

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

Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Sustainability Appraisal (SD5) sets out further details in relation to the sustainability indicators used to assess this site (note that H2563 covers the same area). 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. Accepted Safeguarded Land options are to be considered as potential future housing sites through a future review of the Local Plan. This site has been assessed as potentially accessible with third party land required to achieve the required sight lines. The wider local highway network links have been assessed as acceptable. There are no exceptional circumstances to use this green belt land for housing during the local plan period however, to ensure longevity of green belt boundaries beyond the plan period to potentially meet longer term development needs, there are exceptional circumstances to justify the allocation of this land as safeguarded land. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local 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: **SL3358**

Consultee: **1048539 Mr paul jackson**

Agent:

Rep ID: **PDLP_AD395**

Soundness - Positively Prepared

There has been no process of community involvement whatsoever regarding the future development of this site. It has been added without any local consultation whatsoever. It is unfair, unreasonable and undemocratic to introduce this and other new sites into the Local Plan through the back door and then to seek to restrict public comment.

Soundness - Justified

It fails any reasonable sustainability test as the transport facilities are totally inadequate for any further development which would lead to a substantial increase in journeys by car. Similarly the healthcare and education facilities are already under great pressure.

Proposed Change Requested

This site should be restored to Green Belt in the Plan.

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 was subject to a representations period in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This site has been assessed as accessible and the wider local highway network links have been assessed as acceptable. There are no exceptional circumstances to use this green belt land for housing during the local plan period however, to ensure longevity of green belt boundaries beyond the plan period to potentially meet longer term development needs, there are exceptional circumstances to justify the allocation of this land as safeguarded land. The Sustainability Appraisal (SD5) sets out further details in relation to the sustainability indicators used to assess this site (note that H2563 covers the same area). 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. Accepted Safeguarded Land options are to be considered as potential future housing sites through a future review of the Local Plan. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local 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: **UGS1042, UGS2489, UGS1043, UGS1267, UGS1269, UGS1044, UGS1045, UGS1804, UGS1046, UGS1047, UGS1266, UGS964, UGS965, UGS1254, UGS967, UGS1477,**

Consultee: **978303 Cllr Andrew Palfreeman**

Agent:

Rep ID: **PDLP_AD2517**

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UGS966, UGS1316, UGS968, UGS969, UGS970,
UGS963.

Council Response No change.Support for the allocation of the following sites as urban green space is noted: UGS1042, UGS2489, UGS1043, UGS1267, UGS1269, UGS1044, UGS1045, UGS1804, UGS1046, UGS1047, UGS1266, UGS964, UGS965, UGS1254, UGS967, UGS1477, UGS966, UGS1316, UGS968, UGS969, UGS970, UGS963.

Paragraph/Site: **UGS1068** Consultee: **942144** **unknown** Agent: **970993** **Anna Turton** Rep ID: **PDLP_AD1820**

Soundness - Justified The Urban Green Space and Local Green Space Technical Paper and associated evidence base is flawed as the conclusions in Appendix 1 of the technical paper do not apply to the New Lane, Cleckheaton site. The site is not of high value in terms of physical, social, environmental or visual qualities. The LPA has not published any information relating to health inequalities in the ward and the site is not publicly accessible and therefore cannot perform a role in reducing health inequalities and enhancing physical activity. The New Lane, Cleckheaton site only forms part of a larger area of land allocated for urban greenspace and its development would not lead to a qualitative or quantitative deficiency in urban greenspace within Cleckheaton. The New Lane, Cleckheaton site should be removed from the wider UGS for reasons relating to use and accessibility, purpose, character and visual quality, views, ecological value, other benefits and overall quality and value.

Soundness - Consistent with National Policy Allocation of the site is not consistent with NPPF. The urban greenspace is not considered to fulfil the function of a valued landscape in terms of paragraph 109 of NPPF.

Proposed Change Requested Review the approach towards urban greenspace to be in accordance with the Framework. Review UGS1068 and remove the New Lane, Cleckheaton portion from its proposed allocation.

Council Response No change.Full planning permission for the erection of 39 dwellings with associated highways and landscaping (application 2014/93073) on land off New Lane was allowed on appeal on the 15 February 2017. However, to date development of this site has not commenced.

Paragraph/Site: **UGS1068** Consultee: **942409** Agent: **950095** **Mr Jonathan Dunbavin** Rep ID: **PDLP_AD1807**

Soundness - Justified UGS1068 does not meet the definition of open space in para 74 of NPPF. It would also fail to meet definition of local greenspace.

Soundness - Consistent with National Policy The proposed urban greenspace allocation (UGS1068) is inconsistent with National Planning Policy in terms of the open space definitions set out within the NPPF.

Council Response No change.The council considers this site is justified as urban green space based on evidence set out in the Kirklees Open Space Study 2015 (Revised 2016) (LE119) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), Appendix 1.It is considered that this site is an integral and fundamental part of a larger strategically important green space categorised as natural/semi-natural greenspace and assessed as having high value as open space in the Open Space Study (see LE119 Appendix 7 OS Site Ref 561 Class No. 1365) for:-(i) its structural and landscape benefits performing an important strategic urban green space function as a green wedge within a highly urban area, separating the built-up areas of Cleckheaton and Liversedge and helping define the identity and character of the area;(ii) the amenity of the area and sense of place as a high quality attractive greenspace that has the appearance of open countryside which can be viewed from many locations within the built-up area and plays a very significant role in providing relief from urban development; and (iii) use and enjoyment for informal recreation along the public footpath network across the land.The allocation of this site as urban green space is consistent with the methodology provided in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) section 5.The definition of urban green space is provided in the council's Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) paragraph 1.4. This includes areas of open land identified as being particularly valuable as open space, including land important for its visual amenity and not necessarily in sport or recreational use. Open space can also have value in providing variety in urban townscapes and for its contribution to the landscape. This is consistent with the NPPF Glossary definition of open space which includes all open space of public value, including that which can act as a visual amenity, and the broader definition of open space in PPG (Paragraph: 001 Reference ID: 37-001-20140306) which recognises that open space can take many forms.Urban green space allocations are identified in the Local Plan irrespective of whether the land is in public or private ownership, and are not dependent on public access being available. The NPPF does not require open space to be in public ownership or publicly accessible.

Paragraph/Site: **UGS1804** Consultee: **969223** **Mr T Garside** Agent: **941840** **Andrew Keeling** Rep ID: **PDLP_AD337**

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Soundness - Justified	Site UGS1804 is not valuable for sport, recreation, amenity or wildlife. It is a former football ground that has not been used for over 30 years and is cut off from urban green space to the north by residential development. The site is in private ownership and residential use, is landlocked, provides no public amenity and is not publicly accessible. A recent appeal for a single dwelling on the land was successful.		
Soundness - Consistent with National Policy	A recent appeal for a single dwelling on the land was successful and the Inspector considered that the proposed development would not conflict with paragraphs 73 and 74 of the NPPF as they relate to the provision of high quality open spaces and sports and recreational land.		
Proposed Change Requested	Remove urban green space allocation UGS1804 and redesignate the land appropriately.		
Council Response	No change.The council considers this site is justified as urban green space based on evidence set out in the Kirklees Open Space Study 2015 (Revised 2016) (LE119) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), Appendix 1. The site is a disused sports ground and now forms a semi-natural greenspace within a residential area with protected trees on the northern boundary. It has been assessed as having high value as open space in the Open Space Study 2015 (Revised 2016) (LE119), Appendix 7 (OS site ref 1437). There are current deficiencies in the quantity of open space in the Birstall and Birkenshaw ward with the provision of natural and semi-natural greenspace being significantly below the benchmark standard (see BP13, Appendix 1 and LE119, Table 6.2). The allocation of this site as urban green space is consistent with the methodology provided in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) section 5.The definition of urban green space is provided in the council's Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) paragraph 1.4. This includes areas of open land identified as being particularly valuable as open space, including land not necessarily in sport or recreational use. This is consistent with the NPPF Glossary definition of open space which includes all open space of public value, including that which can act as a visual amenity, and the broader definition of open space in PPG (Paragraph: 001 Reference ID: 37-001-20140306) which recognises that open space can take many forms.Urban green space allocations are identified in the Local Plan irrespective of whether the land is in public or private ownership, and are not dependent on public access being available. The NPPF does not require open space to be in public ownership or publicly accessible.		
Paragraph/Site: UGS2917	Consultee: 951542	Mr Richard Quincey	Agent: Rep ID: PDLP_AD991
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 953910	Mr Philip Day	Agent: Rep ID: PDLP_AD923
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 955858	Mr David Gill	Agent: Rep ID: PDLP_AD1031
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 956134	Mr Spencer Bain	Agent: Rep ID: PDLP_AD863
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 956374	Mr John Darton	Agent: Rep ID: PDLP_AD995
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 956658	Mr Khalid Aziz	Agent: Rep ID: PDLP_AD986
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 960788	Kathleen Anderson	Agent: Rep ID: PDLP_AD977
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 960887	Mr Philip Bristow	Agent: Rep ID: PDLP_AD1193

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Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 961344	Mr Stephen Walker	Agent: Rep ID: PDLP_AD919
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 961411	Mr John Downs	Agent: Rep ID: PDLP_AD913
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 961444	Mr John Mellor	Agent: Rep ID: PDLP_AD1206
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 962051	Cynthia Hardiman	Agent: Rep ID: PDLP_AD949
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 962151	Frank & Elaine Lodge	Agent: Rep ID: PDLP_AD943
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 963057	Mrs Shirley Downs	Agent: Rep ID: PDLP_AD917
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 963204	Mrs Tracy Blackburn	Agent: Rep ID: PDLP_AD938
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 963307	Miss Linda Shaw	Agent: Rep ID: PDLP_AD1211
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 963308	Mr Paul Weston	Agent: Rep ID: PDLP_AD870
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 963319	Mrs Margaret Rogers	Agent: Rep ID: PDLP_AD920
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 963322	Mr Phillip Gott	Agent: Rep ID: PDLP_AD1819
Council Response	No Change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 963425	Maureen Griffiths	Agent: Rep ID: PDLP_AD872
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 963666	Mrs Ann Day	Agent: Rep ID: PDLP_AD932
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 964616	Mr R.L. Norton	Agent: Rep ID: PDLP_AD1023

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Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 965273	Mr Philip Wray	Agent: Rep ID: PDLP_AD1471
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 965564	Mrs Christine Bristow	Agent: Rep ID: PDLP_AD1202
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome..		
Paragraph/Site: UGS2917	Consultee: 966107	Miss Anya Weston-Shaw	Agent: Rep ID: PDLP_AD869
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 966559	Mr Ian J Harms	Agent: Rep ID: PDLP_AD937
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome .		
Paragraph/Site: UGS2917	Consultee: 966970	Mrs Anne Wade	Agent: Rep ID: PDLP_AD1028
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 967060	Mrs Mary Gott	Agent: Rep ID: PDLP_AD1818
Council Response	No Change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 967670	Mr Graham Woodall	Agent: Rep ID: PDLP_AD942
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 967772	Dr CD and Mrs P Givens	Agent: Rep ID: PDLP_AD988
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 968238	Mr & Mrs Paul & Christine Horbury	Agent: Rep ID: PDLP_AD837
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 970444	D I Bland	Agent: Rep ID: PDLP_AD987
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome .		
Paragraph/Site: UGS2917	Consultee: 974227	Barbara Wilson	Agent: Rep ID: PDLP_AD842
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974230	Mrs K Blewett	Agent: Rep ID: PDLP_AD873
Council Response	No change.Comments relating to the objection of this site for housing are noted.		
Paragraph/Site: UGS2917	Consultee: 974235	Mrs June Rawcliffe	Agent: Rep ID: PDLP_AD922
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974245	Mrs Margaret Pugh	Agent: Rep ID: PDLP_AD1032

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Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974254	Shelley Mellor	Agent: Rep ID: PDLP_AD908
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974258	Paul Marsden	Agent: Rep ID: PDLP_AD1111
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974259	Carol Marsden	Agent: Rep ID: PDLP_AD1112
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974262	Neelam & Arun Goel	Agent: Rep ID: PDLP_AD944
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974270	Nadine Knox	Agent: Rep ID: PDLP_AD882
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974287	Mr and Mrs A Gledhill	Agent: Rep ID: PDLP_AD956
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974291	Drs CK & S Biswas	Agent: Rep ID: PDLP_AD959
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974298	Lawrence and Margaret Sheard	Agent: Rep ID: PDLP_AD973
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974305	Ajit & Meena Mehrotra	Agent: Rep ID: PDLP_AD866
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974308	Kate Addison	Agent: Rep ID: PDLP_AD940
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974331	Michael Green	Agent: Rep ID: PDLP_AD876
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974337	Mr Brian Cawthray	Agent: Rep ID: PDLP_AD934
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 974953	Mrs Yvonne Quincey	Agent: Rep ID: PDLP_AD921
Council Response	No change.Support for the rejection of the allocation of site UGS2917 for housing is welcome.		
Paragraph/Site: UGS2917	Consultee: 1039545	Mr David Sykes	Agent: Rep ID: PDLP_AD1216

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Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1044922	John Grimbleby	Agent: Rep ID: PDLP_AD861
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1045345	Mrs Margaret White	Agent: Rep ID: PDLP_AD1359
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1045374	Mr John White	Agent: Rep ID: PDLP_AD1354
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1048781	Peter Stainton	Agent: Rep ID: PDLP_AD1110
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome .		
Paragraph/Site: UGS2917	Consultee: 1048801	Brenda Bradford	Agent: Rep ID: PDLP_AD1106
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1048802	Clifford Deighton	Agent: Rep ID: PDLP_AD1108
Council Response	No change.Comments concerning no building within the vicinity of Birch Grove are noted.		
Paragraph/Site: UGS2917	Consultee: 1048804	Winifred Latham	Agent: Rep ID: PDLP_AD1109
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1048805	Richard Armstead	Agent: Rep ID: PDLP_AD1105
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1048922	Tracey Lister	Agent: Rep ID: PDLP_AD1103
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1048924	Ahmed Shoaib	Agent: Rep ID: PDLP_AD1102
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1048927	Carol and Alan Waller	Agent: Rep ID: PDLP_AD1095
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1048932	John Clayton	Agent: Rep ID: PDLP_AD1072
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1048932	John Clayton	Agent: Rep ID: PDLP_AD1085
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.		
Paragraph/Site: UGS2917	Consultee: 1048935	Dianne Lee	Agent: Rep ID: PDLP_AD1093

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Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.				
Paragraph/Site: UGS2917	Consultee: 1048937	Ian Lovell	Agent:	Rep ID: PDLP_AD1055	
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.				
Paragraph/Site: UGS2917	Consultee: 1048939	David Bradford	Agent:	Rep ID: PDLP_AD1071	
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.				
Paragraph/Site: UGS2917	Consultee: 1049519	David Adolf	Agent:	Rep ID: PDLP_AD1054	
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.				
Paragraph/Site: UGS2917	Consultee: 1049520	Lamia Hassain	Agent:	Rep ID: PDLP_AD1053	
Council Response	No Change.Support for the allocation of site UGS2917 as urban green space is welcome.				
Paragraph/Site: UGS2917	Consultee: 1049522	Hazel Ackroyd	Agent:	Rep ID: PDLP_AD1050	
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.				
Paragraph/Site: UGS2917	Consultee: 1049523	Melvin Taylor	Agent:	Rep ID: PDLP_AD1046	
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.				
Paragraph/Site: UGS2917	Consultee: 1049524	Jane Jones	Agent:	Rep ID: PDLP_AD1041	
Council Response	No change.Support for the allocation of site UGS2917 as urban green space is welcome.				
Paragraph/Site: UGS2917	Consultee: 1049527	Brian Smith	Agent:	Rep ID: PDLP_AD1035	
Council Response	No change.Support for the allocation of UGS2917 as urban green space is welcome.				
Paragraph/Site: UGS973	Consultee: 942142	unknown	Agent: 950095	Mr Jonathan Dunbavin	Rep ID: PDLP_AD1837
Soundness - Justified	UGS973: The definition of semi natural greenspace derived from PPG17 and its companion guide are only possible typologies for open space. These do not apply to the site. As the site is not used for sport and recreation and is private land, any visual amenity derived from the land and in particular appreciated from the right of way, cannot, in its own right define the site as open space as per the NPPF definition. It would also fail to meet definition of local greenspace.				
Soundness - Consistent with National Policy	The assessment of UGS973 against the Urban Green Space criteria and NPPF guidance clearly indicates that Urban Green Space notation is misplaced.				
Council Response	No change.The council considers this site is justified as urban green space based on evidence set out in the Kirklees Open Space Study 2015 (Revised 2016) (LE119) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), Appendix 1. It is considered that this site is an integral and fundamental part of a strategically important green space categorised as natural/semi-natural greenspace and assessed as having high value as open space in the Open Space Study (see LE119 Appendix 7 Open Space Site Ref 466 Class No. 1542) for :-(i) its structural and landscape benefits performing an important strategic urban green space function as a green wedge within a highly urbanised area, separating the built-up areas of Heckmondwike and Batley and helping define the identity and character of the area;(ii) the amenity of the area and sense of place as an attractive greenspace with extensive open qualities important for providing relief from urbanisation which can be viewed over a wide distance and contributing significantly to the appearance and character of the area; and (iii) use and enjoyment for informal recreation along the public footpaths.The site is within an area identified as having health inequalities and open space deficiencies, in particular the provision of natural and semi-natural greenspace in the area is significantly below the benchmark standard. See details for Heckmondwike and Batley West wards provided in the Urban Green Space and Local Green Space				

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Technical Paper April 2017 (BP13), Table 3 and Table 7. The allocation of this site as urban green space is consistent with the methodology provided in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) section 5. The definition of urban green space is provided in the council's Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) paragraph 1.4. This includes areas of open land identified as being particularly valuable as open space, including land important for its visual amenity and not necessarily in sport or recreational use. Open space can also have value in providing variety in urban townscapes and for its contribution to the landscape. This is consistent with the NPPF Glossary definition of open space which includes all open space of public value, including that which can act as a visual amenity, and the broader definition of open space in PPG (Paragraph: 001 Reference ID: 37-001-20140306) which recognises that open space can take many forms. Urban green space allocations are identified in the Local Plan irrespective of whether the land is in public or private ownership, and are not dependent on public access being available. The NPPF does not require open space to be in public ownership or publicly accessible. The site is subject to an appeal against the non-determination of an outline planning application (2016/93746) for the erection of up to 200 dwellings and formation of public open space (within a conservation area).

Paragraph/Site: **UGS973**

Consultee: **968476**

Agent: **970993**

Anna Turton

Rep ID: **PDLP_AD1821**

Soundness - Justified

The Urban Green Space and Local Green Space Technical Paper and associated evidence base is flawed as the conclusions in Appendix 1 of the technical paper do not apply to the White Lee Road, Batley site. The site is not of high value in terms of physical, social, environmental or visual qualities. The LPA has not published any information relating to health inequalities in the ward and the site is not publicly accessible and therefore cannot perform a role in reducing health inequalities and enhancing physical activity. The White Lee Road, Batley site is entirely separate from the wider UGS973 site and is different in character and context. The site is not assimilated with adjacent land and performs no open space function. It is concerning that the Urban Green Space Review has not considered the disaggregation of this large site. The White Lee Road, Batley site should be removed from the wider UGS for reasons relating to use and accessibility, purpose, character and visual quality, views, ecological value, other benefits and overall quality and value.

Soundness - Consistent with National Policy

Allocation of the site is not consistent with NPPF. The urban greenspace is not considered to fulfil the function of a valued landscape in terms of paragraph 109 of NPPF.

Council Response

No change. The council considers this site is justified as urban green space based on evidence set out in the Kirklees Open Space Study 2015 (Revised 2016) (LE119) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), Appendix 1. The site comprises of a number of fields with trees around the periphery with a public footpath along the southern boundary. It forms part of a larger, strategically important green space assessed in the Open Space Study as natural/semi-natural greenspace having high value as open space (see LE119 Appendix 7 Open Space Site Ref 466 Class No. 1542) for: -i) structural and landscape benefits performing an important strategic urban green space function as a green wedge within a highly urbanised area, separating the built-up areas of Heckmondwike and Batley and helping define the identity and character of the area; ii) the amenity of the area and sense of place as an attractive greenspace with extensive open qualities important for providing relief from urbanisation which can be viewed over a wide distance and contributing significantly to the appearance and character of the area; and iii) use and enjoyment for informal recreation along the public footpaths. The site is within an area identified as having health inequalities and open space deficiencies, in particular the provision of natural and semi-natural greenspace in the area is significantly below the benchmark standard. See details for Heckmondwike and Batley West wards provided in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), Table 3 and Table 7. The allocation of this site as urban green space is consistent with the methodology provided in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) section 5. The definition of urban green space is provided in the council's Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) paragraph 1.4. This includes areas of open land identified as being particularly valuable as open space, including land important for its visual amenity and not necessarily in sport or recreational use. This is consistent with the NPPF Glossary definition of open space which includes all open space of public value, including that which can act as a visual amenity, and the broader definition of open space in PPG (Paragraph: 001 Reference ID: 37-001-20140306) which recognises that open space can take many forms. Urban green space allocations are identified in the Local Plan irrespective of whether the land is in public or private ownership, and are not dependent on public access being available. The NPPF does not require open space to be in public ownership or publicly accessible. The site is subject to an appeal against the refusal of planning permission for the erection of 66 dwellings (application 2015/92944).

Paragraph/Site: **UGS1016**

Consultee: **1059925 Kevin Frain**

Agent:

Rep ID: **PDLP_AD1703**

Council Response

No change. Support for the change to the boundary of site UGS1016 is welcome.

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Paragraph/Site:	UGS2151	Consultee:	942154 unknown	Agent:	941891 Paul Leeming	Rep ID:	PDLP_AD1991
Soundness - Justified	UGS2151 – Land at Rumble Road, Bywell is not appropriate for designation as urban greenspace. It performs part of an agricultural field divorced from the main agricultural holding. It does not perform a greenspace function and apart for a footpath across the site there is not public access.						
Proposed Change Requested	Land at Rumble Road should be allocated for housing.						
Council Response	No change.The council considers this site is justified as urban green space based on its assessment as a high value open space shown in the Kirklees Open Space Study 2015 (Revised 2016) (LE119 Appendix 7) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13 Appendix 1). The site comprises an area of semi-natural greenspace surrounded by existing residential and business development. It has been assessed as having high value as open space for the amenity of the area, with informal recreation use along the public footpath on the eastern boundary. In view of the built-up surroundings, the open character of this site is important in providing visual relief as a buffer separating existing housing from the adjoining business park, as well as for local residents and for users of the public footpath. The site is within an area identified as having health inequalities and open space deficiencies, in particular the provision of natural and semi-natural greenspace in the Dewsbury East ward is significantly below the benchmark standard. New housing development and Dewsbury Rams Stadium is currently under construction close to the site and will result in the loss of green belt in this area.The definition of urban green space is provided in the council’s Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) paragraph 1.4. This includes areas of open land identified as being particularly valuable as open space, sport or recreation facilities and can include land protected specifically for its visual amenity. This is consistent with the NPPF Glossary definition of open space which includes all open space of public value, including that which can act as a visual amenity, and the broader definition of open space in PPG (Paragraph: 001 Reference ID: 37-001-20140306) which recognises that open space can take many forms.Urban green space allocations are identified in the Local Plan irrespective of whether the land is in public or private ownership, and are not dependent on public access being available. The NPPF does not require open space to be in public ownership or publicly accessible.A full planning application (2017/91459) for the erection of 149 dwellings with associated car parking, access, landscaping, public open space and drainage works has been submitted for this site and the decision is still pending.						
Paragraph/Site:	UGS1168	Consultee:	1061712	Agent:	942058 Mr Michael Townsend	Rep ID:	PDLP_AD2458
Soundness - Positively Prepared	Allocation of this site would reduce pressures to release Green Belt land.						
Soundness - Justified	This [part of the] site is a small unsightly area of land used for keeping of livestock and incorporating a number of unsightly livestock buildings with no public access. The site bounds housing on its northern, western and eastern sides. It is considered the site does not have a role to play in overall functioning of UGS1168 allocation. The removal of site from UGS would provide a coherent extension to settlement. Open Space Assessment identifies that there is sufficient greenspace in the area.						
Soundness - Consistent with National Policy	UGS1168 is not necessary/ justifiable to retain as Green Space in accordance with National Policy. The Open Space Assessment for the site has not been considered in context of NPPF.						
Proposed Change Requested	Modify urban greenspace to remove area adjacent to Forest Road.						
Council Response	No change.The council considers this site is justified as urban green space as part of the wider urban green space allocation UGS1168 based on its assessment as open space set out in the Kirklees Open Space Study 2015 (Revised 2016) (LE119), Appendix 7(OS site ref 663, class number 370) and the urban green space assessment set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), Appendix 1.The objection relates to a small part of site UGS1168 fronting onto Forest Road which is used for horse grazing and the keeping of livestock, and slopes upwards from Forest Road to an area of woodland which forms part of the Kirklees Wildlife Habitat Network. Although this site has been assessed through the Open Space Study as having low value, in itself, as open space. It is considered the site forms an integral part of the wider area of green space and as a semi-natural area is important in providing an open aspect to the adjoining woodland, adding to the mixed character and appearance of the streetscape. Its allocation as urban green space is consistent with the methodology provided in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) section 5.The definition of urban green space is provided in the council’s Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) paragraph 1.4. This includes areas of open land identified as being particularly valuable as open space, sport or recreation facilities and can include land protected for its visual amenity which does not necessarily have a formal recreational or sporting function. Urban green spaces can have value in providing variety in the towns and villages of Kirklees and						

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contribute to the landscape and may also have wildlife value. The NPPF Glossary definition of open space includes all open space of public value, including that which has visual amenity value, and the broader definition of open space in PPG (Paragraph: 001 Reference ID: 37-001-20140306) recognises that open space of public value can take many forms. Urban green space can be in public and private ownership and is not dependent on public access being available. This is consistent with the NPPF which does not require open space to be in public ownership or publicly accessible. The site has not been put forward for Local Green Space designation and as such has not been assessed against the guidance in NPPF paragraph 77 and NPPG.

Paragraph/Site: **UGS1240**

Consultee: **942466**

unknown

Agent: **941849**

Iain Bath

Rep ID: **PDLP_AD1972**

Soundness - Justified

Land edged red on Plan A attached should be removed from urban greenspace allocation and allocated for housing. Paragraph 14.1 of the Publication Draft Local Plan states that sites designated as urban greenspace are identified as being valuable for sport, recreation, amenity or wildlife and that UGS designation sets out the protection of these sites from development. The site area of UGS1240 is 37.19 hectares which is too significant an area to identify for urban greenspace provision in this location given the need to deliver considerable housing land supply in the district. The University land historically used as playing fields has been surplus to requirements for a number of years. The adjacent area of land, forming a comprehensive site, is also vacant and unused. The land in the ownership of Huddersfield University nor that owned privately or by the council does not currently perform any recreation function or contain characteristics pertaining to urban green space designation. They are vacant and unused green areas with no activity, facility or public access. Allocation of 11 hectares for housing would ensure beneficial and useable greenspace provision from residential development and potential to enhance adjoining urban green space.

Proposed Change Requested

Allocate the site edged red on plan [attached] for residential development with associated text advising of the need for a planning brief to link the residual area of UGS1240 to assist in the delivery of enhanced urban green space facilities as part of any residential scheme.

Council Response

No change. The council considers that the allocation of the former University playing fields, the former Britannia sports ground, Celandine Avenue Recreation Ground and the allotments are justified as urban green space based on evidence set out in the Kirklees Open Space Study 2015 (Revised 2016) (LE119), the Kirklees Playing Pitch Strategy Assessment Report 2015 (LE126), the Kirklees Playing Pitch Strategy and Action Plan 2015 (LE124) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), Appendix 1. The former University playing fields and sports ground are identified in the Playing Pitch Strategy 2015 as lapsed football and cricket provision but recommended for protection due to shortfalls in the area. As such, these sites have not been identified as surplus to requirements. The shortfalls identified in Huddersfield are significant and include deficits in junior football and 3G pitches, as well as deficiencies in cricket, senior rugby league and rugby union provision. Further details are provided in LE124 (pages 10-13, 28, 74 and 75). The council owned recreation ground and allotments have been assessed as valuable open space in the Open Space Study (see LE119, Appendix 6 and 9) and the recreation ground which includes an adult football pitch is also recommended for protection as a local football site in the Playing Pitch Strategy (see LE124 page 73). The value of these sites for sports and recreational use justify their allocation as urban green space consistent with the methodology set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) section 5. The definition of urban green space is provided in BP13 (paragraph 1.4) and includes land identified as being valuable for sport or recreational use. Urban green space allocations are not dependent on public access being available and are identified irrespective of whether the land is in public or private ownership. This is consistent with the NPPF which does not require open space to be in public ownership or publicly accessible. No evidence has been provided for replacement sport or recreation provision or improvements to the quantity and quality of existing urban green space and playing pitches. There is sufficient flexibility in the urban green space policy PLP61 to deal with any changes in circumstances consistent with the tests set out in NPPF paragraph 74.

Paragraph/Site: **UGS851**

Consultee: **1049652**

Agent: **1049639**

Cornell

Rep ID: **PDLP_AD668**

Soundness - Positively Prepared

Given the District is proposing major changes to the green belt to accommodate housing needs it is important that all opportunities within the urban area are reviewed and brought forward where their value is and will be diminished. This is the case here and the UGS notation is not justified for the particular area of land shown on the attached plan.

Soundness - Justified

The boundaries of UGS851 are not sound. They arise in part at least from the non-allocation of part of the site for housing the reasons for which are flawed. Para 19.39 of the Strategy document explains the purposes of urban greenspace: 1) providing opportunities for sport, recreation and play - none of which apply as the site has no public rights of access; 2) visual amenity and wildlife - the visual amenity of the site is considered low quality and development of housing allocation immediately to the north negates any benefit from openness per se while the latest ecological databases show the site to have no

significant wildlife or habitat value.

Proposed Change Requested

The boundary of UGS851 should be moved west and Housing allocation H1783 should be extended south.

Council Response

No change. The council considers this site is justified as urban green space based on its assessment as part of a high value open space shown in the Kirklees Open Space Study 2015 (Revised 2016) (LE119), Appendix 8 (open space site ref 238) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), Appendix 1. The site comprises a mixture of heathland, attractive trees and some natural vegetation and forms an integral part of a larger amenity greenspace assessed as having high value as open space for its structural and landscape benefits as a buffer between housing and nearby quarrying operations; ecological benefits provided by heathland and acid grassland Priority Habitats; the amenity and visual attractiveness of the area; and use for informal recreation, including use of public footpaths. There are significant open space deficiencies in the ward with the provision of amenity green space being below the benchmark standard. The allocation of this site as urban green space is consistent with the methodology provided in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) section 5. The definition of urban green space is provided in the council's Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) paragraph 1.4. This includes areas of open land identified as being particularly valuable as open space, including land not necessarily in sport or recreational use. This is consistent with the NPPF Glossary definition of open space which includes all open space of public value, including that which can act as a visual amenity, and the broader definition of open space in PPG (Paragraph: 001 Reference ID: 37-001-20140306) which recognises that open space can take many forms. Urban green space allocations are identified in the Local Plan irrespective of whether the land is in public or private ownership, and are not dependent on public access being available. This is consistent with the NPPF which does not require open space to be in public ownership or publicly accessible.

Paragraph/Site: **UGS1214**

Consultee: **1044323 Mr and Mrs Rhodes**

Agent: **1041912 Mr Frazer Sandwith**

Rep ID: **PDLP_AD670**

Soundness - Justified

JLL consider that the allocation of land to the west of Intake/Green Crescent, Golcar for Urban Green Space (part of UGS1214) is not justified. There are no constraints to the residential development of the part of the site which is numbered H298. The site should have been assessed as several distinct parcels of land, rather than as one. If assessed on its own merits, H298 could be considered as semi-natural green space of poor quality and value. No public access is currently possible across or into H298. The proximity of the settlement edge and countryside calls into question the Council's calculations of the amount of green space available to the community. The Council has failed to consider uses other than Urban Green Space for the site. There are inconsistencies between the treatment of Green Belt and Urban Green Space in the allocation of housing sites.

Proposed Change Requested

Delete site UGS1214 from the Local Plan. Allocate part of the site (H298) for housing development.

Council Response

No change. The council considers this site is justified as urban green space based on evidence set out in the Kirklees Open Space Study 2015 (Revised 2016) (LE119) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), Appendix 1. The site comprises an area of grassland adjoining allotments and amenity space to the west with housing development to the north and east. This land forms part of a larger area of flat natural/semi-natural greenspace that comprises adjoining grassland to the south and has been assessed through the Kirklees Open Space Study as having medium value as open space with some informal recreation use along the public footpath on the western boundary. See LE119, Appendix 7 (Open Space Site Ref 710). The Open Space Study 2015 (Revised 2016) (LE119) identifies significant quantity deficiencies in open space in the ward with shortfalls in the provision of parks and recreation grounds, amenity greenspace and allotments and particularly in natural and semi-natural greenspace. As such, this site is not identified as clearly surplus to requirements. Further details are provided in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) Table 3. The allocation of this site as urban green space is consistent with the methodology provided in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) section 5. The definition of urban green space is provided in the council's Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) paragraph 1.4. This includes areas of open land identified as being particularly valuable as open space, including land not necessarily in sport or recreational use. This is consistent with the NPPF Glossary definition of open space which includes all open space of public value, including that which can act as a visual amenity, and the broader definition of open space in PPG (Paragraph: 001 Reference ID: 37-001-20140306) which recognises that open space can take many forms. Urban green space allocations are identified in the Local Plan irrespective of whether the land is in public or private ownership, and are not dependent on public access being available. The NPPF does not require open space to be in public ownership or publicly accessible.

Paragraph/Site: **UGS1251**

Consultee: **1028892 Mr Adrian Saxton**

Agent:

Rep ID: **PDLP_AD795**

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Soundness - Positively Prepared Kirklees did not inform me of its plans to change the status of my land.

Soundness - Justified The proposed extension to the current Urban Green Space site at Meltham Pleasure Grounds will have a direct impact on myself, being the owner of the land at the bottom of the site that Kirklees is looking to incorporate into UGS1251. The land is now in 3 plots with plots 1 and 2 on the attached plan being in my ownership and the middle plot being a back garden in someone else's ownership. The plan for UGS1251 is not sound as it would be a unilateral imposition of terms and restrictions that don't take into account my current/future plans and aspirations for the site. It also fails to consider the mixed use of the land that has taken place up to the present time, that being its use as a builders storage yard since 1978 and its current use as a tree surgery/forestry storage and processing site.

Proposed Change Requested Remove land that I own from the Urban Green Space allocation. The land currently has the protection of a Tree Preservation Order which already prevents undue development and creates a balance of interest between my own use/future plans and the sites protection. Alternatively, allocate plot 1 in my ownership as Urban Green Space but leave plot 2 as unallocated land. This would represent a minimal increase in Urban Green Space as it is only 0.36 hectares. If the compromise is implemented then I would only be retaining the very small amount of 0.2444 hectares of land as non Urban Green Space. This is in contrast to the many hundreds of hectares of greenbelt/greenfield sites that Kirklees is opening up for development, such as the 158 hectare woodland plot between Mirfield and Dewsbury and Bradley golf course.

Council Response No change. Allocation UGS1251 has been extended to include protected trees adjoining Meltham Pleasure Grounds.

Paragraph/Site: **UGS1281**

Consultee: **975861**

K Bellwood

Agent:

Rep ID: **PDLP_AD1458**

Council Response No change. Support for the allocation of site UGS1281 as urban green space is welcome.

Paragraph/Site: **UGS886**

Consultee: **1075019**

Mr & Mrs Bonas

Agent: **1075016**

Mr N P Charlton

Rep ID: **PDLP_AD3703**

Soundness - Justified Objection to the inclusion of land fronting 29-33 Summervale within urban green space allocation UGS886. The land has developed over a period of time as individual plots with the lower section of paddock and one strip plot remaining in my clients ownership. The paddock section of the land has been re-designated under the now expired Kirklees UDP as open space. This has been done without due process being followed and without notifying the landowner.

Proposed Change Requested Ensure that the land is correctly designated as part of the domestic curtilage of the Summervale Development.

Council Response No change. The council considers this land is justified as urban green space on the basis it forms an integral part of a wooded embankment, contiguous with adjoining woodland and forming part of the Kirklees Wildlife Habitat Network identified by West Yorkshire Ecology. It makes a valuable contribution to the River Holme corridor and is part of the Holme Valley Strategic Green Infrastructure Network which has been identified in partnership with Natural England. Further details are provided in the Kirklees Open Space Study 2015 (Revised 2016) (LE119) in Appendix 7 (see open space site 377, class no. 1784) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), section 5 and Appendix 1. Information regarding the Kirklees Wildlife Habitat Network and the Strategic Green Infrastructure Network is provided in the Environmental Designations Technical Paper (BP10), Sections 6 and 8. A wide range of processes were used to inform stakeholders of the Local Plan, including letters/emails to everyone on the Local Plan database, advertisements/press releases in the local press, information provided to local councillors to undertake consultation in their own areas, focus groups, drop in sessions and a summary booklet in key locations. Full details of the consultation process are provided in council's Statement of Community Involvement September 2015 (SD16) which 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.

Paragraph/Site: **UGS928**

Consultee: **975861**

K Bellwood

Agent:

Rep ID: **PDLP_AD1971**

Council Response No change. Support for the allocation of site UGS928 as urban green space is welcome.

Paragraph/Site: **UGS936**

Consultee: **968659**

Mrs Lynn Hardy

Agent:

Rep ID: **PDLP_AD109**

Soundness - Justified The allocation of urban green space for the whole site [UGS 936] is unfounded. One third of this allocation is grazing farm land and a farm track which operates heavy agricultural machinery

Proposed Change Requested One third of UGS936 is grazing farm land and a farm track and should be removed from urban green space allocation.

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Council Response No change. The council considers this site is justified as urban green space based on evidence set out in the Kirklees Open Space Study 2015 (Revised 2016) (LE119) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), Appendix 1. The council considers that the whole of allocation UGS936 is justified as urban green space based on its sport (cricket ground) and recreation (play area) uses and that the adjoining grazing land is visually linked to these, forming a contiguous open space that contributes to the open character and visual amenity of the area. Further details are provided in the Kirklees Open Space Study 2015 (Revised 2016) (LE119) in Appendix 7 (see Open Land Site 428, class no. 2616) and the review of urban green space set out in the Urban Green Space and Local Green Space Technical Paper April 2017 (BP13), section 5 and Appendix 1. The definition of urban green space is provided in the council's Urban Green Space and Local Green Space Technical Paper April 2017 (BP13) paragraph 1.4. This includes areas of open land identified as being particularly valuable as open space or for sport and recreational use. This is consistent with the NPPF Glossary definition of open space which includes all open space of public value, including that which can act as a visual amenity, and the broader definition of open space in PPG (Paragraph: 001 Reference ID: 37-001-20140306) which recognises that open space can take many forms.

Paragraph/Site: **SGI2110**

Consultee: **944352**

Michael Hutchinson

Agent:

Rep ID: **PDLP_AD22**

Soundness - Justified

The plan is unsound due to the lack of clarity regarding the boundary of SGI2110 as it relates to Lady Wood and housing allocation H2089. The boundary of SGI2110 is shown yellow on the proposals map and is supposed to be hatched across but this is unclear, particularly where it includes Lady Wood which is also shown within housing allocation H2089.

Proposed Change Requested

Review the colour of the boundary of SGI2110 and the nature of the cross hatching on the Proposals Map. Remove Lady Wood from housing allocation H2089. .

Council Response

No change. The colour of the boundary of SGI2110 is not considered to be a soundness issue. However, the council may give further consideration to the prominence of designations shown on the Policies Map if necessary. Development of site H2089 will be expected to take account of the Mirfield Promenade proposal as set out in the site allocations box in the Kirklees Publication Draft Local Plan Allocations and Designations document (SD2). A masterplan will be required for the site which seeks to retain important biodiversity areas, such as Lady Wood.

Paragraph/Site: **SGI2110**

Consultee: **972220**

Agent: **941908**

Mr Andrew Rose

Rep ID: **PDLP_AD3309**

Soundness - Justified

Miller Homes understands and supports the concept of the Mirfield Promenade but is keen to understand the evidence base for the proposal and what it is seeking to achieve in order to reflect this in the Dewsbury Riverside masterplan. The evidence base for the proposal is not available therefore there is no justification.

Proposed Change Requested

Provide evidence for the designation of SGI2110 - Mirfield Promenade.

Council Response

No change. The boundary of the Mirfield Promenade (SGI2110) reflects the route proposed by the Mirfield Community Partnership and the Canals and Rivers Trust.