

Holme Valley Neighbourhood Development Plan (NDP) (Submission Plan) Summary of representations

Kirklees Council is required under Regulation 4 (3)(b) of the Neighbourhood Planning (Referendums) Regulations 2012 to provide a summary of any representations submitted to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act.

Kirklees Council undertook publicity on the Holme Valley Neighbourhood Development Plan (Submission Plan) between 8 December 2020 and 2 February 2021. This is required by Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

75 representations were received in response to the publicity and are summarised below:

Electronic copies of the full representations on the Plan are available to view at: [Kirklees Council - Holme Valley Neighbourhood Development Plan \(objective.co.uk\)](http://objective.co.uk)

All representations were submitted by the council to the independent examiner for consideration as part of the examination of the Holme Valley NDP.

Respondent	Summary of representation
The Coal Authority	There are recorded risks from past coal mining activity at shallow depth in the Neighbourhood area including; mine entries, shallow mine workings and past reported surface hazards. The Neighbourhood Plan does not appear to allocate sites for future development, no specific comments to make.
Defence Infrastructure Organisation (DIO)	General The DIO consider the NDP is in general conformity with the strategic policies contained in the Kirklees Local Plan and NPPF. Policy 9 Protecting and Enhancing Local Community Facilities Part 3 should be deleted to ensure that any re-use of community buildings can be appropriately assessed and to ensure that the policy would not be a constraint to bringing forward suitable development.
Forestry Commission England (Y and NE Forestry Commission)	The Forestry Commission is not able to input into the consultation process for Local Plans. The representation does, however, provide a list of information sources to assist in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving renewable energy obligations.
Natural England	Natural England does not have any specific comments on the Regulation 16 Neighbourhood Plan.

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National Grid	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. No record of such assets within the Neighbourhood Plan area have been identified.</p>
Peak District National Park Authority	<p>General PDNPA concurs with the comments made by KMBC regarding the use of HVNP as a development management tool.</p> <p>Many of the policies do not apply to that part of the neighbourhood area that is within the Peak District National Park (PDNP). However, the exclusion is phrased with reference to the planning authority, not the physical reality of the national park. In order to ensure that the PDNP remains protected from possibly harmful development in the (however unlikely) event of planning powers being transferred to constituent authorities; this should be amended.</p> <p>Policy 1 Protecting and enhancing the landscape character of Holme Valley The policy 'applies to that part of the Neighbourhood Area where Kirklees Council is the local Planning Authority.' However, Holme Valley Parish Council, via the Neighbourhood Plan, has a duty under section 62 of the Environment Act to have regard to the purposes of a national park in exercising or performing any functions in relation to, or so as to affect, land in a national park. One of the 'valued characteristics' listed on paragraph 9.15 of the PDNPA's Core Strategy (CS) is 'the flow of landscape character across and beyond the national park boundary, providing a continuity of landscape and valued setting for the national park.' For this reason, simply 'excluding' the national park part of the neighbourhood area from the operation of the policy may not be sufficient. The neighbourhood policy is a confusing mix of spatial strategy & design code, does not have sufficient clarity to meet the NPPF test (para 16d) and therefore risks undermining strategic policy.</p> <p>Policy 2 Protecting and enhancing the built character of the Holme Valley and promoting high quality design Neighbourhood policy 'avoid any adverse impacts' is weaker than CS L3 'development will not be permitted where it is likely to cause harm to the significance of any cultural heritage asset.' Neighbourhood policy could undermine strategic policy therefore is not in general conformity. Does not satisfy NPPF para 16 d due to lack of clarity.</p>

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	<p>Policy 3 Conserving and enhancing local heritage assets PDNPA concurs with the comments offered by KMBC but additionally would require that any non-designated heritage assets within the national park part of the neighbourhood area be considered under Development Management Policy DMC5.</p> <p>Policy 4 Design codes for high quality shopfronts and advertisements PDNPA has a 'Detailed Design Guide Supplementary Planning Document for shop fronts'. It also has detailed Development Management Policies with regard to shop fronts (DMS4) and outdoor advertising (DMS5). The direct conflicts between neighbourhood and strategic policy (regarding roller shutters and illuminations, which were allowed by the (reg 14) neighbourhood plan but not by strategic policy) were addressed in accordance with comments submitted by PDNPA at regulation 14. However the policy as submitted does not meet the NPPF requirement for clarity and it is not evident how a decision maker should react to development proposals when confronted with neighbourhood policies, development management policies and supplementary planning documents that are all contain very detailed policies that may or may not be (but on the face it not) working together as a coherent package.</p> <p>Policy 5 Promoting high quality public realm and improvements to gateways and highways The neighbourhood policy does not satisfy the NPPF requirement for clarity. It confuses transport, public realm and provision of open space, and contains non-planning matters. The policy duplicates many of the requirements of the PDNPA's Transport Design Guide Supplementary Document.</p> <p>Policy 6 Building homes for the future The issues of non-conformity with strategic policy have been addressed in accordance with comments submitted by PDNPA at regulation 14. Policy as submitted now does not apply to the national park part of the neighbourhood area.</p> <p>Policy 7 Supporting economic activity It is noted that the issues of non-conformity of neighbourhood policy with PDNPA's strategic planning policies has been addressed by stating "Policy 7 only applies to that part of the Neighbourhood Area where Kirklees Council is the local planning authority."</p>

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	<p>The policy does not meet the NPPF requirement for clarity. It covers business expansion, farm diversification, home working, tourist and visitor facilities and tourist and visitor accommodation.</p> <p>If this policy were to be re-written into separate policies for each type of development, then the following strategic planning policies would apply: CS L1. Most of the neighbourhood within the PDNP is 'natural zone' and protected from development other than in exceptional circumstances. CS E2 (and DMP DME 2,5 and 7) which deal with business development in the countryside CS RT3 which sets out the principles for camping and caravan sites</p> <p>Policy 9 Protecting and enhancing local community facilities Replicates strategic policy except the definition of a community facility is different so this would be confusing for the decision-maker.</p> <p>Policy 11 Improving transport, accessibility and local infrastructure The policy does not meet the NPPF requirement for clarity. It is a confusing mixture of design guide, parking standards and traffic management, and in most cases replicates – and therefore risks undermining – strategic policy.</p> <p>Policy 12 Promoting sustainability The policy is constructed in a confusing way. The first part is a requirement for a sustainability statement for major development, but the associated list does not contain elements of sustainability that could be assessed but fragments of policy.</p>
Planning North Sport England	<p>The representation sets out a series of issues that neighbourhood plans can consider and sources of guidance and advice. No specific issues were raised in relation to the Holme Valley neighbourhood Plan.</p> <p>The issues covered include:</p> <ul style="list-style-type: none"> • Compliance with national planning policy for sport as set out in the NPPF with reference to paragraphs 96 and 97. • Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. • Assessments of need and strategies for indoor and outdoor sport facilities. • Design guidance for new or improved sports facilities.

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	<ul style="list-style-type: none"> • Implications of new housing development on the demand for sport and links to healthy lifestyles and creating healthy communities. • Active Design principles
Theatres Trust (Mr Tom Clarke)	<p>The Trust is supportive of HVNDP Policy 9 which provides protection for the area's valued facilities, although for clarity we suggest the list of facilities is amended to include theatres and performance venues. The Trust would recommend inclusion of 'cultural/performance' facilities within the defined list for the avoidance of doubt and to add greater clarity, enhancing the protection of the area's valued facilities including the Southgate Theatre and Picturedrome. This will ensure better consistency with paragraph 92 of the NPPF. We would consider this to be justifiable given theatres and music venues help provide access to culture and the arts for local people and provide opportunities for participation and engagement. This is particularly true of the Southgate as the home of the Honley Players group.</p>
Trans Pennine Trail	No comment.
Yorkshire Wildlife Trust (Miss Laura Hobbs)	<p>Encouraged to see the theme of climate emergency and targets to reduce emissions running through the document. However, some aspects could be strengthened.</p> <p>4.9 Sustainability and Biodiversity, greater emphasis could be had for local biodiversity assets, outside of key Biodiversity Opportunity Zones. Holme Valley contains 2 internationally designated sites, a nationally designated site and a number of locally designated sites. Their value and need for protection should not be underestimated.</p> <p>Local wildlife sites (LWS) play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites. With no statutory status, only form of protection is good planning policy and decisions. Together with SSSI, LWS support locally and nationally threatened species and habitats. They are essential building blocks of ecological networks. Absolutely paramount that core sites for biodiversity are protected from developmental loss and damage if to avoid a net loss in biodiversity. Strengthening of such sites and their buffering habitat within policy 13 is encouraged.</p> <p>Encourage the consideration of measurable biodiversity net gains for developments to include 10% aspiration net gain as expected in the emerging Environment Bill.</p>

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	<p>Clear from the plan that climate emergency, sustainability and local character are important to the community. This could be supported by consideration of an additional policy to support better placemaking under the use of Building with Nature standards.</p> <p>Support for the use of sensitive lighting schemes and green infrastructure should be encouraged.</p>
Holme Valley Vision Network	<p>Support Holme Valley Neighbourhood Development Plan. Recognise amount of hard work put into its production. Holme Valley Parish Area is one of the largest in the country, this and the diversity of the parish (nature of settlements, landscape and population) has meant the compilation of the plan has been a complex exercise.</p> <p>Reassured the Neighbourhood Development Plan has been by a group of people drawn from a number of different interest groups. The plan has been founded on research and consultation exercises carried out over the last ten years. Confident the plan addresses matters that most people care about including provision of housing that reflect the needs of people who live and work in the valley, provision of local employment opportunities, a vibrant local economy, development that respects and works with our heritage and landscape, taking action to mitigate the impact of climate change and reduce carbon emissions, provision of facilities that most people's everyday needs and enhance strength of our local communities including the identified local green spaces.</p> <p>Regret not been permissible to allocate sites and have greater influence over factors such as density. These matters are contained in the Local Plan but this does not reflect fully the needs of the valley. The need for lower cost, smaller dwellings not properly taken into account and other factors particularly accessibility and impact of traffic on unsuitable roads and proximity of employment opportunities. The extent and amount of consultation carried out is evidenced throughout the plan. In the main part, the plan is acceptable and addresses these matters. Consider plan could have gone further requiring actions from developers. Complying with National Planning Policy Framework and planning professional's requirements by providing flexibility has led in places to ambiguity and weakness in places which could make enforcement more difficult.</p>
Holmfirth Transition Town (Ms Frances Bennett)	Holmfirth Transition Town (HoTT) are very keen that the NDP reflects the determination of Holme Valley to become carbon neutral by 2030 by reducing carbon footprint and installing

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	<p>more sustainable energy. This has only been referenced in the last NDP objective Sustainability, should be in the vision as well.</p> <p>The NDP should include support for both local councils Climate Change Emergency declarations. Sustainability must be considered in all policies to mitigate climate change.</p> <p>HoTT endorses the NDP where it encourages protecting and enhancing the landscape and built character of Holme Valley, promoting high quality design for new development, shops and public realm and conserving heritage and non-designated assets. Important now, as government going to introduce 'beauty' as a criterion for judging planning applications for new developments, placing greater emphasis on locally popular design, quality and access to nature through national planning policies and introducing model design codes.</p> <p>Important to protect the landscape but not be at the exclusion of renewable energy projects such as wind turbines. Any construction which can reduce our carbon footprint must have equal consideration as the landscape. Further comment should also be included on retaining and restoring peat bogs to retain their carbon sink and on tree planting to mitigate carbon footprints.</p> <p>Important to protect built character and conservation areas but policy should not exclude developments to promote renewable energy. Agree non designated assets should be preserved but not listed as this will prevent buildings adding energy efficient measures.</p> <p>The NDP should include provisions for supporting building of live/work housing units to encourage and provide for people to be able to work from or near to home and for a sustainable economy.</p> <p>Community led housing/self-build/housing associations and affordable housing should have a high priority. NDP policy of encouraging use of brownfield sites over greenfield, recycling of mills for apartments endorsed.</p> <p>Old and new build housing should incorporate significant insulation to be more energy efficient and where possible renewable energy for heating and hot water. NDP does not go far enough, only encourages such actions which developers are likely to override to save costs. All new</p>

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	<p>buildings should be zero energy rated and older buildings should be encouraged to attain a better energy efficiency.</p> <p>Renewable Energy must be better supported through the NDP.</p> <p>Proposed support for local businesses, town centres to retain their uniqueness, provision of services and goods for the local population, encouragement of home working to reduce carbon footprint and tourist facilities to assist local economy welcomed.</p> <p>Providing allotments and other initiatives to encourage well-being of community by protecting community facilities and local green spaces welcomed.</p> <p>Idea of a cycleway between Holmfirth and Huddersfield and other areas supported. The Plan should be looking at ways to prevent or discourage HGVs from coming through Holmfirth/Honley. Hierarchy of traffic management interventions welcomed.</p> <p>Policy that new developments should install district heating from renewable resources or prove why it is unviable welcomed.</p> <p>On the whole HoTT supports the NDP although it would like to see firmer action required of developers of housing and infrastructure for promoting sustainable living.</p>
GL and EA Bennett	<p>Comments relate to Kirklees Local Plan allocation HS183 Land to the west of Bankfield Drive, Holmbridge and sets out reasons why this site should not be developed.</p>
Vivien Aizlewood	<p>Wooldale Chapel Field It is understood that the owner of Wooldale Chapel Field does not support its designation as a Local Green Space.</p> <p>Sandygate Fields Support the designation of Sandygate Fields as a Local Green Space on the grounds of its historic and field patterns and views.</p> <p>Cross Lane Development Due to soil and surface drainage issues the height of the development is raised from the original plan and its design is out of keeping with the area.</p>

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Scholes Future Group	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
JK and R Meadows	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Robin Sherwell	Support the HVNDP designation of Well Garden, Marsh Road and Sandygate Fields as Local Green Spaces.
Miss Gina Nelson	Well Garden and Sandygate Fields should be protected from development.
Mr and Mrs Deakin	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Stephen Frost	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Malcolm Hoffman	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Ben Bolton	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Judith and David Brignell	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr John Cunningham	The Plan is incompatible with the Climate Emergency Kirklees declared in 2019. In particular, the sites for housing allocation place the majority of sites on greenfield locations, this is in conflict with one of the reports stated aims and is in conflict to responding to the climate emergency. The plan fails to consider any change to work patterns as a result of the Covid pandemic, and how this might impact work from home and the changes necessary to support such changing work patterns.
Mr Eddie Dawson-Jones	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Peter Booth	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mrs Laura Wild	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Bob Luty	The area to the west of Wesley Ave should be set aside as a local Green Space and a habitat for the growth of Wild flowers and rich in wild life and bird life which is slowly being pushed towards busy roads and being killed by traffic
Helen Howden	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mrs Anne Charlesworth	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Michael Howden	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr B Moran	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mrs J Moran	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
I and J Lofthouse	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.

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Jillian Sherwell	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
James Hirst	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Michael Reader	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Michael Battye	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr David Wild	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Stephen Hey	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
R Hey	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Chris Stanley	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Mark Perkins	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mrs Karen Ellis	Support the HVNDP.
Mrs Jayne Andrews	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr N Haworth	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Oliver Plunkett	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Ms Diane Wilson	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mrs Judith Haworth	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Dorril	<p>The description of the area is largely nostalgic and does not reflect current development and traffic issues. The Plan does not address what is Holme Valley and Holmfirth which lacks a physical centre. The Plan does recognise economic activity and the role of small independent businesses but there is no plan of how this might be supported and the role of broadband.</p> <p>There is no plan for supporting the Picturedrome.</p> <p>The Plan does not address the damage to the character of the area through housing development and road schemes and it is not considered that the policies could enhance the environment or wildlife.</p>
Ms Elizabeth Heywood	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mrs Linda Moore	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Andrew Wild	Support the HVNDP designation of Sandygate Fields as a Local Green Space.

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Mrs Margaret Biggs	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space. Concerned about the level of traffic and the safety of pedestrians.
Jean Cook	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Michael Cook	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Rodney Websdell	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr C R Atkinson	References to Community Infrastructure Levy should be deleted from the HVNDP as this is not being progressed by Kirklees Council.
Mr Ryan Sweeney	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mrs Tracy Dearnley	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Miss Maggie Dearnley	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
M and B Berryman	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Joshua Dalton	There should be no more building in the Holme Valley due to pressures on infrastructure. Designate all untouched land in the Holme Valley as green belt. No more new builds.
Mr Malcolm Mason	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Edward Booth	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
June Snow	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr John Reynolds	Support the HVNDP designation of Well Garden as a Local Green Space. Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr Peter Jones	I have no confidence in the HVNDP process due to existing new builds in the area. The consultation is undertaken in the context of decisions already taken including government housing targets which the Plan cannot stop.
Wendy Dale	Support the HVNDP designation of Sandygate Fields as a Local Green Space.
Mr David Sykes	The Neighbourhood Plan needs to recognise the fields to the west of Wesley Avenue as being Local Green Space. These fields are of particular local significance and should be protected from new development in a similar way to Green Belt protection. These fields are a) reasonably close proximity to the community they serve; b) demonstrably special to a local community and hold a particular local significance because of their beauty, tranquillity and the richness of their wildlife; and c) they are local in character and are not an extensive tract of land.

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	The Plan should be amended to state that all new build houses will be carbon zero houses, both at the point of construction and throughout their lifetime.
Mr Ian Webb	The policy intentions to protect and enhance the landscape and built character and promote high quality design are good but must be implemented. This comment is also made in relation to conserving and enhancing local non designated heritage assets and design codes for high quality shop fronts.
Julie Vickerman	Although the documents are well prepared to put cases forward, in the light of the pandemic do certain items not need a re-think? People will be working from home now, the high street will change forever, is it not possible to look at this with fresh eyes? High Street premises could be redeveloped for housing with innovative architectural approaches, this cuts down on emissions and the need to gobble up our valuable green spaces which have proved to be ever-more needed when outdoor activities have been encouraged and taken up. New accommodation/housing, whether development on Brownfield or conversions should be environmentally sustainable at the point of build/conversion. There will be no returning 'normal' but there will be 'different' and this is a great opportunity for infrastructural change.
Mr Peter Jackson	There should be a focus on tackling dog fouling in the area and tackling illegal dumping in the area.
Mr O Berryman	It's a very good document, well done to all those involved in putting it together. I would like to see a little more emphasis on the need to keep the valley sides around Holmfirth Town Centre free of development. If areas like Cliff or the area below Holt Lane were ever to be developed then I fear that the town itself would start to lose its distinctive semi rural character and become much like many other towns
Kirklees Council	<p>Holme Valley Neighbourhood Development Plan could not be interpreted with certainty as it lacks clarity of meaning and in places is inconsistent, repetitive, unreasonable and overly prescriptive. The complex policies would result in applicants and the planning service finding it difficult to navigate them to produce development schemes that would accord with the HVNDP as a whole.</p> <p>There is a significant degree of overlap with Kirklees Local Plan policy which risks confusion for both applicants and officers, Officers are also concerned that Neighbourhood Plan policy as written would significantly undermine Local Plan policies, in particular LP35 'Historic Environment' and LP52 'Protection and Improvement of Environmental quality' with respect to the protection of heritage assets and protection from pollution.</p>

Respondent	Summary of representation
	<p>There is significant amount of overlap within the NDP with the same issues repeated within and between policies.</p> <p>The HVNP needs to clearly identify which policies apply within Kirklees and the Peak District National Park.</p> <p>Policy 1 and 2 There is overlap between policy 1 and 2 which leads to duplicated criteria and some inconsistency of approach.</p> <p>Policy 1 Protecting and enhancing the landscape character of Holme Valley The policy is overly detailed which may make it difficult for applicants and decision makers to identify the key characteristics in each of the 8 landscape character areas which make them unique and need to be protected and the requirements of applicants to ensure protection and enhancement of the landscape character. Clarity is also required as to how applicants should use the supporting evidence and Appendix 7 to inform potential planning applications.</p> <p>Policy 2 Protecting and enhancing the landscape character of the Holme Valley Title of policy and supporting text implies that policy 2 applies only to conservation areas but the policy does not distinguish between development within or outside conservation areas. Issues of high quality design and management of conservation areas is not the same. Wording in the policy will undermine Local Plan policy LP35. Policy conflicts with NPPF.</p> <p>Policy 3 Conserving and enhancing local heritage assets An agreed list of non-designated heritage assets is required and should be listed in the policy.</p> <p>Policy 4 Design codes for high quality shopfronts and advertisements In general conformity with NPPF. Many principles repeat Local Plan policy LP25. Length and complexity of policy makes it more suited to a design code. It is prescriptive in parts, imprecise and difficult to apply. Undermines Local Plan policy LP52 in respect to light pollution.</p> <p>Policy 5 Promoting high quality public realm and improvements to gateways and highways</p>

Respondent	Summary of representation
	<p>Unclear what type of development the public realm part of the policy is aimed at. Significant focus given to this area of policy most of which is likely beyond the scope of development proposals. Little supporting text to justify or evidence the policy. It is ambiguously worded or repetitive.</p> <p>Policy 6 Building homes for the future Significant overlap with local plan policy including LP7 Efficient and Effective use of land and Buildings, LP11 Housing Mix and Affordable Housing, LP20 Sustainable Travel and LP21 Highways and Access. There is very little in part 1 'General Principles' that addresses any issue specific to the Neighbourhood Plan area.</p> <p>Policy 7 Supporting economic activity There is nothing in Policy 7 that provides any local distinctiveness to policies already contained within the Local Plan.</p> <p>Policy 8 Facilitating development in Holmfirth Town Centre and Honley District centre and Brockholes and New Mill Local Centres There is very little in the policy that addresses any issue specific to the neighbourhood plan area. The Retailing and Town Centres section of the Local Plan Strategy and Policies Document sets out a strategy that seeks to protect all defined centres and facilitate new growth including Holmfirth, Honley, Brockholes and New Mill.</p> <p>Policy 9 Protecting and enhancing local community facilities Overlaps, repeats and undermines Local Plan policy LP48.</p> <p>Policy 10 Protecting Local Green Space Well Garden, Marsh Road, Scholes - Designation of this site as Local Green Space (LGS) meets the NPPF and NPPG criteria for LGS designation as it performs the function of a village green within Scholes village and has a particular local significance based on its community use.</p> <p>The proposed designation of Wooldale Chapel Field and Sandy Gate Scholes as Local Green Space (LGS) which would have similar protection to green belt is not supported as officers do not consider that they meet the criteria as set out in NPPF paragraph 100 as to what constitutes a LGS.</p>

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	<p>The Triangle, Hade Edge - the site comprises an area of amenity greenspace which has a particular local significance based on its use by the community and is considered to meet the NPPF criteria for LGS designation.</p> <p>Policy 11 Improving transport, accessibility and local infrastructure Duplicates Local Plan policy, LP20, LP21, LP31 and undermines LP20 by focusing on car share or carpooling facilities only.</p> <p>The Council welcomes policy to encourage access improvements to the River Holme footpath network.</p> <p>Policy 12 Promoting sustainability No information in supporting information to justify why only major development must prepare a sustainability statement, could undermine the Local Plan and not be as supportive as intended to achieve the Parish Council's target of becoming carbon neutral by 2030.</p> <p>Duplication of Local Plan policy LP24 and LP26 in some parts.</p> <p>Reference to install district heating from renewable resources and deliver an on-site heat network and clauses 5 to 7 should be supported by viability evidence. Evidence is also needed to support the requirement that 50% of energy must come from renewable sources.</p> <p>Policy 13 Protecting wildlife and securing biodiversity net gain Inconsistencies with Local Plan policy LP30. NDP policy 13 is generic and does not add local detail. In view of emerging technical note and anticipated Environment Act consider deleting policy.</p> <p>Policy 14 Community Infrastructure Levy Areas highlighted for funding need further evidence to support community views. Unclear what gaps are being filled in relation to new and existing infrastructure to accommodate new development.</p>