfield Conservation Area and a number of Grade II Listed Buildings in the settlement which might be affected by this site’s development. The loss of this area and its subsequent development could harm elements which contribute to the significance of these designated heritage assets . By allocating this site, 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 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 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	No change.Part of this site has planning permission for housing (2014/92737, appeal upheld: 1/06/16) and as such the principle has been established for

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housing on that part of the site. 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).

Paragraph/Site: **H288a**

Consultee: **942723**

Mr Michael Moorhouse

Agent:

Rep ID: **PDLP_AD3539**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

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Paragraph/Site: H288a	Consultee: 942768	Mr Andrew Wood	Agent:	Rep ID: PDLP_AD1791
Soundness - Justified	Object to H288a in Hade Edge.			
Council Response	No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.			

Paragraph/Site: H288a	Consultee: 943627	A J Dalton	Agent:	Rep ID: PDLP_AD3459
Soundness - Positively Prepared	Lack of consultation with local community.			
Soundness - Justified	The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.			
Soundness - Consistent with National Policy	The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).			
Proposed Change Requested	Return the site to the Green Belt.			
Council Response	No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district.There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.			

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Paragraph/Site: **H288a**Consultee: **943847****Mrs Sally Barber**

Agent:

Rep ID: **PDLP_AD2347****Soundness - Justified**

The site should remain safeguarded land. Other sites such as Washpit Mill would be better alternatives.

Proposed Change Requested

Remove the site from the plan.

Council Response

No change. 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. It is appropriate for the Local Plan process to consider the allocation of site H288a to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288A.

Paragraph/Site: **H288a**Consultee: **943957****Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3758****Soundness - Justified**

Hade Edge Methodist Chapel and Sunday School opposite this site are Grade II Listed Buildings. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of these buildings. 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. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually be developed.

Proposed Change Requested

Before allocating this site for development 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

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: **H288a**Consultee: **944688****Mr John Dalton**

Agent:

Rep ID: **PDLP_AD3593****Soundness - Positively Prepared**

The Peak Park Core Strategy makes unambiguous statements with regard to new developments on the Park Boundary – relevant bodies are required to have regard to national park purposes.

Soundness - Justified

The destruction of existing habitats within the development site and the impact of light, noise, water and carbon pollution within the site, the Peak Fringe

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buffer zone and Dark Peak it is believed would have a significantly damaging effect to the integrity of the protected sites. In previous years this site has supported a rich and diverse wildlife habitat alongside small scale grazing of cattle, during part of the year, which has worked in harmony with retaining a high level of biodiversity. The land is within a Biodiversity Opportunity Zone. The contribution of the site for protecting and improving biodiversity in this area are documented in the Kirklees' Biodiversity Action Plans In the HRA report completed for the draft Local Plan, Natural England agreed that should the site come forward in the next plan period for development, further Appropriate Assessment would be required. The Council should have instigated the next stage of the HRA process as agreed with Natural England. Kirklees only responded following validation of planning application on the site, which was too late in 2016 – so a bird survey will have to be scheduled in March to August 2017. The proposal does is not consistent with Local Plan policies with regard to Landscape (PLP6, PLP7, PLP8, PLP10, PLP31, PLP33, PLP34 and PLP35. Historic England have raised concerns about the impact of the building directly opposite a listed building. Since the site was allocated as Safeguarded Land in the 1999 UDP, several changes have taken place affecting the site such as growth in farming, growth in tourism, extended designation of local wildlife sites and the ongoing emphasis on protecting and promoting biodiversity, protected habitats and species. The site plays an important role as a carbon neutralising landscape, as air pollution from A628 affects protected sites. Noise / light / air pollution affecting designated sites puts habitat at risk and bird assemblages at risk of displacement. It is important that the precautionary approach is taken.

Soundness - Consistent with National Policy

The destruction of existing habitats and the impact of noise pollution would have a significantly damaging effect to the integrity of protected sites. NPPF 109, 110, 113, 114, 115, 116, 117, 118, 119, 120, 122, 123,124, 125, 170) The NPPF states the importance of 'net gains' for biodiversity, if allowed to go ahead this development would create gross losses and remove the potential for the site fulfilling BAPS Objectives.

Council Response

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Kirklees Local Plan contains policies which will help to ensure that the needs of the rural tourism industry are positively supported (Policy PLP 10, 'Supporting the rural economy') and that development is sensitively designed to respect and enhance the character of the townscape, heritage assets and landscape (Policy PLP 24, 'Design'; Policy PLP 35, 'Historic environment'). The core cycling and walking network (as shown on the Policies Map) will be safeguarded and extended (Policy PLP 23, 'Core walking and cycling network'), thus protecting existing routes and providing further opportunities for leisure uses such as walking, cycling and horse riding. New proposals will be expected to integrate into the existing network by providing connecting links where appropriate.

Paragraph/Site: H288a

Consultee: 961137

Jacky Emmerton

Agent:

Rep ID: PDLP_AD3373

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing

allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **961401 R Malkin**

Agent:

Rep ID: **PDLP_AD3477**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **968476**

Agent: **942058**

Mr Michael Townsend

Rep ID: **PDLP_AD2499**

Council Response

No change. Support noted.

Paragraph/Site: **H288a**

Consultee: **969134**

Mr Merlin Ash

Agent:

Rep ID: **PDLP_AD3836**

Legally Compliant

With regards to the assessment of allocations H288A and ME1966 we do not consider that sufficient evidence has been provided in order to rule out adverse effects on integrity from the loss of these sites. Natural England does not consider that data from the Huddersfield Birdwatchers Group alone is sufficient to determine that these allocations will not affect habitat that is vital for SPA birds. We advise that data from the ecological data centre should be considered along with the 2014 South Pennine Moors Phase 2 breeding bird review survey carried out by Brown and Shepherd. Unfortunately similar bird survey work for the Peak District Moors (South Pennine Moors Phase 1) will not be undertaken until 2017. With regards to the availability of similar habitat in proximity to these sites we advise that this should only be considered a mitigating factor where there is sufficient evidence to rule out significant functional linkage to the SPA. For instance where surveys have been undertaken which show only intermittent use of the site by a small number of birds. Natural England advise that, unless robust evidence can be found which clearly demonstrates that the allocations are in areas that are not used by South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA birds, then bird surveys will need to be undertaken at all of the sites considered in table 4.4 of the Habitats Regulations Assessment report. For further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Soundness - Justified

With regards to the assessment of allocations H288A and ME1966 we do not consider that sufficient evidence has been provided in order to rule out adverse effects on integrity from the loss of these sites. Natural England does not consider that data from the Huddersfield Birdwatchers Group alone is sufficient to determine that these allocations will not affect habitat that is vital for SPA birds. We advise that data from the ecological data centre should be considered along with the 2014 South Pennine Moors Phase 2 breeding bird review survey carried out by Brown and Shepherd. Unfortunately similar bird survey work for the Peak District Moors (South Pennine Moors Phase 1) will not be undertaken until 2017. With regards to the availability of similar habitat in proximity to these sites we advise that this should only be considered a mitigating factor where there is sufficient evidence to rule out significant functional linkage to the SPA. For instance where surveys have been undertaken which show only intermittent use of the site by a small number of birds. Natural England advise that, unless robust evidence can be found which clearly demonstrates that the allocations are in areas that are not used by South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA birds, then bird surveys will need to be undertaken at all of the sites considered in table 4.4 of the Habitats Regulations Assessment report. For further correspondence relating to this representation see Core Document

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'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Council Response

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

Paragraph/Site: **H288a**

Consultee: **969145**

Mr Jon Rust

Agent:

Rep ID: **PDLP_AD1672**

Legally Compliant

It has not been possible in the time available to access the on-line comments forms.

Soundness - Positively Prepared

Over development will lead to a reduction in landscape value which is essential for physical, spiritual and natural refreshment.

Soundness - Justified

Development will have a negative impact on roads, transport, schools and health facilities etc which are already stretched. Local roads are steep and narrow with blind bends and therefore cannot cope with additional traffic.

Proposed Change Requested

New developments should include provision for adequate off road parking.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). As part of the planning application process, consideration will be given to the need for on-site car parking. There is a primary school in Hade Edge. 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. Policy PLP 24, 'Design' requires that development is sensitively designed to respect and enhance the character of the townscape, heritage assets and landscape. The core cycling and walking network (as shown on the Policies Map) will be safeguarded and extended (Policy PLP 23, 'Core walking and cycling network'), thus protecting existing routes and providing further opportunities for leisure uses such as walking, cycling and horse riding. New proposals will be expected to integrate into the existing network by providing connecting links where appropriate. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **976851**

John Clayton

Agent:

Rep ID: **PDLP_AD1252**

Soundness - Justified

Hade Edge is not a sustainable location so development on this scale is not justified. Hade Edge is bottom of the ranking for access to essential services such as employment, shops and public transport. The foul drainage system cannot cope with the increased number of houses. Hade Edge's elevation above sea level means that it suffers from severe adverse weather conditions in the winter but is not a priority area for keeping the roads clear of snow.

Proposed Change Requested

Delete site H288a and retain the site as safeguarded land.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local

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Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **978506 Cllr Nigel Patrick**

Agent:

Rep ID: **PDLP_AD2935**

Soundness - Justified

Housing allocation sites H288a will add significant numbers of cars to a very substandard road network in close proximity to Holmfirth High School where road safety is an issue. All the above allocations will impact on New Mill Junction where the A635 meets the A616. This junction should be a priority for improvement in the plan. This allocation will also impact on the number of school places available in the area.

Proposed Change Requested

Reduce the number of housing allocation sites (H and SL). That will spread the build over a longer period and reduce the immediate impact on school places. However, we feel it would still be necessary to include New Mill Junction as an improvement scheme in the Local Plan.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1034329 Mr David Pursehouse**

Agent:

Rep ID: **PDLP_AD9**

Soundness - Justified

For Site 288a, there is also a need for Bat Study, as demonstrated to Kirklees from Bat Conservation Trust. The report and study needs to be done whilst the maternity roost is in active use, or it is not representative, and would misguide or mislead consultees planners and developers. Note that the bat winter hibernation roost is not at this site, and its location is unknown without a full study being undertaken. The LPA have a duty under Regulation 3(4) of the 1994 Habitats Regulations to undertake or consider this information via consultation with the appropriate experts and organisations.

Proposed Change Requested

Full wildlife study and habitat survey included in the relevant reports is to include protected bat species.

Council Response

No change. The site was assessed in accordance with the Local Plan site assessment methodology. West Yorkshire Ecology were consulted regarding this site and raised no issues specifically relating to bats. As part of the planning application process, consideration will be given to the need for applicants to submit a site-specific bat survey.

Paragraph/Site: **H288a**

Consultee: **1034329 Mr David Pursehouse**

Agent:

Rep ID: **PDLP_AD1989**

Legally Compliant

Impact on SPA/SAC/SSSI not fully taken into account, especially where outside the Kirklees boundary. Decisions made without due consideration of the surrounding areas of international importance and covered by European law could be questionably not legal.

Duty to Co-operate

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

Soundness - Justified

Publication draft in relation to H288a, SL2170a and SL2170b is unsound as regards the evidence on which it is based. Site is unsustainable – no access to local shops, amenities, healthcare or services without the use of a private car. It is not a suitable location for cycling and walking amenities. Proposals would increase the scale of the village by 40%. Poor (worsening) public transport. Sites should be assessed at the end of the emerging plan period. Housing

allocation option was as a result of the landowner's request.. Protected species use the fields. Impact on DEFRA Priority Habitats. Potential impact on bats using Moreton Wood (within 2.5km zone of influence of the site). Impact on Bird Diversity Areas which are identified as under threat. Frequent number of birds on the BoCC Red List 4 use the fields adjacent to the site and the surrounding area. Support for the detailed representations made by the Hade Edge Fight for the Fields group (HEFF) (see PDLP_AD2363, PDLP_SP531, PDLP_SA88)

Soundness - Consistent with National Policy

With reference to H288a, SL2170a and SL2170b, failure to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 157, 158. Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment). Support for the detailed representations made by the Hade Edge Fight for the Fields group (HEFF)

Proposed Change Requested

Return of H288a, SL2170a and SL2170b to green belt. Perform a new assessment of the sites, taking into account the transitory nature of this land in regard to maternity bat roost, resident and migratory bird species. Re-evaluation of the scale of housing developments in relation to the "swamping" effects of developing at such a large scale. Meeting with local residents who know, work and understand the village.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation. None of Kirklees's neighbouring local planning authorities consider that the council has failed to comply with the duty to co-operate. Meaningful cooperation has taken place and evidence to that effect is documented in SD14 (Duty to Cooperate Statement). Natural England is content with the conclusions of the HRA (SD10), i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. Their letter dated 3rd April 2017 confirms this (see BP28). Kirklees Council met with Peak Park on 5th Feb 2016. Furthermore SD14 identifies at paragraph 3.3 that the council has reflected Yorkshire West Local Nature Partnership's statement of principles and priorities at paragraph 13.20 of the Strategy and Policies document and that the Council also discussed the South Pennine Moors Special Protection Area (SPA) with YWLNP at their meeting on January 5th 2016. SD14 demonstrates how

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

Paragraph/Site: **H288a**

Consultee: **1042012 Mr Steve Sykes**

Agent:

Rep ID: **PDLP_AD3651**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020. Particular concerns raised regarding impact of housing allocation on neighbouring turkey-farming business.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Removal of H288a from the Local Plan. Return of H288a to Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1042965 Mr Kevin Macmillan**

Agent:

Rep ID: **PDLP_AD2363**

Soundness - Justified

The allocation of H288a does not satisfy Local Plan strategic objectives 4 (No evidence to suggest H288a addresses the needs of Hade Edge) and 7 (Poor sustainability credentials and residents reliance on the use of the private car). H288a is in an unsustainable location (therefore inconsistent with PLP10).

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Allocating a relatively large area of land in a settlement to deliver part of the housing requirement should be questioned. H288a would represent a disproportionate increase in the size of the village and does not provide access to a range of transport choices and local services (therefore inconsistent with PLP3). The UDP inquiry Inspector raised concerns in terms of local facilities reliance on the private car and sustainability. Kirklees Council planning application decisions referred to locations at the fringe of the village as relatively unsustainable and relying on the use of the private car. Poor (worsening) public transport meaning residents rely heavily on the use of the private car for commuting and to access facilities (inconsistent with PLP 20). Lack of local facilities (shops, schools, health facilities). Safeguarded land so should be considered at the next Local Plan review, not during this Local Plan process (inconsistent with PLP 6). Circumstances have not changed since the site was rejected in the draft Local Plan. Options considered for the land containing H288a were only those put forward by landowners and to coincide with a planning application on the land. Settlement appraisal heat maps are inaccurate as they do not properly account for the frequency of public transport or local topography. Hade Edge has the lowest score in the district for accessibility to local services.

Soundness - Consistent with National Policy
Proposed Change Requested

The site is not in a sustainable location in relation to NPPF paragraph 34 (need to minimise travel) and NPPF paragraph 55 (sustainable development in rural areas).

Revert H288a to “safeguarded land”, rectify the flaws in the assessment of H288a and amend the heat maps to properly reflect the lack of sustainability of Hade Edge.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as a sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 sustainable travel. The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is suitable for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1042984 Mr John Dalton**

Agent:

Rep ID: **PDLP_AD2969**

Soundness - Justified

There are inconsistencies in the Sustainability Appraisal for the site. The site allocation does not accord with Local Plan policies PLP3, PLP6, PLP10 and PLP20. The assessment is based on a number of inaccuracies. This demonstrates a failure to accurately evaluate the significant, social, economic and environmental effects that the land allocation will have on itself, surrounding agricultural land, National Park, SPA, SAC and SSSI. The Heat Maps used to identify public transport access times from the site.

Soundness - Consistent with National Policy

The proposals fails to adequately reflect NPPF paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157 and 158. The site also fails to reflect NPPF paras 28, 74, 76, 77, 78, 93, 94, 95, 103, 109, 110, 111, 113, 114, 115, 116, 117, 118, 119, 120, 123, 124, 125, 126, 128, 129, 130, 131, 132, 133, 134, 135 and 141.

Proposed Change Requested

Redesignate the site as Green Belt.

Council Response

No change. Site H288a is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. It is suitable for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the

council through the draft Local Plan public consultation. The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy (SD1, Strategy and Policies, page 36) states that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The comments within this representation directly relating to the Sustainability Appraisal have been addressed in SD8 (Publication Draft Sustainability Appraisal Report Schedule of Responses, pages 46-50). In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. The Local Plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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 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. Historic England 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). The option to put this land into the green belt has been tested through the Local Plan process (AGB2072). The assessment of this option is that there has been no change in circumstances and no evidence to suggest that the green belt boundary is incorrectly drawn. Exceptional circumstances do not exist to justify an amendment to the green belt boundary in this location.

Paragraph/Site: **H288a**

Consultee: **1044265 Mrs Penelope Sykes**

Agent:

Rep ID: **PDLP_AD3646**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020. Poor communication/consultation with local residents.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to

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site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation. 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.

Paragraph/Site: **H288a**

Consultee: **1049097 Dr Karnesh Patel**

Agent:

Rep ID: **PDLP_AD392**

Soundness - Justified

All the necessary surveys required for legal compliance have not been performed yet (and the results assessed for appropriateness). Until it is clear that such a developments would NOT adversely affect the existing landscape/ecology, and any protected species that could be present, approval should not be given.

Proposed Change Requested

The appropriate surveys that have not been carried out need to be performed and should show there is no risk to possible protected species, or to the surrounding land. If the survey results are satisfactory, the above issues would be resolved.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.

Paragraph/Site: **H288a**

Consultee: **1049699 Christopher Heaton**

Agent:

Rep ID: **PDLP_AD3511**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to

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National Policy	reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).
Proposed Change Requested	Return the site to the Green Belt.
Council Response	No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288A.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district.There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050170 Sarah Pursehouse**

Agent:

Rep ID: **PDLP_AD3514**

Soundness - Justified	The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.
Soundness - Consistent with National Policy	The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).
Proposed Change Requested	Return the site to the Green Belt.
Council Response	No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing

allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050298 Mrs Gillian Malkin**

Agent:

Rep ID: **PDLP_AD3480**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050305**

Ms Rachael Oaks

Agent:

Rep ID: **PDLP_AD3472**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan

has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050307 Mr Maximus Cunningham**

Agent:

Rep ID: **PDLP_AD3468**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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

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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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050313 Mrs Jacqueline Cunningham**

Agent:

Rep ID: **PDLP_AD3456**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

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Paragraph/Site: **H288a**Consultee: **1050316 Mr Andrew Cunningham**

Agent:

Rep ID: **PDLP_AD3452****Soundness - Justified**

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**Consultee: **1050321 Mr Jack Dalton**

Agent:

Rep ID: **PDLP_AD3448****Soundness - Justified**

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in

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line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested Council Response

Return the site to the Green Belt.

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: H288a

Consultee: 1050325 Miss Alice Dalton

Agent:

Rep ID: PDLP_AD3445

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural

environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050339 Mr James Spencer**

Agent:

Rep ID: **PDLP_AD3442**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees

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Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050342 Miss Lily Crook**

Agent:

Rep ID: **PDLP_AD3438**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan

seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050351 Mrs Kathryn McGenity**

Agent:

Rep ID: **PDLP_AD3435**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council’s sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a

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proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050357 Dr Philip McGenity**

Agent:

Rep ID: **PDLP_AD3526**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the

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Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050361 Miss Alice McGenity**

Agent:

Rep ID: **PDLP_AD3522**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050434 Mr Alan Battye**

Agent:

Rep ID: **PDLP_AD985**

Soundness - Justified

All the relevant surveys and assessments that are legally required to be undertaken, have not been carried out before making a decision to allocate the land

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for development. The proposed development would ruin three neighbouring farms, where privacy, running and managing farmers own land would be ruined forever. The four fields now incorporated as building land are full of wildlife - this would ruin the wildlife who have depended on these fields to survive and breed for years. Hade Edge is not a suitable or sustainable location for the development of the scale of housing proposed.

Proposed Change Requested

Removal of H288a from the Local Plan.Return of H288a to Green Belt.

Council Response

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district.It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050437**

Harold & Rita Battye

Agent:

Rep ID: **PDLP_AD2346**

Soundness - Positively Prepared

Hade Edge is bottom in the ranking of "access to essential services". There is only one bus every two hours which finishes at 7.30 pm. The steep hills make it difficult to walk any distance and the hospital is far away. Therefore, this site is not in a sustainable location.

Soundness - Justified

Objection to site H288a and change from green belt to housing. The plan is not technically sound as the relevant surveys and assessments have not been done, e.g. ecology survey and landscape assessments. Damage to wildlife would be irreversible. There are pheasants and grouse feeding in our fields and moving on to the other fields. These hay meadows attract lots of birds, bees and butterflies which are decreasing in numbers. It is very close to the Peak District National Park.

Proposed Change Requested

Removal of H288a from the Local Plan.Return of H288a, SL2170A and SL2170b to Green Belt.

Council Response

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050443**

Mr Nicholas Shaw

Agent:

Rep ID: **PDLP_AD3483**

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

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050452 Dr Barbara Shaw**

Agent:

Rep ID: **PDLP_AD3486**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs

2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested Council Response

Return the site to the Green Belt.

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district.There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: H288a

Consultee: 1050469 Steve Baker

Agent:

Rep ID: PDLP_AD3519

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council’s sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050781 Pamela Moorhouse**

Agent:

Rep ID: **PDLP_AD3508**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050782 Edward Dalton**

Agent:

Rep ID: **PDLP_AD3505**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council’s sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development

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Paragraph/Site: **H288a**

Consultee: **1050783 Ben Wardill**

Agent:

Rep ID: **PDLP_AD3499**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. The impact of development on school place planning has been assessed through the infrastructure

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

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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050784** **Elon Sykes**

Agent:

Rep ID: **PDLP_AD3502**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan

public consultation.

Paragraph/Site: **H288a**

Consultee: **1050788 Denise Kersey**

Agent:

Rep ID: **PDLP_AD3496**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district.There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050793 Anna Rowland**

Agent:

Rep ID: **PDLP_AD3569**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI

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and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested Council Response

Return the site to the Green Belt.

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050798 Alan Linton**

Agent:

Rep ID: **PDLP_AD3566**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge

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of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050803 Cllr Kenneth Sims**

Agent:

Rep ID: **PDLP_AD3665**

Soundness - Justified

Housing allocation sites H288a will add significant numbers of cars to a very substandard road network in close proximity to Holmfirth High School where road safety is an issue. All the above allocations will impact on New Mill Junction where the A635 meets the A616. This junction should be a priority for improvement in the plan. This allocation will also impact on the number of school places available in the area.

Proposed Change Requested

Reduce the number of housing allocation sites (H and SL). That will spread the build over a longer period and reduce the immediate impact on school places. However, we feel it would still be necessary to include New Mill Junction as an improvement scheme in the Local Plan.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to

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consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050805 Cllr Donald Firth**

Agent:

Rep ID: **PDLP_AD3666**

Soundness - Justified

Housing allocation sites H288a will add significant numbers of cars to a very substandard road network in close proximity to Holmfirth High School where road safety is an issue. All the above allocations will impact on New Mill Junction where the A635 meets the A616. This junction should be a priority for improvement in the plan. This allocation will also impact on the number of school places available in the area.

Proposed Change Requested

Reduce the number of housing allocation sites (H and SL). That will spread the build over a longer period and reduce the immediate impact on school places. However, we feel it would still be necessary to include New Mill Junction as an improvement scheme in the Local Plan.

Council Response

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).There is a primary school in Hade Edge. 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.It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050807 John Whitford**

Agent:

Rep ID: **PDLP_AD3559**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth

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will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050809 Dorothy Sykes**

Agent:

Rep ID: **PDLP_AD3563**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested Council Response

Return the site to the Green Belt.

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of

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the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050811 David Porter**

Agent:

Rep ID: **PDLP_AD3555**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have

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been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050813 Helen Heaton**

Agent:

Rep ID: **PDLP_AD3549**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050814 Edward Moorhouse**

Agent:

Rep ID: **PDLP_AD3552**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social,

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economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested Council Response

Return the site to the Green Belt.

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district.There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050816 Paul Palmer**

Agent:

Rep ID: **PDLP_AD3546**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to

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National Policy	reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).
Proposed Change Requested	Return the site to the Green Belt.
Council Response	No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district.There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050818 Judith Palmer**

Agent:

Rep ID: **PDLP_AD3542**

Soundness - Justified	The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.
Soundness - Consistent with National Policy	The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).
Proposed Change Requested	Return the site to the Green Belt.
Council Response	No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing

allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050820 Martin Antinori**

Agent:

Rep ID: **PDLP_AD3532**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050824 Joanne Appleyard**

Agent:

Rep ID: **PDLP_AD3535**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council’s sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan

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has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050827 Paul Mcgenity**

Agent:

Rep ID: **PDLP_AD3529**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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

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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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050831 Caroline Kennett**

Agent:

Rep ID: **PDLP_AD3429**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

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Paragraph/Site: **H288a**Consultee: **1050833 Thomas Craggs**

Agent:

Rep ID: **PDLP_AD3432****Soundness - Justified**

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**Consultee: **1050834 Nick Kennett**

Agent:

Rep ID: **PDLP_AD3327****Soundness - Justified**

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in

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line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested Council Response

Return the site to the Green Belt.

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050835 Valerie Parkin**

Agent:

Rep ID: **PDLP_AD3426**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural

environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050837 Robert Heaton**

Agent:

Rep ID: **PDLP_AD3423**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees

Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050839 Helen Craggs**

Agent:

Rep ID: **PDLP_AD3420**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan

seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050842**

Monica Bowden

Agent:

Rep ID: **PDLP_AD3346**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a

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proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050844**

Josephine Shaw

Agent:

Rep ID: **PDLP_AD3376**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the

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Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050846 Matthew Milburn**

Agent:

Rep ID: **PDLP_AD3343**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050849 John Lloyd**

Agent:

Rep ID: **PDLP_AD3340**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability

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Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050851 David Craggs**

Agent:

Rep ID: **PDLP_AD3337**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to

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National Policy	reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).
Proposed Change Requested	Return the site to the Green Belt.
Council Response	No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district.There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050855 David Lloyd**

Agent:

Rep ID: **PDLP_AD3369**

Soundness - Justified	The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.
Soundness - Consistent with National Policy	The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).
Proposed Change Requested	Return the site to the Green Belt.
Council Response	No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing

allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050856 Mandy Lloyd**

Agent:

Rep ID: **PDLP_AD3370**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050858 James Charlton**

Agent:

Rep ID: **PDLP_AD3396**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council’s sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan

has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050860 Helen Vellensworth**

Agent:

Rep ID: **PDLP_AD3391**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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

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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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050862 Matthew Vellensworth**

Agent:

Rep ID: **PDLP_AD3390**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

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Paragraph/Site: **H288a**Consultee: **1050864 Leigh Milburn**

Agent:

Rep ID: **PDLP_AD3414****Soundness - Justified**

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**Consultee: **1050937 Paul Crook**

Agent:

Rep ID: **PDLP_AD3386****Soundness - Justified**

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in

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line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested Council Response

Return the site to the Green Belt.

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050940 George Brunskill**

Agent:

Rep ID: **PDLP_AD3411**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural

environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050944 Harry Crook**

Agent:

Rep ID: **PDLP_AD3379**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees

Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050946 Karen Crook**

Agent:

Rep ID: **PDLP_AD3399**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan

seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050948**

Beverley Stevenson

Agent:

Rep ID: **PDLP_AD3402**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested Council Response

Return the site to the Green Belt.

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a

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proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050951 Alan Stevenson**

Agent:

Rep ID: **PDLP_AD3408**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the

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Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050953 Cameron Irving**

Agent:

Rep ID: **PDLP_AD3417**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050956 Emma Atkin**

Agent:

Rep ID: **PDLP_AD3364**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability

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Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050965 Mr Guy Atkin**

Agent:

Rep ID: **PDLP_AD3355**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to

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National Policy	reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).
Proposed Change Requested	Return the site to the Green Belt.
Council Response	No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district.There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050970 Miss Madison Atkin**

Agent:

Rep ID: **PDLP_AD3403**

Soundness - Justified	The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.
Soundness - Consistent with National Policy	The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).
Proposed Change Requested	Return the site to the Green Belt.
Council Response	No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing

allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050974 Mr Chris Giles**

Agent:

Rep ID: **PDLP_AD1878**

Soundness - Positively Prepared

The council has not given sufficient weight to previous objections raised by the local community. The design of the proposal is overbearing, out of scale and out of character for the area.

Soundness - Justified

The development will not fulfil the local need for affordable homes. The development will lead to increased flooding in the locality.

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 Publication Draft Local Plan recognises that high quality design is fundamental to making places more attractive, sustainable, safe and accessible. Policy PLP 24 seeks to ensure that good design is embedded into development proposals in Kirklees. The design of housing proposals will be discussed and determined at planning application stage. The Housing Mix and Affordable Housing policy (Policy PLP 11) sets out the requirement for the mix and tenure of housing to be accommodated on sites and this will be in accordance with the latest available evidence. Factors relating to the design of the housing proposals must also be considered. The proposed housing mix for particular sites is not included within the Local Plan and will be determined at planning application stage. 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. [Also see response to rep. PDLP_AD3352].

Paragraph/Site: **H288a**

Consultee: **1050974 Mr Chris Giles**

Agent:

Rep ID: **PDLP_AD3352**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI

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and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested Council Response

Return the site to the Green Belt.

No change.Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology.In terms of impacts on the South Pennine Moor Special Protection Area,in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a.Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district.There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.[Also see PDLP_AD1878 for additional comments on this site from the same consultee].

Paragraph/Site: **H288a**

Consultee: **1050977 Karen Heaton**

Agent:

Rep ID: **PDLP_AD3573**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council’s sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge

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of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050979 Mrs Leonie Brunskill**

Agent:

Rep ID: **PDLP_AD3349**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine

Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050981 Mr Gordon Dalton**

Agent:

Rep ID: **PDLP_AD3462**

Soundness - Positively Prepared

Disproportionate scale and pace of development. Proposed development will be detrimental to character of village. Lack of consultation.

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050991 Mr Simon Senior**

Agent:

Rep ID: **PDLP_AD3465**

Soundness - Positively Prepared

Concern regarding affordability of proposed development, especially for younger people and first-time buyers.

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment). Additionally: Particular concerns regarding inadequate broadband infrastructure.

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan

seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1050997 Dr Hazel Girvan**

Agent:

Rep ID: **PDLP_AD3489**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a

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proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1051001 Mr Christian England**

Agent:

Rep ID: **PDLP_AD3492**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested Council Response

Return the site to the Green Belt.

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the

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Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1051003 Mrs Victoria Porter**

Agent:

Rep ID: **PDLP_AD3358**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1051008 Dr Clare McGenity**

Agent:

Rep ID: **PDLP_AD3361**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability

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

Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1053435**

Matt Winterburn

Agent:

Rep ID: **PDLP_AD3841**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to

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

National Policy	reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).
Proposed Change Requested	Return the site to the Green Belt.
Council Response	No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1059413 Alexander Armstrong**

Agent:

Rep ID: **PDLP_AD1266**

Soundness - Justified	Inclusion of H288a in the plan is unsound as regards the evidence on which it is based. The assessment results contain a number of significant inaccuracies as it fails to accurately evaluate the significant social, economic and environmental effects, individual and in-combination, which the allocation will have on the site itself, the agricultural land surrounding it, the South Pennines SPA 1, PDNP SAC, SSI & SSSI protected sites, and KC Ecological Networks. Allocation of H228a fails to acknowledge the fundamental social, economic and environmental role that the South Pennines SPA/SAC/SSSI landscape performs in line with Natural England Guidance, European Commission Regulations, Southern Pennines Rural Regeneration Company Objectives (Pennine Prospects), Kirklees Council Biodiversity Action Plans (BAPS), UK BAPS 2020. Supports the detailed representations made by Hade Edge Fight for the Fields Group document ref: HEFF Local Plan Rep - December 2016.
Soundness - Consistent with National Policy	The plan is unsound as it fails to adequately reflect NPPF policies, specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158. Allocation of H288a is unsound as it fails to acknowledge the fundamental social, economic and environmental role that the South Pennines SPA/SAC/SSSI landscape performs in line with NPPF guidelines. It also fails to reflect NPPF policies paragraphs 28, 74, 76, 77, 78, 93, 94, 95, 103, 109, 110, 111, 113, 114, 115, 116, 117, 118, 119, 120, 123, 124, 125, 126, 128, 129, 130, 131, 132, 133, 134, 135, 141.
Proposed Change Requested	Remove site H288a from the Local Plan and return the land to green belt.
Council Response	No change Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing

allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1059414 Michael Armstrong**

Agent:

Rep ID: **PDLP_AD1269**

Soundness - Justified

Inclusion of H288a in the plan is unsound as regards the evidence on which it is based. The assessment results contain a number of significant inaccuracies as it fails to accurately evaluate the significant social, economic and environmental effects, individual and in-combination, which the allocation will have on the site itself, the agricultural land surrounding it, the South Pennines SPA 1, PDNP SAC, SSI & SSSI protected sites, and KC Ecological Networks. Allocation of H228a fails to acknowledge the fundamental social, economic and environmental role that the South Pennines SPA/SAC/SSSI landscape performs in line Natural England Guidance, European Commission Regulations, Southern Pennines Rural Regeneration Company Objectives (Pennine Prospects), Kirklees Council Biodiversity Action Plans (BAPS), UK BAPS 2020. Supports the detailed representations made by Hade Edge Fight for the Fields Group document ref: HEFF Local Plan Rep - December 2016.

Soundness - Consistent with National Policy

The plan is unsound as its fails to adequately reflect NPPF policies, specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158. Allocation of H288a is unsound as it fails to acknowledge the fundamental social, economic and environmental role that the South Pennines SPA/SAC/SSSI landscape performs in line with NPPF guidelines. It also fails to reflect NPPF policies paragraphs 28, 74, 76, 77, 78, 93, 94, 95, 103, 109, 110, 111, 113, 114, 115, 116, 117, 118, 119, 120, 123, 124, 125, 126, 128, 129, 130, 131, 132, 133, 134, 135, 141.

Proposed Change Requested Council Response

Remove site H288a from the Local Plan and return the land to green belt.

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1059416 Alison Armstrong**

Agent:

Rep ID: **PDLP_AD1263**

Soundness - Justified

Inclusion of H288a in the plan is unsound as regards the evidence on which it is based. The assessment results contain a number of significant inaccuracies as it fails to accurately evaluate the significant social, economic and environmental effects, individual and in-combination, which the allocation will have on the site itself, the agricultural land surrounding it, the South Pennines SPA 1, PDNP SAC, SSI & SSSI protected sites, and KC Ecological Networks. Allocation of H228a fails to acknowledge the fundamental social, economic and environmental role that the South Pennines SPA/SAC/SSSI landscape performs in line Natural England Guidance, European Commission Regulations, Southern Pennines Rural Regeneration Company Objectives (Pennine Prospects), Kirklees Council Biodiversity Action Plans (BAPS), UK BAPS 2020. Supports the detailed representations made by Hade Edge Fight for the Fields Group document ref: HEFF Local Plan Rep - December 2016.

Soundness - Consistent with National Policy

The plan is unsound as its fails to adequately reflect NPPF policies, specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158. Allocation of H288a is unsound as it fails to acknowledge the fundamental social, economic and environmental role that the South Pennines SPA/SAC/SSSI landscape performs in line with NPPF guidelines. It also fails to reflect NPPF policies paragraphs 28, 74, 76, 77, 78, 93, 94, 95, 103, 109, 110, 111, 113, 114, 115, 116, 117, 118, 119, 120, 123, 124, 125, 126, 128, 129, 130, 131, 132, 133, 134, 135, 141.

Proposed Change Requested Council Response

Remove site H288a from the Local Plan and return the land to green belt.

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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).The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development

for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1059491 Jessica Conway**

Agent:

Rep ID: **PDLP_AD1289**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council’s sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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

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

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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1059684 Dick Palfrey**

Agent:

Rep ID: **PDLP_AD1440**

Soundness - Justified

- Support detailed representations made by Hade Edge Fight for the Fields Group (HEFF) Refer to their document. - Site been withdrawn by landowner from grazing animals. Farmer faced with inappropriate housing encroachment on turkey sheds, incompatible neighbouring land use. - Increase in trespass, damage, fly-tipping - Proposed housing encroachment on valuable habitats for biodiversity. Discussed more specifically HEFF group objection. Brown hare, many wild birds, significant populations of lapwing, curlew, snipe, all on the RSPB's Red List, and the twite, short-eared owl and golden plover, locally present, but nationally rare. - Landscape character value would take a big hit. Aspect under-estimated, HEFF group commissioned study shows. - Village spends long periods of winter above snow line. Development would lead to cars all brought up to park on top (gritted) road, already serious flooding along Dunford Road, down Snittle Road would significantly increase, closure of Woodhead Pass with escape routes through Hade Edge causing serious gridlock, proposed closure of HRI longer journey to Halifax, significant extra traffic generated. - No explanation for change in from 'Safeguarded land' to 'Housing allocation' circumventing and short-circuiting the need for a further public debate and decision in a planning meeting.

Soundness - Effective

- Most maps by Kirklees show land within their admin. boundary only, terminating just South of Hade Edge. Full consideration of the wildlife habitat value of site H288a and neighbouring fields depends crucially upon seeing this site in its contiguous context with Barnsley district, the Peak Park, Derbyshire, and various other South Pennine conservation designations to the immediate South of the Kirklees boundary, over whose borders I am not convinced there has been sufficient 'effective joint working on cross-boundary strategic priorities.'

Soundness - Consistent with National Policy

- Failure to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein. - Failing to reflect NPPF policies 3. Supporting a Prosperous & Rural Economy (3.28), 8. Promoting Healthy Communities (8.74, 8.76, 8.77, 8.78), 10. Meeting the Challenge of Climate Change, Flooding & Coastal Change (10.93, 10.94, 10.95, 10.103), 11. Conserving & Enhancing the Natural Environment (11.109, 11.110, 11.111, 11.113, 11.114, 11.115, 11.116, 11.117, 11.118, 11.119, 11.120, 11.123, 11.124, 11.125), 12. Conserving & Enhancing the Historic Environment (12.126, 12.128, 12.129, 12.130, 12.131, 12.132, 12.133, 12.134, 12.135, 12.141 - Kirklees assessments show site to be one of the least sustainable locations in the borough. - Open' character of Hade Edge is threatened by the scale of this development proposal. Such a large block of settlement 'infill' may contravene the National Planning Policy Framework guidance document, which argues for 'limited infilling of villages' in the Green Belt, building exception would be allowed, 'as long as it preserves the openness of the Green Belt', which this development would not do. Below (North of) the crossroads the land is open to the West of Dunford Road, while above (South of) the crossroads, this land to the East is open.

Proposed Change Requested

- Removal of H288a from the Local Plan- Return of H288a, SL2170A and SL2170b to Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288A. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is

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regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel).The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1059685 Gaynor Palfrey**

Agent:

Rep ID: **PDLP_AD1441**

Soundness - Justified

- Support detailed representations being made by Hade Edge Fight for the Fields group (HEFF). Refer to their document ref: HEFF Local Plan Rep - December 2016. - No explanation for change in from 'Safeguarded land' to 'Housing allocation'. Many reasons why not suitable site for housing put to Council by HEFF and Hade Edge village residents which don't appear to have been heeded.

Soundness - Consistent with National Policy

- Failure to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein. - Failing to reflect NPPF policies 3. Supporting a Prosperous & Rural Economy (3.28), 8. Promoting Healthy Communities (8.74, 8.76, 8.77, 8.78), 10. Meeting the Challenge of Climate Change, Flooding & Coastal Change (10.93, 10.94, 10.95, 10.103), 11. Conserving & Enhancing the Natural Environment (11.109, 11.110, 11.111, 11.113, 11.114, 11.115, 11.116, 11.117, 11.118, 11.119, 11.120, 11.123, 11.124, 11.125), 12. Conserving & Enhancing the Historic Environment (12.126, 12.128, 12.129, 12.130, 12.131, 12.132, 12.133, 12.134, 12.135, 12.141),

Proposed Change Requested

- H288a, SL2170a, SL2170b are re-designated as Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288A. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1059848 Mrs Catherine Murphy**

Agent:

Rep ID: **PDLP_AD1660**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1059849 Mr Robert Stepien**

Agent:

Rep ID: **PDLP_AD1665**

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Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI.

Soundness - Consistent with National Policy

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).

Proposed Change Requested

Return the site to the Green Belt.

Council Response

No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288A. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H288a**

Consultee: **1063138 Mrs Karen Dalton**

Agent:

Rep ID: **PDLP_AD3047**

Soundness - Justified

The allocation of H288a for development is not sound as there are flaws and inconsistencies in the assessment of the site in the Council's sustainability Appraisal Report. The site does not comply with Local Plan Policies PLP3, PLP6, PLP10 and PLP20. Allocation fails to accurately evaluate the significant social, economic and environmental effects that the allocation will have on the site, the agricultural land surrounding it and the South Pennines SPA, PDNP SAC, SSI and SSSI. Allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.

Soundness - Consistent with

The plan fails to adequately reflect NPPF policies specifically paragraphs 9, 14, 17, 28, 29, 34, 42, 43, 47, 55, 72, 109, 117, 118, 119, 157, 158 therein Failure to

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National Policy	reflect NPPF paragraphs 28 (supporting a prosperous rural economy), 74/76/77/78 (promoting healthy communities), 93/94/95/103 (meeting the challenge of climate change, flooding & coastal change), 109/110/111/113/114/115/116/117/118/119/120/123/124/125 (conserving and enhancing the natural environment), 126/128/129/130/131/132/133/134/135/141 (conserving & enhancing the historic environment).
Proposed Change Requested	Return the site to the Green Belt.
Council Response	No change. Site H288a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as a housing allocation in the Local Plan. The allocation of this site is consistent with the Local Plan site allocation methodology. In terms of impacts on the South Pennine Moor Special Protection Area, in combination effects on the Special Protection Area / Special Area of Conservation have been considered through the Kirklees Habitat Regulations Assessment (SD10). The Peak District National Park has been consulted on the Local Plan and no concerns have been raised in relation to site H288a. Historic England 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). The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development Strategy set out in SD1 (Strategy and Policies, page 36) sets out that most growth will be met in the main urban areas of Huddersfield and Dewsbury and a more flexible approach elsewhere to achieve a sustainable pattern of development for in the district. This site has been assessed through the Sustainability Appraisal (SD5) and using information from the settlement appraisal (BP17) and is regarded as sustainable. The Local Plan (SD1, Strategy and Policies, page 102) supports sustainable travel through Policy PLP 20 (sustainable travel). The plan has identified a range of sites to ensure employment opportunities exist for the local workforce where possible. Policy PLP 10 (supporting the rural economy) of the Strategy and Policies document (SD1, page 61) recognises the need to support rural and locally generated employment opportunities through a proactive policy response which supports the need for home working, local employment opportunities and SME operations within the smaller settlements of the district. There is a primary school in Hade Edge. 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. It is appropriate for the Local Plan process to consider the allocation of this land to assist in meeting the housing needs of Kirklees. The council has considered site options which have been submitted for consideration through the Local Plan process. This includes option H288a which was submitted to the council through the draft Local Plan public consultation.

Paragraph/Site: **H294**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3759**

Soundness - Justified	This site adjoins the boundary of the Netherthong/Deanhouse Conservation Area. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of this area. 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	Before allocating this site for development 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. This site has planning permission for residential development (planning application reference: 2016/93365 decision date: 17/02/17) therefore