

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

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renewable energy resource, not just a waste site. There is no mention of this site in Kirklees' renewable policy, yet Kirklees has a shortfall in meeting its renewable energy target.

### Soundness - Justified

The size of the proposed area is double the area of the footprint of the existing planning permission for the biogas plant. Slurry lagoons and lanes have been included, which are owned and operated by the farm. The landowner does not agree to this designation. The entire site is currently green belt and designated area that is not currently AD Plant is in agricultural use and used for storage of equipment - no other farms have been allocated in this way. The proposed allocation is located within 50m of residential housing. The immediate vicinity has historical importance, with barns dating to 1653. The site is a haven for wildlife and migratory birds, the environment and biodiversity would be damaged by this allocation and associated policies. Tourism in the area will be damaged, this is a tourism hub, it is a gateway to Denby Dale and Holmfirth. It is located close to the Art Triangle, Cannon Hall, Kirklees Light Railway, Bretton and National Coal Mining Museum. It will have an impact on the landscape, due to its prominent visibility and proximity to land allocated as Country Park.

### Soundness - Effective

The waste safeguarding criteria effectively changes the planning permission secured for this site. The safeguarding may prevent the farm business developing and effect the viability of the farm.

### Soundness - Consistent with National Policy

-The National Policy for Waste does not require local authorities to 'safeguard' sites, only to identify opportunities to meet identified needs for the management of waste. The safeguarding policy would endow Kirklees with powers which are beyond those envisaged by National Planning Policy. It should enable Kirklees to plan effectively and to meet changes in waste management - this can be achieved by monitoring methods. - The entire site is currently green belt and this designation contravenes national green belt policies, by eroding the green spaces between communities.

### Council Response

No changeThe boundary reflects the planning permissions and subsequent grant of agricultural notifications in association with the bio-digesters and effluent lagoonsKirklees Council is working towards a net self-sufficient approach towards waste treatment/management, therefore monitoring of all facilities that accept and manage waste is a key component of this process to fully understand the capacity within the districtThe Kirklees Waste Needs Assessment has included the waste capacity of Clayton Hall Farms Bioenergy Plant and accounted for an annual treatment capacity of 5009 tonnes in its modellingAlthough it is recognised that waste treatment/management facilities accept waste from outside of the district, the Council must plan to manage waste both generated within and/or imported to the district for the duration of the plan period. This helps the Council's objective of being net self-sufficient.Policy PLP 45 does not prevent established operations from continuing. The policy affects the waste facilities within the designation only, therefore any current and future farm operations would remain unaffectedThe waste safeguarding designation and associated policy do not change the planning status already affecting this sitePolicy PLP 45 would not prevent the development of the farm, particularly if such developments had no impact upon the established bio-digesters and associated infrastructure. However, the policy is flexible and would allow a change of use from the facilities safeguarded if it can be justified.Any impact on the green belt, landscape, nearby residents and heritage assets have already been established and dealt with through the planning application process. The designation is to safeguard the facilities that already exist.Policy PLP 10 provides a positive policy approach towards tourism and the rural economy

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Paragraph/Site: 12.1

Consultee: 968958

Mr Matthew Mills

Agent:

Rep ID: PDLP\_AD3621

### Soundness - Positively Prepared

- Should be explicit reference to and consideration of student housing needs. Preference affordable town centre accommodation close to campus. Long term, believe decline in popularity of student halls which require commuting to campus. - Need to provide affordable accommodation but maintain high quality stock. Wish to see further growth in halls in immediate vicinity of campus to provide increased choice, improve market competition to reduce costs. - Growth in additional hall places would have additional benefit of potentially freeing up housing stock for families. - Recent graduates require access to affordable accommodation for rent and purchase.

### Proposed Change Requested

- Should be explicit consideration of and reference to Student Housing needs.- Should prioritise provision of affordable starter homes for recent graduates, homes suitable for 'empty nesters' ready to trade down, Housing Association and social landlord provision.

### Council Response

No change. Policy PLP 11 (SD1, Strategy and Policies, page 68) refers to meeting a wide range of needs. The SHMA (SD18) and associated documents include a consideration of student housing needs. The policy also refers to affordable housing including Starter Homes which could be accessed by graduates where they meet the criteria for such housing provision.

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Paragraph/Site: 12.2

Consultee: 943894

Mrs Beverley Lambert

Agent:

Rep ID: PDLP\_AD2356

### Council Response

No change. Support noted

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Paragraph/Site: <b>MDGB2134</b>	Consultee: <b>943957</b>	<b>Mr Ian Smith</b>	Agent:	Rep ID: <b>PDLP_AD3784</b>
<b>Council Response</b>	No change. Comment noted.			
Paragraph/Site: <b>MDGB2134</b>	Consultee: <b>967018</b>	<b>Mrs Ann Priestman</b>	Agent:	Rep ID: <b>PDLP_AD232</b>
<b>Council Response</b>	No change. Support for the need for improvements at the Penistone Road/Storthes Hall Lane junction noted.			
Paragraph/Site: <b>MDGB2134</b>	Consultee: <b>974056</b>	<b>Mrs R Bellwood</b>	Agent:	Rep ID: <b>PDLP_AD1659</b>
<b>Soundness - Justified</b>	The site should implicitly state that it is to be developed for a retirement village. This would have less impact than normal housing on local transport, education and health infrastructure, particularly when considered along side other accepted housing sites.			
<b>Soundness - Effective</b>	The cumulative effects of housing proposals will worsen already significant traffic issues and make drivers seek alternative routes into Huddersfield. There are inadequate detailed solutions within the plan to address traffic issues on the A616 and A629 and the roads between them which pass through small settlements.			
<b>Proposed Change Requested</b>	The following should be added to "Other site specific considerations" for site MDGB2134 : <ul style="list-style-type: none"><li>• Development proposals shall include an assessment of traffic on rural roads and villages and improvements to the local road network between the A629 and A616."Other site specific considerations" should also be amended to include:</li><li>• The junction of Storthes Hall Lane and Penistone Road WILL be improved.</li><li>• Improvements will give due consideration to and should not transfer traffic to the rural road infrastructure.Change MDGB2134 to implicitly refer to a retirement village for 300 homes on the former hospital site.</li></ul>			
<b>Council Response</b>	No change. The exact type of housing to be provided on each site is to be determined through the planning applications process in accordance with PLP11 (SD1, Strategy and Policies, page 68). Highways information indicates that junction improvements will be required to the Storthes Hall Lane and Penistone Road junction to accommodate development of this scale but can be made acceptable in the context of the proposed site allocation.			
Paragraph/Site: <b>MDGB2134</b>	Consultee: <b>975861</b>	<b>K Bellwood</b>	Agent:	Rep ID: <b>PDLP_AD1459</b>
<b>Soundness - Effective</b>	There is support for the existing planning approval for a retirement village and the reduction in capacity to 505 dwellings. However, the cumulative effect of the increased traffic generated when added to other accepted sites in Kirklees Rural puts a heavy demand on the A629 which has been recognised as an issue but without an adequate solution.			
<b>Proposed Change Requested</b>	The existing planning approval for a retirement village should be emphasised in the site description. Road improvements are required at the junction of Storthes Hall Lane with Penistone Road. There should be a turning restriction when exiting the site and signage at the junction of Storthes Hall Lane with Farnley Road to minimise traffic passing through Farnley Tyas. Speed reduction and traffic calming measures are required in Farnley Tyas.			
<b>Council Response</b>	No change. The Local Plan does not specify the exact type of housing to be provided on each site as this is to be determined through the planning applications process in accordance with PLP11 (SD1, Strategy and Policies, page 68). Highways information indicates that junction improvements will be required to the Storthes Hall Lane and Penistone Road junction to accommodate development of this scale but can be made acceptable in the context of the proposed site allocation.			
Paragraph/Site: <b>MDGB2134</b>	Consultee: <b>1045848</b>	<b>Mrs Toni Rios</b>	Agent: <b>1045846</b>	<b>Mr Christopher Yapp</b> Rep ID: <b>PDLP_AD391</b>
<b>Soundness - Effective</b>	Development for residential use may well result in an impact on the M1 motorway at junction 39 which will also be subject to increased pressure as a result of other development proposals in the Skelmanthorpe, Scissett, Clayton West and Denby Dale areas. The site may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan where committed Road Investment Strategy schemes will not provide sufficient capacity or where Highways England does not have committed investment For further correspondence relating to this representation see Core Document 'Correspondence received from statutory consultees after the Regulation 19 Publication Draft Local Plan Consultation'			
<b>Council Response</b>	No change. PLP 4 (Providing Infrastructure) in SD1 (Strategy and Policies, page 42) provides the policy framework to secure the essential infrastructure in relation to this representation.Highways England intend to retract their comments on the publication draft at the earliest opportunity to reflect their current			

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position. These matters have been subsequently addressed within Highways England's letter to Kirklees Council dated 12th April 2017 (BP28). Further to this correspondence, the 'site specific considerations' (in relation to individual site and cumulative site impacts upon the Strategic Road Network) have either been removed or modified in accordance with Highways England's expressed position (see SD4 and BP28). Highways England's recommendations within BP28 were informed by LE141 and their latest Network Analysis Tool modelling. Highways England have agreed that Local Plan Policy PLP 4 will enable the Council to seek contributions towards additional mitigation measures from applications upon allocations that do not in themselves generate a significant impact upon the SRN (but that may contribute towards cumulative impact).

Paragraph/Site: **MDGB2134**

Consultee: **1049391 Miss Lucie Jennings**

Agent:

Rep ID: **PDLP\_AD741**

**Soundness - Justified**

I do not believe this plan to be sound as it will affect the air quality, thus affecting the habitat and surrounding areas. It would also impact upon the existing listed buildings here. Storthes Hall is a highly valued green space and I strongly feel that building in this area will negatively affect the people and the wildlife.

**Proposed Change Requested**

To remove MBG2134 from the Local Plan blueprint.

**Council Response**

No change. It should be noted that the Storthes Hall site is brownfield (previously developed) as it comprises an area which previously contained hospital buildings (the southern part of the site) and existing student accommodation (the northern part of the site). Protected trees within the site have been removed from the developable area and protected trees outside the site boundary are covered by the local plan trees policy and tree preservation orders where appropriate. An Air Quality Impact Assessment would be required for a site of this size.

Paragraph/Site: **SL2176**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3785**

**Soundness - Justified**

The hillfort at Castle Hill is one of the defining features of the plan area. The Castle Hill Setting Study identifies this site as making an important contribution to the setting of that Monument. Consequently, one might assume that the loss of this area and its subsequent development would be likely to harm the significance of this important Scheduled Monument. By identifying this area as Safeguarded Land, 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 meaningful evaluation about whether or not the development of this site would be compatible with the protection of the setting of Castle Hill (and hence accord with Policy PLP35 Criterion 3.f).

**Proposed Change Requested**

Before identifying this area as Safeguarded Land a detailed assessment needs to be undertaken of the contribution that this site makes to the setting of Castle Hill.

**Council Response**

The local plan is supported by the Castle Hill Setting Study and the impact of developing this site is not identified as inappropriate.

Paragraph/Site: **SL2176**

Consultee: **945975 Mrs Iris Moses**

Agent:

Rep ID: **PDLP\_AD1169**

**Soundness - Justified**

Drainage would be a problem, land is very wet. Underground streams cross the site, diverting these could cause a damage to private land or property. Increased traffic would cause problems.

**Proposed Change Requested**

Add land to the green belt

**Council Response**

This site is not deliverable or developable during the Local Plan period. There is a reasonable prospect that the constraints on this site could be overcome to allow the delivery of new homes beyond the end of the Local Plan period.

Paragraph/Site: **SL2177**

Consultee: **943977 Mr Russell Rowe**

Agent:

Rep ID: **PDLP\_AD1693**

**Soundness - Justified**

The land adjacent to Goslin Hall Farm, Almondbury is a steep sloping site which has little or no agricultural value with limited grazing value due to the soil make-up and grass production is minimal. Reclassify the land for residential as infrastructure is on hand and there is a proven need for housing across all sectors. Affordable housing could be accommodated to meet the needs of Almondbury families. Access is available via Bank End Lane and inquiries with utilities suggest adequate capacity.

**Proposed Change Requested**

Reclassify the land for residential.

**Council Response**

No change. Rejected site option H696 in the rejected site options report indicate that no suitable site access can be achieved at this current time.

Paragraph/Site: **SL2161**

Consultee: **1049286 Mr Nicholas Willock**

Agent: **1049237 Mr Nicholas Willock**

Rep ID: **PDLP\_AD464**

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<b>Soundness - Justified</b>	The site is available for development as shown by the submission of outline planning application 2016/91688 on part of the site. Through the planning application process there is an officer recommendation to planning committee to approve the application and the Council's Highways Service have acknowledged that an adoptable estate road and internal layout is achievable. The site would be viable as a housing allocation. The proposed safeguarded land allocation provides little certainty for the landowner if seeking to purchase further third party land to improve the access to the full site. A housing allocation would provide more certainty.
<b>Soundness - Consistent with National Policy</b>	Rejection of this site for housing is inconsistent with national policy including aims to "boost significantly" the supply of housing. Release of green belt land within the Local Plan ahead of existing safeguarded land in the UDP therefore not justified as the most appropriate strategy when considered against alternatives. Green belt boundaries should only be altered in exceptional circumstances.
<b>Proposed Change Requested</b>	Allocate this site for housing.
<b>Council Response</b>	No ChangeThe planning application had not been determined at the time the Local Plan was prepared for submission. The site option was assessed based on the site area of 1.2 ha potentially accommodating 37 units as per the site allocation methodology presented in background paper BP23.The Council acknowledges the site now has an outline approval for 9 units on part of the site planning ref 2016/91688. This planning permission is currently unimplemented and reserved matters have not been submitted to the Council. It is noted condition 17 attached to this permission restricting the number of units to 10:17. No more than 10 dwellings shall be served off the approved access.Reason: With regard to highway safety considerations, and amenity concerns over the comings and goings from the use of the access, it is considered the quantum of development that can be accommodated from the proposed access is no more than 10 dwellings and to accord with Policies D2 and T10 of the Kirklees Unitary Development Plan.This re-affirms the Councils decision to continue to allocate the whole of the POL site as safeguarded land.

Paragraph/Site: **SL2194**

Consultee: **943957**

**Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3786**

<b>Soundness - Justified</b>	Nether Hall Barn at the southern end of this area is a Scheduled Monument and also a Grade II Listed Building. By identifying this area as Safeguarded Land, 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 Scheduled Monument or what harm might result to those elements which contribute to its significance by its eventual development.
<b>Soundness - Consistent with National Policy</b>	Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, national policy guidance makes it clear that Scheduled Monuments are considered to be in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional. The development of this site could, potentially, harm elements which contribute towards the significance of this Scheduled Monument.
<b>Proposed Change Requested</b>	Before identifying this site as Safeguarded Land an assessment needs to be undertaken of the contribution which this site makes to the setting of the Scheduled Monument and what impact the loss of this open area and its subsequent development might have upon its significance.
<b>Council Response</b>	At a meeting on 2 nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that Safeguarded land sites are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2 nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is subsequently undertaken.Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent local plan review, then a heritage impact assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then Policy PLP35 will provide appropriate mitigation. Furthermore, a heritage impact assessment would be required for safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2268**

Consultee: **943957**

**Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3787**

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<b>Soundness - Justified</b>	The northern part of this site would result in the loss of an open area in the Quarmby Fold Conservation Area. The Stables to the former farm at Holly Bank adjacent to the site's northeastern corner are Grade II Listed Buildings. By identifying this area as Safeguarded Land, 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.
<b>Soundness - Consistent with National Policy</b>	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
<b>Proposed Change Requested</b>	Before identifying this site as Safeguarded Land 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.
<b>Council Response</b>	No changeAt a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that Safeguarded land sites are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is subsequently undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent local plan review, then a heritage impact assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then Policy PLP35 will provide appropriate mitigation. Furthermore, a heritage impact assessment would be required for safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2271**

Consultee: **943957**

**Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3788**

<b>Soundness - Justified</b>	Salendine Nook Baptist Chapel under 70 metres from the western extent of this site is a Grade II Listed Building. By identifying this area as Safeguarded Land, 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.
<b>Soundness - Consistent with National Policy</b>	Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment.
<b>Proposed Change Requested</b>	Before identifying this site as Safeguarded Lan 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.
<b>Council Response</b>	No change.At a meeting on 2 nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site.It is important to note that the Council is not proposing that Safeguarded land sites are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2 nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is subsequently undertaken.Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent local plan review, then a heritage impact assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to

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the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then Policy PLP35 will provide appropriate mitigation. Furthermore, a heritage impact assessment would be required for safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2201**Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3789****Soundness - Justified**

There is a group of Listed Buildings adjacent to the north-eastern corner of this area. This includes the Grade I Listed Thornhill Lees Hall and the Grade II\* Listed Second Hall. By identifying this area as Safeguarded Land, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of these Listed Buildings or what harm might result to those elements which contribute to their significance by its eventual development.

**Soundness - Consistent with National Policy**

Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, national policy guidance makes it clear that Grade I and II\* Listed Buildings are regarded as being in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional.

**Proposed Change Requested**

Before identifying this site as Safeguarded Land 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 At a meeting on 2<sup>nd</sup> February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2<sup>nd</sup> February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2163**Consultee: **941518 Mrs Christine Sykes**

Agent:

Rep ID: **PDLP\_AD25****Soundness - Justified**

Any potential development would be dependent on new access roads, dependent on land in private ownership which would not be available. The National Playing Field Association NPFA 6 acre standard for the provision of sport & recreational areas has a significant shortfall in Mirfield.

**Proposed Change Requested**

This site should be redesignated as Urban Greenspace.

**Council Response**

No change The site has been considered for allocation as urban green space in the Local Plan and rejected. Details of the technical assessment undertaken to reach this conclusion are set out in the Urban Green Space & Local Green Space Technical Paper (BP13) paragraphs 5.3.1 to 5.3.13 and in Appendix 2 Local Plan reference UGS2743.

Paragraph/Site: **SL2163**Consultee: **942462 Bellway Homes (Yorkshire) Ltd**Agent: **993144 Mr Jon Brier**Rep ID: **PDLP\_AD1261****Soundness - Positively Prepared**

The Local Plan seeks to propose a large amount of green belt land. This site is within the existing urban area and not allocating it is contrary to the Local Plan's strategy.

**Soundness - Justified**

The site is available for development and in ownership of a national house builder and is within a strong housing market area. There are a wide range of local services and access to schools. It is not considered there are significant environmental constraints. The previous application was not fully supported by Council's highways dept but the application was withdrawn to allow these issues to be further explored and addressed.

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<b>Proposed Change Requested</b>	Allocate the site for housing.
<b>Council Response</b>	No change It is considered that the site is not deliverable or developable during the Local Plan period.
Paragraph/Site: <b>SL2163</b>	Consultee: <b>943957 Mr Ian Smith</b> Agent: Rep ID: <b>PDLP_AD3804</b>
<b>Soundness - Justified</b>	By identifying this area as Safeguarded Land, 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.
<b>Soundness - Consistent with National Policy</b>	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.
<b>Proposed Change Requested</b>	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
<b>Council Response</b>	development might have upon their significance. No changeAt a meeting on 2 nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2 nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.
Paragraph/Site: <b>SL2163</b>	Consultee: <b>972595 Mrs Cheryl Tyler</b> Agent: Rep ID: <b>PDLP_AD524</b>
<b>Soundness - Justified</b>	NPPF requires the council to base all land allocation on OAN, but there is no evidence this has been done in relation to safeguarded land. The development of the site for housing has therefore been shown to be unacceptable and unsustainable on two occasions, the most recent being only last year.
<b>Soundness - Consistent with National Policy</b>	NPPF requires the council to base all land allocation on OAN, but there is no evidence this has been done in relation to safeguarded land.
<b>Proposed Change Requested</b>	Change the allocation to urban greenspace.
<b>Council Response</b>	No changeSection 4 of the Housing Technical Paper (SD23) sets out how the objectively assessed need for housing in Kirklees has been calculated and includes reference to Safeguarded Land. The site has been considered for allocation as urban green space in the Local Plan and rejected. Details of the technical assessment undertaken to reach this conclusion are set out in the Urban Green Space & Local Green Space Technical Paper (BP13) paragraphs 5.3.1 to 5.3.13 and in Appendix 2 Local Plan reference UGS2743.
Paragraph/Site: <b>SL2163</b>	Consultee: <b>972595 Mrs Cheryl Tyler</b> Agent: Rep ID: <b>PDLP_AD521</b>
<b>Soundness - Justified</b>	We do not believe the proposals for allocation SL2163 comply with National Planning Policy or comply with the Spatial Development Strategy set out in 19.2 of the Publication Draft Local Plan Strategy and Policies. The Open Space study shows a deficiency of natural and semi-natural greenspace in Mirfield. The site

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would be better served meeting shortfall of quality open space in this area

**Soundness - Consistent with National Policy** We do not believe the proposals for allocation SL2163 comply with National Planning Policy or comply with the Spatial Development Strategy set out in 19.2 of the Publication Draft Local Plan Strategy and Policies. The Open Space study shows a deficiency of natural and semi-natural greenspace in Mirfield. The site would be better served meeting shortfall of quality open space in this area

**Proposed Change Requested** Change site to urban greenspace.

**Council Response** No changeThe site has been considered for allocation as urban green space in the Local Plan and rejected. Details of the technical assessment undertaken to reach this conclusion are set out in the Urban Green Space & Local Green Space Technical Paper (BP13) paragraphs 5.3.1 to 5.3.13 and in Appendix 2 Local Plan reference UGS2743.

Paragraph/Site: **SL2163** Consultee: **1067812 Mr R A Shaw** Agent: Rep ID: **PDLP\_AD3592**

**Soundness - Effective** Unwilling landowner.

**Council Response** No changeIt is considered that there is a reasonable prospect that the constraints on this site could be overcome to allow the delivery of new homes beyond the end of the Local Plan period.

Paragraph/Site: **SL2197** Consultee: **943957 Mr Ian Smith** Agent: Rep ID: **PDLP\_AD3790**

**Soundness - Justified** The southern half of this area lies within the Upper Batley Conservation Area. By identifying this area as Safeguarded Land, 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.

**Proposed Change Requested** Before identifying this site as Safeguarded Land 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 changeAt a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.

Paragraph/Site: **SL2202** Consultee: **978303 Cllr Andrew Palfreeman** Agent: Rep ID: **PDLP\_AD2536**

**Soundness - Justified** The site does not] offer any logical extension of the local settlements and [its] inclusion as [a] Safeguarded site, which we appreciate would be developed for housing once the housing land supply in the Local plan is exhausted, does not make [a] rational addition to the communities [it is] near. SL2202 – Tong Moorside – this is a totally illogical development as it is cut off from Birkenshaw and will physically be more part of Bradford as well as being sandwiched between two areas of open moorland.



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<b>Proposed Change Requested</b>	The site should be returned to green belt.			
<b>Council Response</b>	No change This site was identified in the UDP as provisional open land (POL), this allocation has been carried forward into the Local Plan.			
Paragraph/Site: <b>SL2290</b>	Consultee: <b>978303</b>	<b>Cllr Andrew Palfreeman</b>	Agent:	Rep ID: <b>PDLP_AD2537</b>
<b>Soundness - Justified</b>	[The site does not] offer any logical extension of the local settlements and [its] inclusion as [a] Safeguarded site, which we appreciate would be developed for housing once the housing land supply in the Local plan is exhausted, does not make [a] rational addition to the communities [it is] near. SL2290 – Summerbridge Crescent/Cambridge Chase – This goes directly against Green Belt policy as it will join up two communities if developed.			
<b>Proposed Change Requested</b>	The site should remain as green belt.			
<b>Council Response</b>	No change The size, location and degree of containment of this site presents the opportunity to round off this area of Gomersal without significantly undermining the role and function of the green belt in this location. Removal of the site from the green belt would also necessitate the removal of the long rear gardens to properties on Summerbridge Crescent in order to create a defendable new green belt boundary.			
Paragraph/Site: <b>SL2167</b>	Consultee: <b>945728</b>	<b>Mr John B Donnelly</b>	Agent:	Rep ID: <b>PDLP_AD1172</b>
<b>Soundness - Positively Prepared</b>	Use disused buildings first. Bring back into use for residential purposes.			
<b>Soundness - Justified</b>	Development of this land would disturb natural drainage, causing surface water drainage issues. Traffic problems will increase. Statutory consultations on recent planning application 2015/93926 raised drainage and highways issues.			
<b>Proposed Change Requested</b>	Add land to the green belt			
<b>Council Response</b>	No change. Previously Developed Sites MX1919 and MX1920 have been allocated in Marsden. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The Accepted Site Options Technical Appraisal (BP29) provides further information on the assessment of the site. It is not considered that the site would have any significant impact on drainage.			
Paragraph/Site: <b>SL2167</b>	Consultee: <b>946005</b>	<b>Mr and Mrs William and Wendy Worthington</b>	Agent:	Rep ID: <b>PDLP_AD1167</b>
<b>Soundness - Positively Prepared</b>	The character of Marsden would be diminished. use brownfield sites in the village - mills, this would preserve industrial heritage.			
<b>Soundness - Justified</b>	Traffic congestion would increase. Land is unsuitable as it has springs draining down from Pule Hill. This already causes problems, disruption of the land could make matters worse. Recent application 2015/93926 opposed			
<b>Proposed Change Requested</b>	Fields should be designated as green belt to preserve habitats.			
<b>Council Response</b>	No change. Previously Developed Sites MX1919 and MX1920 have been allocated in Marsden. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The Accepted Site Options Technical Appraisal (BP29) provides further information on the assessment of the site. It is not considered that the site would have any significant impact on drainage.			
Paragraph/Site: <b>SL2167</b>	Consultee: <b>946028</b>	<b>Mr Andrew Lister</b>	Agent:	Rep ID: <b>PDLP_AD1163</b>
<b>Soundness - Positively Prepared</b>	Consider other sites such as Crowther's Mill, instead of using countryside.			
<b>Soundness - Justified</b>	Wildlife in fields. Main roads are already struggling to cope. Fields are like marshes, will increase flooding risk. Schools cannot cope.			
<b>Council Response</b>	No change. Previously Developed Sites MX1919 and MX1920 have been allocated in Marsden. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The Accepted Site Options Technical Appraisal (BP29) provides further information on the assessment of the site. It is not considered that the site would have any significant impact on drainage. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth			
Paragraph/Site: <b>SL2167</b>	Consultee: <b>946097</b>	<b>Mrs Jan Lister</b>	Agent:	Rep ID: <b>PDLP_AD1171</b>
<b>Soundness - Positively Prepared</b>	Consider use of existing mills in area.			

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<b>Soundness - Justified</b>	Road is not suitable for more traffic, too much congestion will increase air pollution. Schools and doctors are full. have to travel to see a dentist. Area is teaming with wildlife. Wells and drainage pipes on site				
<b>Council Response</b>	No change.Previously Developed Sites MX1919 and MX1920 have been allocated in Marsden.The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2.The Accepted Site Options Technical Appraisal (BP29) provides further information on the assessment of the site. It is not considered that the site would have any significant impact on drainage.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.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 would require a Habitat Risk Assessment.				
Paragraph/Site: <b>SL2167</b>	Consultee: <b>961787</b>	<b>Jim Westhead</b>	Agent: <b>941905</b>	<b>Mr Robert Halstead</b>	Rep ID: <b>PDLP_AD51</b>
<b>Soundness - Justified</b>	The reasons for rejecting the site as a possible housing site ( which give rise to its proposed designation as safeguarded land) are wholly inconsistent with the relevant planning evidence. In December 2015 an outline planning application was submitted for residential development on the site by the owner. The highways consultation response, which is appended to this representation, did not suggest that third party land was required nor that junction improvements were required. There is nothing in the planning application evidence to suggest that the highways issues might be capable of resolution beyond the end of the local plan period				
<b>Proposed Change Requested</b>	Remove the Safeguarded land SL2167 from the allocations and designations plan and replace with a new housing allocation.				
<b>Council Response</b>	No change. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The highways comments note that “Potential access could be provided off Netherley Drive however there would be significant impact on the PROW which crosses the site frontage. Third party land would be required in order to form a suitable site access” and “Sub-standard visibility splays at Netherley Drive / Mount Road junction.”. The comments on planning application 2015/93926 note that limitations of this visibility splays due to on-street parking and road alignment.				
Paragraph/Site: <b>SL2167</b>	Consultee: <b>969243</b>	<b>Mr Ian Tattersall</b>	Agent:		Rep ID: <b>PDLP_AD1052</b>
<b>Soundness - Justified</b>	Development of the site would have a high risk of damaging properties on Mount Road due to springs running through the site, site topography, potential for instability and flooding. A new road would be close to the rear of the site. Access to the site would cross a footpath and existing footpath to three properties, development would further exacerbate existing problems. Wildlife impact, the site is 500m from Peak District National Park and 200m from SPA. Planning application on site withdrawn.				
<b>Proposed Change Requested</b>	Remove site SL2167 from the Local Plan and designate as Green Belt.				
<b>Council Response</b>	No change.The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2.The Accepted Site Options Technical Appraisal (BP29) provides further information on the assessment of the site. It is not considered that the site would have any significant impact on drainage.The site would require a habitat risk assessment.				
Paragraph/Site: <b>SL2184</b>	Consultee: <b>943957</b>	<b>Mr Ian Smith</b>	Agent:		Rep ID: <b>PDLP_AD3791</b>
<b>Soundness - Justified</b>	This site adjoins the boundary of the Marsden Conservation Area. Dirker and Ivy Cottage, on the site’s northern boundary, are Grade II Listed Buildings By identifying this area as Safeguarded Land, 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.				
<b>Soundness - Consistent with National Policy</b>	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 identifying this site as Safeguarded Land 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

At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that Safeguarded land sites are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is subsequently undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent local plan review, then a heritage impact assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then Policy PLP35 will provide appropriate mitigation. Furthermore, a heritage impact assessment would be required for safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

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Paragraph/Site: **SL2284**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3792**

### Soundness - Justified

The Barn 20 yards to west of Lower Busker Farmhouse to the south of this site is a Grade II Listed Building. By identifying this area as Safeguarded Land, 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.

### Proposed Change Requested

Before identifying this site as Safeguarded Land 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. At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that Safeguarded land sites are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is subsequently undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent local plan review, then a heritage impact assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then Policy PLP35 will provide appropriate mitigation. Furthermore, a heritage impact assessment would be required for safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

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Paragraph/Site: **SL3396**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3793**

### Soundness - Justified

This site lies in the Golcar Conservation Area. In addition, there are Listed Buildings to the north and west of this area. By identifying this area as Safeguarded Land, 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

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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 identifying this site as Safeguarded Land 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. At a meeting on 2 nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2 nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘ safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.

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Paragraph/Site: **SL2331**

Consultee: **943957**

**Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3794**

### **Soundness - Justified**

Netherley House, to the south of this site, is a Grade II Listed Building. By identifying this area as Safeguarded Land, 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 the absence of any assessment of the degree of harm which the development of this area of Safeguarded Land might cause to this Listed Building, 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 identification of this area as Safeguarded Land is compatible the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.

### **Proposed Change Requested**

Before identifying this site as Safeguarded Land 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. At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects

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upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2166**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3795**

### **Soundness - Justified**

This site adjoins the boundary of the Hinchliffe Mill Conservation Area. There is also a pair of Grade II Listed Buildings at its south-eastern corner. By identifying this area as Safeguarded Land, 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 identifying this site as Safeguarded Land 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. At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2170a**

Consultee: **942723 Mr Michael Moorhouse**

Agent:

Rep ID: **PDLP\_AD3537**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **943627 A J Dalton**

Agent:

Rep ID: **PDLP\_AD3457**

**Soundness - Positively Prepared**

Lack of consultation with local community.

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35.

Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **961137**

**Jacky Emmerton**

Agent:

Rep ID: **PDLP\_AD3374**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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development on school place planning has been assessed through the infrastructure planning work between the Local 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **961401 R Malkin**

Agent:

Rep ID: **PDLP\_AD3473**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **978506 Cllr Nigel Patrick**

Agent:

Rep ID: **PDLP\_AD2933**

### **Soundness - Justified**

Housing allocation sites SL2170a will add significant numbers of cars to a very substandard road network in close proximity to Holmfirth High School where



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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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1034329 Mr David Pursehouse**

Agent:

Rep ID: **PDLP\_AD1993**

### 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)

### 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development

upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees. 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 YWLNLP at their meeting on January 5th 2016. SD14 demonstrates how 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 YWLNLP).

Paragraph/Site: **SL2170a**

Consultee: **1042012 Mr Steve Sykes**

Agent:

Rep ID: **PDLP\_AD3653**

**Soundness - Justified**

The 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 Green Belt.

**Council Response**

No change. Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development

upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1042984 Mr John Dalton**

Agent:

Rep ID: **PDLP\_AD2971**

**Soundness - Justified**

The 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 SL2170a is proposed as a safeguarded land site in the Local Plan. There is a reasonable prospect that the constraints on this site could be overcome to allow the delivery of new homes beyond the end of the local plan period. Environmental Health objection raised to housing site adjacent to the chicken farm to the south east. As this site is proposed to remain as safeguarded land, a further assessment during the next Local Plan review would be required to determine whether this site should be allocated for development at that time. 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 SL2170a. 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. 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

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boundary in this location.

Paragraph/Site: **SL2170a**

Consultee: **1044265 Mrs Penelope Sykes**

Agent:

Rep ID: **PDLP\_AD3647**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.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: **SL2170a**

Consultee: **1049699 Christopher Heaton**

Agent:

Rep ID: **PDLP\_AD3509**

### **Soundness - Justified**

The 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

<b>National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050170**

**Sarah Pursehouse**

Agent:

Rep ID: **PDLP\_AD3512**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050298 Mrs Gillian Malkin**

Agent:

Rep ID: **PDLP\_AD3478**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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Paragraph/Site: **SL2170a**

Consultee: **1050305 Ms Rachael Oaks**

Agent:

Rep ID: **PDLP\_AD3469**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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

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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050307 Mr Maximus Cunningham**

Agent:

Rep ID: **PDLP\_AD3466**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050313 Mrs Jacqueline Cunningham**

Agent:

Rep ID: **PDLP\_AD3453**

### **Soundness - Justified**

The 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

<b>National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050316 Mr Andrew Cunningham**

Agent:

Rep ID: **PDLP\_AD3449**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050321 Mr Jack Dalton**

Agent:

Rep ID: **PDLP\_AD3446**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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Paragraph/Site: **SL2170a**

Consultee: **1050325 Miss Alice Dalton**

Agent:

Rep ID: **PDLP\_AD3443**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050339 Mr James Spencer**

Agent:

Rep ID: **PDLP\_AD3439**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050342 Miss Lily Crook**

Agent:

Rep ID: **PDLP\_AD3439**

### **Soundness - Justified**

The 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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<b>National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050351 Mrs Kathryn McGenity**

Agent:

Rep ID: **PDLP\_AD3433**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050357 Dr Philip McGenity**

Agent:

Rep ID: **PDLP\_AD3524**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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Paragraph/Site: **SL2170a**

Consultee: **1050361 Miss Alice McGenity**

Agent:

Rep ID: **PDLP\_AD3520**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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

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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050434 Mr Alan Battye**

Agent:

Rep ID: **PDLP\_AD3644**

### 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 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

Return of SL2170a to Green Belt.

### Council Response

No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050437 Harold & Rita Battye**

Agent:

Rep ID: **PDLP\_AD2349**

### 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.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



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Paragraph/Site: **SL2170a**

Consultee: **1050443 Mr Nicholas Shaw**

Agent:

Rep ID: **PDLP\_AD3481**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050452 Dr Barbara Shaw**

Agent:

Rep ID: **PDLP\_AD3484**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170a**

Consultee: **1050469 Steve Baker**

Agent:

Rep ID: **PDLP\_AD3517**

### Soundness - Justified

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

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Paragraph/Site: **SL2170a**

Consultee: **1050781 Pamela Moorhouse**

Agent:

Rep ID: **PDLP\_AD3506**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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Paragraph/Site: **SL2170a**

Consultee: **1050782 Edward Dalton**

Agent:

Rep ID: **PDLP\_AD3503**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050783 Ben Wardill**

Agent:

Rep ID: **PDLP\_AD3497**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050784 Elon Sykes**

Agent:

Rep ID: **PDLP\_AD3500**

### **Soundness - Justified**

The 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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### Proposed Change Requested

Return the site to the Green Belt.

### Council Response

No change. Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170a**

Consultee: **1050788 Denise Kersey**

Agent:

Rep ID: **PDLP\_AD3494**

### Soundness - Justified

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050793 Anna Rowland**

Agent:

Rep ID: **PDLP\_AD3567**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050798 Alan Linton**

Agent:

Rep ID: **PDLP\_AD3564**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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



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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050803 Cllr Kenneth Sims**

Agent:

Rep ID: **PDLP\_AD3659**

### **Soundness - Justified**

Housing allocation sites SL2170a 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050805 Cllr Donald Firth**

Agent:

Rep ID: **PDLP\_AD3660**

### **Soundness - Justified**

Housing allocation sites SL2170a 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050807 John Whitford**

Agent:

Rep ID: **PDLP\_AD3556**

### **Soundness - Justified**

The 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).

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### Proposed Change Requested

Return the site to the Green Belt.

### Council Response

No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050809 Dorothy Sykes**

Agent:

Rep ID: **PDLP\_AD3560**

### Soundness - Justified

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by

the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050811 David Porter**

Agent:

Rep ID: **PDLP\_AD3553**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050813 Helen Heaton**

Agent:

Rep ID: **PDLP\_AD3547**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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

Paragraph/Site: **SL2170a**

Consultee: **1050814 Edward Moorhouse**

Agent:

Rep ID: **PDLP\_AD3550**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050816 Paul Palmer**

Agent:

Rep ID: **PDLP\_AD3544**

### **Soundness - Justified**

The 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.

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

**Council Response**

No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050818 Judith Palmer**

Agent:

Rep ID: **PDLP\_AD3540**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to

the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050820**

**Martin Antinori**

Agent:

Rep ID: **PDLP\_AD3530**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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

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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050824 Joanne Appleyard**

Agent:

Rep ID: **PDLP\_AD3533**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.



**Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations**Paragraph/Site: **SL2170a**Consultee: **1050827 Paul Mcgenity**

Agent:

Rep ID: **PDLP\_AD3527****Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**Consultee: **1050831 Caroline Kennett**

Agent:

Rep ID: **PDLP\_AD3427****Soundness - Justified**

The 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.

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

### Council Response

No change. Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050833 Thomas Craggs**

Agent:

Rep ID: **PDLP\_AD3430**

### Soundness - Justified

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development

upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050834 Nick Kennett**

Agent:

Rep ID: **PDLP\_AD3328**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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Paragraph/Site: **SL2170a**

Consultee: **1050835 Valerie Parkin**

Agent:

Rep ID: **PDLP\_AD3424**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170a**

Consultee: **1050837 Robert Heaton**

Agent:

Rep ID: **PDLP\_AD3421**

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

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050839 Helen Craggs**

Agent:

Rep ID: **PDLP\_AD3418**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded

land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050842 Monica Bowden**

Agent:

Rep ID: **PDLP\_AD3347**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35.

Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050844**

**Josephine Shaw**

Agent:

Rep ID: **PDLP\_AD3377**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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

development on school place planning has been assessed through the infrastructure planning work between the Local 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050846 Matthew Milburn**

Agent:

Rep ID: **PDLP\_AD3344**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050849 John Lloyd**

Agent:

Rep ID: **PDLP\_AD3341**

### **Soundness - Justified**

The allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line



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

	with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050851 David Craggs**

Agent:

Rep ID: **PDLP\_AD3338**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050855 David Lloyd**

Agent:

Rep ID: **PDLP\_AD3367**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having

an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050856 Mandy Lloyd**

Agent:

Rep ID: **PDLP\_AD3371**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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.

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

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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050858 James Charlton**

Agent:

Rep ID: **PDLP\_AD3394**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050860 Helen Vellensworth**

Agent:

Rep ID: **PDLP\_AD3392**

### **Soundness - Justified**

The 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.

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

<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050862 Matthew Vellensworth**

Agent:

Rep ID: **PDLP\_AD3388**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050864 Leigh Milburn**

Agent:

Rep ID: **PDLP\_AD3412**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. The Local Plan seeks to meet the housing needs of Kirklees and the Spatial Development

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Paragraph/Site: **SL2170a**

Consultee: **1050937 Paul Crook**

Agent:

Rep ID: **PDLP\_AD3384**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050940 George Brunskill**

Agent:

Rep ID: **PDLP\_AD3409**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050944 Harry Crook**

Agent:

Rep ID: **PDLP\_AD3380**

### **Soundness - Justified**

The 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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<b>National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050946 Karen Crook**

Agent:

Rep ID: **PDLP\_AD3397**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050948 Beverley Stevenson**

Agent:

Rep ID: **PDLP\_AD3400**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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Paragraph/Site: **SL2170a**

Consultee: **1050951 Alan Stevenson**

Agent:

Rep ID: **PDLP\_AD3406**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050953 Cameron Irving**

Agent:

Rep ID: **PDLP\_AD3415**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050956 Emma Atkin**

Agent:

Rep ID: **PDLP\_AD3365**

### **Soundness - Justified**

The 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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<b>National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050965 Mr Guy Atkin**

Agent:

Rep ID: **PDLP\_AD3356**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050970 Miss Madison Atkin**

Agent:

Rep ID: **PDLP\_AD3404**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050974 Mr Chris Giles**

Agent:

Rep ID: **PDLP\_AD1889**

**Soundness - Positively Prepared** The council has not given sufficient weight to previous objections raised by the local community.

### 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. [Also see PDLP\_AD3353 for further comments on this site from the same consultee].

Paragraph/Site: **SL2170a**

Consultee: **1050974 Mr Chris Giles**

Agent:

Rep ID: **PDLP\_AD3353**

### Soundness - Justified

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050977 Karen Heaton**

Agent:

Rep ID: **PDLP\_AD3570**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as



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safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050979 Mrs Leonie Brunskill**

Agent:

Rep ID: **PDLP\_AD3350**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050981 Mr Gordon Dalton**

Agent:

Rep ID: **PDLP\_AD3460**

### **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 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050991 Mr Simon Senior**

Agent:

Rep ID: **PDLP\_AD3463**

### Soundness - Positively Prepared

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

### Soundness - Justified

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1050997 Dr Hazel Girvan**

Agent:

Rep ID: **PDLP\_AD3487**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1051001 Mr Christian England**

Agent:

Rep ID: **PDLP\_AD3490**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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

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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1051003 Mrs Victoria Porter**

Agent:

Rep ID: **PDLP\_AD3359**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1051008 Dr Clare McGenity**

Agent:

Rep ID: **PDLP\_AD3362**

### **Soundness - Justified**

The 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

<b>National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1053435 Matt Winterburn**

Agent:

Rep ID: **PDLP\_AD3842**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1059413 Alexander Armstrong**

Agent:

Rep ID: **PDLP\_AD1267**

**Soundness - Justified**

Inclusion of SL2170a 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 SL2170a 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. based.

**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 SL2170a 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**

Return SL2170a to Green Belt.

**Council Response**

No change. Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to

the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1059414 Michael Armstrong**

Agent:

Rep ID: **PDLP\_AD1270**

**Soundness - Justified**

Inclusion of SL2170a 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 SL2170a 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. based.

**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 SL2170a 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**

Return SL2170a to Green Belt.

**Council Response**

No change. Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1059416**

**Alison Armstrong**

Agent:

Rep ID: **PDLP\_AD1264**

**Soundness - Justified**

Inclusion of SL2170a 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 SL2170a 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.based.

**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 SL2170a 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**

Return SL2170a to Green Belt.

No change. Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1059491 Jessica Conway**

Agent:

Rep ID: **PDLP\_AD3595**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: SL2170a

Consultee: 1059684 Dick Palfrey

Agent:

Rep ID: PDLP\_AD3257

**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 (grittled) 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1059685 Gaynor Palfrey**

Agent:

Rep ID: **PDLP\_AD3260**

### 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170a**

Consultee: **1059848 Mrs Catherine Murphy**

Agent:

Rep ID: **PDLP\_AD1662**

### **Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1059849 Mr Robert Stepien**

Agent:

Rep ID: **PDLP\_AD1666**

### **Soundness - Justified**

The 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.

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

**Council Response**

No change.Site SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170a**

Consultee: **1063138 Mrs Karen Dalton**

Agent:

Rep ID: **PDLP\_AD3054**

**Soundness - Justified**

The 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 SL2170a is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170a.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to

the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **942723**

**Mr Michael Moorhouse**

Agent:

Rep ID: **PDLP\_AD3538**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **943627**

**A J Dalton**

Agent:

Rep ID: **PDLP\_AD3458**

**Soundness - Positively Prepared** Lack of consultation with local community.

**Soundness - Justified** The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as



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safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3796**

### **Soundness - Justified**

Hade Edge Methodist Chapel and the adjacent Sunday School 50 metres to the south-west of this area are Grade II Listed Buildings. By identifying this area as Safeguarded Land, 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 the absence of any assessment of the degree of harm which the development of this area of Safeguarded Land might cause to these Listed Buildings, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the identification of this area as Safeguarded Land is compatible the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.

### **Proposed Change Requested**

Before identifying this site as Safeguarded Land 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**

At a meeting on 2 nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2 nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2170b**

Consultee: **961137 Jacky Emmerton**

Agent:

Rep ID: **PDLP\_AD3375**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by

the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **961401 R Malkin**

Agent:

Rep ID: **PDLP\_AD3475**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **978506**

**Cllr Nigel Patrick**

Agent:

Rep ID: **PDLP\_AD2934**

### **Soundness - Justified**

Housing allocation sites SL2170b 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1034329**

**Mr David Pursehouse**

Agent:

Rep ID: **PDLP\_AD1994**

### **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)

### **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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees. The DTC extends beyond the Kirklees boundary. 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. 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 YWLNPA at their meeting on January 5th 2016. SD14 demonstrates how 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 YWLNPA).

Paragraph/Site: **SL2170b**

Consultee: **1042012 Mr Steve Sykes**

Agent:

Rep ID: **PDLP\_AD3654**

**Soundness - Justified**

The allocation fails to acknowledge the fundamental social, economic and environmental role this nationally recognised heritage landscape performs in line

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	with NPPF, Natural England guidance, European commission regs, Pennine Prospects objectives, Kirklees Biodiversity Action Plans (BAPs) and UK BAPs 2020.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to Green Belt.
<b>Council Response</b>	No change.Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1042984 Mr John Dalton**

Agent:

Rep ID: **PDLP\_AD2972**

**Soundness - Justified**

The 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 SL2170b is proposed as a safeguarded land site in the Local Plan. There is no evidence to suggest that this site has a willing landowner supporting development during the plan period as this safeguarded land option has been created as a result of the acceptance of option H288a in the central

part of the existing UDP safeguarded land site. There is a reasonable prospect that the site may be developed beyond the plan period therefore an accepted safeguarded land option is appropriate for this site. As this site is proposed to remain as safeguarded land, a further assessment during the next Local Plan review would be required to determine whether this site should be allocated for development at that time. 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 SL2170b. 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. 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: **SL2170b**

Consultee: **1044265 Mrs Penelope Sykes**

Agent:

Rep ID: **PDLP\_AD3648**

**Soundness - Justified**

The 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 Council Response**

Return the site to the Green Belt.

No change. Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.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: **SL2170b**

Consultee: **1049699 Christopher Heaton**

Agent:

Rep ID: **PDLP\_AD3510**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.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

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and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050170 Sarah Pursehouse**

Agent:

Rep ID: **PDLP\_AD3513**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050298 Mrs Gillian Malkin**

Agent:

Rep ID: **PDLP\_AD3479**

### **Soundness - Justified**

The 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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<b>National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050305 Ms Rachael Oaks**

Agent:

Rep ID: **PDLP\_AD3470**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050307 Mr Maximus Cunningham**

Agent:

Rep ID: **PDLP\_AD3467**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050313**

**Mrs Jacqueline Cunningham**

Agent:

Rep ID: **PDLP\_AD3455**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050316 Mr Andrew Cunningham**

Agent:

Rep ID: **PDLP\_AD3450**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050321 Mr Jack Dalton**

Agent:

Rep ID: **PDLP\_AD3447**

### **Soundness - Justified**

The 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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<b>National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050325 Miss Alice Dalton**

Agent:

Rep ID: **PDLP\_AD3444**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050339 Mr James Spencer**

Agent:

Rep ID: **PDLP\_AD3440**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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Paragraph/Site: **SL2170b**

Consultee: **1050342 Miss Lily Crook**

Agent:

Rep ID: **PDLP\_AD3437**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050351 Mrs Kathryn McGenity**

Agent:

Rep ID: **PDLP\_AD3434**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050357 Dr Philip McGenity**

Agent:

Rep ID: **PDLP\_AD3525**

### **Soundness - Justified**

The 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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<b>National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050361 Miss Alice McGenity**

Agent:

Rep ID: **PDLP\_AD3521**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050434 Mr Alan Battye**

Agent:

Rep ID: **PDLP\_AD3645**

**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 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**

Return of SL2170b to Green Belt.

**Council Response**

No change. Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050437 Harold & Rita Battye**

Agent:

Rep ID: **PDLP\_AD2357**

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<b>Soundness - Positively Prepared</b>	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.
<b>Soundness - Justified</b>	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.
<b>Proposed Change Requested</b>	Removal of H288a from the Local Plan. Return of H288a, SL2170A and SL2170b to Green Belt.
<b>Council Response</b>	No change. Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050443**

**Mr Nicholas Shaw**

Agent:

Rep ID: **PDLP\_AD3482**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change. Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050452 Dr Barbara Shaw**

Agent:

Rep ID: **PDLP\_AD3485**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050469 Steve Baker**

Agent:

Rep ID: **PDLP\_AD3518**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050781 Pamela Moorhouse**

Agent:

Rep ID: **PDLP\_AD3507**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050782 Edward Dalton**

Agent:

Rep ID: **PDLP\_AD3504**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050783 Ben Wardill**

Agent:

Rep ID: **PDLP\_AD3498**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

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

Agent:

Rep ID: **PDLP\_AD3501**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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



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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050788 Denise Kersey**

Agent:

Rep ID: **PDLP\_AD3495**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050793 Anna Rowland**

Agent:

Rep ID: **PDLP\_AD3568**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050798 Alan Linton**

Agent:

Rep ID: **PDLP\_AD3565**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

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plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050803 Cllr Kenneth Sims**

Agent:

Rep ID: **PDLP\_AD3664**

### **Soundness - Justified**

Housing allocation sites SL2170b 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050805 Cllr Donald Firth**

Agent:

Rep ID: **PDLP\_AD3663**

### **Soundness - Justified**

Housing allocation sites SL2170b 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050807 John Whitford**

Agent:

Rep ID: **PDLP\_AD3557**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050809 Dorothy Sykes**

Agent:

Rep ID: **PDLP\_AD3562**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050811 David Porter**

Agent:

Rep ID: **PDLP\_AD3554**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050813 Helen Heaton**

Agent:

Rep ID: **PDLP\_AD3548**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050814 Edward Moorhouse**

Agent:

Rep ID: **PDLP\_AD3551**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050816 Paul Palmer**

Agent:

Rep ID: **PDLP\_AD3545**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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



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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050818 Judith Palmer**

Agent:

Rep ID: **PDLP\_AD3541**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050820 Martin Antinori**

Agent:

Rep ID: **PDLP\_AD3531**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050824 Joanne Appleyard**

Agent:

Rep ID: **PDLP\_AD3534**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

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Paragraph/Site: **SL2170b**

Consultee: **1050827 Paul Mcgenity**

Agent:

Rep ID: **PDLP\_AD3528**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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Paragraph/Site: **SL2170b**

Consultee: **1050831 Caroline Kennett**

Agent:

Rep ID: **PDLP\_AD3428**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050833 Thomas Craggs**

Agent:

Rep ID: **PDLP\_AD3431**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050834 Nick Kennett**

Agent:

Rep ID: **PDLP\_AD3329**

### **Soundness - Justified**

The 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

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

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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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050835 Valerie Parkin**

Agent:

Rep ID: **PDLP\_AD3425**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

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Paragraph/Site: **SL2170b**

Consultee: **1050837 Robert Heaton**

Agent:

Rep ID: **PDLP\_AD3422**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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Paragraph/Site: **SL2170b**

Consultee: **1050839 Helen Craggs**

Agent:

Rep ID: **PDLP\_AD3419**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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



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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050842 Monica Bowden**

Agent:

Rep ID: **PDLP\_AD3348**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050844 Josephine Shaw**

Agent:

Rep ID: **PDLP\_AD3378**

### **Soundness - Justified**

The 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

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

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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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050846 Matthew Milburn**

Agent:

Rep ID: **PDLP\_AD3345**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

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Paragraph/Site: **SL2170b**

Consultee: **1050849 John Lloyd**

Agent:

Rep ID: **PDLP\_AD3342**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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Paragraph/Site: **SL2170b**

Consultee: **1050851 David Craggs**

Agent:

Rep ID: **PDLP\_AD3339**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050855 David Lloyd**

Agent:

Rep ID: **PDLP\_AD3368**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050856 Mandy Lloyd**

Agent:

Rep ID: **PDLP\_AD3372**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050858 James Charlton**

Agent:

Rep ID: **PDLP\_AD3395**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050860 Helen Vellensworth**

Agent:

Rep ID: **PDLP\_AD3393**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050862 Matthew Vellensworth**

Agent:

Rep ID: **PDLP\_AD3389**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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



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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050864 Leigh Milburn**

Agent:

Rep ID: **PDLP\_AD3413**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050937 Paul Crook**

Agent:

Rep ID: **PDLP\_AD3385**

### **Soundness - Justified**

The 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

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

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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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050940**

**George Brunskill**

Agent:

Rep ID: **PDLP\_AD3410**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

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Paragraph/Site: **SL2170b**

Consultee: **1050944 Harry Crook**

Agent:

Rep ID: **PDLP\_AD3382**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050946 Karen Crook**

Agent:

Rep ID: **PDLP\_AD3398**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050948 Beverley Stevenson**

Agent:

Rep ID: **PDLP\_AD3401**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050951 Alan Stevenson**

Agent:

Rep ID: **PDLP\_AD3407**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050953 Cameron Irving**

Agent:

Rep ID: **PDLP\_AD3416**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a

plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050956 Emma Atkin**

Agent:

Rep ID: **PDLP\_AD3366**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050965 Mr Guy Atkin**

Agent:

Rep ID: **PDLP\_AD3357**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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



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including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050970 Miss Madison Atkin**

Agent:

Rep ID: **PDLP\_AD3405**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1050974 Mr Chris Giles**

Agent:

Rep ID: **PDLP\_AD1890**

**Soundness - Positively Prepared**

The council has not given sufficient weight to previous objections raised by the local community.

**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.[Also see PDLP\_AD3354 for further comments on this site from the same consultee].

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Paragraph/Site: **SL2170b**

Consultee: **1050974 Mr Chris Giles**

Agent:

Rep ID: **PDLP\_AD3354**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050977 Karen Heaton**

Agent:

Rep ID: **PDLP\_AD3571**

### **Soundness - Justified**

The 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.

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

### Council Response

No change. Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050979 Mrs Leonie Brunskill**

Agent:

Rep ID: **PDLP\_AD3351**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development

upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050981 Mr Gordon Dalton**

Agent:

Rep ID: **PDLP\_AD3461**

**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 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050991 Mr Simon Senior**

Agent:

Rep ID: **PDLP\_AD3464**

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

**Soundness - Justified** The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1050997 Dr Hazel Girvan**

Agent:

Rep ID: **PDLP\_AD3488**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1051001 Mr Christian England**

Agent:

Rep ID: **PDLP\_AD3491**

### **Soundness - Justified**

The 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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<b>National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1051003 Mrs Victoria Porter**

Agent:

Rep ID: **PDLP\_AD3360**

<b>Soundness - Justified</b>	The 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.
<b>Soundness - Consistent with National Policy</b>	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).
<b>Proposed Change Requested</b>	Return the site to the Green Belt.
<b>Council Response</b>	No change.Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1051008 Dr Clare McGenity**

Agent:

Rep ID: **PDLP\_AD3363**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1053435 Matt Winterburn**

Agent:

Rep ID: **PDLP\_AD3843**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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

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and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. It is appropriate for the Local Plan process to consider the allocation of this land as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1059413**

**Alexander Armstrong**

Agent:

Rep ID: **PDLP\_AD1268**

### **Soundness - Justified**

Inclusion of SL2170b 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 SL2170b 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 SL2170b 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**

Return SL2170b to Green Belt.

### **Council Response**

No change.Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**Consultee: **1059414 Michael Armstrong**

Agent:

Rep ID: **PDLP\_AD1271****Soundness - Justified**

Inclusion of SL2170b 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 SL2170b 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 SL2170b 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**

Return SL2170b to Green Belt

No change. Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**Consultee: **1059416 Alison Armstrong**

Agent:

Rep ID: **PDLP\_AD1265****Soundness - Justified**

Inclusion of SL2170b 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

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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 SL2170b 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 SL2170b 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**

Return SL2170b to Green Belt.

No change. Site SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1059491 Jessica Conway**

Agent:

Rep ID: **PDLP\_AD3596**

**Soundness - Justified**

The 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

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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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1059684 Dick Palfrey**

Agent:

Rep ID: **PDLP\_AD3258**

### 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

- 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

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**National Policy** 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1059685 Gaynor Palfrey**

Agent:

Rep ID: **PDLP\_AD3261**

**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

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(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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

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Paragraph/Site: **SL2170b**

Consultee: **1059848**

**Mrs Catherine Murphy**

Agent:

Rep ID: **PDLP\_AD1663**

### Soundness - Justified

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic

environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1059849 Mr Robert Stepien**

Agent:

Rep ID: **PDLP\_AD1667**

**Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b. Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29. 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



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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 as safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2170b**

Consultee: **1063138 Mrs Karen Dalton**

Agent:

Rep ID: **PDLP\_AD3055**

### **Soundness - Justified**

The 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 SL2170b is allocated as Provisional Open Land (safeguarded land) in the Kirklees Unitary Development Plan and is proposed as safeguarded land 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 SL2170b.Historic England and the Council have agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.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 as

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safeguarded land to assist in meeting the future housing needs of Kirklees.

Paragraph/Site: **SL2187**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3797**

### **Soundness - Justified**

This site would involve the loss of an open space within the Wooldale Conservation Area. The Methodist Free Church at the site's south-eastern edge is a Grade II Listed Building. By identifying this area as Safeguarded Land, 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 identifying this site as Safeguarded Land 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. At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that Safeguarded land sites are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is subsequently undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent local plan review, then a heritage impact assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then Policy PLP35 will provide appropriate mitigation. Furthermore, a heritage impact assessment would be required for safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2189**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3798**

### **Soundness - Justified**

This site includes 191 Huddersfield Road which is a Grade II Listed Building. By identifying this area as Safeguarded Land, 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 the absence of any assessment of the degree of harm which the development of this area of Safeguarded Land might cause to this Listed Building, 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 identification of this area as Safeguarded Land is compatible the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.

### **Proposed Change Requested**

Before identifying this site as Safeguarded Land 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. At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of

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safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2191**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3799**

### **Soundness - Justified**

Development of this site could affect the setting of the Holmfirth Conservation Area. By identifying this area as Safeguarded Land, 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. In the absence of any assessment of the degree of harm which the development of this area of Safeguarded Land 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 identification of this area as Safeguarded Land 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 identifying this site as Safeguarded Land 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. At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that Safeguarded land sites are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is subsequently undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent local plan review, then a heritage impact assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then Policy PLP35 will provide appropriate mitigation. Furthermore, a heritage impact assessment would be required for safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2191**

Consultee: **978506 Cllr Nigel Patrick**

Agent:

Rep ID: **PDLP\_AD2928**

### **Soundness - Justified**

Roads to the site are inadequate, single track, steep, poor camber and there is no suitable road in or out and no infrastructure plans in place or planned. It is unbelievable to think that site could be evidenced on suitability from a highways perspective and this site along with others raises questions about the accuracy of the highways assessments. Would encourage the Planning Inspector to look at some of these sites. The evidence for school places has not been calculated properly. It is a gross under estimation.

### **Proposed Change Requested**

Reduce the number of housing allocation sites (H and SL), but in addition the Planning Inspector might also consider changing the status of some of the

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

housing allocation sites to 'safeguarded'. 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. CIL raised locally can then be used to bring this junction to the required standard.

### Council Response

No change. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The Highways assessment of the site acknowledges that the local highway network is unsuitable. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local 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: **SL2191**

Consultee: **1050803**

**Cllr Kenneth Sims**

Agent:

Rep ID: **PDLP\_AD3662**

### Soundness - Justified

Roads to the site are inadequate, single track, steep, poor camber and there is no suitable road in or out and no infrastructure plans in place or planned. It is unbelievable to think that site could be evidenced on suitability from a highways perspective and this site along with others raises questions about the accuracy of the highways assessments. Would encourage the Planning Inspector to look at some of these sites. The evidence for school places has not been calculated properly. It is a gross under estimation.

### Proposed Change Requested

Reduce the number of housing allocation sites (H and SL), but in addition the Planning Inspector might also consider changing the status of some of the housing allocation sites to 'safeguarded'. 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. CIL raised locally can then be used to bring this junction to the required standard.

### Council Response

No change. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The Highways assessment of the site acknowledges that the local highway network is unsuitable. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local 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: **SL2191**

Consultee: **1050805**

**Cllr Donald Firth**

Agent:

Rep ID: **PDLP\_AD3661**

### Soundness - Justified

Roads to the site are inadequate, single track, steep, poor camber and there is no suitable road in or out and no infrastructure plans in place or planned. It is unbelievable to think that site could be evidenced on suitability from a highways perspective and this site along with others raises questions about the accuracy of the highways assessments. Would encourage the Planning Inspector to look at some of these sites. The evidence for school places has not been calculated properly. It is a gross under estimation.

### Proposed Change Requested

Reduce the number of housing allocation sites (H and SL), but in addition the Planning Inspector might also consider changing the status of some of the housing allocation sites to 'safeguarded'. 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. CIL raised locally can then be used to bring this junction to the required standard.

### Council Response

No change. The site has been assessed in accordance with BP23 - Local Plan Methodology Part 2. The Highways assessment of the site acknowledges that the local highway network is unsuitable. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local 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: **SL3359**

Consultee: **942846**

**Carolyn Newton**

Agent:

Rep ID: **PDLP\_AD3215**

### Soundness - Justified

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

### Soundness - Consistent with National Policy

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

### Proposed Change Requested

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

### Council Response

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **943847**

**Mrs Sally Barber**

Agent:

Rep ID: **PDLP\_AD2336**

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

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<b>Soundness - Positively Prepared</b>	Housing in this area is located away from employment opportunities.
<b>Soundness - Justified</b>	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.
<b>Soundness - Consistent with National Policy</b>	Impact on highways and character is contrary to policies set out in NPPF.
<b>Proposed Change Requested</b>	Remove the site from the plan
<b>Council Response</b>	<p>No change. The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Although this site is currently open, it is not within the green belt and is therefore not subject to the consideration of openness as set out in national planning policy in relation to green belt. This site was designated as safeguarded land in the Unitary Development Plan. This site has been assessed using the Council's site allocations methodology and supporting evidence includes the Sustainability Appraisal and settlement appraisal which provide up to date evidence indicating that this site is in a sustainable location. Site H297 has been accepted as a housing allocation as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative only and the actual capacity will be determined through the planning application process in accordance with Local Plan Policy PLP7 (SD, Strategy and Policies, page 47) once adopted which allows lower density development in certain circumstances. The Local Plan is supported by an Infrastructure Delivery Plan which sets out the required Infrastructure to support the spatial strategy outlined in the Local Plan. Highways assessment has shown that the site can be accessed and that the local highway links are acceptable. Consideration has been given to the previous planning appeal on this site but the site has been assessed as acceptable in highways terms under the current national planning policy framework. The Local Plan (SD1, Strategy and Policies, page 104) supports sustainable travel through Policy PLP 20 (Sustainable travel). The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Greenfield run-off rates will be required to manage surface water from this site in accordance with the local plan policies once adopted. 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. 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. At present there is no Neighbourhood Plan within this area to take into account in plan making. A Local Green Space option (LocGS2721) which covered the whole existing UDP Provisional Open Land site was rejected because when assessed against the Local Green Space criteria it is not demonstrably special and does not therefore merit designation as Local Green Space (see option LocGS2721). Further individual Local Green Space options have been created as a result of representations for the discrete areas of land covered by sites H297 (LocGS3449), H597 (LocGS3450) and SL3359 (LocGS3451) and these are set out in SD30 (New Site Options Report). 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 playground referred to is located on Ryecroft Lane, between sites H297 and SL3359. As such, it is not proposed to remove the playground as part of the Local Plan. Dobroyd Mills is situated within an accepted mixed use allocation (MX1912a) within the Publication Draft Local Plan. It has, therefore, been fully considered as part of the site allocation process. 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</p>

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the existing network by providing connecting links where appropriate.

Paragraph/Site: **SL3359**

Consultee: **943932 Mr Michael Howarth-Coyne**

Agent:

Rep ID: **PDLP\_AD1932**

**Soundness - Positively Prepared** Use brownfield sites first and use empty homes.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. Additional comments made relate to increased noise, air and light pollution, need to increase policing in the village, lack of recreation facilities, developments will not help biodiversity or geodiversity in the village, lack of gritting local roads, a Neighbourhood Plan should be prepared for the area.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space. Additional comments made relate to the site not being in conformity with NPPF paragraph 12 (core planning principles).

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. The 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 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. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option.

Paragraph/Site: **SL3359**

Consultee: **944355 Dianne Hirst**

Agent:

Rep ID: **PDLP\_AD1935**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **944393 James A Hirst**

Agent:

Rep ID: **PDLP\_AD1913**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>944394</b>	<b>E Mitchell</b>	Agent:	Rep ID: <b>PDLP_AD1880</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>944651</b>	<b>Mr Simon E Cave</b>	Agent:	Rep ID: <b>PDLP_AD3000</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>944666</b>	<b>Mrs Jayne Andrews</b>	Agent:	Rep ID: <b>PDLP_AD1848</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>944670</b>	<b>Mr W E Booth</b>	Agent:	Rep ID: <b>PDLP_AD2283</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>944679</b>	<b>Mr Howard J Chadwick</b>	Agent:	Rep ID: <b>PDLP_AD2594</b>
<b>Soundness - Positively Prepared</b>	Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for housing.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			

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**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for housing. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Paragraph/Site: **SL3359**

Consultee: **944684**

**Mr Gerry Murray**

Agent:

Rep ID: **PDLP\_AD1894**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **944803**

**Mr Michael Howden**

Agent:

Rep ID: **PDLP\_AD2551**

**Soundness - Positively Prepared**

Empty homes in Kirklees should be filled before allocating greenfield sites for housing. Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for housing. Scale of proposed development disproportionate to the size of the village. A smaller proposal for housing in the locality was refused 20 years ago.

**Proposed Change Requested**

The site should not be built upon.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. The empty homes in Kirklees should be filled before allocating greenfield sites for housing. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for housing. 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



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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.Reference to historic refused planning application [94/62/94132/W3?]Proposed allocations and planning applications are assessed against current national planning policy.The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.

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Paragraph/Site: **SL3359** Consultee: **944805 Elaine Mason** Agent: Rep ID: **PDLP\_AD2761**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **944807 Mrs L M Stanley** Agent: Rep ID: **PDLP\_AD2193**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **944816 Mr Mark Fisher** Agent: Rep ID: **PDLP\_AD2153**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **944860 Mr R Sherwell** Agent: Rep ID: **PDLP\_AD2575**

**Soundness - Positively Prepared** Scale of proposed development is disproportionate to the size of the village. The council has not searched out the most suitable sites and spread them evenly throughout the area. The council has not given enough weight to objections raised by local residents.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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

### Council Response

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. The council hasn't fully considered possible alternative sites. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. The council hasn't given sufficient weight to previous objections raised by the local community. 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: **SL3359**

Consultee: **945018**

**Miss Mary Mullan**

Agent:

Rep ID: **PDLP\_AD3167**

### Soundness - Justified

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

### Soundness - Consistent with National Policy

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

### Proposed Change Requested

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

### Council Response

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **945623**

**Carolyn Walker**

Agent:

Rep ID: **PDLP\_AD3053**

### Soundness - Positively Prepared

The scale of development proposed is disproportionate to the size of the village. Empty homes should be filled before building on greenfield sites.

### Soundness - Justified

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

### Soundness - Consistent with National Policy

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

### Proposed Change Requested

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

### Council Response

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no

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

exceptional circumstances for the site boundaries to be amended to add this land to the green belt. The empty homes in Kirklees should be filled before allocating greenfield sites for housing. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average.

Paragraph/Site: **SL3359**

Consultee: **948129**

**Ms M L Newsome**

Agent:

Rep ID: **PDLP\_AD3067**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **950948**

**mr dom green**

Agent:

Rep ID: **PDLP\_AD3516**

**Soundness - Positively Prepared**

Proposed mix of housing is not appropriate.

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space. Reduce proposed number of houses in plan to less than 20. Increase school provision and improve local infrastructure.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: The Infrastructure Delivery Plan (IDP) for the Kirklees District supports the delivery of the Local Plan. The analysis and conclusions within the IDP assess the suitability of infrastructure provision and the extent to which existing infrastructure will be 'fit for purpose' against the land requirements to deliver objectively assessed housing and employment needs. 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 proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.

Paragraph/Site: **SL3359**

Consultee: **954030**

**Mr Stephen Frost**

Agent:

Rep ID: **PDLP\_AD1855**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **954035**

**Mrs Cath Laurs**

Agent:

Rep ID: **PDLP\_AD2567**

**Soundness - Positively Prepared**

Scale of proposed development disproportionate to size of village. Reference to refused (housing) planning application 20 years ago. Other, more suitable, sites have not been allocated. Empty homes should be filled before allocating greenfield sites for housing. Brownfield sites should be redeveloped before

allocating greenfield sites for housing. The proposed development at Dobroyd Mills (which will increase the number of new homes in the area) hasn't been considered within the Local Plan. The Local Plan favours North Kirklees over South Kirklees in terms of spending on infrastructure. The council has made it difficult for residents to comment on the proposals and has acted against the will of the people.

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Reference to historic refused planning application [94/62/94132/W3?]. Proposed allocations and planning applications are assessed against current national planning policy. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. Other, more suitable, sites have not been allocated. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. Empty homes should be filled before allocating greenfield sites for housing. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. Brownfield sites should be redeveloped before allocating greenfield sites for housing. 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 proposed development at Dobroyd Mills (which will increase the number of new homes in the area) hasn't been considered within the Local Plan. Dobroyd Mills is situated within an accepted mixed use allocation (MX1912a) within the Publication Draft Local Plan. It has, therefore, been fully considered as part of the site allocation process. The Local Plan favours North Kirklees over South Kirklees in terms of spending on infrastructure. The Infrastructure Delivery Plan (IDP) for the Kirklees District supports the delivery of the Local Plan. The analysis and conclusions within the IDP assess the suitability of infrastructure provision and the extent to which existing infrastructure will be 'fit for purpose' against the land requirements to deliver objectively assessed housing and employment needs. Significant infrastructure

improvements are proposed within North Kirklees to support the anticipated growth in this area. The council has made it difficult for residents to comment on the proposals and has acted against the will of the people. 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.

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Paragraph/Site: **SL3359**

Consultee: **954035 Mrs Cath Laurs**

Agent:

Rep ID: **PDLP\_AD3641**

**Soundness - Positively Prepared** -There are 8,500 empty homes in Huddersfield - these properties should be used before greenfield/green belt land is used. -Brownfield sites should be used first and greenbelt when there is absolutely no alternative.

**Soundness - Justified** - Generation of at least 300+ cars and associated traffic. - No visitor parking. - All 7 roads into Scholes Village have safety issues. - The roads around Scholes are already congested, due to them being too narrow. - Difficult for emergency vehicles to get through. - There is no access to trains, therefore there will be a need for extra buses and use of cars. - There are limited employment opportunities in the area. - The extra housing will constitute a 25% increase in the size of the village. - There are other areas that are far more suitable for development. - Grazing land will be lost. - Wildlife habitats will be lost. - Noise, pollution and traffic detrimental to Local Wildlife Sites. - Open aspect of the village will be lost. - Visual impact of the proposed development, not in keeping with the character of Scholes. - Impact on schools, dentists and GP's. - Can the drainage systems cope? - Will the children's play area on Ryecroft Lane be lost?

**Council Response**

No change. The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Although this site is currently open, it is not within the green belt and is therefore not subject to the consideration of openness as set out in national planning policy in relation to green belt. This site was designated as safeguarded land in the Unitary Development Plan. This site has been assessed using the Council's site allocations methodology and supporting evidence includes the Sustainability Appraisal and settlement appraisal which provide up to date evidence indicating that this site is in a sustainable location. Site H297 has been accepted as a housing allocation as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative only and the actual capacity will be determined through the planning application process in accordance with Local Plan Policy PLP7 (SD, Strategy and Policies, page 47) once adopted which allows lower density development in certain circumstances. The Local Plan is supported by an Infrastructure Delivery Plan which sets out the required Infrastructure to support the spatial strategy outlined in the Local Plan. Highways assessment has shown that the site can be accessed and that the local highway links are acceptable. Consideration has been given to the previous planning appeal on this site but the site has been assessed as acceptable in highways terms under the current national planning policy framework. The Local Plan (SD1, Strategy and Policies, page 104) supports sustainable travel through Policy PLP 20 (Sustainable travel). The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth. Greenfield run-off rates will be required to manage surface water from this site in accordance with the local plan policies once adopted. 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. 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. At present there is no Neighbourhood Plan within this area to take into account in plan making. A Local Green Space option (LocGS2721) which covered the whole existing UDP Provisional Open Land site was rejected because when assessed against the Local Green Space criteria it is not demonstrably special and does not therefore merit designation as Local Green Space (see option LocGS2721). Further individual Local Green Space options have been created as a result of representations for the discrete areas of land covered by sites H297 (LocGS3449), H597 (LocGS3450) and SL3359 (LocGS3451) and these are set out in SD30 (New Site Options Report). There were no comments from specific technical consultees through the site allocations process in relation to impacts on Morton Wood Local Wildlife Site which is to the south-east of Scholes village. Site H297 is to the west of the village. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant

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(at 2015) which is slightly higher than the national average. 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 playground referred to is located on Ryecroft Lane, between sites H297 and SL3359. As such, it is not proposed to remove the playground as part of the Local Plan.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 appropriateA quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option.

Paragraph/Site: <b>SL3359</b>	Consultee: <b>954084 Miss Charlotte Boorman</b>	Agent:	Rep ID: <b>PDLP_AD2461</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>954091 Mr Eric Barlow</b>	Agent:	Rep ID: <b>PDLP_AD3043</b>
<b>Soundness - Positively Prepared</b>	The council hasn't fully considered and acted upon previous objections to the Local Plan.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.Consultation process 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: <b>SL3359</b>	Consultee: <b>954128 Mrs Carmel Boorman</b>	Agent:	Rep ID: <b>PDLP_AD3206</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		

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

<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>954417 Mrs J. Lofthouse</b>	Agent:	Rep ID: <b>PDLP_AD2894</b>
<b>Soundness - Positively Prepared</b>	Brownfield sites should be redeveloped before allocating greenfield sites for new housing.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. Additionally: The Local Plan has not taken into account the number of new homes that have been built in Scholes over the last 15 years.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for housing. 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 Local Plan has not taken into account the number of new homes that have been built in Scholes over the last 15 years. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>954671 Ms Heather Wood</b>	Agent:	Rep ID: <b>PDLP_AD3240</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>955802 Mrs Rhiannon Owens</b>	Agent:	Rep ID: <b>PDLP_AD2075</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for		

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**National Policy** the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **956151 MRS LINDA EASTWOOD** Agent: Rep ID: **PDLP\_AD2163**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **956323 Miss Katie Hollingworth** Agent: Rep ID: **PDLP\_AD2299**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **956531 Maureen Buckley** Agent: Rep ID: **PDLP\_AD2779**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **956582 MR ROGER SNOW** Agent: Rep ID: **PDLP\_AD3149**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **956608 miss Claire Brearley** Agent: Rep ID: **PDLP\_AD2278**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for



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<b>National Policy</b>	the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.

Paragraph/Site: **SL3359** Consultee: **956659 Ms. Heidi Ottiger** Agent: Rep ID: **PDLP\_AD2743**

<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village.
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. Additionally, other sites have not been adequately searched for.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space. Widen the roads (although this may not be possible), consider other sites diligently, increase the capacity in local schools, ensure development does not proceed at a rapid pace and make a more moderate increase in the size of the village.

**Council Response**  
 As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. The council hasn't fully considered possible alternative sites. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.

Paragraph/Site: **SL3359** Consultee: **956776 Mr Geoffrey Daniel** Agent: Rep ID: **PDLP\_AD2815**

<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.

Paragraph/Site: **SL3359** Consultee: **956820 Mr David Brennan** Agent: Rep ID: **PDLP\_AD2456**

<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17. 28. 30. 34. 38. 72. 76. 77. 55. 109. 157 therein. Regarding this, there is support for

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<b>National Policy</b>	the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>956854 Mr Hobson</b> Agent: Rep ID: <b>PDLP_AD2680</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>957082 Maggie Biggs</b> Agent: Rep ID: <b>PDLP_AD2685</b>
<b>Soundness - Positively Prepared</b>	Brownfield sites should be used for new homes, before allocating green sites. Smaller homes for older people would be more appropriate in Scholes than larger 'executive' homes.
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Develop brownfield sites first The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. Housing mix The Publication Draft Local Plan (paragraph 8.29) recognises that 'it is important to achieve a mix of housing in terms of size, type, tenure and suitability for specific groups of people to contribute to meeting local needs and contribute to sustainable development in accordance with national planning policy'. The housing mix for a particular site will be determined at planning application stage, with reference to Policy PLP 11 Housing Mix and Affordable Housing of the Local Plan.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>957269 Mr Mark Williams</b> Agent: Rep ID: <b>PDLP_AD3197</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163,

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PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**Consultee: **957325 Mr John Townsend**

Agent:

Rep ID: **PDLP\_AD3133****Soundness - Positively Prepared** Concerned that the council hasn't fully considered alternative sites.**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.Paragraph/Site: **SL3359**Consultee: **957366 Mr John M Ainley**

Agent:

Rep ID: **PDLP\_AD2888****Soundness - Positively Prepared** Scale of proposed development is disproportionate to the size of Scholes.**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.Paragraph/Site: **SL3359**Consultee: **957520 Mrs Monique Brennan**

Agent:

Rep ID: **PDLP\_AD2464****Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.Paragraph/Site: **SL3359**Consultee: **957548 Jean Dobrowski**

Agent:

Rep ID: **PDLP\_AD3004**

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<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.

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Paragraph/Site: **SL3359** Consultee: **957812 Miss Anna Priestley** Agent: Rep ID: **PDLP\_AD3190**

<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.

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Paragraph/Site: **SL3359** Consultee: **958051 Alan Hinchcliffe** Agent: Rep ID: **PDLP\_AD2980**

<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.

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Paragraph/Site: **SL3359** Consultee: **958498 Derek Marshall** Agent: Rep ID: **PDLP\_AD1058**

<b>Soundness - Justified</b>	The plan is unsound as regards the evidence on which it is based. Supports the detailed representations being made by Scholes Future Group. Building would be on a greenfield site. More housing in Scholes would result in the village becoming gridlocked, accidents inevitable and the infrastructure severely compromised. The village cannot cope with more traffic due to the narrowness of the main road through Scholes, which together with the volume of traffic causes disruption and difficulties for both drivers and pedestrians. Local infrastructure cannot cope with more traffic. New development at St Georges Working Mens Club has created driving and parking problems. The junction at the Boot and Shoe PH and adjacent area gets severely congested. St Georges Rd is very narrow and mostly has no pavement. Some of the area in Jackson Bridge is not paved and the hill that drops into Jackson Bridge causes driving difficulty when two vehicles are trying to pass. Paris is not paved and only passable by a single vehicle and Cinderhills Road is already hazardous due its narrowness. During snowfalls and ice in winter there are major parking and driving problems as owners leave their vehicles on the main roads and residents cannot access the developments at Ryfields, Whitewells, Wickledon Gate. More vehicles would be irresponsible. An increase of nearly 30% to the current housing would adversely impact on the village identity and rural character. Plans for 91 homes in the village twenty years ago was rejected on the grounds " it would be incompatible with the size, character and setting of Scholes ". Village services, such as drainage and the school, would become strained and there are no plans to improve the infrastructure or the school (which is already oversubscribed) for at least 15 years.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to reflect NPPF policies, specifically paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109 and 157.
<b>Proposed Change Requested</b>	Designate sites H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. These sites were designated as safeguarded land in the

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Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.

Paragraph/Site: **SL3359**

Consultee: **958590 Kathryn Winnard**

Agent:

Rep ID: **PDLP\_AD2900**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **958675 Richard & Sandra Worsnup**

Agent:

Rep ID: **PDLP\_AD2858**

**Soundness - Positively Prepared**

Scale of proposed development is disproportionate to the size of the village. Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for new housing.

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for new housing. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

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

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Paragraph/Site: <b>SL3359</b>	Consultee: <b>959052</b>	<b>Rebecca Gilmartin</b>	Agent:	Rep ID: <b>PDLP_AD2376</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

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Paragraph/Site: <b>SL3359</b>	Consultee: <b>959325</b>	<b>Paul Webster</b>	Agent:	Rep ID: <b>PDLP_AD1523</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

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Paragraph/Site: <b>SL3359</b>	Consultee: <b>959444</b>	<b>Michael Battye</b>	Agent:	Rep ID: <b>PDLP_AD2546</b>
<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village. Concern that consultees are not being listened to.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Concern that consultees are not being listened to. 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.			

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Paragraph/Site: <b>SL3359</b>	Consultee: <b>959466</b>	<b>Carol Swallow</b>	Agent:	Rep ID: <b>PDLP_AD1896</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163.			

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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **959517 Andrew Wild** Agent: Rep ID: **PDLP\_AD2118**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **959521 Philip Rostron** Agent: Rep ID: **PDLP\_AD2186**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **959814 Simon Powell** Agent: Rep ID: **PDLP\_AD3235**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **959816 Mr Sydney Haworth** Agent: Rep ID: **PDLP\_AD2846**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **959883 Tim Pickup** Agent: Rep ID: **PDLP\_AD3009**

**Soundness - Positively Prepared** Scale of development is disproportionate to the size of the village.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.

Paragraph/Site: **SL3359** Consultee: **960171 Christopher Simpson** Agent: Rep ID: **PDLP\_AD2083**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **960649 Mr Howard Topham** Agent: Rep ID: **PDLP\_AD2302**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **960691 Frank Dickin** Agent: Rep ID: **PDLP\_AD2776**

**Soundness - Positively Prepared** Reference made to historic refused planning application for '80 houses in the same area' [94/62/94132/W3?].

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Proposed allocations and planning applications are assessed against current national planning policies.

Paragraph/Site: **SL3359** Consultee: **960724 June Snow** Agent: Rep ID: **PDLP\_AD3021**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,



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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **960739 F Small** Agent: Rep ID: **PDLP\_AD3061**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **960958 Cheryl Burgess** Agent: Rep ID: **PDLP\_AD1539**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **961430 Mr PETER BOOTH** Agent: Rep ID: **PDLP\_AD2945**

**Soundness - Positively Prepared** Scale of proposed development is disproportionate to the size of the village. Brownfield sites should be redeveloped before allocating greenfield sites for new homes.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for housing. 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

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sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Paragraph/Site: **SL3359**

Consultee: **961576 Mrs Jackie Green**

Agent:

Rep ID: **PDLP\_AD2182**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **961613 Mr David Brignell**

Agent:

Rep ID: **PDLP\_AD2088**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **961654 Neil Haworth**

Agent:

Rep ID: **PDLP\_AD2800**

**Soundness - Positively Prepared**

Scale of proposed development is disproportionate to the size of the village.

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.

Paragraph/Site: **SL3359**

Consultee: **961691 Martin Woods**

Agent:

Rep ID: **PDLP\_AD2417**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,

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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **961695 Garnet Heller** Agent: Rep ID: **PDLP\_AD2554**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **961810 Jean Lawton** Agent: Rep ID: **PDLP\_AD3024**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **961883 Mrs J Greenway** Agent: Rep ID: **PDLP\_AD1833**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **962206 Peter Smith** Agent: Rep ID: **PDLP\_AD2994**

**Soundness - Positively Prepared** Scale of proposed development is disproportionate to the size of the village.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.

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Paragraph/Site: <b>SL3359</b>	Consultee: <b>962210 Philip Murat</b>	Agent:	Rep ID: <b>PDLP_AD2983</b>
<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village. Construction process will be disruptive and dangerous.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. Additionally: Specific reference to inadequate play area / space for children to exercise.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Concern that the construction process will be disruptive and dangerous. As part of the planning application process, consideration will be given to the need for developers to produce a site-specific Construction Management Plan. Concern regarding the loss of play area within Scholes A playground is located on Ryecroft Lane, between sites H297 and SL3359. It is not proposed to remove the playground as part of the Local Plan.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>962296 Mr Rob Laurs</b>	Agent:	Rep ID: <b>PDLP_AD2722</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>963303 Mr David Crowther</b>	Agent:	Rep ID: <b>PDLP_AD3074</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>963455 Jane Trumbell</b>	Agent:	Rep ID: <b>PDLP_AD2101</b>
<b>Soundness - Positively Prepared</b>	There are many empty houses in Kirklees; there is no need to build more.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for		

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**National Policy** the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average.

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Paragraph/Site: **SL3359** Consultee: **963736** **Malcolm Mason** Agent: Rep ID: **PDLP\_AD2897**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **963827** **Lindsey Crowther** Agent: Rep ID: **PDLP\_AD3058**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **963848** **Mr C. R. Hutchesson** Agent: Rep ID: **PDLP\_AD2481**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **964205** **Dr Lucy Douglas** Agent: Rep ID: **PDLP\_AD3012**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **964384** **Charles Firbank** Agent: Rep ID: **PDLP\_AD2694**

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**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space. Correct the issues identified from the relevant paragraphs of the NPPF.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **964710 John Watson** Agent: Rep ID: **PDLP\_AD2855**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **965001 Mrs Beverley Firbank** Agent: Rep ID: **PDLP\_AD2644**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space. Allocate 'The Drill Hall', Huddersfield Road, Holmfirth as a housing site.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. 'The Drill Hall' is situated within an allocated Priority Employment Area, KR10.

Paragraph/Site: **SL3359** Consultee: **965312 Ms F C Taylor** Agent: Rep ID: **PDLP\_AD3098**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **965355 Mr A Symms** Agent: Rep ID: **PDLP\_AD2950**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. Additionally: The Local Plan does not contain a reasoned justification of the policies contained within it.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Each policy within the Publication Draft Local Plan is

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followed by a reasoned Policy Justification.

Paragraph/Site: <b>SL3359</b>	Consultee: <b>965357</b>	<b>Mrs Sandra Topham</b>	Agent:	Rep ID: <b>PDLP_AD3222</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>966072</b>	<b>Tracy Dearnley</b>	Agent:	Rep ID: <b>PDLP_AD2652</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>967035</b>	<b>Anne Murphy</b>	Agent:	Rep ID: <b>PDLP_AD1378</b>
<b>Soundness - Positively Prepared</b>	Disappointed that 'rural' areas are being included in the plan when there are sufficient brownfield sites around Kirklees. Do people want to live on the 'outskirts' of Holme Valley in sufficient numbers to fill these houses? Areas close to large towns & cities would be more desirable due to facilities, jobs etc. If this area is desirable, there are many brownfield sites that would be more suitable.			
<b>Soundness - Justified</b>	The plan is unsound as regards the evidence on which it is based. Supports the detailed representations being made by Scholes Future Group. Please refer to their document reference: SFG Reps Kirklees PDLP Dec 2016. Amenities and facilities in this local area are just not adequate to cope with such a huge increase in population. Dunford road would be the main 'artery' route and is currently unable to cope at present. It is barely wide enough for on-coming traffic due to parking and regularly blocks due to volume of traffic - especially when 'incidents' on any other cross-pennine routes (A628, M62 etc). Local school is not equipped or able to take more students with class sizes already over 30+ pupils.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately to reflect NPPF policies, specifically paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157.			
<b>Proposed Change Requested</b>	Designate sites H297, H597 and SL3359 as Local green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>967227</b>	<b>Ms Alison Searle</b>	Agent:	Rep ID: <b>PDLP_AD2483</b>
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**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **967266 Mrs Joan Haworth** Agent: Rep ID: **PDLP\_AD2843**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **967284 Mr Robert S Joynson** Agent: Rep ID: **PDLP\_AD2758**

**Soundness - Positively Prepared** A local resident on Ryecroft Lane has not heard of these proposals.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. 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: **SL3359** Consultee: **967290 Mrs Pat Williamson** Agent: Rep ID: **PDLP\_AD2133**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **967294 Ernest Moore** Agent: Rep ID: **PDLP\_AD2964**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,



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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: <b>SL3359</b>	Consultee: <b>967633 Mrs C Garlick</b>	Agent:	Rep ID: <b>PDLP_AD2597</b>
<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village. It would be preferable to locate new housing on the former Midlothian Garage site in Holmfirth.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. The former Midlothian Garage site in Holmfirth is allocated as an accepted housing site (H2587) within the Publication Draft Local Plan.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>967655 Mr Peter Griffiths</b>	Agent:	Rep ID: <b>PDLP_AD2620</b>
<b>Soundness - Positively Prepared</b>	Dobroyd Mill and Washpit Mill redevelopments should be encouraged, as should the re-use of all brownfield sites.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>967790 Mrs JD Hillock</b>	Agent:	Rep ID: <b>PDLP_AD2740</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. There will be no play area in Scholes.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		

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

<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. The play area east of Ryecroft Lane is not included in either housing site H297 or safeguarded land site SL3359.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>967848</b> <b>Mr David Jackson</b> Agent: Rep ID: <b>PDLP_AD1534</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>967862</b> <b>Ms Val Marshall</b> Agent: Rep ID: <b>PDLP_AD2296</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>967864</b> <b>Laura Marshall</b> Agent: Rep ID: <b>PDLP_AD2191</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>967868</b> <b>Bob Boorman</b> Agent: Rep ID: <b>PDLP_AD2271</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>967905</b> <b>Mr Peter L Bradley</b> Agent: Rep ID: <b>PDLP_AD2676</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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

<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>967906</b> <b>Mr Michael Berryman</b> Agent: Rep ID: <b>PDLP_AD2885</b>
<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village.
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>967926</b> <b>Mrs Kathryn Gibson</b> Agent: Rep ID: <b>PDLP_AD3027</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space. Particular reference to impact on historic landscape.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>967930</b> <b>Miss Emily Firbank</b> Agent: Rep ID: <b>PDLP_AD2719</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>968014</b> <b>Mary Haigh</b> Agent: Rep ID: <b>PDLP_AD1934</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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

<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>968058</b>	<b>Mrs J Mirehouse</b>	Agent:	Rep ID: <b>PDLP_AD1875</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>968076</b>	<b>Machutus M Pimblett</b>	Agent:	Rep ID: <b>PDLP_AD2716</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>968133</b>	<b>Alison Ramsey</b>	Agent:	Rep ID: <b>PDLP_AD2549</b>
<b>Soundness - Positively Prepared</b>	Scale of development is disproportionate to the size of the village.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. Additionally, construction traffic will be disruptive to local residents.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Concern that the construction process will be disruptive. As part of the planning application process, consideration will be given to the need for developers to produce a site-specific Construction Management Plan.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>968162</b>	<b>Paula Haigh</b>	Agent:	Rep ID: <b>PDLP_AD2956</b>
<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village. Empty homes within Kirklees should be used before allocating greenfield sites.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			

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

<b>Soundness - Consistent with National Policy</b>	Additionally: The redevelopment of Dobroyd Mills (which will increase the number of new homes in the area) has not been considered within the Local Plan. The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. The empty homes in Kirklees should be filled before allocating greenfield sites for housing. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. The proposed development at Dobroyd Mills (which will increase the number of new homes in the area) hasn't been considered within the Local Plan. Dobroyd Mills is situated within an accepted mixed use allocation (MX1912a) within the Publication Draft Local Plan. It has, therefore, been fully considered as part of the site allocation process.

Paragraph/Site: <b>SL3359</b>	Consultee: <b>968357</b>	<b>Ms Melanie Caswell</b>	Agent:	Rep ID: <b>PDLP_AD3130</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>968360</b>	<b>Mr Gilbert Caswell</b>	Agent:	Rep ID: <b>PDLP_AD3142</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>968448</b>	<b>Ms Alison Sharland</b>	Agent:	Rep ID: <b>PDLP_AD3117</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163,			

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PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **968463 Mrs Carole Quarmby** Agent: Rep ID: **PDLP\_AD2882**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **968499 Ms Joyce Binks** Agent: Rep ID: **PDLP\_AD2423**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **968505 David Wild** Agent: Rep ID: **PDLP\_AD2867**

**Soundness - Positively Prepared** Scale of proposed development is disproportionate to the size of the village.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.

Paragraph/Site: **SL3359** Consultee: **968591 N R Binks** Agent: Rep ID: **PDLP\_AD1871**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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

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Paragraph/Site: **SL3359** Consultee: **968603 Robert & Sandra Owen** Agent: Rep ID: **PDLP\_AD2447**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **968630 Mr Wilfred Battye** Agent: Rep ID: **PDLP\_AD2785**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **968636 Ms Anna Dolby** Agent: Rep ID: **PDLP\_AD2646**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **969036 Mrs S Dixon** Agent: Rep ID: **PDLP\_AD2212**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **969039 Mr R Dixon** Agent: Rep ID: **PDLP\_AD2260**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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

Paragraph/Site: <b>SL3359</b>	Consultee: <b>969293</b>	<b>Mrs Jill Turner</b>	Agent:	Rep ID: <b>PDLP_AD3038</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>969482</b>	<b>I M Pell</b>	Agent:	Rep ID: <b>PDLP_AD1899</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>969495</b>	<b>Mr James I Ainley</b>	Agent:	Rep ID: <b>PDLP_AD3136</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>969524</b>	<b>Mrs M Holmes</b>	Agent:	Rep ID: <b>PDLP_AD2903</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>969576</b>	<b>Mr Alan Wainwright</b>	Agent:	Rep ID: <b>PDLP_AD2683</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			



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

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Paragraph/Site: <b>SL3359</b>	Consultee: <b>969587</b>	<b>Mr David Ellis</b>	Agent:	Rep ID: <b>PDLP_AD2557</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

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Paragraph/Site: <b>SL3359</b>	Consultee: <b>969624</b>	<b>Mr &amp; Mrs K Wright</b>	Agent:	Rep ID: <b>PDLP_AD2770</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

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Paragraph/Site: <b>SL3359</b>	Consultee: <b>969629</b>	<b>Ms Linda Moore</b>	Agent:	Rep ID: <b>PDLP_AD3126</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

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Paragraph/Site: <b>SL3359</b>	Consultee: <b>969634</b>	<b>Mr Adrian Moss</b>	Agent:	Rep ID: <b>PDLP_AD2578</b>
<b>Soundness - Positively Prepared</b>	Scale of development is disproportionate to the size of the village.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space. Additional query as to whether site is in Green Belt.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.			

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

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Paragraph/Site: **SL3359** Consultee: **969748** **Mr Tony Sherlock** Agent: Rep ID: **PDLP\_AD2864**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **969754** **Mr Geoff Lawton** Agent: Rep ID: **PDLP\_AD3164**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **969815** **Mr Simon Hey** Agent: Rep ID: **PDLP\_AD2400**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **969818** **Mr Stephen Hey** Agent: Rep ID: **PDLP\_AD2109**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **969828** **R Hey** Agent: Rep ID: **PDLP\_AD3019**

**Soundness - Positively Prepared** Scale of proposed development is disproportionate to the size of the village.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is

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disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.

Paragraph/Site: <b>SL3359</b>	Consultee: <b>969830</b>	<b>Mr Thomas Hey</b>	Agent:	Rep ID: <b>PDLP_AD2388</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>969835</b>	<b>Mrs P. Heywood</b>	Agent:	Rep ID: <b>PDLP_AD1552</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>969853</b>	<b>Mrs Helen Howden</b>	Agent:	Rep ID: <b>PDLP_AD2710</b>
<b>Soundness - Positively Prepared</b>	Green sites should not be built on when there are more than 2,500 empty houses in Kirklees. Develop at the Midlothian Garage and Huddersfield Road (next to the old Drill Hall) brownfield sites first.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where			

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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.Both the former Midlothian garage site (residential) and land north of the old Drill Hall (employment) already have permission for development.

Paragraph/Site: **SL3359** Consultee: **970067 Ms Marilyn Hinchcliffe** Agent: Rep ID: **PDLP\_AD2440**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **970071 Mr B Parratt** Agent: Rep ID: **PDLP\_AD1859**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **970090 Mr John P Hillock** Agent: Rep ID: **PDLP\_AD2818**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **970099 Mrs Margaret Robinson** Agent: Rep ID: **PDLP\_AD2640**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **970106 Ms Julia Casserly** Agent: Rep ID: **PDLP\_AD2492**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

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<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>970113 Ms Cheryl Booth</b> Agent: Rep ID: <b>PDLP_AD2135</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>970121 Ms Veronica Haigh</b> Agent: Rep ID: <b>PDLP_AD2673</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>970162 Ms Karen Smith</b> Agent: Rep ID: <b>PDLP_AD2752</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>970172 Mr Robert Heywood</b> Agent: Rep ID: <b>PDLP_AD2601</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>970202 Ms Judith Brignell</b> Agent: Rep ID: <b>PDLP_AD2563</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>970209</b>	<b>Ms Vivien Chesman</b>	Agent:	Rep ID: <b>PDLP_AD1521</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>970353</b>	<b>Sylvia R H Parker</b>	Agent:	Rep ID: <b>PDLP_AD2997</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>970357</b>	<b>Rebecca L Haigh</b>	Agent:	Rep ID: <b>PDLP_AD2177</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>970371</b>	<b>Mr John Parker</b>	Agent:	Rep ID: <b>PDLP_AD2755</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>970388</b>	<b>Mrs Diane Binks &amp; Mr Duncan Dyson</b>	Agent:	Rep ID: <b>PDLP_AD2433</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

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PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **970445 Mrs Judith Howarth** Agent: Rep ID: **PDLP\_AD2803**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **970489 Mrs B Donnellan** Agent: Rep ID: **PDLP\_AD2611**

**Soundness - Positively Prepared** There is a shortage of affordable homes for young people but a recent application proposed 4 - 5 bedroom houses. Empty homes should be used before building new ones.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **970497 Adrian Dickinson** Agent: Rep ID: **PDLP\_AD2318**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **970562 Mr Rodney Websdell** Agent: Rep ID: **PDLP\_AD2879**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **971065 Rob Newton** Agent: Rep ID: **PDLP\_AD3219**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>971230</b>	<b>Nancy Micklethwaite</b>	Agent:	Rep ID: <b>PDLP_AD1888</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>971235</b>	<b>Roger Hallsworth</b>	Agent:	Rep ID: <b>PDLP_AD2810</b>
<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>971238</b>	<b>Peter Ciesielski</b>	Agent:	Rep ID: <b>PDLP_AD1580</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>971242</b>	<b>Sarah Kelly</b>	Agent:	Rep ID: <b>PDLP_AD1838</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163,			



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PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359**

Consultee: **971256**

**Tracy Ciesielska**

Agent:

Rep ID: **PDLP\_AD2617**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80

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Paragraph/Site: **SL3359**

Consultee: **971272**

**Mr Chris Burgess**

Agent:

Rep ID: **PDLP\_AD1587**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359**

Consultee: **971273**

**S J Quinn**

Agent:

Rep ID: **PDLP\_AD2628**

**Soundness - Positively Prepared**

Scale of proposed development is disproportionate to the size of the village.

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.

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Paragraph/Site: **SL3359**

Consultee: **971276**

**M J Quinn**

Agent:

Rep ID: **PDLP\_AD2707**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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

Paragraph/Site: <b>SL3359</b>	Consultee: <b>971628</b>	<b>Miss Bridget Mullan</b>	Agent:	Rep ID: <b>PDLP_AD2773</b>
<b>Soundness - Positively Prepared</b>	Use all the empty houses in Huddersfield before considering building on green belt or green fields.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>971789</b>	<b>Heather Lemm</b>	Agent:	Rep ID: <b>PDLP_AD2486</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>971797</b>	<b>Dean Killock</b>	Agent:	Rep ID: <b>PDLP_AD1929</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>971800</b>	<b>Paul Davies</b>	Agent:	Rep ID: <b>PDLP_AD2150</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			

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

<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>971822</b>	<b>Mr Daniel Garlick</b>	Agent:	Rep ID: <b>PDLP_AD2452</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>971827</b>	<b>Christine Beaumont</b>	Agent:	Rep ID: <b>PDLP_AD2560</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>971842</b>	<b>Vivien Hodgkiss</b>	Agent:	Rep ID: <b>PDLP_AD2324</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>971924</b>	<b>JK and R Meadows</b>	Agent:	Rep ID: <b>PDLP_AD2321</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>972032</b>	<b>H.H. Whittle</b>	Agent:	Rep ID: <b>PDLP_AD3070</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **972094** **Laura Pegg** Agent: Rep ID: **PDLP\_AD1923**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **972116** **J. Pickup** Agent: Rep ID: **PDLP\_AD3161**

**Soundness - Positively Prepared** Too many houses - not appropriate in scale.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.

Paragraph/Site: **SL3359** Consultee: **972654** **Kathryn Fuller** Agent: Rep ID: **PDLP\_AD1558**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **972854** **Rebecca Wilkinson** Agent: Rep ID: **PDLP\_AD2834**

**Soundness - Positively Prepared** There is enough empty housing in Huddersfield that could be refurbished.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,

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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average.

Paragraph/Site: **SL3359**Consultee: **972885****Susan L Waite**

Agent:

Rep ID: **PDLP\_AD2824****Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**Consultee: **972913****Sandra Elizabeth Hale**

Agent:

Rep ID: **PDLP\_AD2861****Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**Consultee: **972925****Mr A R Waite**

Agent:

Rep ID: **PDLP\_AD2095****Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**Consultee: **972928****Mr Steven Croft**

Agent:

Rep ID: **PDLP\_AD3229****Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**Consultee: **972931****Mr Nicholas Webster**

Agent:

Rep ID: **PDLP\_AD3170****Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

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

<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>972935</b> <b>Glen Wilson</b> Agent: Rep ID: <b>PDLP_AD2959</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>973440</b> <b>Timothy Prendegast</b> Agent: Rep ID: <b>PDLP_AD2077</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>973471</b> <b>Mrs P Keeley</b> Agent: Rep ID: <b>PDLP_AD2691</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>973516</b> <b>Gary Heseltine</b> Agent: Rep ID: <b>PDLP_AD1531</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>973522</b> <b>Reef Healey</b> Agent: Rep ID: <b>PDLP_AD1574</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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

<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>973838</b>	<b>Diane Bentley</b>	Agent:	Rep ID: <b>PDLP_AD3109</b>
<b>Soundness - Positively Prepared</b>	Disproportionate scale of development for the size of Scholes. Empty homes should be used before greenfield sites are developed. Brownfield sites should be used for housing before allocating greenfield sites. The council has acted against the will of the people and has made it difficult to comment on proposed sites.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. Additionally: The redevelopment of Dobroyd Mills (which will increase the quantity of new homes in the area) has not been considered within the Local Plan.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Disproportionate scale of development for the size of Scholes. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Empty homes should be used before greenfield sites are developed. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. Brownfield sites should be used for housing before allocating greenfield sites. 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 has acted against the will of the people and has made it difficult to comment on proposed sites. 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 redevelopment of Dobroyd Mills (which will increase the quantity of new homes in the area) has not been considered within the Local Plan. Dobroyd Mills is situated within an accepted mixed use allocation (MX1912a) within the Publication Draft Local Plan. It has, therefore, been fully considered as part of the site allocation process.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>973868</b>	<b>Mr Anthony Bentley</b>	Agent:	Rep ID: <b>PDLP_AD2637</b>
<b>Soundness - Positively Prepared</b>	Brownfield sites should be used for housing before allocating greenfield sites. The council hasn't consulted effectively with local residents.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for			

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

<b>National Policy</b>	the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Develop brownfield sites first. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure. Consultation process 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.

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Paragraph/Site: **SL3359** Consultee: **973906 Michael Cook** Agent: Rep ID: **PDLP\_AD2581**

<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village. The council hasn't attached enough weight to previous objections.
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. 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.

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Paragraph/Site: **SL3359** Consultee: **973925 Geoffrey Verney** Agent: Rep ID: **PDLP\_AD2704**

<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.



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

Paragraph/Site: <b>SL3359</b>	Consultee: <b>973967</b>	<b>Edwin Bates</b>	Agent:	Rep ID: <b>PDLP_AD2840</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>973976</b>	<b>Graham Latham</b>	Agent:	Rep ID: <b>PDLP_AD2764</b>
<b>Soundness - Positively Prepared</b>	The Local Plan doesn't provide suitable homes for older people.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space. Sustainably located homes should be provided for older people.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Housing Mix: 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.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>974315</b>	<b>Mr Ian &amp; Mrs Sheila Smith</b>	Agent:	Rep ID: <b>PDLP_AD2849</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. Additional concerns raised regarding protection of trees on the site.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. There are no trees affected by tree preservation orders on the site.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>974332</b>	<b>Neil Walker</b>	Agent:	Rep ID: <b>PDLP_AD3158</b>
<b>Soundness - Positively Prepared</b>	Too many houses proposed for the size of the village. Brownfield sites should be used for housing, before allocating greenfield sites.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Too many houses proposed for the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to			

Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Brownfield sites should be used for housing, before allocating greenfield sites. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Paragraph/Site: **SL3359**

Consultee: **974590**

**Jean Cook**

Agent:

Rep ID: **PDLP\_AD2635**

**Soundness - Positively Prepared**

Scale of proposed development is disproportionate to the size of the village. Empty homes in Kirklees should be filled before allocating greenfield sites for housing. Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for housing. The proposed development at Dobroyd Mills (which will increase the number of homes in the area) hasn't been considered within the Local Plan. The council has made it difficult for residents to comment on the Local Plan.

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Empty homes in Kirklees should be filled before allocating greenfield sites for housing. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for housing. 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

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

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 proposed development at Dobroyd Mills (which will increase the number of homes in the area) hasn't been considered within the Local Plan.Dobroyd Mills is situated within an accepted mixed use allocation (MX1912a) within the Publication Draft Local Plan. It has, therefore, been fully considered as part of the site allocation process.The council has made it difficult for residents to comment on the 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: <b>SL3359</b>	Consultee: <b>974659</b>	<b>R S Gooch</b>	Agent:	Rep ID: <b>PDLP_AD3123</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. It would be inappropriate to remove the local playground.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.The playground referred to is located between sites H297 and SL3359; the Local Plan does not propose to remove the playground.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>974663</b>	<b>Mrs R Pauline Gooch</b>	Agent:	Rep ID: <b>PDLP_AD2658</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. It would be inappropriate to remove the local playground in favour of new housing provision.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.The playground area to the east of Ryecroft Lane is not included within allocated site H297 nor SL3359.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>974700</b>	<b>Lynne Harper</b>	Agent:	Rep ID: <b>PDLP_AD2327</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>974734</b>	<b>Carole Exley</b>	Agent:	Rep ID: <b>PDLP_AD2591</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			

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

<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>974755</b>	<b>Christian Exley</b>	Agent: Rep ID: <b>PDLP_AD1561</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>974782</b>	<b>Ian Roger Deakin</b>	Agent: Rep ID: <b>PDLP_AD2160</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>974784</b>	<b>Mrs Hilary J Deakin</b>	Agent: Rep ID: <b>PDLP_AD2782</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>975141</b>	<b>Teresa Turner</b>	Agent: Rep ID: <b>PDLP_AD2143</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>975192</b>	<b>Mark Hollingdale</b>	Agent: Rep ID: <b>PDLP_AD2409</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		

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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **975198** **Rebecca Hollingdale** Agent: Rep ID: **PDLP\_AD1863**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **975257** **Hilary Fletcher** Agent: Rep ID: **PDLP\_AD3030**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **975275** **Sinead Robbins-Smith** Agent: Rep ID: **PDLP\_AD2138**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **975287** **Lydia Washington-Quinn** Agent: Rep ID: **PDLP\_AD2172**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **975292** **Christopher Washington** Agent: Rep ID: **PDLP\_AD2373**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,

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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: <b>SL3359</b>	Consultee: <b>975348</b>	<b>Mr John Reynolds</b>	Agent:	Rep ID: <b>PDLP_AD2661</b>
<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village. Concern that the design of proposals will be inappropriate.			
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Concern that the design of proposals will be inappropriate. 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.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>975378</b>	<b>Yvette Whitwam</b>	Agent:	Rep ID: <b>PDLP_AD2078</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>975407</b>	<b>Vincent M Pescod</b>	Agent:	Rep ID: <b>PDLP_AD2275</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

Paragraph/Site: <b>SL3359</b>	Consultee: <b>975416</b>	<b>Christopher Woolliscroft</b>	Agent:	Rep ID: <b>PDLP_AD2196</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			

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

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **975439**

**Dianne Heppenstall**

Agent:

Rep ID: **PDLP\_AD2625**

**Soundness - Positively Prepared** Scale of proposed development is inappropriate to the size of the village. Other potential sites haven't been fully considered. Empty properties within Kirklees should be used before allocating greenfield sites. The proposed development of Dobroyd Mills (which will increase the number of new homes in the area) hasn't been considered in the Local Plan. The council has acted against the will of the people and has made it difficult to comment on proposals. Concern that new homes will be unaffordable to younger people.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Scale of proposed development is inappropriate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Other potential sites haven't been fully considered. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. Empty properties within Kirklees should be used before allocating greenfield sites. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. The proposed development of Dobroyd Mills (which will increase the number of new homes in the area) hasn't been considered in the Local Plan. Dobroyd Mills is situated within an accepted mixed use allocation (MX1912a) within the Publication Draft Local Plan. It has, therefore, been fully considered as part of the site allocation process. The council has acted against the will of the people and has made it difficult to comment on proposals. 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. Concern that new homes will be unaffordable to younger people. 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.

Paragraph/Site: **SL3359**

Consultee: **975445**

**Andrew Hamilton**

Agent:

Rep ID: **PDLP\_AD1906**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

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

<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.

Paragraph/Site: **SL3359** Consultee: **975680 Gillian Cohen** Agent: Rep ID: **PDLP\_AD3034**

<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village. Brownfield sites within Kirklees should be used for housing, before allocating greenfield sites.
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Brownfield sites within Kirklees should be redeveloped before allocating greenfield sites for housing. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Paragraph/Site: **SL3359** Consultee: **975724 Anne Hinchliffe** Agent: Rep ID: **PDLP\_AD2167**

<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.

Paragraph/Site: **SL3359** Consultee: **975738 Mr Glyn Chapman** Agent: Rep ID: **PDLP\_AD3146**

<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
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**Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations**

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **975840 Alan Gaukroger** Agent: Rep ID: **PDLP\_AD2988**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **975912 Diana Zoe Wilson** Agent: Rep ID: **PDLP\_AD1019**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding the above, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding the above, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space. Additional comments also made in relation to impacts on local tourism and health implications of affecting enjoyment of local walking routes.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. 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: **SL3359** Consultee: **975982 Lynne Holmes** Agent: Rep ID: **PDLP\_AD2749**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **975984 Jack Holmes** Agent: Rep ID: **PDLP\_AD2746**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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

<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>976453</b>	<b>Sarah Shaw</b>	Agent:	Rep ID: <b>PDLP_AD2699</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>976553</b>	<b>Peter McLaren</b>	Agent:	Rep ID: <b>PDLP_AD1465</b>
<b>Soundness - Justified</b>	The Publication Draft is unsound as regards the evidence on which it is based. I support the detailed representations being made by Scholes Future Group. Please refer to their document reference: SFG Reps Kirklees PDLP Dec 2016.			
<b>Soundness - Consistent with National Policy</b>	I believe the Publication Draft is unsound as its fails to adequately reflect NPPF policies, specifically paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157.			
<b>Proposed Change Requested</b>	Designate site SL3359 as Local Green Space.			
<b>Council Response</b>	No change.As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>976558</b>	<b>Joanne Griffiths</b>	Agent:	Rep ID: <b>PDLP_AD1701</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>976588</b>	<b>Peter B Griffiths</b>	Agent:	Rep ID: <b>PDLP_AD1694</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>978506</b>	<b>Cllr Nigel Patrick</b>	Agent:	Rep ID: <b>PDLP_AD3598</b>
<b>Soundness - Justified</b>	The above allocation will impact on New Mill Junction where the A635 meets the A616. This junction should be a priority for improvement in the plan. The junction provides access to Holmfirth, Manchester, Sheffield, Barnsley and the M1 for local traffic and through traffic. It is already operating over capacity and that is a fact recognised by the Highways Authority and indeed a scheme for a roundabout is under preparation. Ward councillors are being consulted, but there is little chance of funding the scheme if it is not also recognised as a required infrastructure improvement in the Local Plan and as such will not attract			

sufficient CIL funding from developments in the locality. The evidence tells us the junction is over capacity and additional traffic from new homes will therefore make the situation much worse, with congestion, pollution and delays. School places are currently calculated on a cumulative basis as new homes are occupied. Homes that are approved and not built or not occupied are not included in the calculation for a subsequent planning application for homes. That means, given the number of homes approved and not built in recent times in the ward (iro 300) the Council is already under estimating the number of school places needed.

**Proposed Change Requested**

Include the New Mill junction in the proposed transport schemes within the Allocations and Designations document. Preference would be to reduce the number of housing allocation sites (H and SL), but in addition the Planning Inspector might also consider changing the status of some of the housing allocation sites to 'safeguarded'. That will spread the build over a longer period and reduce the immediate impact on school places.

**Council Response**

No change. The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Although this site is currently open, it is not within the green belt and is therefore not subject to the consideration of openness as set out in national planning policy in relation to green belt. This site was designated as safeguarded land in the Unitary Development Plan. This site has been assessed using the Council's site allocations methodology and supporting evidence includes the Sustainability Appraisal and settlement appraisal which provide up to date evidence indicating that this site is in a sustainable location. Site SL3359 has been accepted as a safeguarded land option as part of the approach of planning positively for future development beyond the Local Plan period. The site capacity is indicative only and the actual capacity will be determined through a review of the Local Plan. The Local Plan is supported by an Infrastructure Delivery Plan which sets out the required Infrastructure to support the spatial strategy outlined in the Local Plan. Highways assessment has shown that although the site cannot currently be directly accessed, the wider local highway links are acceptable. The Local Plan (SD1, Strategy and Policies, page 104) supports sustainable travel through Policy PLP 20 (Sustainable travel). The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and this will be considered for safeguarded land sites as part of a future Local Plan review. Greenfield run-off rates will be required to manage surface water from this site in accordance with the local plan policies once adopted. 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. 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. At present there is no Neighbourhood Plan within this area to take into account in plan making. A Local Green Space option (LocGS2721) which covered the whole existing UDP Provisional Open Land site was rejected because when assessed against the Local Green Space criteria it is not demonstrably special and does not therefore merit designation as Local Green Space (see option LocGS2721). Further individual Local Green Space options have been created as a result of representations for the discrete areas of land covered by sites H297 (LocGS3449), H597 (LocGS3450) and SL3359 (LocGS3451). There were no comments from specific technical consultees through the site allocations process in relation to impacts on Morton Wood Local Wildlife Site which is to the south-east of Scholes village. Site SL3359 is to the west of the village. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option.

Paragraph/Site: **SL3359**

Consultee: **1030027 Colin Wragg**

Agent:

Rep ID: **PDLP\_AD2495**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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

Paragraph/Site: <b>SL3359</b>	Consultee: <b>1030033</b>	<b>Graham Brake</b>	Agent:	Rep ID: <b>PDLP_AD3233</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1030053</b>	<b>P.W Hinchliffe</b>	Agent:	Rep ID: <b>PDLP_AD2156</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1030056</b>	<b>Muriel Tinker</b>	Agent:	Rep ID: <b>PDLP_AD1564</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1030057</b>	<b>John Clifford Tinker</b>	Agent:	Rep ID: <b>PDLP_AD1827</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1030063</b>	<b>Avril Wilkinson</b>	Agent:	Rep ID: <b>PDLP_AD1545</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

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

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Paragraph/Site: **SL3359** Consultee: **1030079 Anna Dawson-Jones** Agent: Rep ID: **PDLP\_AD2208**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **1030103 D Steadman** Agent: Rep ID: **PDLP\_AD1579**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **1033725 Mrs Claire Howarth-Coyne** Agent: Rep ID: **PDLP\_AD3082**

**Soundness - Positively Prepared** Use brownfield sites first and use empty homes.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. Additional comments made relate to increased noise, air and light pollution, need to increase policing in the village, lack of recreation facilities, developments will not help biodiversity or geodiversity in the village, lack of gritting local roads, a Neighbourhood Plan should be prepared for the area.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space. Additional comments made relate to the site not being in conformity with NPPF paragraph 12 (core planning principles).

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. 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. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option.

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Paragraph/Site: **SL3359** Consultee: **1041191 Adele Makinson** Agent: Rep ID: **PDLP\_AD1527**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for

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

**National Policy** the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1041197 Sheena Kaye** Agent: Rep ID: **PDLP\_AD2713**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1041203 Graham Micklethwaite** Agent: Rep ID: **PDLP\_AD2813**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1041208 Mark Waite** Agent: Rep ID: **PDLP\_AD2821**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1041217 Alan and Jeanne Holmes** Agent: Rep ID: **PDLP\_AD1542**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1041878 Joanne Mair** Agent: Rep ID: **PDLP\_AD1549**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for

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<b>National Policy</b>	the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1041880 Lee Marshall</b> Agent: Rep ID: <b>PDLP_AD3179</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1041883 Sean Chapman</b> Agent: Rep ID: <b>PDLP_AD2788</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1041886 Kevin Chambers</b> Agent: Rep ID: <b>PDLP_AD1557</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042148 J Whittle</b> Agent: Rep ID: <b>PDLP_AD1851</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042166 Robert Riley</b> Agent: Rep ID: <b>PDLP_AD3049</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for

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**National Policy** the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1042170 David Langrick** Agent: Rep ID: **PDLP\_AD1883**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1042172 Michael Robshaw** Agent: Rep ID: **PDLP\_AD3153**

**Soundness - Positively Prepared** The council has been dismissive of objections to the proposed allocations.  
**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. 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: **SL3359** Consultee: **1042177 Malcolm Robshaw** Agent: Rep ID: **PDLP\_AD2585**

**Soundness - Positively Prepared** Scale of proposed development is disproportionate to the size of the village. The council is not acting on behalf of the local community.  
**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. 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.



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Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042179 Wendy Robshaw</b>	Agent:	Rep ID: <b>PDLP_AD2542</b>
<b>Soundness - Positively Prepared</b>	Concern that the council hasn't given sufficient weight to previous objections and is not working on the behalf of the local community.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.Consultation ProcessThe 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: <b>SL3359</b>	Consultee: <b>1042184 Gillian Senior</b>	Agent:	Rep ID: <b>PDLP_AD2589</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042189 Jackie Brook</b>	Agent:	Rep ID: <b>PDLP_AD1845</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042546 Amanda Butterworth</b>	Agent:	Rep ID: <b>PDLP_AD2471</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042552 Matthew Boorman</b>	Agent:	Rep ID: <b>PDLP_AD2474</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		

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<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042555 Bryan Hinchliffe</b> Agent: Rep ID: <b>PDLP_AD1902</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042556 Linda Hinchliffe</b> Agent: Rep ID: <b>PDLP_AD1910</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042559 Alison Lowe</b> Agent: Rep ID: <b>PDLP_AD1920</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042562 John Wright</b> Agent: Rep ID: <b>PDLP_AD2607</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1042565 David Grant</b> Agent: Rep ID: <b>PDLP_AD1866</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1043444 Judith Fearn** Agent: Rep ID: **PDLP\_AD1919**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1043447 Geoffrey Cosslett** Agent: Rep ID: **PDLP\_AD3077**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1043448 Brenda Cosslett** Agent: Rep ID: **PDLP\_AD2614**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1043639 Barbara Ainley** Agent: Rep ID: **PDLP\_AD1570**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1043641 Anne Hobson** Agent: Rep ID: **PDLP\_AD2688**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP SP163.

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PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1043643 Joanne Woods** Agent: Rep ID: **PDLP\_AD1942**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1043656 Bruce Armitage** Agent: Rep ID: **PDLP\_AD2146**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1043669 Lynn Blakely** Agent: Rep ID: **PDLP\_AD2870**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1043671 Carolyn North** Agent: Rep ID: **PDLP\_AD2873**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1043913 Roy Smith** Agent: Rep ID: **PDLP\_AD2876**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,

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PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1044077 John Wallace** Agent: Rep ID: **PDLP\_AD2831**

**Soundness - Positively Prepared** Empty homes should be modernised and used rather than building new houses.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average.

Paragraph/Site: **SL3359** Consultee: **1044079 Valorie Elson** Agent: Rep ID: **PDLP\_AD2092**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1044085 John Cave** Agent: Rep ID: **PDLP\_AD2569**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1044088 Leighan Napthine** Agent: Rep ID: **PDLP\_AD2992**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1044090 Rosemary Pettifer** Agent: Rep ID: **PDLP\_AD2976**

**Soundness - Positively Prepared** Empty homes within Kirklees should be used before allocating greenfield sites. The council have acted against the will of the people and have made it difficult to comment on proposed sites.

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**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: There are a lot of empty homes in any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. Consultation process 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: **SL3359** Consultee: **1044091 Adrian Owens** Agent: Rep ID: **PDLP\_AD2573**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1044102 Gillian Wallace** Agent: Rep ID: **PDLP\_AD2985**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1044104 James Elson** Agent: Rep ID: **PDLP\_AD2386**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1044911 Julie Auckland** Agent: Rep ID: **PDLP\_AD2891**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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

<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1044925</b>	<b>Matthew Roberts</b>	Agent:	Rep ID: <b>PDLP_AD1926</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1044927</b>	<b>Helen Cave</b>	Agent:	Rep ID: <b>PDLP_AD2379</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1044930</b>	<b>Timothy Collins</b>	Agent:	Rep ID: <b>PDLP_AD2852</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1044972</b>	<b>Michael and Ruth Boothroyd</b>	Agent:	Rep ID: <b>PDLP_AD2791</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1044975</b>	<b>Karen Jarman</b>	Agent:	Rep ID: <b>PDLP_AD2725</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			

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PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1044981 Brian Smith** Agent: Rep ID: **PDLP\_AD2767**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046054 Joyce Beardsell** Agent: Rep ID: **PDLP\_AD2470**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046060 Lisa Algar** Agent: Rep ID: **PDLP\_AD2953**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046062 Mark Algar** Agent: Rep ID: **PDLP\_AD2489**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046071 Mairi Binns** Agent: Rep ID: **PDLP\_AD2942**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,



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PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046074 Martin Binns** Agent: Rep ID: **PDLP\_AD2477**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046305 Amy Rostron** Agent: Rep ID: **PDLP\_AD2130**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046313 Mr John Tinker** Agent: Rep ID: **PDLP\_AD2731**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046316 Elizabeth Clarkson** Agent: Rep ID: **PDLP\_AD2667**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046319 Rachel Brennan** Agent: Rep ID: **PDLP\_AD2443**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,

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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046321 Ronald Backhouse** Agent: Rep ID: **PDLP\_AD2450**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046324 David Deakin** Agent: Rep ID: **PDLP\_AD2391**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046325 Sally Deakin** Agent: Rep ID: **PDLP\_AD2394**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046327 Peter Ward** Agent: Rep ID: **PDLP\_AD2398**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046330 Mel Ward** Agent: Rep ID: **PDLP\_AD2403**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,

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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046333 Anthea Purdey** Agent: Rep ID: **PDLP\_AD2664**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046335 Graham Wilkinson** Agent: Rep ID: **PDLP\_AD2406**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046338 Walter Ellis** Agent: Rep ID: **PDLP\_AD1568**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046339 Wendy Hollingworth** Agent: Rep ID: **PDLP\_AD2431**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1046344 Neil Hollingworth** Agent: Rep ID: **PDLP\_AD2427**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,

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

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PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359**

Consultee: **1046348 Emily Cronin**

Agent:

Rep ID: **PDLP\_AD2437**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359**

Consultee: **1046391 Mr kenneth peace**

Agent:

Rep ID: **PDLP\_AD180**

**Soundness - Justified**

The Publication Draft is unsound as regards the evidence on which it is based, and its failure adequately to reflect NPPF polices specifically paragraphs 17, 28, 30,34, 38, 55, 72, 76, 77, 109, 157 therein.

**Soundness - Consistent with National Policy**

The Publication Draft is unsound as regards the evidence on which it is based, and its failure adequately to reflect NPPF polices specifically paragraphs 17, 28, 30,34, 38, 55, 72, 76, 77, 109, 157 therein.

**Proposed Change Requested**

I wish the Local Plan be changed such that the site is designated as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359**

Consultee: **1047086 Kathleen Gledhill**

Agent:

Rep ID: **PDLP\_AD2126**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359**

Consultee: **1047096 Chris Barr**

Agent:

Rep ID: **PDLP\_AD2416**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359**

Consultee: **1047100 Anne and Frank Dickinson**

Agent:

Rep ID: **PDLP\_AD2837**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group. this issue is covered under their representations at PDLP SP163.

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

PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: <b>SL3359</b>	Consultee: <b>1047112 Helen Simpson</b>	Agent:	Rep ID: <b>PDLP_AD2632</b>
<b>Soundness - Positively Prepared</b>	Brownfield sites should be used before allocating greenfield sites for housing.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Develop brownfield sites first (rather than green belt) The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>1047116 Lisa Barr</b>	Agent:	Rep ID: <b>PDLP_AD2420</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>1047121 Margaret Hodgskiss</b>	Agent:	Rep ID: <b>PDLP_AD2123</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>1047127 Barbara Griffiths</b>	Agent:	Rep ID: <b>PDLP_AD2112</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		

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

<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1047131 David Pettifer</b> Agent: Rep ID: <b>PDLP_AD2827</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1047925 John Garnee</b> Agent: Rep ID: <b>PDLP_AD2382</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1047935 Nick Hubbard</b> Agent: Rep ID: <b>PDLP_AD3177</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1047936 Di Raven</b> Agent: Rep ID: <b>PDLP_AD3106</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1047938 Deborah Bentley</b> Agent: Rep ID: <b>PDLP_AD3101</b>
<b>Soundness - Positively Prepared</b>	Disproportionate scale of development for the size of Scholes. Empty homes should be used before greenfield sites are developed. Brownfield sites should be used for housing before allocating greenfield sites. The council has acted against the will of the people and has made it difficult to comment on proposed sites.
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. Additionally: The redevelopment of Dobroyd Mills (which will increase the quantity of new homes in the area) has not been considered within the Local Plan.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

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

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Disproportionate scale of development for the size of Scholes. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. Empty homes should be used before greenfield sites are developed. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. Brownfield sites should be used for housing before allocating greenfield sites. 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 has acted against the will of the people and has made it difficult to comment on proposed sites. 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: **SL3359**

Consultee: **1048741 Dorothy Walker**

Agent:

Rep ID: **PDLP\_AD3095**

**Soundness - Positively Prepared**

Scale of development is disproportionate to the size of the village.

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested**

Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response**

As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.

Paragraph/Site: **SL3359**

Consultee: **1048742 Helen Peace**

Agent:

Rep ID: **PDLP\_AD2293**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

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**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1048763 Terrance Longbottom** Agent: Rep ID: **PDLP\_AD3092**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1048766 Robert Hughes** Agent: Rep ID: **PDLP\_AD2289**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1048768 Clare Cameron** Agent: Rep ID: **PDLP\_AD3088**

**Soundness - Positively Prepared** Brownfield sites should be used for housing, before allocating greenfield sites.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Develop brownfield sites first. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

Paragraph/Site: **SL3359** Consultee: **1048770 Nicola Simpkins** Agent: Rep ID: **PDLP\_AD3085**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.



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<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1049295 Mr Michael Reader</b>	Agent:	Rep ID: <b>PDLP_AD951</b>
<b>Soundness - Positively Prepared</b>	The appeal inspector for the 1996 planning application on part of H597 (also to the west of Scholes) raised concerns the proposal was incompatible with the size of Scholes, elements of the scheme would be out of scale and character and impact on sense of openness. Disproportionate scale of development compared to the size of Scholes. The council have disregarded the weight of local, reasoned opposition. Lack of infrastructure to accommodate new developments (NPPF 157), no funding committed and timing of essential junction improvements in the IDP not consistent with site delivery timescales.		
<b>Soundness - Justified</b>	Cumulative highway impacts of the number of allocations in the area. Inadequate local highways - sub-standard local access roads, lack of footways, parking problems and lack of width on main routes with evidence from Holmfirth/Meltham Local Plan (1987) provided. Congestion caused by commuting to work and school. Disagree with the sustainability appraisal for this site. Insufficient primary school places in Scholes and insufficient secondary school places in the area. Assumptions relating to school places are not consistent with DoE publications on national pupil projections. Flood risk / drainage concerns in relation to general sewerage and drainage infrastructure as also raised by Yorkshire Water in 1995.		
<b>Soundness - Consistent with National Policy</b>	Loss of agricultural land which is linked to a prosperous rural economy (NPPF 28). Lack of infrastructure to accommodate new developments (NPPF 157), no funding committed and timing of essential junction improvements in the IDP not consistent with site delivery timescales. Lack of accessibility to local services and facilities within walking distance and steep walk from Holmfirth centre (primary school, health facilities, retail) (NPPF 17 / NPPF 38 / NPPF 72). Development not located where the need to travel will be minimised (NPPF 34). Lack of local employment opportunities (NPPF 17). Local Plan to take account of neighbourhood plans (NPPF 155). Impact on the role and character of Scholes (NPPF 17 and NPPF 58). Site should be Local Green Space (NPPF76 / NPPF 77). Adverse impact on Morton Wood Local Wildlife site (within 600 metres of H297 and H597) (NPPF 109). Unsustainable location for development (NPPF 6 / NPPF 7 / NPPF 55) specifically in relation to low carbon, biodiversity, waste & pollution, climate change, greenhouse gases, reducing congestion (NPPF 30). Planning decision notice (2007/90856) stated that an application for one dwelling in the green belt adjacent to Scholes was in an unsustainable location which would rely heavily on the private car.		
<b>Proposed Change Requested</b>	Designate H297, H597 and SL3359 as Local Green Space		
<b>Council Response</b>	No change. The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Although this site is currently open, it is not within the green belt and is therefore not subject to the consideration of openness as set out in national planning policy in relation to green belt. This site was designated as safeguarded land in the Unitary Development Plan. This site has been assessed using the Council's site allocations methodology and supporting evidence includes the Sustainability Appraisal and settlement appraisal which provide up to date evidence indicating that this site is in a sustainable location. Site SL3359 has been accepted as a safeguarded land option as part of the approach of planning positively for future development beyond the Local Plan period. The site capacity is indicative only and the actual capacity will be determined through a review of the Local Plan. 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. The Local Plan is supported by an Infrastructure Delivery Plan which sets out the required Infrastructure to support the spatial strategy outlined in the Local Plan. Highways assessment has shown that although the site cannot currently be directly accessed, the wider local highway links are acceptable. The Local Plan (SD1, Strategy and Policies, page 104) supports sustainable travel through Policy PLP 20 (Sustainable travel). The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are		

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available to meet the needs of future growth and this will be considered for safeguarded land sites as part of a future Local Plan review. Greenfield run-off rates will be required to manage surface water from this site in accordance with the local plan policies once adopted. 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. 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. At present there is no Neighbourhood Plan within this area to take into account in plan making. A Local Green Space option (LocGS2721) which covered the whole existing UDP Provisional Open Land site was rejected because when assessed against the Local Green Space criteria it is not demonstrably special and does not therefore merit designation as Local Green Space (see option LocGS2721). Further individual Local Green Space options have been created as a result of representations for the discrete areas of land covered by sites H297 (LocGS3449), H597 (LocGS3450) and SL3359 (LocGS3451). There were no comments from specific technical consultees through the site allocations process in relation to impacts on Morton Wood Local Wildlife Site which is to the south-east of Scholes village. Site SL3359 is to the west of the village.

Paragraph/Site: <b>SL3359</b>	Consultee: <b>1049349</b>	<b>MR PHILIP ROBERTSON</b>	Agent:	Rep ID: <b>PDLP_AD517</b>
<b>Soundness - Consistent with National Policy</b>	I believe the Publication Draft is unsound as regards the evidence on which it is based, and its failure adequately to reflect NPPF policies specifically paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109 and 157 therein.			
<b>Proposed Change Requested</b>	I wish the Local Plan to be changed such that all three sites are designated as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1049498</b>	<b>Jacqueline Garrood</b>	Agent:	Rep ID: <b>PDLP_AD2105</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1049501</b>	<b>Siobhan Campbell</b>	Agent:	Rep ID: <b>PDLP_AD3113</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.			
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.			
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.			
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1049503</b>	<b>Sean Sweeney</b>	Agent:	Rep ID: <b>PDLP_AD2286</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.			
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for			

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**National Policy** the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1049515 Mrs Karen Trimming** Agent: Rep ID: **PDLP\_AD2605**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1049518 Mark Trimming** Agent: Rep ID: **PDLP\_AD3227**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1049678 Janet Park** Agent: Rep ID: **PDLP\_AD2728**

**Soundness - Positively Prepared** There are many empty houses and brownfield sites in Kirklees which should be used before greenfield sites.  
**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.  
**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.  
**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.  
**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.

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Paragraph/Site: <b>SL3359</b>	Consultee: <b>1049683 Ruth Parker</b>	Agent:	Rep ID: <b>PDLP_AD3120</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1049688 Oliver Plunkett</b>	Agent:	Rep ID: <b>PDLP_AD2806</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space. The plan should be scaled back to 10% of the proposed number of houses.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1049692 Dawn Johnson</b>	Agent:	Rep ID: <b>PDLP_AD2656</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1049696 Ian Lofthouse</b>	Agent:	Rep ID: <b>PDLP_AD2650</b>
<b>Soundness - Positively Prepared</b>	Brownfield sites should be used for housing before allocating greenfield sites.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Develop brownfield sites first The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/sreas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for key brownfield sites; use of funding regimes to remediate/pump prime stalled sites/difficult sites; creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.		

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

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Paragraph/Site: **SL3359** Consultee: **1049705 Kayley Dickinson** Agent: Rep ID: **PDLP\_AD2314**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **1049708 Laura Dickinson** Agent: Rep ID: **PDLP\_AD2309**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **1049710 Sarah Hill** Agent: Rep ID: **PDLP\_AD2306**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

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Paragraph/Site: **SL3359** Consultee: **1049912 Vera Parker** Agent: Rep ID: **PDLP\_AD2797**

**Soundness - Positively Prepared** There is a need within Scholes for smaller homes for the over 55s.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Housing mixThe Publication Draft Local Plan (paragraph 8.29) recognises that 'it is important to achieve a mix of housing in terms of size, type, tenure and suitability for specific groups of people to contribute to meeting local needs and contribute to sustainable development in accordance with national planning policy'. The housing mix for a specific site will be determined, in accordance with Policy PLP 11 of the Local Plan, within the planning application process.

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Paragraph/Site: **SL3359** Consultee: **1049918 Jacqueline Mason** Agent: Rep ID: **PDLP\_AD2199**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

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<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1049921 Lisa Holmes</b>	Agent:	Rep ID: <b>PDLP_AD2204</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1050159 Alan Garlick</b>	Agent:	Rep ID: <b>PDLP_AD2696</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL3359</b>	Consultee: <b>1050162 Edward Dawson-Jones</b>	Agent:	Rep ID: <b>PDLP_AD2967</b>
<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village. Alternative sites haven't been fully considered. A previous planning application for housing (on part of the proposed site) was refused in 1995.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. The council hasn't fully considered possible alternative sites. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes		

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for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. Reference to historic refused planning application [94/62/94132/W3?] Proposed allocations and planning applications are assessed against current national planning policy. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.

Paragraph/Site: **SL3359** Consultee: **1050222 Geoff Furse** Agent: Rep ID: **PDLP\_AD2263**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1050446 Louise Roche** Agent: Rep ID: **PDLP\_AD2737**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1050465 Lesley Jackson** Agent: Rep ID: **PDLP\_AD2268**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1050477 Mary McGivern** Agent: Rep ID: **PDLP\_AD3213**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1050478 Jodie Brearley** Agent: Rep ID: **PDLP\_AD3183**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

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

<b>National Policy</b>	the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.

Paragraph/Site: **SL3359** Consultee: **1050480 Jillian Sherwell** Agent: Rep ID: **PDLP\_AD3006**

**Soundness - Positively Prepared** Scale of proposed development is disproportionate to the size of the village. The council has not searched out the most suitable sites and spread them evenly throughout the area. The council has not given enough weight to objections raised by local residents.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. The council hasn't fully considered possible alternative sites. Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district's housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications. The council hasn't given sufficient weight to previous objections raised by the local community. 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: **SL3359** Consultee: **1050486 John Stanley** Agent: Rep ID: **PDLP\_AD1585**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1050488 David Jackson** Agent: Rep ID: **PDLP\_AD3198**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.



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**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1050508 Beverley Brown** Agent: Rep ID: **PDLP\_AD3186**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1050509 Adrian Brown** Agent: Rep ID: **PDLP\_AD3192**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1050510 Francis Brown** Agent: Rep ID: **PDLP\_AD3015**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1050511 Holly Brown** Agent: Rep ID: **PDLP\_AD3204**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1050515 Julie Coe** Agent: Rep ID: **PDLP\_AD3209**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

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<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.

Paragraph/Site: **SL3359** Consultee: **1050516 Don Fisher** Agent: Rep ID: **PDLP\_AD2794**

<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.

Paragraph/Site: **SL3359** Consultee: **1050803 Cllr Kenneth Sims** Agent: Rep ID: **PDLP\_AD3668**

<b>Soundness - Justified</b>	The above allocation will impact on New Mill Junction where the A635 meets the A616. This junction should be a priority for improvement in the plan. The junction provides access to Holmfirth, Manchester, Sheffield, Barnsley and the M1 for local traffic and through traffic. It is already operating over capacity and that is a fact recognised by the Highways Authority and indeed a scheme for a roundabout is under preparation. Ward councillors are being consulted, but there is little chance of funding the scheme if it is not also recognised as a required infrastructure improvement in the Local Plan and as such will not attract sufficient CIL funding from developments in the locality. The evidence tells us the junction is over capacity and additional traffic from new homes will therefore make the situation much worse, with congestion, pollution and delays. School places are currently calculated on a cumulative basis as new homes are occupied. Homes that are approved and not built or not occupied are not included in the calculation for a subsequent planning application for homes. That means, given the number of homes approved and not built in recent times in the ward (iro 300) the Council is already under estimating the number of school places needed.
<b>Proposed Change Requested</b>	Include the New Mill junction in the proposed transport schemes within the Allocations and Designations document. Preference would be to reduce the number of housing allocation sites (H and SL), but in addition the Planning Inspector might also consider changing the status of some of the housing allocation sites to 'safeguarded'. That will spread the build over a longer period and reduce the immediate impact on school places.
<b>Council Response</b>	No change. The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Although this site is currently open, it is not within the green belt and is therefore not subject to the consideration of openness as set out in national planning policy in relation to green belt. This site was designated as safeguarded land in the Unitary Development Plan. This site has been assessed using the Council's site allocations methodology and supporting evidence includes the Sustainability Appraisal and settlement appraisal which provide up to date evidence indicating that this site is in a sustainable location. Site SL3359 has been accepted as a safeguarded land option as part of the approach of planning positively for future development beyond the Local Plan period. The site capacity is indicative only and the actual capacity will be determined through a review of the Local Plan. The Local Plan is supported by an Infrastructure Delivery Plan which sets out the required Infrastructure to support the spatial strategy outlined in the Local Plan. Highways assessment has shown that although the site cannot currently be directly accessed, the wider local highway links are acceptable. The Local Plan (SD1, Strategy and Policies, page 104) supports sustainable travel through Policy PLP 20 (Sustainable travel). The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and this will be considered for safeguarded land sites as part of a future Local Plan review. Greenfield run-off rates will be required to manage surface water from this site in accordance with the local plan policies once adopted. 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. 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. At present there is no Neighbourhood Plan within this area to take into account in plan making. A Local Green Space option (LocGS2721) which covered the whole existing UDP Provisional Open Land site was rejected because when assessed against the Local Green Space criteria it is not demonstrably special and does not therefore merit designation as Local Green Space (see option LocGS2721). Further individual Local Green Space options have been created as a result of representations for the discrete areas of land covered by sites H297 (LocGS3449), H597 (LocGS3450) and SL3359 (LocGS3451). There were no comments from specific technical consultees through the site allocations process in relation to impacts on Morton Wood Local Wildlife Site which is to the south-east of Scholes village. Site SL3359 is to the west of the village. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option.

Paragraph/Site: **SL3359**

Consultee: **1050805 Cllr Donald Firth**

Agent:

Rep ID: **PDLP\_AD3667**

**Soundness - Justified**

The above allocation will impact on New Mill Junction where the A635 meets the A616. This junction should be a priority for improvement in the plan. The junction provides access to Holmfirth, Manchester, Sheffield, Barnsley and the M1 for local traffic and through traffic. It is already operating over capacity and that is a fact recognised by the Highways Authority and indeed a scheme for a roundabout is under preparation. Ward councillors are being consulted, but there is little chance of funding the scheme if it is not also recognised as a required infrastructure improvement in the Local Plan and as such will not attract sufficient CIL funding from developments in the locality. The evidence tells us the junction is over capacity and additional traffic from new homes will therefore make the situation much worse, with congestion, pollution and delays. School places are currently calculated on a cumulative basis as new homes are occupied. Homes that are approved and not built or not occupied are not included in the calculation for a subsequent planning application for homes. That means, given the number of homes approved and not built in recent times in the ward (iro 300) the Council is already under estimating the number of school places needed.

**Proposed Change Requested**

Include the New Mill junction in the proposed transport schemes within the Allocations and Designations document. Preference would be to reduce the number of housing allocation sites (H and SL), but in addition the Planning Inspector might also consider changing the status of some of the housing allocation sites to 'safeguarded'. That will spread the build over a longer period and reduce the immediate impact on school places.

**Council Response**

No change. The council's Statement of Community Involvement sets out when, how and with whom it will consult with as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. Although this site is currently open, it is not within the green belt and is therefore not subject to the consideration of openness as set out in national planning policy in relation to green belt. This site was designated as safeguarded land in the Unitary Development Plan. This site has been assessed using the Council's site allocations methodology and supporting evidence includes the Sustainability Appraisal and settlement appraisal which provide up to date evidence indicating that this site is in a sustainable location. Site SL3359 has been accepted as a safeguarded land option as part of the approach of planning positively for future development beyond the Local Plan period. The site capacity is indicative only and the actual capacity will be determined through a review of the Local Plan. The Local Plan is supported by an Infrastructure Delivery Plan which sets out the required Infrastructure to support the spatial strategy outlined in the Local Plan. Highways assessment has shown that although the site cannot currently be directly accessed, the wider local highway links are acceptable. The Local Plan (SD1, Strategy and Policies, page 104) supports sustainable travel through Policy PLP 20 (Sustainable travel). The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and this will be considered for safeguarded land sites as part of a future Local Plan review. Greenfield run-off rates will be required to manage surface water from this site in accordance with the local plan policies once adopted. 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. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and

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how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. At present there is no Neighbourhood Plan within this area to take into account in plan making. A Local Green Space option (LocGS2721) which covered the whole existing UDP Provisional Open Land site was rejected because when assessed against the Local Green Space criteria it is not demonstrably special and does not therefore merit designation as Local Green Space (see option LocGS2721). Further individual Local Green Space options have been created as a result of representations for the discrete areas of land covered by sites H297 (LocGS3449), H597 (LocGS3450) and SL3359 (LocGS3451). There were no comments from specific technical consultees through the site allocations process in relation to impacts on Morton Wood Local Wildlife Site which is to the south-east of Scholes village. Site SL3359 is to the west of the village. A quantified assessment of the potential impacts of new development and associated traffic is set out in the Kirklees Council Air Quality Assessment (document ref - LE118). No objections were raised by Environmental Health in relation to this site option.

Paragraph/Site: **SL3359** Consultee: **1050975 Alan Stephenson Brown** Agent: Rep ID: **PDLP\_AD2670**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1053436 Stephen Wilson** Agent: Rep ID: **PDLP\_AD3848**

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359** Consultee: **1057467 Mr Andrew Taylor** Agent: Rep ID: **PDLP\_AD2734**

**Soundness - Positively Prepared** Empty homes within Kirklees should be filled before allocating greenfield sites for housing. Brownfield sites should be redeveloped before allocating greenfield sites for housing. Scale of proposed development is disproportionate to the size of the village. Other, more suitable, sites have not been fully considered by the council. Part of the proposed development site was refused planning permission for homes in 1995. The proposed development at Dobroyd Mills (which will increase the number of new homes in the area) hasn't been considered within the Local Plan. The council has made it difficult to comment on proposals and has acted against the will of the people.

**Soundness - Justified** Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy** The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Empty homes within Kirklees should be filled before allocating greenfield sites for housing. In any housing market, there will be homes for sale as part of the normal operation of the housing market. This also applies to homes which are empty on a short-term basis. The council has an Empty Homes Strategy which aims to address the number of long-term empty homes. In Kirklees, 1.2% of properties are long term vacant (at 2015) which is slightly higher than the national average. Brownfield sites should be redeveloped before allocating greenfield sites for housing. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a

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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.Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council’s site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.Other, more suitable, sites have not been fully considered by the council. Full consideration of the likely impacts of the Local Plan’s strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology. The Local Plan promotes the re-use of existing buildings and the use of brownfield land to meet development needs but also recognises that a brownfield only approach will not meet the district’s housing and employment land requirements. The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.Reference to historic refused planning application [94/62/94132/W3?]Proposed allocations and planning applications are assessed against current national planning policy.The proposed number of homes for each allocation is indicative only and based on an efficient use of land required by national planning policy – the actual number of homes to be delivered on sites will be a matter for individual planning applications.The proposed development at Dobroyd Mills (which will increase the number of new homes in the area) hasn’t been considered within the Local Plan. Dobroyd Mills is situated within an accepted mixed use allocation (MX1912a) within the Publication Draft Local Plan. It has, therefore, been fully considered as part of the site allocation process.The council has made it difficult to comment on proposals and has acted against the will of the people. 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: <b>SL3359</b>	Consultee: <b>1059482 Sean Brennan</b>	Agent:	Rep ID: <b>PDLP_AD1287</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>1059568 Mr Andrew Sugden</b>	Agent:	Rep ID: <b>PDLP_AD1372</b>
<b>Soundness - Justified</b>	The Publication Draft is unsound as regards the evidence on which it is based. I support the detailed representations being made by Scholes Future Group. Please refer to their document reference: SFG Reps Kirklees PDLP Dec 2016.		
<b>Soundness - Consistent with</b>	The Publication Draft is unsound as it fails to adequately reflect NPPF policies, specifically paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157.		

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**National Policy**

**Proposed Change Requested** Designate site SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **1059725 Mr Anthony Murphy**

Agent:

Rep ID: **PDLP\_AD1472**

**Soundness - Justified**

The plan is unsound as regards the evidence on which it is based. Supports the detailed representations being made by Scholes Future Group. Please refer to their document reference: SFG Reps Kirklees PDLP Dec 2016. Objection to SL3359 relates to a number of factors which renders Scholes unsuitable for these houses: access roads are barely adequate for the current population; there is little or no capacity in Scholes Junior School nor in Holmfirth High School; and this development will involve a long and short term negative impact on quality of life for existing residents.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately to reflect NPPF policies, specifically paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157.

**Proposed Change Requested** Designate sites H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. As part of the planning application process, consideration will be given to the need for developers to produce a site-specific Construction Management Plan.

Paragraph/Site: **SL3359**

Consultee: **1059926 A and G Micheli**

Agent:

Rep ID: **PDLP\_AD1702**

**Soundness - Positively Prepared**

This land is blighted by its proximity to housing and cannot effectively be used for agriculture. It should be allocated for affordable housing and used along with the adjacent accepted housing option, even if only for recreation/storage facilities.

**Proposed Change Requested** Allocate SL3359 for residential development

**Council Response** No change. Support noted.

Paragraph/Site: **SL3359**

Consultee: **1061673 Harry Trumbell**

Agent:

Rep ID: **PDLP\_AD2370**

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163, PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80.

Paragraph/Site: **SL3359**

Consultee: **1062165 Mrs Theresa Tyrrell**

Agent:

Rep ID: **PDLP\_AD2504**

**Soundness - Positively Prepared**

Scale of proposed development is disproportionate to the size of the village. Proposed housing mix is inappropriate. The council is not acting on behalf of the people.

**Soundness - Justified**

Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.

**Soundness - Consistent with National Policy**

The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.

**Proposed Change Requested** Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space. Reduce the proposed number of properties. Properly consider infrastructure requirements.

**Council Response** As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP\_SP163,

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PDLP\_AD475, PDLP\_AD479, PDLP\_AD951, PDLP\_RSO266, PDLP\_RSO269, PDLP\_RSO271, PDLP\_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt. The proposed mix of housing is inappropriate. 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 council is not acting on behalf of the local community. 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: <b>SL3359</b>	Consultee: <b>1062170 Mr Darren Tyrrell</b>	Agent:	Rep ID: <b>PDLP_AD2507</b>
<b>Soundness - Positively Prepared</b>	Scale of proposed development is disproportionate to the size of the village.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space .		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>1062920 Mr Shaun Ramsey</b>	Agent:	Rep ID: <b>PDLP_AD3174</b>
<b>Soundness - Positively Prepared</b>	Proposed allocations are disproportionate to the size of the village.		
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		
<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80. Additionally: Scale of proposed development is disproportionate to the size of the village. These sites were designated as safeguarded land in the Unitary Development Plan and as such are within the Scholes settlement. The sites have been assessed using the Council's site allocations methodology including use of evidence in the Settlement Appraisal and the sites have also been subject to Sustainability Appraisal as part of the Local Plan process. Sites H297 and H597 have been accepted as housing allocations as part of the approach of planning positively for development in the area. Following these assessments, the development of these sites is not deemed to represent disproportionate development compared to the scale of Scholes village. The site capacity is indicative and the actual capacity will be determined through the planning application process which can allow lower density development in certain circumstances. In relation to these sites, there are no exceptional circumstances for the site boundaries to be amended to add this land to the green belt.		

Paragraph/Site: <b>SL3359</b>	Consultee: <b>1063318 Tanya Davidson</b>	Agent:	Rep ID: <b>PDLP_AD3243</b>
<b>Soundness - Justified</b>	Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group.		

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<b>Soundness - Consistent with National Policy</b>	The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.		
<b>Proposed Change Requested</b>	Delete H297 and H597 and designate H297, H597 and SL3359 as Local Green Space.		
<b>Council Response</b>	As this response refers to support for the representation by Scholes Future Group, this issue is covered under their representations at PDLP_SP163, PDLP_AD475, PDLP_AD479, PDLP_AD951, PDLP_RSO266, PDLP_RSO269, PDLP_RSO271, PDLP_SA80.		
Paragraph/Site: <b>SL2297</b>	Consultee: <b>1061758 Messrs P &amp; N Crowther</b>	Agent: <b>941949 Will Mulvany</b>	Rep ID: <b>PDLP_AD2434</b>
<b>Council Response</b>	No change. Support noted for the allocation of site SL2297.		
Paragraph/Site: <b>SL2195</b>	Consultee: <b>943957 Mr Ian Smith</b>	Agent:	Rep ID: <b>PDLP_AD3800</b>
<b>Soundness - Justified</b>	This site adjoins the boundary of the Kirkburton Conservation Area. By identifying this area as Safeguarded Land, 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.		
<b>Soundness - Consistent with National Policy</b>	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.		
<b>Proposed Change Requested</b>	Before identifying this site as Safeguarded Land 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.		
<b>Council Response</b>	No change. At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that Safeguarded land sites are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is subsequently undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent local plan review, then a heritage impact assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then Policy PLP35 will provide appropriate mitigation. Furthermore, a heritage impact assessment would be required for safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.		
Paragraph/Site: <b>SL2196</b>	Consultee: <b>943957 Mr Ian Smith</b>	Agent:	Rep ID: <b>PDLP_AD3801</b>
<b>Soundness - Justified</b>	The development of this area would involve the loss of an open area within the Thurstonland Conservation Area. It could also affect the setting of the Grade II Ash Cottage to the north-east. By identifying this area as Safeguarded Land, 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.		
<b>Soundness - Consistent with National Policy</b>	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 identifying this site as Safeguarded Land 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. At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that Safeguarded land sites are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is subsequently undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent local plan review, then a heritage impact assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then Policy PLP35 will provide appropriate mitigation. Furthermore, a heritage impact assessment would be required for safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

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Paragraph/Site: **SL2173**

Consultee: **942405**    **unknown**

Agent: **941908**    **Mr Andrew Rose**

Rep ID: **PDLP\_AD3289**

### Soundness - Justified

The site has no available access, is in disparate ownerships, is not deliverable and therefore does not accord with the Framework criteria for allocation. The Technical Appraisal concludes that the site is not developable or deliverable. As such it should not be identified in the Plan.

### Proposed Change Requested

Remove safeguarded land site SL2173 from the plan.

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period as referred to in the conclusion for this site. The site conclusion also refers to there being a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356.

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Paragraph/Site: **SL2173**

Consultee: **942475**

Agent: **942044**    **Mr Charles Watson**

Rep ID: **PDLP\_AD3650**

### Soundness - Effective

The access issues to the site can be rectified.

### Proposed Change Requested

Allocate the site for housing.

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.

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Paragraph/Site: **SL2173**

Consultee: **943445**    **Cllr John Taylor**

Agent:

Rep ID: **PDLP\_AD2918**

### Soundness - Effective

SL3356 & SL2173 The access to these sites would need to be via Far Bank which is a narrow road which already has several side roads accessed off it and is also the access to the Local School. The road could not support a further increase in traffic or any more access points and I do not think that these safeguarded sites could ever be developed safely for housing from a Highways perspective and would question whether the Highways assessment undertaken was adequate and these sites could ever be brought forward for development.

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the

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needs of future growth and will be considered further at the next review of the Local Plan.

Paragraph/Site: **SL2173**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3802**

### Soundness - Justified

Shelly Methodist Church in the centre of this area is a Grade II Listed Building. By identifying this area as Safeguarded Land, 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 the absence of any assessment of the degree of harm which the development of this area of Safeguarded Land might cause to this Listed Building, 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 identification of this area as Safeguarded Land is compatible the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated

### Proposed Change Requested

Before identifying this site as Safeguarded Land 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. At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an 'amber' impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a 'safeguarded land' site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an 'amber' impact upon the historic environment within BP29.

Paragraph/Site: **SL2173**

Consultee: **944135 Mr Anthony Clifton**

Agent:

Rep ID: **PDLP\_AD1086**

### Soundness - Justified

Safeguarded land sites would have negative implications for infrastructure when they go ahead. The site will have access issues: the sites show a small number of very narrow accesses to Far Bank which is already badly congested by parking of residents of terraced houses who have no alternative to using the road; and from school traffic

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.

Paragraph/Site: **SL2173**

Consultee: **967018 Mrs Ann Priestman**

Agent:

Rep ID: **PDLP\_AD225**

### Soundness - Justified

Far Bank is a narrow through road linking two major roads and will not be able to cope with the extra traffic generated, made worse by there being no local major employment, parking for Shelley first school and that the narrow access points will have inadequate sight lines. Public transport is poor and the local schools and doctor's surgeries will not be able to cater for the increased population.

### Proposed Change Requested

Delete site SL2173

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a

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safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan.

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Paragraph/Site: **SL2173**

Consultee: **967018 Mrs Ann Priestman**

Agent:

Rep ID: **PDLP\_AD215**

### **Soundness - Justified**

The road infrastructure will not be able to cope with the increased amount of traffic generated. Road junctions with both Far Bank and especially Near Bank are substandard and the situation is made worse by school traffic. There is insufficient capacity in either the schools or the doctor's surgery to adequately cater for the increased population. There are endangered species of wildlife on the site that would be adversely affected. The land is unstable and development could exacerbate the problem.

### **Proposed Change Requested**

Delete site SL2173.

### **Council Response**

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.

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Paragraph/Site: **SL2173**

Consultee: **971123 Lynn Parsley**

Agent:

Rep ID: **PDLP\_AD2071**

### **Soundness - Justified**

- Proposal ignores very restricted access onto overused road, incredibly busy at school times. Local roads will become even more crowded as new owners will need cars to travel to work - School on Far Bank, is already stretched for places, the doctors surgeries are all full. - Very little adequate infrastructure in the area. Unlikely money will be found to improve the local infrastructure, so Shelley will become even more of a dormitory village than it is already - Drainage situation is dire - Little industry. - Not much affordable housing for local young people - Very few amenities for youngsters therefore the likelihood of vandalism will increase - Accepted the 'legally compliant' and 'co-operation' sections as above because I have no knowledge if it has been done correctly or not. - Plan is not sound, especially as there are undeveloped brownfield sites in the area. Need green fields for our health and sanity.

### **Council Response**

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The 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.

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Paragraph/Site: **SL2173**

Consultee: **1043362 Mrs Carmel Fawcett**

Agent:

Rep ID: **PDLP\_AD1188**

### **Soundness - Justified**

- Impact of traffic onto Far Bank. Already unsafe road conditions, especially at school times. A further (at least 250 vehicles) accessing Far Bank would be unsustainable and dangerous. Accessibility for cars leaving Far Bank to join Penistone Road. At busy times vehicles are already queuing more than half way up the road. Vehicles turning into Far Bank from Penistone Road are already unable to enter due to (residents) parked vehicles and cars queuing to leave. - Available education provision. How many extra primary school places are available at present, and how many extra places will be required to serve 250 houses?

### **Council Response**

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a

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safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan.

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Paragraph/Site: **SL2173**

Consultee: **1045872 Mr Andrew Jones**

Agent:

Rep ID: **PDLP\_AD754**

### Soundness - Justified

The only access available for these sites would be through a small portion of land that joins onto Far Bank from just below the school. At this point the road down the hill becomes effectively single track as there is only on road parking for the houses situated there. As a result parked cars mean that large queues of traffic already occur and this situation would be made worse by a further entrance to a large housing estate. Increased traffic in this area would present a real risk to the children attempting to get to the school. At the bottom of Far Bank you already get large volumes of traffic and this creates frequent near accidents as there is a zebra crossing immediately after the junction with Penistone Road. This zebra crossing is frequently used by the children walking up to school and cars tend to pull out looking for gaps in the traffic not paying attention to the zebra crossing which is a risk that would be made worse by the proposed development. Drainage is already a concern with many of the houses on Far Bank experiencing flooding in their cellars. Developing the land in this area would make run off after heavy rainfall worse and would increase the likelihood of basement level flooding in this area. There is insufficient schooling in this area for the addition of so many houses. This could further compound the traffic problems as people residing in the proposed estate may have to drive to schools further away as opposed to walk to the local ones.

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan. 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.

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Paragraph/Site: **SL2173**

Consultee: **1047340 Dr John Priestman**

Agent:

Rep ID: **PDLP\_AD218**

### Soundness - Justified

This land is between two very poor roads. The infrastructure is lacking - the school and the doctors surgeries are full. There is little employment in this area. Change of this land would affect the wildlife and water table.

### Proposed Change Requested

Remove the site from the plan.

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.

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Paragraph/Site: **SL2173**

Consultee: **1047989 Miss Melanie Hawthornthwaite**

Agent:

Rep ID: **PDLP\_AD1943**

### Soundness - Justified

- The access points to this site from Far Bank are highly unsuitable. Just above and below the school and below the brow of the hill. Parking and traffic on Far Bank is bad all the time, at school drop off and pick up time it is already dangerous and often results in gridlock. Adding potential 400 plus cars is asking for trouble. - Also the school would be unable to cope with so many additional children and the impact on local GP surgeries would be significant.

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved

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through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **SL2173**

Consultee: **1048571 Mr Peter Driscoll**

Agent:

Rep ID: **PDLP\_AD303**

### Soundness - Justified

The possible development of this land would present many problems for the surrounding area. Drainage of that area would be difficult if any number of houses were built there. The burden placed on local facilities, especially schools would be unacceptably high. The impact of extra traffic on both Far Bank and Near Bank would also present major problems. At busy times traffic on Far Bank already becomes congested and this in turn adds to the heavy traffic on both Penistone Road and Huddersfield Road. It has taken the village many years to adapt the extra houses that were built in the 1990's.

### Proposed Change Requested

The major considerations to make these proposals anything like acceptable would be for the issues mentioned above to be addressed. Infrastructure is the big one - drainage, schools and local roads. Is Kirklees MBC prepared to accept the hefty financial investment needed to address these things and make the proposition viable?

### 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. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **SL2173**

Consultee: **1048868 Mrs Julie Walker**

Agent:

Rep ID: **PDLP\_AD347**

### Soundness - Justified

There is already a substantial amount of traffic using Far Bank, especially at work and school times. There are many houses with no off road parking so residents cars are parked on Far Bank. Joining Penistone Road from Far Bank is already difficult during peak periods (work and school times). For all of these reasons Far Bank is not suitable for more housing and associated cars. Drainage is already a problem for houses on Far Bank so again it is not suitable for additional housing on the scale suggested. The First School is fully subscribed and does not have the capacity for the number of children that would need a place if such large numbers of houses were built.

### Council Response

No change. 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: **SL2173**

Consultee: **1049289 Mark Crawshaw**

Agent:

Rep ID: **PDLP\_AD2330**

### Soundness - Justified

- Site SL3356 and SL2173 will increase pressure on local population. -Far Bank is a traffic pressure point. Traffic overload through Shelley, Kirkburton and Skelmanthorpe each working day, especially mornings and evenings, the main arteries being Penistone road to Huddersfield, Denby Dale road to Wakefield. Commuters suffer snail pace travel speeds and exhaust emissions. Adding more and more housing only exacerbates this pressure as well as the provision on health services, school provision etc.. -

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes

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beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **SL2173**

Consultee: **1049359 Mrs Carol Hirst**

Agent:

Rep ID: **PDLP\_AD533**

### **Soundness - Justified**

There is no provision for extra school places. There are no plans to improve the road on Far Bank. There is an unused brown field site ready to use south of this designated land. No provision for more health centres and an on-going consultation about closing A and E in Huddersfield. is proceeding.

### **Soundness - Effective**

Safeguarded land between Far Bank and Near Bank, Shelley has no suitable access. Any entry off Far Bank would be off a dangerous road, near a school's entrance, graveyard and listed chapel. Drainage would be a severe problem on the sloping site.

### **Proposed Change Requested**

A better access point to the site, improvements to flow of traffic on Far Bank. More school provision. Better local health provision in, especially A and E in local area. More jobs locally before more houses are built. 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. 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.

### **Council Response**

No Change Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal and a wider consideration of infrastructure planning impacts, such as schools, roads and other infrastructure – this is set out in the Local Plan evidence base. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **SL2173**

Consultee: **1049386 Mrs Laura Brunning**

Agent:

Rep ID: **PDLP\_AD576**

### **Soundness - Positively Prepared**

There are brownfield sites in the locality that have not been utilised.

### **Soundness - Justified**

Near Bank and Far Bank are narrow, busy roads reduced to single width in places by parked cars. The proposed access would exacerbate problems especially near the access to the school and when there are community events at the church. Shelley college buses also use Far Bank and this causes traffic jams. These roads join Penistone Road at a dangerous bend. The site floods and therefore has drainage issues. The school, GP and dental practices are already near capacity.

### **Proposed Change Requested**

Use brownfield sites.

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

**Council Response** No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The Local Plan 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. Policy PLP7 of SD1 (Strategy and Policies) refers to the efficient use of previously developed land in sustainable locations.

Paragraph/Site: **SL2173**

Consultee: **1050435 Diane Lowther**

Agent:

Rep ID: **PDLP\_AD2328**

**Soundness - Justified**

Far Bank is already congested due to existing traffic, school drop-off and pick ups, its narrow width and parking problems which leaves one lane to use most of the time. There is no infrastructure for further housing, such as schools and health facilities. Flooding occurs on Penistone Road at times and more run off would be caused through a very old chapel (cemetery) causing pollution and drainage systems problems.

**Proposed Change Requested**

Wider road and reduce traffic flow through Far Bank. No access into and out of Far Bank but onto New Bank. Less traffic.

**Council Response**

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The management of surface water in development proposals is set out in Policy PLP28 (SD1, Strategy and Policies, page 127) which includes reference to maintaining typical greenfield run-off rates from sites.

Paragraph/Site: **SL2173**

Consultee: **1057679 Mrs Susan Screaton**

Agent:

Rep ID: **PDLP\_AD957**

**Soundness - Justified**

Traffic would be horrendous.

**Council Response**

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.

Paragraph/Site: **SL2164**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP\_AD3803**

**Soundness - Justified**

This site adjoins the boundary of the Kirkburton Conservation Area. By identifying this area as safeguarded Land, 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**

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

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

<b>National Policy</b>	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. In the absence of any assessment of the degree of harm which the development of this area of Safeguarded Land 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 identification of this area as Safeguarded Land is compatible with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.
<b>Proposed Change Requested</b>	Before identifying this site as Safeguarded Land 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
<b>Council Response</b>	No change. At a meeting on 2nd February 2017 Historic England and the Council discussed whether assurances could be put in place to ensure that a Heritage Impact Assessment would be required in the event of an application being received on a safeguarded land site. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. Planning permission for the permanent development of safeguarded land should only be granted following a subsequent Local Plan review which proposes the development. At the meeting on 2nd February 2017 Historic England and the Council agreed that safeguarded land should not be allocated for development within the plan period unless a plan review is undertaken. Nevertheless, should a proposed safeguarded land site (i.e. one identified as having an ‘amber’ impact upon the historic environment within BP29) be allocated for development following a subsequent Local Plan review, then a Heritage Impact Assessment will be undertaken by the Council to provide the necessary degree of evaluation to inform both the reviewed Plan itself and its associated Sustainability Appraisal with respect to the likely effects upon the historic environment of developing that site. The Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. Furthermore, an applicant would also be required to prepare a Heritage Impact Assessment for applications upon safeguarded land sites identified as having an ‘amber’ impact upon the historic environment within BP29.

Paragraph/Site: <b>SL3356</b>	Consultee: <b>942405</b>	<b>unknown</b>	Agent: <b>941908</b>	<b>Mr Andrew Rose</b>	Rep ID: <b>PDLP_AD3290</b>
<b>Soundness - Justified</b>	The site has no access and is not deliverable. There is no site frontage to the adopted highway. SL3356 is landlocked with no feasible access. Potential impacts on the Grade 2 listed Shelley Methodist Church, contains a pond, well/spring and has potential overland drainage issues. The site is not deliverable or developable and should not be identified in the Plan. As such it should not be identified in the Plan.				
<b>Proposed Change Requested</b>	Remove safeguarded land site SL3356 from the plan.				
<b>Council Response</b>	No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period as referred to in the conclusion for this site. The site conclusion also refers to there being a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. It is important to note that the Council is not proposing that safeguarded land sites (SL sites) are allocated for development at this present time. In relation to the historic environment, the Council considers that in the event that an application is made for development upon a ‘safeguarded land’ site then this would have to be in conformity with Policy PLP 6 and any other relevant Local Plan policies, including Policy PLP35. The site is not within a high flood risk area on the Environment Agency Flood Map. The management of surface water in development proposals is set out in Policy PLP28 (SD1, Strategy and Policies, page 127) which includes reference to maintaining typical greenfield run-off rates from sites.				

Paragraph/Site: <b>SL3356</b>	Consultee: <b>942475</b>		Agent: <b>942044</b>	<b>Mr Charles Watson</b>	Rep ID: <b>PDLP_AD3652</b>
<b>Soundness - Effective</b>	The access issues to the site can be rectified.				
<b>Proposed Change Requested</b>	Allocate the site for housing.				
<b>Council Response</b>	No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.				



**Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations**Paragraph/Site: **SL3356**Consultee: **943445 Cllr John Taylor**

Agent:

Rep ID: **PDLP\_AD2917****Soundness - Effective**

SL3356 & SL2173 The access to these sites would need to be via Far Bank which is a narrow road which already has several side roads accessed off it and is also the access to the Local School. The road could not support a further increase in traffic or any more access points and I do not think that these safeguarded sites could ever be developed safely for housing from a Highways perspective and would question whether the Highways assessment undertaken was adequate and these sites could ever be brought forward for development.

**Council Response**

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL3356. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan.

Paragraph/Site: **SL3356**Consultee: **944135 Mr Anthony Clifton**

Agent:

Rep ID: **PDLP\_AD1087****Soundness - Justified**

Safeguarded land sites would have negative implications for infrastructure when they go ahead. The site will have access issues: the sites show a small number of very narrow accesses to Far Bank which is already badly congested by parking of residents of terraced houses who have no alternative to using the road; and from school traffic

**Council Response**

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.

Paragraph/Site: **SL3356**Consultee: **967018 Mrs Ann Priestman**

Agent:

Rep ID: **PDLP\_AD216****Soundness - Justified**

The road infrastructure will not be able to cope with the increased amount of traffic generated. Road junctions with both Far Bank and especially Near Bank are substandard and the situation is made worse by school traffic. There is insufficient capacity in either the schools or the doctor's surgery to adequately cater for the increased population. There are endangered species of wildlife on the site that would be adversely affected. The land is unstable and development could exacerbate the problem.

**Proposed Change Requested**

Delete site SL3356.

**Council Response**

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.

Paragraph/Site: **SL3356**Consultee: **967018 Mrs Ann Priestman**

Agent:

Rep ID: **PDLP\_AD228****Soundness - Justified**

Access to this site is dependant on the neighbouring site (SL2173) so will result in cars from 250 new homes feeding into Far Bank which is unsuitable to cater for the additional traffic. Far Bank and Near Bank are both narrow and winding and both have inadequate junctions with main roads linking major towns and the motorways, although there is no local major employment. The situation on Far Bank is made worse by parking for the local school. The local schools and doctor's surgeries are full and will not be able to cater for the increased population. The site acts as a soakaway for surrounding land but is poorly drained with lots of surface water.

**Proposed Change Requested**

Delete site SL3356

**Council Response**

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes

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beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan.

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Paragraph/Site: **SL3356**

Consultee: **971123 Lynn Parsley**

Agent:

Rep ID: **PDLP\_AD2069**

**Soundness - Positively Prepared** - There is a local brownfield site undeveloped, why use greenfields?

**Soundness - Justified** - Proposal seems not to take into account the already heavily used road, Far Bank, which is likely to be main exit point for the development. - Already 3,000 people living in this small village. School is overcrowded, doctors overcrowded. No real amenities, so where do these extra residents find work. - Greenfield sites which help with drainage. Shelley Beck already to capacity.

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs. The 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.

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Paragraph/Site: **SL3356**

Consultee: **1043362 Mrs Carmel Fawcett**

Agent:

Rep ID: **PDLP\_AD1187**

### Soundness - Justified

- Impact of traffic onto Far Bank. Already unsafe road conditions, especially at school times. A further (at least 250 vehicles) accessing Far Bank would be unsustainable and dangerous. Accessibility for cars leaving Far Bank to join Penistone Road. At busy times vehicles are already queuing more than half way up the road. Vehicles turning into Far Bank from Penistone Road are already unable to enter due to (residents) parked vehicles and cars queuing to leave. - Available education provision. How many extra primary school places are available at present, and how many extra places will be required to serve 250 houses?

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan.

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Paragraph/Site: **SL3356**

Consultee: **1045872 Mr Andrew Jones**

Agent:

Rep ID: **PDLP\_AD753**

### Soundness - Justified

The only access available for these sites would be through a small portion of land that joins onto Far Bank from just below the school. At this point the road down the hill becomes effectively single track as there is only on road parking for the houses situated there. As a result parked cars mean that large queues of traffic already occur and this situation would be made worse by a further entrance to a large housing estate. Increased traffic in this area would present a real risk to the children attempting to get to the school. At the bottom of Far Bank you already get large volumes of traffic and this creates frequent near accidents as there is a zebra crossing immediately after the junction with Penistone Road. This zebra crossing is frequently used by the children walking up to school and cars tend to pull out looking for gaps in the traffic not paying attention to the zebra crossing which is a risk that would be made worse by the proposed development. Drainage is already a concern with many of the houses on Far Bank experiencing flooding in their cellars. Developing the land in this area would make run off after heavy rainfall worse and would increase the likelihood of basement level flooding in this area. There is insufficient schooling in this area for

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

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the addition of so many houses. This could further compound the traffic problems as people residing in the proposed estate may have to drive to schools further away as opposed to walk to the local ones.

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan. 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.

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Paragraph/Site: **SL3356**

Consultee: **1046422 Mrs Annette Kenworthy**

Agent:

Rep ID: **PDLP\_AD555**

### Soundness - Justified

The proposed development by reason of its size has an unacceptably adverse impact on the amenities of the properties in close proximity to the site and the surrounding area by reason of overlooking, loss of privacy and visually overbearing impact. The site access proposals are not in accordance with acceptable standards and would lead to potential safety hazards. The proposed access points for the site are unacceptable and will create conflicts between pedestrians, cyclists and vehicular movements thereby creating a safety hazard on already overcrowded neighbourhood roads that are often difficult to navigate due to the regional topography. The Layout and Siting, both in itself and relation to adjoining buildings, spaces and visual amenities, is inappropriate and unsympathetic to the appearance and character of the local environment. The statement that insufficient brown field development sites are available is not valid. A limited brownfield site is available within the draft area and would indeed support small scale development. The loss of valuable open greenbelt spaces is detrimental to the welfare of the local population and even more so to wildlife in particular amphibious species and birds. The decline in many local species would be greatly accelerated at a time when planning should be giving extra care and consideration to such issues. With health care and educational resources already stretched in the area the impact of large scale development would be damaging and unsound on many levels. The use of this virtually landlocked natural environment for such a large scale development shows a lack of sound judgement as well as a lack of understanding as to the needs of the surrounding community. The natural topography of this area of natural beauty indicate major issues with drainage.

### 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 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).

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Paragraph/Site: **SL3356**

Consultee: **1047340 Dr John Priestman**

Agent:

Rep ID: **PDLP\_AD219**

### Soundness - Justified

This land is between two very poor roads. The infrastructure is lacking - the school and the doctors surgeries are full. There is little employment in this area. Change of this land would affect the wildlife and water table.

### Proposed Change Requested

Remove the site from the plan.

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes

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

beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.

Paragraph/Site: **SL3356**

Consultee: **1047989 Miss Melanie Hawthornthwaite**

Agent:

Rep ID: **PDLP\_AD1940**

### Soundness - Justified

- The access points to this site from Far Bank are highly unsuitable. Just above and below the school and below the brow of the hill. Parking and traffic on Far Bank is bad all the time, at school drop off and pick up time it is already dangerous and often results in gridlock. Adding potential 400 plus cars is asking for trouble. - Also the school would be unable to cope with so many additional children and the impact on local GP surgeries would be significant.

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan. Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **SL3356**

Consultee: **1048571 Mr Peter Driscoll**

Agent:

Rep ID: **PDLP\_AD300**

### Soundness - Justified

The possible development of this land would present many problems for the surrounding area. Drainage of that area would be difficult if any number of houses were built there. The burden placed on local facilities, especially schools would be unacceptably high. The impact of extra traffic on both Far Bank and Near Bank would also present major problems. At busy times traffic on Far Bank already becomes congested and this in turn adds to the heavy traffic on both Penistone Road and Huddersfield Road. It has taken the village many years to adapt the extra houses that were built in the 1990's.

### Proposed Change Requested

The major considerations to make these proposals anything like acceptable would be for the issues mentioned above to be addressed. Infrastructure is the big one - drainage, schools and local roads. Is Kirklees MBC prepared to accept the hefty financial investment needed to address these things and make the proposition viable?

### 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. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper. The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth.

Paragraph/Site: **SL3356**

Consultee: **1048868 Mrs Julie Walker**

Agent:

Rep ID: **PDLP\_AD348**

### Soundness - Justified

There is already a substantial amount of traffic using Far Bank, especially at work and school times. There are many houses with no off road parking so residents cars are parked on Far Bank. Joining Penistone Road from Far Bank is already difficult during peak periods (work and school times). For all of these reasons Far Bank is not suitable for more housing and associated cars. Drainage is already a problem for houses on Far Bank so again it is not suitable for additional housing on the scale suggested. The First School is fully subscribed and does not have the capacity for the number of children that would need a place if such large numbers of houses were built.

### Council Response

No change. 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

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

impacts on infrastructure. This is explained in the Infrastructure Technical Paper (Nov 2016) (BP11).The individual site assessment provides site specific infrastructure evidence for allocating this site. BP29

Paragraph/Site: **SL3356**

Consultee: **1049289 Mark Crawshaw**

Agent:

Rep ID: **PDLP\_AD2329**

### Soundness - Justified

- Site SL3356 and SL2173 will increase pressure on local population. -Far Bank is a traffic pressure point. Traffic overload through Shelley, Kirkburton and Skelmanthorpe each working day, especially mornings and evenings,the main arteries being Penistone road to Huddersfield, Denby Dale road to Wakefield. Commuters suffer snail pace travel speeds and exhaust emissions. Adding more and more housing only exacerbates this pressure as well as the provision on health services , school provision etc.. -

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.

Paragraph/Site: **SL3356**

Consultee: **1049386 Mrs Laura Brunning**

Agent:

Rep ID: **PDLP\_AD581**

### Soundness - Positively Prepared

There are brownfield sites in the locality that have not been utilised.

### Soundness - Justified

Near Bank and Far Bank are narrow, busy roads reduced to single width in places by parked cars. The proposed access would exacerbate problems especially near the access to the school and when there are community events at the church. Shelley college buses also use Far Bank and this causes traffic jams. These roads join Penistone Road at a dangerous bend. The site floods and therefore has drainage issues. The school, GP and dental practices are already near capacity.

### Proposed Change Requested

Use brownfield sites. Sort out parking and traffic congestion and add traffic calming measures to current roads and traffic signals on Penistone Road. Rectify Near Bank access onto Huddersfield road

### Council Response

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan.Health issues have been factored into the site assessment process for the local plan. Meetings have been held and discussions are on-going as part of the Local Plan infrastructure planning process with North Kirklees and Greater Huddersfield CCGs to plan for the impacts of allocations in the local plan and how it can influence NHS forward planning and investment including GP estates strategies and hospital infrastructure needs.The Local Plan 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. Policy PLP7 of SD1 (Strategy and Policies) refers to the efficient use of previously developed land in sustainable locations.

Paragraph/Site: **SL3356**

Consultee: **1049801 Mr Stephen Hughes**

Agent:

Rep ID: **PDLP\_AD718**

### Soundness - Positively Prepared

There are no plans for employment opportunities in the area and as there broad band access is poor there is no encouragement for self employment working from home. It is unsound in that any development on this site will encourage more commuter traffic onto the roads. This in turn counters a stated policy aim

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	in 12.1 of the PDLP which states that implementation of the policy should take into account any impact on climate change factors.
<b>Soundness - Justified</b>	It is unsound because it does not take account of access to the site and the increase in traffic generated on Far bank or Near Bank. Far Bank is a heavily used road at peak times, particularly during school starts and finishes, generating excessive parking, making progress up or down the road difficult now. If Near Bank was designated as the access to the site it would create difficulties at the junction of Huddersfield Road and Near Bank, where a left turn is not feasible without blocking traffic in both directions. It is unsound because there is no indication of how these problems would be mitigated. It is unsound because it does not take account of the need for extra spaces being available in local school Should this development and others listed in the PDLP take place it would put extra pressure on Shelley First School, Kirburton Middle School and Shelley College.
<b>Proposed Change Requested</b>	The plan should address how the road and transport infrastructure will be modified to cope with the extra developments in the Shelley area. In particular how the local traffic problems can be mitigated. The ones listed in the PDLP do not help this area of Kirklees..The plan should indicate how extra school places will be planned for.
<b>Council Response</b>	No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option. As this land is proposed as safeguarded land it would be subject to further assessment at the next Local Plan review.The impact of development on school place planning has been assessed through the infrastructure planning work between the Local Plan and School Place Planning Teams. This work is on-going to ensure school places are available to meet the needs of future growth and will be considered further at the next review of the Local Plan.

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Paragraph/Site: **SL3356**

Consultee: **1057679 Mrs Susan Screaton**

Agent:

Rep ID: **PDLP\_AD958**

**Soundness - Justified**

Traffic would be horrendous.

**Council Response**

No change. Lack of evidence that access can be achieved to enable delivery of this site during the plan period. This option has therefore been accepted as a safeguarded land option. There is a reasonable prospect that the constraints on this site could be overcome in the future to allow the delivery of new homes beyond the end of the local plan period along with SL2173. Significant third party land required for access. Suitable access could only be achieved through land to the east which is within a rejected housing option.

Paragraph/Site: **SL3357**

Consultee: **944135 Mr Anthony Clifton**

Agent:

Rep ID: **PDLP\_AD1088**

**Soundness - Justified**

Safeguarded land sites would have negative implications for infrastructure when they go ahead.

**Council Response**

No change. 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.

Paragraph/Site: **SL3357**

Consultee: **1034209 Mr David Robert Taylor**

Agent:

Rep ID: **PDLP\_AD87**

**Soundness - Justified**

Taken together with this site SS3357 (22 house capacity) and the next SS3358 (87 house capacity), the clear outcome could be more than doubling the number of houses in the village. Considering that Stocksmoor has no shops, no doctors' or dentists' surgery, no school, poor road links, poor public transport, it is difficult to understand why the village has been targeted for such a large future development plan.

**Proposed Change Requested**

Extend the consultation period and its scope.Take the Stocksmoor 2 safeguarded sites completely out of the plan, as being totally unsuitable for sustainable development.

**Council Response**

No change. The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. The Publication Draft Local Plan is subject to a representations period in accordance with

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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 H2562 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: **SL3357**

Consultee: **1048539 Mr paul jackson**

Agent:

Rep ID: **PDLP\_AD394**

**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 through the back door in this way 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. The Sustainability Appraisal (SD5) sets out further details in relation to the sustainability indicators used to assess this site (note that H2562 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: **SL3358**

Consultee: **942774 Lauren Garside**

Agent:

Rep ID: **PDLP\_AD3815**

**Soundness - Positively Prepared**

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

**Soundness - Justified**

- The proposed allocation is immediately adjacent to Shepley Mill Wood Ancient Woodland and Upper and Lower Stones Wood Local Wildlife Site. - Developments which lead to detrimental impacts on Local Wildlife Sites, is likely to damage the biodiversity value of the Local Wildlife Site and lead to net losses in biodiversity. - The development of large housing estates or employment land immediately adjacent to areas of ancient woodland can significantly

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	impact the biodiversity value of woodland through poor design and recreational disturbance. The allocation therefore has the potential to lead to significant impacts on the Ancient Woodland/ Local Wildlife.
<b>Soundness - Consistent with National Policy</b>	- Developments which lead to detrimental impacts on Local Wildlife Sites, is likely to damage the biodiversity value of the Local Wildlife Site and lead to net losses in biodiversity. Such is in contradiction of Paragraphs 9 and 118 of the NPPF.
<b>Proposed Change Requested</b>	Should the allocation be adopted we advise that the development is master planned to avoid, mitigate and compensate for the biodiversity impacts on the ancient woodland and to prevent net losses in biodiversity. A 20m ecological buffer should also be created between SL3358 and Shepley Mill Wood Ancient Woodland, in order to protect the ancient woodland from design impacts (such as fly tipping and dumping of garden waste) and to prevent houses/ development backing directly onto the site. This is in accordance with Natural England guidelines. Such area should be managed for biodiversity, contain areas of habitat creation which complement and support the Ancient Woodland and the planning application for the site should include an ecological management and monitoring plan for the buffer for a minimum for 5 years. If the allocation is to be developed for housing we also advise that substantial areas of green spaces are provided within the site to provide residents with alternative areas for recreation, in order to reduce recreational disturbance impacts on the ancient woodland
<b>Council Response</b>	No change. This site is proposed as Safeguarded Land therefore it would be safeguarded for potential future development through a Local Plan review. The site is adjacent to a Local Wildlife Site but does not encroach into the Local Wildlife Site. The Local Plan contains Policy PLP 30 (SD1, Strategy and Policies, page 132) which seeks to protect Local Wildlife Sites when development proposals may have a direct or indirect adverse effect on Local Wildlife Sites including reference to potential mitigation.

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Paragraph/Site: **SL3358**

Consultee: **943445 Cllr John Taylor**

Agent:

Rep ID: **PDLP\_AD2926**

**Soundness - Justified**

SL3358 is land outside the current boundary of the village. The only feasible access in onto Shepley Rd at a bend in the road where the visibility is poor. This is a large site with circa 90 houses planned for it and an unsuitable location from a Highways viewpoint.

**Council Response**

No change. 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.

Paragraph/Site: **SL3358**

Consultee: **944135 Mr Anthony Clifton**

Agent:

Rep ID: **PDLP\_AD1089**

**Soundness - Justified**

Safeguarded land sites would have negative implications for infrastructure when they go ahead.

**Council Response**

No change. 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.

Paragraph/Site: **SL3358**

Consultee: **1034209 Mr David Robert Taylor**

Agent:

Rep ID: **PDLP\_AD85**

**Soundness - Justified**

Taken together with this site SS3357 (22 house capacity) and the next SS3358 (87 house capacity), the clear outcome could be more than doubling the number of houses in the village. Considering that Stocksmoor has no shops, no doctors' or dentists' surgery, no school, poor road links, poor public transport, it is difficult to understand why the village has been targeted for such a large future development 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 is subject to a representations period in accordance with



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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.

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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**