

Kirklees Local Plan Submission Documents SD13

Statement of Publication
Consultation and Summary of
Main Issues (Regulation 22)





Kirklees Statement of Publication Consultation and Summary of Main issues (Regulation 22)

April 2017

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1 Introduction

- 1.1 The purpose of this document is to outline the consultation undertaken on the Kirklees Publication Draft Local Plan and to provide a summary of the main issues raised in the representations. This is to accord with Regulation 22 (1) (c) (v) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 As part of the Publication draft consultation the following documents were consulted on:
- Kirklees Publication Draft Local Plan – Strategies and Policies
 - Kirklees Publication Draft Local Plan – Allocations and Designations
 - Green belt boundary changes
 - Rejected site options
 - Kirklees Publication Draft Local Plan Sustainability Appraisal
 - Community Infrastructure Levy (CIL) – Draft Charging Schedule (This document has its own Consultation Reports - see CIL Submission Document – CIL/010 Kirklees CIL Statement of Consultation and Summary of Representations - April 2017).
- 1.3 This document should be read in conjunction with the council’s Statement of Pre-Submission Consultation (SD12) which sets out the following:
- who the local authority invited to make representations on the preparation of the plan up to Publication stage;
 - how those bodies and persons were invited to make representations;
 - a summary of the main issues raised; and
 - how the representations were taken into account.
- 1.4 It should also be read in conjunction with Supporting document: Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan consultation. This sets out the outcomes of continued negotiations to resolve issues raised during the consultation.
- 1.5 It should be noted that the summary of the main issues outlined in this document is the council’s interpretation of the representations received. The Inspector appointed to examine the Local Plan will determine the nature of the hearings and the Matters and Issues to be debated at these sessions.
- 1.6 The council’s Cabinet and Council approved the Publication Draft Local Plan for public consultation on 12th October 2016.

2 Publication Draft Local Plan consultation

When the consultation took place and its purpose

- 2.1 Consultation on the following documents took place from 7th November to 19th December 2016. The specific publication consultation requirements are set out at Regulations 17, 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The focus of the consultation on the Publication Draft Local Plan was to seek views on whether the plan met legal and soundness tests.
- 2.2 The legal tests are as follows:
- compliance with the Local Development Scheme;
 - the process of community involvement for the plan should be in general accordance with the Statement of Community Involvement;
 - the plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012;
 - whether a Sustainability Appraisal has been carried out and whether the Habitat Regulations have been complied with; and
 - whether the Duty to Co-operate has been complied with.
- 2.3 The soundness tests are as follows:
- positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
- 2.4 During the consultation on the Draft Local Plan some new site options were submitted to the council. All new sites options were assessed using the council's Local Plan Methodology Statement and presented for public comment as part of the Publication stage of the Local Plan.

Who we invited to make comments on the Publication Draft Local Plan

- 2.5 The council's Statement of Community Involvement (SCI) sets out who we will consult with. It states that generally we will seek the views of those who live or work in the district relevant to the document being consulted on such as:
- residents;
 - marginalised groups which includes young, elderly, disabled, faith and ethnic groups;
 - adjoining local authorities;

- parish and town councils;
- specific consultee bodies and general consultee bodies;
- interest groups;
- voluntary organisations;
- businesses; and
- developers and landowners.

2.6 Specific and general consultees are outlined in Appendix 1. It should be noted that Appendix 1 does not replicate all the contacts contained on the local plan mailing list which includes a wider range of individuals/organisations who expressed an interest in being kept informed of the plan progress.

2.7 The council contacted a total of 11,754 individuals/groups recorded on its on-line consultation system. Contacts were notified by letter or e-mail. The council also contacted all Kirklees councillors.

	E-mail	Post	Total
Agents	324	97	421
Consultees/Public	5457	5876	11333
Total	5781	5973	11754

2.8 The council has further requirements for consultation as part of the Sustainability Appraisal of the local plan. Details of this consultation are outlined in this document and also in the Kirklees Local Plan: Publication Draft Sustainability Appraisal report October 2016.

2.9 The duty to co-operate was created in the Localism Act 2011 and places a legal duty on local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plans in the context of strategic cross boundary matters. The council's Interim Duty to Co-operate Statement November 2016 and its Duty to Co-operate Statement April 2016 (Submission Document 14) set out how the council has undertaken this requirement and the outcomes from this exercise.

How we notified and invited representations on the Publication Draft Local Plan

2.10 The following methods were used to publicise the Publication Draft Local Plan consultation documents:

- details of the council's consultation plans were outlined in its Cabinet Report 12th October 2016 which was available to view on the council's website;
- copies of all consultation documents were made available on-line from 7th November. Hard copies were made available at two deposit locations specified in the council's Statement of Community Involvement (Dewsbury Service Centre and Huddersfield Service Centre) on 7th November 2016;
- to help identify the changes between the draft Local Plan and the Publication Draft, a summary of the main changes was produced and a comprehensive list of

- site changes. Both were available to view on-line and in hard copy at the deposit locations;
- every elected member was provided with a map of their ward area identifying any site changes, a summary of the main changes and a comprehensive list of site changes in order to assess the impact of any changes on their wards. Party Business Managers were provided with multiple sets of the consultation documents in order that copies were available for members to run their own consultation events if requested/required or loan them for community consultation meetings;
 - a summary leaflet was produced which set out an explanation of the Local Plan process, how to access the revised Local Plan on-line, and hard copies, details of drop-in sessions and how to make comments and an explanation of the tests of soundness, information on revised sites and new sites and information on the consultation on the Community Infrastructure Levy (CIL) Draft Charging Schedule. 10,000 copies of the summary leaflet were distributed to:
 - Dewsbury Service Centre and Huddersfield Service Centre
 - Huddersfield, Dewsbury and Cleckheaton Town halls
 - All Kirklees Library and Information Centres (See Appendix 2)
 - All elected members
 - Local Plan drop-in sessions were held to help individuals register their views at:
 - 12pm – 8pm, Tuesday 22nd November
Dewsbury Town Hall Reception Room
 - 12pm – 8pm Tuesday 29th November
Huddersfield Town Hall Reception Room
 - every contact on the council's on-line consultation portal was contacted by letter or e-mail (See Appendix 3 for Consultee Letter);
 - notification of the Publication Draft Local Plan was placed in the local press (See Appendix 4);
 - the consultation was publicised via Kirklees Together both on-line and print versions. This is a magazine which is distributed district-wide. The articles contained information on the Publication Draft Local plan consultation, signposts to the council's website and information on how to make a comment;
 - on-line campaign which included information on the council's homepage for a two week period;
 - social media campaign including Facebook and Twitter;
 - internal Intranet system to make all staff aware.

How comments shaped the Kirklees Local Plan

- 2.11 The council considered all representations received and Submission Document SD4 contains Proposed Modifications to the Local Plan. This is available to view on the council's website and hard copies at Dewsbury Service Centre and Huddersfield Service Centre.

3 Overview of the representations received by document

Number of responses

- 3.1 The council received the following number of responses on the Publication Draft Consultation Documents:

Document Name	No. of responses
Strategy and Policies	752
Allocations and Designations	3723
Green Belt Boundary Changes	27
Rejected Site Options	1244
Sustainability Appraisal	69
Total	5815

- 3.2 Of the responses received, 74 were received after the close of the consultation on 19th December 2016 and were recorded as late. A schedule of late representations is set out at Appendix 5.
- 3.3 Responses were received from a wide range of organisations and individuals on the consultation documents. 368 representations were received on H297 and 369 on H597 from Scholes Future Group. Petitions were also received on the following sites:

Petitions

Site Name	Organisation	No. of signatures
H69	Merchant Fields Residents	10
H138	Smithies Community Group	127
H2089	Horses not Houses (Marcus Jessop)	36,663
ME2248a ME2248b ME2248c ME2314	Cumberworth Community Association (4 x individual petitions)	235

Specific consultee responses

3.4 Comments were received from 12 specific consultees. A breakdown of their support/objection to the plan is outlined below:

Person ID	Full Name	Organisation Details	Event Name	Support	Object	Total
942501		National Grid	PDLP - Strategies and Policies	1	0	1
942501		National Grid	PDLP Allocations & Designations	1	0	1
943022	Mr Robin Coghlan	Leeds City Council	PDLP Allocations & Designations	4	0	4
943022	Mr Robin Coghlan	Leeds City Council	PDLP Rejected Site Options	7	0	7
943459	Mr Anthony Northcote	Planning Advisor The Coal Authority	PDLP - Strategies and Policies	6	1	7
943459	Mr Anthony Northcote	Planning Advisor The Coal Authority	PDLP Allocations & Designations	1	0	1
943847	Mrs Sally Barber	Clerk Holme Valley Parish Council	PDLP - Strategies and Policies	1	8	9
943847	Mrs Sally Barber	Clerk Holme Valley Parish Council	PDLP Allocations & Designations	0	6	6
943894	Mrs Beverley Lambert	Sustainable Places - Planning Advisor Environment Agency	PDLP - Strategies and Policies	2	0	2
943894	Mrs Beverley Lambert	Sustainable Places - Planning Advisor Environment Agency	PDLP Allocations & Designations	6	0	6
943943	Angela Royle	Kirkburton Parish Council	PDLP - Strategies and Policies	0	4	4
943957	Mr Ian Smith	Regional Planner Historic England	PDLP - Strategies and Policies	29	4	33
943957	Mr Ian Smith	Regional Planner	PDLP Allocations & Designations	28	85	113

Person ID	Full Name	Organisation Details	Event Name	Support	Object	Total
		Historic England				
965590	Dave McGuire	Planning Manager Sport England	PDLP - Strategies and Policies	7	2	9
965590	Dave McGuire	Planning Manager Sport England	PDLP Allocations & Designations	0	2	2
969134	Mr Merlin Ash	Lead Adviser Natural England	PDLP - Strategies and Policies	0	2	2
969134	Mr Merlin Ash	Lead Adviser Natural England	PDLP Allocations & Designations	0	10	10
978569	Tony Rivero	Network Rail	PDLP - Strategies and Policies	0	3	3
978569	Tony Rivero	Network Rail	PDLP Allocations & Designations	0	3	3
1045848	Mrs Toni Rios	Asset Manager Highways England	PDLP - Strategies and Policies	6	6	12
1045848	Mrs Toni Rios	Asset Manager Highways England	PDLP Allocations & Designations	3	14	17
1061679	Calderdale Council		PDLP Allocations & Designations	1	0	1

Strategy and Policies

3.5 The Tables below form a summary of support/objection against Plan tests including legal compliance, duty to co-operate and soundness:

Strategy and Policies	Support	Objection
Legal Compliance	741	11
Duty to co-operate	748	4
Soundness	239	513

Strategy and Policies	Support	Objection
Positively prepared	10	179
Justified	6	304
Effective	6	71
Consistent with national policy	14	126

3.6 Legal compliance issues – Strategy and Policies

- Inadequate consultation
 - lack of awareness raising especially given the level of change from the draft plan to the Publication Plan
 - documents were only available at one location in Dewsbury
 - the press is ineffective as a communication tool
 - impact of politics on proposals
 - consultation run over the Christmas holidays
 - website was confusing and difficult to use
 - the public's concerns have not been taken on board
 - the council could have produced a shorter, simplified summary booklet outlining general principles applied to the district supplemented by ward information
- Habitats Regulation Assessment has not been complied with (Natural England). Natural England disagrees with the screening assessments in table 4.4. of the Habitats Regulations Assessment (HRA) Report with regards to likely significant effects on the South Pennine Moors Phase 2 Special protection Area (SPA) and the Peak District Moors (South Pennine Moors Phase 1) SPA with regard to functionally linked land for golden plover and curlew and air quality.

It should be noted that further consultation was undertaken with Natural England in response to the above. The outcomes are outlined in Supporting document: Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation.

3.7 Duty to co-operate – Strategy and Policies

- Concern that despite what the council says, DtC has not happened
- Concerned that a funding shortfall for the A653 shows a lack of co-operation with Leeds City Council
- The plan does not appear to demonstrate levels of co-operation with the Peak Park Authority and statutory bodies as demonstrated through the objections raised to impact on the South Pennine Moor
- Housing and employment projects excessively aspirational and there is concern that they have not been subject to DtC.

3.8 A breakdown of the support/objections by document part for the Strategy and policies is contained at Appendix 6.

3.9 A summary of the main issues on the Strategy and Policies is contained at Appendix 7.

Allocations and Designations

3.10 The Tables below form a summary of support/objection against Plan tests including legal compliance, duty to co-operate and soundness:

Allocations and Designations	Support	Objection
Legal Compliance	3537	185
Duty to co-operate	3650	72
Soundness	277	3446

Allocations and Designations	Support	Objection
Positively prepared	28	969
Justified	13	3239
Effective	132	142
Consistent with national policy	34	2057

3.11 Legal compliance – Allocations and Designations

- Lack of public consultation
 - The plan has not been prepared in consultation with the local community
 - The summary booklet contained inaccurate information
 - People who live adjacent to sites were not notified
 - Inadequate consultation period
 - New sites added without consultation
 - Website difficult to use and there were technical problems with it. Elderly people do not have access to computers
 - The consultation was flawed and complex and many people did not know about the consultation
 - The public's comments has not been taken into account
 - The Statement of Community Involvement lacks detail and is not comparable with neighbouring authorities. The plan has not fulfilled its obligations in relation to paragraphs 1.4, 1.5, 1.7, 1.11 and 2.4
 - Inadequate consultation. Only direct contact was via a councillor. Use of websites and placing documents in libraries is only acceptable if people know about it.
 - The on-line form was difficult to use
 - No consultation with the public prior to the minerals and waste section of the plan.
- Failure to consult with statutory consultees and Natural England. Any discussions should have been formally minuted

- The plan has been prepared with insufficient evidence and is not robust and credible or the most appropriate strategy when compared against alternatives
- The sustainability appraisal is flawed
- Failure to comply with Appropriate Assessment and habitat regulations assessment

3.12 Duty to co-operate – Allocations and Designation

- No evidence of co-operation with Calderdale
- Lack of evidence that Kirklees has co-operated with Wakefield Council on school places
- Residents in neighbouring West Bretton and Calder Grove have not been consulted
- Duty to co-operate must apply 1 km around Hade Edge
- No evidence of DtC with Natural England, Wakefield or Barnsley
- No evidence that consideration was given to locating development outside of Kirklees boundary.
- Leeds City and Wakefield concerns with Chidswell
- Calderdale Council concerns with Cooper Bridge

3.13 A breakdown of the support/objections by document part for the Allocations and Designations is contained at Appendix 6.

3.14 A summary of the main issues on the Allocations and Designations is contained at Appendix 7.

Strategic Sites

3.15 The following tables identifies a summary of issues for key strategic sites:

- H2089 land to the south of, Ravensthorpe Road/Lees Hall Road, Dewsbury
- MX1905 Land east of 932 – 1110 Leeds Road, Shaw Cross/Woodkirk, Dewsbury
- H1747/H351 Land north of Bradley Road, Bradley
- E2333a land to the east of, park Mill, Clayton West
- E1832c Cooper Bridge

H2089 - Land to the south of, Ravensthorpe Road / Lees Hall Road, Dewsbury

- Concern over consultation and public awareness
- Concern due to loss of trees and woodland in particular Lady Wood
- Concern due to the loss/use of green belt on the basis of its function:
- Prevent urban sprawl,
- Stop towns merging
- Protect the countryside
- Promote urban regeneration
- The density is not appropriate compared to surrounding area
- Wildlife and ecology issues concerns on site, namely:
- Ancient woodland
- Natural spring
- Protective species
- The development of the site would be visibility intrusive harming character and appearance of area
- Footpath and bridleway are used by ramblers, horse rider, cyclists and dog walkers
- The local infrastructure is not suited to 4000 homes
- Existing roads in Mirfield and Ravensthorpe already at capacity and congested
- Doctors, Hospitals and schools are at capacity with existing population
- Preference for housing growth to be located elsewhere in district, including the concept of a new garden town with appropriate infrastructure.
- Mirfield has had a lot of development on brownfield and greenfield in recent years
- Brownfield sites should be used first
- Derelict/empty houses in the area should be used
- Flood risk due to loss of vegetation
- the Mirfield Boundary has been incorrectly designated; and it serves to link the two distinct communities of Mirfield and Ravensthorpe.
- Access to Sands Lane is dependant on the incorporation of private land which would not be available.
- Sands Lane is narrow, has no pavements and because of a railway bridge cannot be widened
- Access from Sands Lane to Steanard Lane will be compromised because the River Calder floods several times a year.
- The land within the correct Mirfield boundary adjacent to Sands Lane should remain as Greenbelt, thus allowing for a definite division between Mirfield and Ravensthorpe.
- The removal of the need to access Sands Lane will ensure that current users will not have their safety put in jeopardy
- Properties on land further towards Lees Hall Road should be accessed from Dewsbury only in order to prevent householders being trapped by floodwater.
- The destruction of one of the few green spaces in the area by one of the largest proposed allocations for Kirklees in an already overdeveloped area
- Roads which are already gridlocked cannot absorb traffic from up to a further 4000 houses
- Including Sands Lane, as one access to this site, which is single lane over a single lane

railway bridge shows how little consideration has been given to reality

- Originally only 100 jobs were identified resulting in road traffic at peak times being impossible as people travel out of the area
- The area is already under resourced for schools, doctors and recreational areas
- Kirklees have allowed Dewsbury to go into permanent decline as against Huddersfield and this new housing is not going to reverse this .More fundamental changes need to be made to avoid this becoming a “sink area”.
- The wording in the Reports/Commentary is “Council boiler plate” verbiage which does not stand up to scrutiny
- This allocation is not EFFECTIVE because to be achieved the costs of roads, schools, doctors and railway stations is incapable of being funded by the Council and they should not be permitted to even consider such extensive development without being obliged to first put in place the required infrastructure
- Page 15 of the document shows a Plan “Development in Dewsbury and Mirfield”, which indicates that there will be 400 New Homes in Mirfield Ward.
- The document failed to identify that there were indeed circa a further 570 dwellings to be provided within the Mirfield boundary as part of the proposed allocation H2089.
- The document implied that H2089 is to be within Dewsbury, however, the western section is within Mirfield.
- The document has misled the community and has undermined the effective community engagement.
- Many people may have considered 400 new homes in Mirfield to be acceptable.
- Had local people realised the figure to be 970 new homes in Mirfield many more comments would have been submitted to the Council.
- The Council would have taken these comments into consideration in preparing the publication draft of the local plan.
- This error clearly has an impact on the soundness of the previous consultation exercise
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exercise

- Whilst it is clear that a site of this size helps meet Kirklees housing requirement there is no evidence to provide the justification for site of this size in this location.
- Section 6.1 of the PDLPS&P sets out that the proposed strategy “ *allows most growth to be met in the urban areas of Huddersfield and Dewsbury* ” However allocation H2089 is three miles from Dewsbury town centre and is **NOT** an urban area.
- The National Planning Policy Framework (NPPF) sets out that one of the five purposes of Green Belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The proposed developed is entirely contrary this part of the NPPF.
- New housing in this location will not deliver regeneration benefits to Dewsbury
- We believe that this level of new housing in this location will further drive down house prices in Dewsbury decreasing its appeal for developers and therefore reducing opportunities for future development in Dewsbury.
- There is no evidence to suggest that alternative sites closer to Dewsbury Town Centre have been assessed and dismissed as not being suitable, available or deliverable.
- The proposed allocation is immediately adjacent to Jordan and Oliver Wood Local Wildlife Site, part of which is an ancient woodland (Oliver Wood).
- Developments which lead to detrimental impacts on Local Wildlife Sites, is therefore likely to damage the biodiversity value of the Local Wildlife Site and lead to net losses in biodiversity.
- The development of large housing estates immediately adjacent to areas of woodland can significantly impact the biodiversity value of woodland through poor design and recreational disturbance. As mitigation to reduce such impacts we advised that a 20m ecological buffer is established between the development site and the Local Wildlife Site. This has not been carried out.
- The plan is too dependent on input by third party involvement for road and infrastructure services as yet unknown to the public to comment. There are constraints on this site, roads, mine workings, power station gas main and flood problems on Ravensthorpe Road. Who will supply and pay for road and other infrastructure projects to support this plan.
- Natural England has been made aware that allocation H2089 lies immediately adjacent to
- Jordan and Oliver Wood Local Wildlife Site and advise that the site brief should include avoidance
- and mitigation measures in order to avoid significant impacts upon this locally designated site.
- For further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.
- Although supportive of the allocation at H2089, Miller Homes object to the Landscape Character Assessment undertaken for this site. From the assessment, it is not possible to understand the relative importance of the landscape character area in the wider landscape context. The report does not define the criteria used to

determine landscape sensitivity and does not state what the important landscape characteristics of areas are (Character Area 37 and Character Profile E7). The matrix used in the assessment seems to confer a hierarchy which is not consistent with the descriptions of character types. The Landscape Character Assessment is not considered to form a suitable tool to inform the decision making process to show which areas should be conserved and which areas could accommodate development without significant harm.

- The policy for H2089 should be amended. An additional point should be added to the section titled 'Other Site Specific Considerations' as follows:
- 'This development could have an impact on the local highway network in Wakefield. Evidence will need to be provided to demonstrate that any impacts within Wakefield are being adequately mitigated. In particular impacts on Thornhill Road / Hostingley Lane and to Horbury Road before it crosses Horbury Bridge need to be considered.'
- Wakefield considers with this modification the policy would be sound.
- Wakefield previously raised concerns about this sites possible impact on school place provision within the district. However cooperation has occurred and should continue to occur and data on school place planning is being shared between the two authorities. It is essential that as planning applications are submitted on this allocation Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary.

MX1905 - Land east of, 932-1110 Leeds Road, Shaw Cross/Woodkirk, Dewsbury

- Chidswell Lane is not capable of accommodating the traffic associated with this development.
- Leeds City Councils Highways Section confirmed that no recent discussions had taken place on the proposal at Chidswell and that they continue to have significant concerns – which have not been addressed – about the impact this industrial and housing development would have on the A653 corridor.
- Little evidence exists that a clear infrastructure plan exists to consider the impact of the proposal on Junctions 25 and 28 of the M62 and the impact on education and healthcare facilities.
- Removing the site from Green Belt breaches obligations in NPPF to retain the Green Belt except in exceptional circumstances.
- This is the last Green Belt land between Leeds, Kirklees and Wakefield so where are people going to go to stay healthy? Where are all these new homes with at least one car plus lorries going to exit this land?
- Where are the children going to go to school as the schools are all full - where are they going to go to a doctor or dentist - plus which hospital as Dewsbury is barely working as a hospital.
- The industrial estates in the area such as Shaw Cross down Grange Road into Batley and Tingley all have spare spaces so why do you need to build industrial premises on this land?
- What about a playground for the children?
- What about an old people home so that people can downsize and move into somewhere local.
- Why not build on brownfield site, convert the old mills that are now redundant - is

that because the builders find it easier to build on green field?

- If you build on this land nobody will know where Leeds finishes and Kirklees starts or where Wakefield is.
- This is the last Green Belt land between Leeds, Kirklees and Wakefield so where are people going to go to stay healthy? Where are all these new homes with at least one car plus lorries going to exit this land?
- Where are the children going to go to school as the schools are all full - where are they going to go to a doctor or dentist - plus which hospital as Dewsbury is barely working as a hospital.
- The industrial estates in the area such as Shaw Cross down Grange Road into Batley and Tingley all have spare spaces so why do you need to build industrial premises on this land?
- What about a playground for the children?
- What about an old people home so that people can downsize and move into somewhere local.
- Why not build on brownfield site, convert the old mills that are now redundant - is that because the builders find it easier to build on green field?
- If you build on this land nobody will know where Leeds finishes and Kirklees starts or where Wakefield is.
- Brownfield sites would be a better option than to ruin our protected green belt area where valuable farmland is being compromised.
- The pollution from the busy main road of Leeds Road is bad for habitants health, but to bring the pollution that more houses and in particular business units would bring is unacceptable. The council have also not made available adequate resource for schools, roads or doctors.
- Plans do not show where the access and exit will be to this green belt - it gave a hint but not a proper answer.
- Strongly disagrees with the statement "no need for primary or secondary schools" - sorry but you must be on a different planet to me and others in this area as the schools are busting at the seams and the playgrounds are full of temporary buildings.
- You also say exceptional circumstances that "housing development on site outweighs loss of green belt land - again what about the health of people in their youth as well as us old age people?
- Plans do not show where the access and exit will be to this green belt - it gave a hint but not a proper answer.
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- You also say exceptional circumstances that "housing development on site outweighs loss of green belt land - again what about the health of people in their youth as well as us old age people?
- With the allocation of the M62 Corridor Enterprise Zone status, allocation for land at Chidswell should be withdrawn. It is unreasonable to suggest Chidswell would be able to compete with this. The housing should be located to more suitable and sustainable sites, i.e. brownfield sites and close to the M62 corridor enterprise zone.
- The site is on a large area of green belt separating Leeds, Wakefield and Kirklees. The

site also includes ancient woodland. The exceptional circumstances required by NPPF no longer exist.

- The site is on a large area of green belt separating Leeds, Wakefield and Kirklees. The site also includes ancient woodland. The exceptional circumstances required by NPPF no longer exist.
- There has been no adequate Land Management after mining, as such further building in the surface of the land will be a danger. It can't stand more weight of roads, or buildings.
- Loss of agricultural land.
- Impact on road infrastructure / increased traffic
- Development will have a negative impact on health and wellbeing.
- The extent of the site would be contrary to the role and function of green belt, as set out in national policy.
- This would be contrary to para 73 of NPPF.
- The proposal therefore has the potential to cause significant harm to the purpose of including land within Green Belt The site has 3 major negatives in SA relating to efficient use of land, landscape and biodiversity.
- Delivery of the site will require alterations to Junction 28 of M62 and significant improvements to local highway network
- There are concerns about the proposed plans for Chidswell due to the impact on air pollution as the traffic fumes from Soothill Lane and Dewsbury Road are horrendous and getting worse. There is no need for industrial units and houses to be built on the last parts of the green belt area. The build-up of heavy traffic can be considerable.
- Other site specific considerations
 - Education: Secondary School Provision. Council evidence suggests a need for additional provision for primary and secondary school places. To date, no decision on where and how much needs to be accommodated. Policy requires amendment to reflect needs to be further work to establish additional secondary provision and how needs are met.
 - Flood Risk: reference to "flood risk vulnerability of proposed uses and an exception test may be required as part of a planning application" is not necessary. Table in paragraph 5.6, Council's Flood Risk Technical Paper lists sites including MX1905 where there is no requirement for sequential test and exception test.
 - Strategic Road Network: Potential for a severe adverse impact not accepted. Interim Transport Assessment, August 2016 concludes development will not have a severe impact on surrounding highway network. Concern with reference that construction should should take place following completion of committed RIS improvements. Potential conflict between timescales.
- Evidence base: Accepted Site Options - Technical Appraisals
 - Education red score concern. Issues associated with education have not yet fully been assessed.
- The development site is included in the plan as a result of a landowner which is a national estate investment company. This is not genuinely plan-led and is not based on 'adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

- Archaeological records indicate an Iron Age settlement was to the west of Dum Wood. Site includes ancient hedgerows, with TPO trees.
- Watercourses on the site are UK BAP Priority Habitats. The site provides habitat for a broad biodiversity of species. The woodland cannot be protected simply by not building on it. Impacts on the woods and their hydrology depend on local topography and geology, the whole project require a full and thorough environmental impact assessment.
- With any major development there will be extensive drainage and other modifications to the water environment. Land to the east of the site is in Flood Zone 3. There are implications for drainage, maintenance, and ongoing revenue costs flood risk measures. The geology in this area means that there is a heavy impermeable clayey soil. Appropriate Sustainable Drainage Systems should be mandatory on the site.
- The site was described by West Yorkshire County Council in 1978 as 'part of a major lung of open space separating Wakefield, Ossett, Dewsbury and Morley. It is a valuable area of open undeveloped land and Green Belt'. Developments in the south of Leeds and at Soothill mean that the need for the land to be maintained as Green Belt is greater than ever.
- The developer would need to afford due consideration to the prior extraction of any surface coal resources that are present. Such extraction, if it did go ahead, would be an environmental disaster. When the site was previously considered for opencast mining, Kirklees' arguments that the land was rural, open and true countryside in nature were upheld.
- The proposals currently lack survey-based information on vital aspects of the current countryside resource
- Development on the site would lead to increased air and noise pollution. There is a deficit of open space in the area.
- There are problems with current infrastructure capacity and congestion including to the motorway network and huge investment and works would need to be done to enable easy access to this network.
- The newly allocated Enterprise Zones provide much greater economic incentives and financial possibilities than proposed site MX1905.
- The Council has not provided evidence that the land allocation can meet the stipulated offer for housing and employment land.
- The public sewer network does NOT have adequate capacity available to accommodate the anticipated foul water discharge for this proposed allocation.
- The land serves all five purposes of the green belt set out by NPPF paragraph 80. There would be coalescence with the Leeds boundary as a result of the development,.
- No evidence of very special circumstances have been provided, in accordance with NPPF paragraph 87.
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- The site was described by West Yorkshire County Council in 1978 as ‘part of a major lung of open space separating Wakefield, Ossett, Dewsbury and Morley. It is a valuable area of open undeveloped land and Green Belt’. This is still the case.
- The developer would need to afford due consideration to the prior extraction of any surface coal resources that are present. Such extraction, if it did go ahead, would be an environmental disaster.
- The proposals currently lack survey-based information on vital aspects of the current countryside resource
- Despite objections made during the 2015 consultation, the 2016 consultation documents fail to answer these objections. Infrastructure requirements have not been objectively assessed.
- Exceptional circumstances for releasing this land from the green belt have not been demonstrated. Wakefield Council conclude that “it is considered there is currently insufficient evidence available to ascertain if the release of this site from the green belt can be justified”.
- The plan is not effective on the grounds there are highway infrastructure deficiencies but there has been no proper assessment of how the road system could cope with the extra traffic or whether it will be possible to upgrade it, such as the capacity of Tingley roundabout and the A653 Dewsbury Road; the impact of Leeds LDF proposals on Tingley roundabout and lack of a link road from the site to the Ossett by-pass and junction 40 on the M1. No improvement scheme has been prepared for the A653 Leeds Road either by Kirklees or Leeds Council. Existing problems at the junction of Dewsbury Road with Syke Road and Rein Road and the cumulative traffic impact of Leeds LDF have not been included in the highway assessment by the Church Commissioners’ consultants. Highways England comment that traffic modelling indicates that site MX1905 has an individual severe adverse impact based on the number of trips generated on links on the motorway network. The site may not be deliverable over its period or based on effective joint working on cross-boundary strategic priorities.
- The plan is unsound because site MX1905 is contrary to the aims and purposes of the green belt listed in NPPF. It would result in unrestricted sprawl of the large built-up area of Dewsbury up to the boundary with Wakefield and merge Shaw Cross and Chidswell with the Tingley and West Ardsley in Leeds and severely compromise the whole of the green belt between Leeds and Dewsbury. Development would encroach on the countryside that is an integral part of a larger piece of countryside extending into Leeds and Wakefield.
 - Object to the loss of green belt land.
 - Alternative sites exist including brownfield, scrubland and derelict land particularly in Batley and Dewsbury.

- Rejected sites should be re-considered including Brow Wood Road, Raikes Lane and disused buildings of Birkdale High School.
- The site is not justified on the grounds of:
 - the council's motivation to allocate the site is based on potential, expensive houses and the increase in council tax yields
 - infrastructure capacity - no consideration has been given to additional infrastructure required to support 1,500 homes including school, medical centre and road capacity
 - increased air pollution
 - traffic congestion
 - highway capacity
 - impact on health
 - contend that EU referendum will reduce immigration from EU and thus reduce the housing requirement
- Community engagement has been attempted but the information provided on line is difficult to access and to navigate. Evidence is to be found only by following links that do not always connect and make following the reasoning that much more difficult.
- Cross boundary and inter-authority issues have not been properly addressed. The huge amount of development proposed by Leeds in the South of their area, Kirklees in the North of their area and Wakefield in the West of their area will result in the addition of 10,000 dwellings. There is no coherent plan to deal with the issues development to this extent will raise.
- There is no justification for allowing this site to be developed and complete the merger of three major authorities.
- If there was a proven, overwhelming need for development on this scale then the site to the west of the A653 would be a better alternative as it rounds off existing communities, lessens the impact of urban sprawl and has defensible boundaries in a golf course, quarries and the M62 motorway.
- Traffic generated presently leads to congestion at peak times on the A653. The additional loads imposed by this proposal will only exacerbate that situation.
- There are transport/infrastructure concerns associated with this development.
- This would be a major development in a broad open landscape. it would have a high visual impact and encourage the merger of Dewsbury with East Ardsley/Tingley/Morley.
- The proposal therefore has the potential to cause significant harm to the purpose of including land within Green Belt The site has 3 major negatives in SA relating to efficient use of land, landscape and biodiversity.
- Delivery of the site will require alterations to Junction 28 of M62 and significant improvements to local highway network

H1747 / H351 – Land north of Bradley Road, Bradley, Huddersfield

- Access, highways and transportation issues are currently limited and under pressure, further development will create gridlock.
- Infrastructure cannot cope.
- Part of site is undevelopable- local refuse tip/toxic organic chemical tip on the north

east boundary.

- Biodiversity of the site is of regional importance.
- This is an outstanding golf course - giving people the chance of recreation without having to pay a lot of money to be a member.
- Please leave us some green space.
- Covering such large areas with concrete will lead to flooding.
- Bradley Road is gridlocked most days with the current traffic demand. The idea that the Golf course is not required is unsubstantiated, this is well used and held in high esteem by golfing fraternities throughout England. Health risks of the chemical waste tip behind the proposed area along with the potential underground workings and the area being prone to flooding makes this site unsuitable for habitation.
- The land is the final bit of greenspace separating Bradley and Brighouse. Traffic congestion on Bradley Road. Increased flood risk in Calder Valley. Former ICI chemical tip on the site.
- By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development.
- Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment.
- In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.
- Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually be developed.
- In the absence of any assessment of the degree of harm which this proposed Allocation
- 1577 dwellings north side of Bradley Road is unsound as this site is last area for recreation in an existing well used open area which is Bradley Golf Club. Existing congestion on Bradley Road.
- Regarding greenbelt development, NPPF 87 says that this should only take place “in very exceptional circumstances”. I appreciate Government edicts have to be met but there are more suitable areas within Kirklees that could be utilised before Green Belt is eroded.
- As to building on existing open space/recreational land, NPPF 74 says that this should not take place unless one of three specified conditions is fulfilled. The guidance says:-
- Existing open space, sports and recreational buildings and land, including playing

fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.
- None of these requirements have been satisfied, so again surely the Draft Local Plan should not go forward. If it does, I do not see how it can pass independent scrutiny.
- There is no evidence that Kirklees has consulted with Calderdale and the amount of proposed building in a small residential area demonstrates a lack of joined up planning.
- The plan is neither justified nor has it been positively prepared because the proposals remain directly at odds with the Council's own stated objectives. All available brownfield sites and other alternatives must be used before any irreversible destruction of green belt land.
- These open spaces are used for social outdoor purposes and contributes to the semi rural ambience of Fixby. The greenbelt supports a variety of wildlife including birds, pheasants, foxes and bats. The local infrastructure (roads, schools, doctors) is already strained and will only get worse. Pollution levels (that are already high) and other health and safety risks through increased traffic will all increase. Local road flooding is already an issue and will only get worse.
- I consider your housing plan undemocratic there is no way you have taken on board people's worries and concerns regarding over extended essentials such as schools, doctors etc.
- I cannot understand why you would take a beautiful green space used by a lot of people for leisure to build houses, not affordable houses, but expensive so called executive houses. It is your responsibility is to make sure truly affordable houses are built, and this means not building on prime land especially when cheaper land is available. Concerns over essentials such as schools, doctors etc
- Oppose to the Councils own objectives - it does not promote the use of brownfield land. Brownfield
- sites and other alternatives must be used before destroying green belt land.
- The roads cannot cope with the increased volume of traffic, the schools cannot cope, nor the doctors,
- dentists or hospitals. The traffic congestion from the motorway along Clough Lane/Fixby Road and
- Bradley road is already to a standstill each morning. The pollution levels due to increased traffic is
- also a major concern.
- Brownfield sites and other alternatives must be used before destroying green belt land.
- Concerns have not been discussed with adjoining Calderdale Council.
- Concerns have not been discussed with local residents.
- Does not comply with the plans Vision and Objectives.
- All available brownfield sites and other alternatives must be used prior to the

destruction of green belt land.

- Will destroy the Green belt.
- Open spaces are used for social outdoor purposes and contribute to the semi-rural ambience of parts of Fixby and Birkby.
- Impact on wildlife.
- Impact on local infrastructure - doctors, schools, roads.
- High pollution levels that already exist will be made worse.
- Flooding for buildings and roads is a problem now this will only get worse.
- Will destroy the Green belt that protects open spaces and prevents urban uncontrolled sprawl.
- Do not use green belt in this location as it is a buffer between the M62 motorway and dwellings on Bradley Road.
- The infrastructure will not be able to cope with the development of 1500 to 2000 homes due to the amount of traffic. More traffic will increase air pollution, the loss of the golf course as a meeting place will impact on the community and this area is likely to flood. Impact of noise from the M62 is continuous.
- The allocation is not justified as the golf needs assessment supporting the allocation has just been commissioned to justify the allocation and meet the requirements of DLP54, and fails to do so.
- The site is in an unsustainable location, in terms of journeys to services and facilities. The site is in the Green Belt and likely to have significant adverse effects on the purpose of including land in the Green Belt, in context of merging with Calderdale.
- None of the current access points are of sufficient width to be the main point of access
- Objection to site H1747. Developers are becoming more choosy about where to build. There are two main issues: where to build houses and what type of houses to build. If brownfield sites are left undeveloped there will be large areas of land on the outskirts of towns and cities left derelict at the expense of green belt. Brownfields sites should be used before green belt land. Houses currently being built are not affordable because the land is so expensive.
- The roads around Fixby Road are already busy and this proposal will put more pressure on the existing transport infrastructure and existing facilities.
- The site is in an unsustainable location, in terms of journeys to services and facilities. The site is in the Green Belt and likely to have significant adverse effects on the purpose of including land in the Green Belt, in context of merging with Calderdale.
- None of the current access points are of sufficient width to be the main point of access
- At odds with the Council's own Strategic Objectives: to protect and improve green infrastructure, to provide access to good quality open spaces and opportunities for sport, recreation and play, to protect and enhance characteristics of the built, natural and historic environment and local distinctiveness and to promote the use of brownfield land first.
- It is not an appropriate strategy to propose developing a well-established, popular and profitable golf course located in the green belt when considered against other reasonable alternatives of which there are several as evidenced by the Council's Rejected Sites List.

- There is no assessment clearly showing the site to be surplus to requirements, nor has any suitably-located equivalent or better replacement facility been proposed. The burden of proof is on the Council to show compliance with NPPF para. 74 and it has not discharged that burden.
- The Plan is unsound because it is debateable whether it is deliverable over its period bearing in mind the amount of pre-development work and the cost involved not only in preparation of the site itself but also the attendant road and other ancillary works on which the development is dependent, particularly the cost, time-frame and unknown difficulties connected with the proposed new motorway junction.
- The Plan is not sound because it does not comply with the policy expressed in paragraph 74 National Planning Policy Framework (NPPF). The site comprises Bradley Park golf course which is clearly both an existing open space and sports & recreational buildings and land within the ambit of paragraph 74. Neither the Plan nor the Council directly state which of the three heads of para. 74 is relied upon. There is no assessment clearly showing the site to be surplus to requirements, nor has any suitably-located equivalent or better replacement facility been proposed. The burden of proof is on the Council to show compliance with NPPF para. 74 and it has not discharged that burden.
- This choice of green belt land(H1747) versus the strategy of building on other smaller green belt sites that have been rejected purely on green belt grounds by the council is unsound as the other sites would not incur such significant infrastructure costs and improvements and could be delivered in a shorter timeframe.
- Also the council has not shown that it has an assessment clearly showing that Bradley Park is surplus to requirements under NPPF paragraph 74 nor that it is proposing an equivalent or better facility to replace the loss suffered.
- This release H1747 site relies heavily on the introduction of significant highway improvements involving the M62/A62 and the Bradley Road existing road structure. The M62 and A62 corridor from junction 27 to cooper bridge is currently horrendous-travel times are excessive of 45 mins between 3.30 and 18.30 at night and in the morning 7.00 to 9.00 am in reverse-this says nothing of the rabbit runs that exist passing through villages such as Lepton/Hartshead and Brighouse etc. Additional schools ,secondary and primary i believe will be necessary ,these along with the mentioned road improvements will incur more than significant infrastructure costs. This major infrastructure requirement will lead to a long timeline for delivery of the housing and will raise a question mark on the plan being delivered in the set timeframe.
- The council has failed to state which of the 3 categories in the National Planning Policy Framework paragraph 74 the proposed development falls
- Health and Well Being are important and sporting facilities are vital to ensure a healthy community. Bradley Park is the only Municipal Golf Course in Kirklees and therefore easily accessible to the general public.
- The club is a valued addition to the Kirklees Active Leisure portfolio. Kirklees Active Leisure were not party to any discussions prior to the club being included in the Local Plan.
- Due to the reducing funding from the council to Kirklees Active Leisure I am of the opinion that they should have been consulted on the proposals at an early stage.

- The loss of Bradley Park Golf Club will have an adverse effect on a number of areas within Kirklees.
- Brownfield sites should be the first option - there are many in Kirklees.
- Will cause an increase in air pollution.
- Extra traffic.
- Strain on doctors, schools and roads.
- This is precious open space.
- Fixby infrastructure cannot stand the strain of this development.
- Sport England does not consider that there is surplus golf provision in Kirklees sufficient to allow Bradley Park golf course to be lost without suitable replacement.
- The Council has also yet to demonstrate that the interests of golf provision and golf participants would be best served by consolidation of provision.
- The plan is as unsound as delivery of housing numbers relies heavily on 3 large Strategic Green Belt releases at Chidswell, South Dewsbury and Bradley Park Golf Course which represent 25% of the required housing on new allocations. This is not an insignificant amount. These sites will require significant infrastructure and highway network improvements to be completed before they can come forward and given likely build rates, it is questionable whether the sites can be deliverable in the plan period.
- The strategy of delivering a significant number of houses on 3 large Green Belt releases is flawed and does not meet the needs of the whole of Kirklees. The Green Belt is tightly drawn around settlements and does not relieve the pressure around settlements and threatens their futures.
- Many fringe Green Belt sites have been rejected for housing only because they lie within designated Green Belt. Many of these sites would assist in sustaining settlements as well as adding to the housing numbers to make up for the loss of Bradley Park Golf Course, including sites H653; H649; H534; H593; H440; H177; H571; H664a; H475; H322; H1766; H180; H2582; H249; H258; H16; H315 which provides some 2368 dwellings.
- Kirklees also have a number of settlements that are 'washed over' as Green Belt. This is an historical carry over from the Unitary Development Plan with no logical explanation as there are also many settlements in the District that are inset.
- Objection to site H1747 as the council has not had due regard to NPPF paragraph 74. The plan does not suggest that the well-used facility at Bradley Park is surplus to requirements or that an alternative provision of equivalent or better quality is being provided in a suitable location. Bradley Park Golf Course is the only municipal golf course within Kirklees and is unique in what it provides and the broad spectrum of people that it caters for that cannot be matched by private golf clubs in the district. The plan is unsound in failing to demonstrate how NPPF paragraph 74 has been met.
- The site is in an unsustainable location, in terms of journeys to services and facilities. The site is in the Green Belt and likely to have significant adverse effects on the purpose of including land in the Green Belt, in context of merging with Calderdale.
- None of the current access points are of sufficient width to be the main point of access
- The plan does not comply with policy DLP 54 and NPPF paragraph 74.
- The assessment must clearly show the open space, building or land to be surplus to

requirements or the resulting loss from the proposed development would be replaced by equivalent or better provision in terms of quality or quantity in a suitable location. Development is for alternative sports and recreation facilities the needs for which clearly outweighs the loss:

- The assessment has not met these requirements.
- The Ashbrow ward has an imbalance and unfair total allocation of houses when measured against most other wards without the infrastructure to sustain the impact on transport, schools and other local facilities, There is no land shortage in Kirklees and these dwellings could be filled by sites taken out of the plan both green field and brown field sites.
- This site is more than 30 minutes walk to a railway station so is not sustainably located.
- Requires an alternative site for a public golf course, so self-defeating in terms of open space.
- The site is in an unsustainable location, in terms of journeys to services and facilities. The site is in the Green Belt and likely to have significant adverse effects on the purpose of including land in the Green Belt, in context of merging with Calderdale.
- In terms of overall sustainability the combined Kirklees and Calderdale proposed allocations are not sustainable in view of the transport impacts (and in addition to the local environmental impact on existing greenfield sites). Both authorities should be required to produce a combined sustainability assessment to demonstrate how they believe the proposals can be delivered without adverse impacts on generated traffic, local and strategic highways congestion, travel-to-work carbon emissions, and loss of Greenbelt functionality.
- Object - on cumulative traffic impact grounds, in both Kirklees and Calderdale, and on the M62:
- The Bradley Park Masterplan Delivery Statement Part 1 identifies the traffic impact for the site on its own, current capacity constraints at junctions, queuing and congestion at the signalised junction where Bradley Road intersects with the A62. Support allocation text that there is the potential for a severe impact on the operation of the Strategic Road Network. However, this does not take into account cumulative impact of development including the impact of H351 and E1832c and high level of development in Calderdale.
- Adjacent site H351 which is part of the Bradley Park Masterplan': the combined number of new housing units at both H1747 and H351 would be 1,938. As at December 2016 the number of new units proposed across the district boundary on the two adjacent possible Calderdale urban extension sites – Woodhouse: 1,223 units, and Thornhill Lane: 1,926 units see Strategic Vision for South East Calderdale, WSP Nov 2016 - total 3,149 in Calderdale, which when set alongside the Kirklees housing proposals would bring the number of proposed new units to 5,087 in both districts. This very high weight of new housing should have been explicitly referred to, but is not. Additionally the adjacent and allocated employment site at Cooper Bridge E1832c, identified at 33-35 ha and 161,000 square metres capacity, should also have been explicitly referred to.
- It is this combined cumulative transport impact that should be assessed in relation to site H1747. But such proposals also operate in the opposite direction. By increasing

road traffic demand to a very considerable extent at this location alongside the M62 they also apply pressure to authorities such as Highways England to increase capacity and accessibility on the strategic highway network (beyond that now been provided by the smart motorways programme) which will consequently undermine the sustainability of overall transport and climate change policies, both in this local plan and beyond (see: 'Development proposals will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site.')

E2333a - Land to the east of, Park Mill, Wakefield Road, Clayton West, Huddersfield

- By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the significance of this Registered Historic Park and Garden or what harm might result to those elements which contribute to its significance by its eventual development.
- Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. The allocation of this site could, potentially, harm elements which contribute towards the significance of this Registered Historic Park and Garden.
- This site is so wrong in every way. From traffic, impact on the green belt and the views upon entering the gateway to the valley.
- There are plenty of run down places in and around Huddersfield that need redevelopment.
- Objection on the grounds that it is a nice quiet area and the development is bigger than the village.
- Insufficient justification to remove the site from the Green Belt
- Road access is poor and the site is considerable distance from the M1 compared to other employment sites in the area.
- There are currently vacant units at Clayton West.
- Development on this site would fundamentally change the character of Clayton West.
- Impact on wildlife and loss of agricultural land.
- Opportunities for tourism in the area aligned to sculpture park and light railway.
- Proposal conflicts with PLP54 and PLP63.
- Insufficient justification to remove the site from the Green Belt, in terms of national policy for Green Belts.
- The proposal conflicts with para 109 and 179 of NPPF
- NPPF Para 150 – The Draft Local Plan should 'reflect the visions or aspirations of the local community'. The Dearne Valley is one of just 12 Nature Improvement Areas, established in 2012 with funding from Defra, to help protect wildlife and connect people with nature, while providing a boost to rural economies.
- NPPF Para 100. The site is in an area at risk of flooding or which forms flood plains for rivers, particularly in the Dearne Valley. Building is proposed on wetland areas and sumps that mitigate flooding lower down the valley and reduce the flood risk to the A636.
- NPPF para 128. The north end of the site will be prominent and visible from Bretton

Country Park thus proving detrimental to it and the Yorkshire Sculpture Park (a heritage asset).

- NPPF Paragraphs 114 and 119 – The site contravenes UK BAP Priority Habitats. NPPF Paragraphs 120 and 121 – the site is in a in ‘high coal risk’ location.
- The site does not comply with the following NPPF paragraphs;
14,100,114,119,120,121,128,150,
 - Cross boundary and inter-authority issues have not been considered. Adjacent Local Authorities have large employment sites in development along the M1. In addition HS2 is likely to promote employment development in other areas, and render this site redundant. The transport impact on West Bretton, Wakefield; a village with narrow roads and proximity to the Yorkshire Sculpture Park have not been considered.
- There is no tourism policy in the Local Plan to support this local resource and support the rural economy.
 - The designation of this site would sterilise the land in perpetuity for employment purposes only.
 - The location of the site and it’s environs is not suitable for an employment due to it’s effect on the landscape, due to its prominent visibility and proximity to land allocated as country park and Bretton Hall.
 - Located within 50m of residential housing.
 - The immediate vicinity has historical importance, with medieval monastic bellpits located nearby.
 - Impact on wildlife and migratory birds.
 - The Upper Dearne valley is the gateway to Denby Dale and Holmfirth. The site is situated in close proximity to the Art Triangle, Kirklees Light Railway, Cannon Hall, Bretton Hall and the Coal Mining Museum - impact on tourism.
 - The Kirklees Way is not identified.
 - Increase in noise, light and air pollution.
 - The valley is designated as a green corridor by Natural England.
 - The entire site is currently in green belt, and the designation contravenes national green belt policies, by further eroding the green spaces between communities.
- Little or no consultation has been carried out with surrounding authorities to check the availability of more appropriate land ‘just over the border’.
- The consultation methodology is flawed. Most of the proposed development sites are included on the plan simply because they were put forward by the land owner and this is not a sound basis for selection and for planning the future of our communities. The Council has done little or nothing to examine the proposed sites to check for suitability in terms of location, access, condition and surroundings. It has simply plotted the sites on a plan. No serious effort has been made to inform the public about ‘the public consultation’ as there has been no leaflet drop and the plans have not been displayed publicly in local areas. The deadline for comments was around Christmas time, when most members of the public have other things on their minds. There are many more appropriate sites that have not been selected, including many brownfield sites that will be left as eyesores if not re-developed. These should automatically be considered first for inclusion in the plan but some have been rejected for unknown reasons.

- E2333a can only be accessed from the north following a drive of around 6 miles or through the narrow roads of Bretton village, joining the A635. This road is already heavily congested with long queues at the roundabout and slow moving lorries will make the situation worse. In winter weather, this road is unsafe road, including the right turn to Emley at the bottom of the hill which means that traffic has to stop suddenly behind vehicles waiting to turn and there are already a lot of serious accidents. High volumes of heavy lorries will increase accidents. A new access would be necessary onto the A635 which is already busy and cannot cope with more delays caused by lorries accessing the site which would be dangerous. It makes more sense for businesses to be located in existing industrial parks, including at Junction 39 which has lots of space and un-let units, Junction 41 and further south alongside the M1.
- Greenbelt land is supposed to be preserved unless there are absolutely no other alternatives but in this case there are many better alternatives.
- Industrial units will impact on the attractiveness of the Dearne Valley and many tourists will be unlikely to visit the area. It is impossible for the development to be 'disguised' within the landscape as the land slopes away from the main road and any building would stand out. There are concerns about the impact of noise, air pollution and pollution of water-courses by oil and fuel spills from commercial vehicles. Flooding occurs annually and run off from the fields runs down onto and across the road. The potential for pollution and contamination is abundant. The need for small, local businesses to be able to set up and to expand could easily be accommodated on smaller, more discrete sites locally. The development would result in empty buildings standing idle and the loss of valuable, productive agricultural land.
- This is green belt land, why use this green belt land when there is a brownfield site adjacent that is already used for industry?
- It will scar the approach to Clayton West and the rest of the villages up the valley.
- It will be a blot on the landscape and seen from miles around.
- More traffic on already crowded roads.
- Do we need more industrial buildings?
- The proposal to use green belt on the northern side of the A636 is unreasonable use of the green belt. Site topography means any development will be overbearing and destroying skyline on main gateway to Clayton West.
- Lack of an alternative for this site (E2333a) is not a valid reason for the plan to go ahead. Traffic congestion and associated pollution concerns would be worse including queues through Denby Dale, Scissett, Clayton West and to Bretton roundabout. Unaccepted visual impact of the development on a valued landscape. Loss of wildlife habitat including impact on protected species. Negative impact on the sculpture park. The site is in a flood zone and loss of agricultural land and building on the site will cause further flood risk.
- Consultation at the early stages did not mention plans for housing on this site. Since then, there have been no letters to residents or other means of communication detailing the plans. There has been little opportunity to object to the plan.
- The land was given to the people of Clayton West, with the intention of being open space for the community to enjoy. The countryside and the views it offers are enjoyed by families, walkers and dog walkers. There has been no concern for the

community who have been here for generations.

- Site assessment fails to address cross boundary and inter-authority issues
 - The inclusion of the site contravenes Kirklees Local Plan policies and guidance
 - Prioritise the use of brownfield land
 - Larger firms are more likely to be attracted to more cost effective locations along the M1, particularly junctions 37 and 39
 - Kirklees needs to work more closely with neighbouring authorities when considering employment sites on the Dearne Valley side of Kirklees
 - Reasonable alternatives have not been properly considered
 - Negative impact on the green belt
 - Site allocation will increase noise and air pollution in Clayton West
 - Risk of flooding will increase affecting the River Dearne's flood plain
 - There is no power network to service this site
 - Development is completely counter to the green corridor designation
 - Significant impact upon the landscape affecting the green interconnectivity between Kirklees, Barnsley and Wakefield
 - Development would be highly visible from Bretton Country Park
 - Very special circumstances do not exist to release land from the green belt. Brownfield opportunities exist
 - Loss of commercial to residential is compounding the issue
 - Access is unsuitable for a site of this scale
 - A636 is a single carriageway and highly congested already
 - Surrounding road network and junction 39 of the M1 is already at capacity and cannot accommodate further commercial traffic
 - Site is not compliant with paragraph 7 as development location does not support economic growth, it provides no social benefit as it is not well serviced and does not support the health, social or cultural wellbeing of current or future occupiers. The development fails to protect or enhance the natural, built or historic environment
 - Site is not compliant with NPPF paragraph 14 as the impact of the site outweighs the benefit to the local community
 - Site is not compliant with NPPF paragraph 17 as the site allocation does not accord with the 12 principles
 - Site is not compliant with NPPF paragraphs 80, 82 and 84 because the allocation fails to comply with these requirements
 - Site is not compliant with NPPF paragraph 100 because part of the site serves as the flood plain to the River Dearne and the underlying strata is unsuitable for soakaway arrangements
 - Site is not compliant with NPPF paragraphs 109, 110, 114 and 119 because parts of the site are in a UK BAP priority habitat
 - Site is not compliant with NPPF paragraph 112 because the site results in the loss of valuable agricultural land
 - Site is not compliant with NPPF paragraphs 150, 151 and 152 because the allocation does not reflect the visions or aspirations of the local community in the Dearne Valley
- Every village road leads down to the Dearne Valley and the A636 Wakefield Road which is also a major feeder route for the Holme Valley. This road is increasingly busy

and congested and to add traffic from the proposed 5,500 new homes in Kirklees Rural is a travesty of National Policy relating to soundness. What consultation has taken place with neighbouring councils of Wakefield and Barnsley?

- The entire exercise has been rushed and contains many inaccuracies, a sizeable majority of Kirklees Rural residents are unaware of what the Local Plan is and the consequences to their communities.
- Sustainable development should be at the core of any Plan. The allocated locations, topography and road networks throughout this area are totally unsuitable and the proposed developments unsustainable.
- To allow the building of an Employment Site E2333a on 40 acres of well farmed agricultural Green Belt as the A636 cuts through the Dearne Valley up towards Bretton and the Yorkshire Sculpture Park is completely inappropriate, unsound and contravenes a great number of requirements within Paragraph 182 of the NPPF. High level environmental stewardship by generations of the same farming family combined with the Dearne Valley being designated a 'green corridor' have preserved a stunning vista and promoted a significant natural habitat for many protected species.
- The Plan is inconsistent with or directly contravenes National Planning Policy Framework.
- E2333a is a huge Greenbelt site, it is unsound to develop this area into industrial developments where little research has been shown that there is a benefit to the local people and area to destroy the Greenbelt. There are many other brownfield sites available for small scale developments locally and sites nearer the M1/M62 corridor for large scale developments.
- The site is in a flood plain.
- Part of the green corridor and a valuable habitat area.
- The site is part of a tourist route from Bretton Park to The Last of the Summer Wine Country
- Have Wakefield council and the neighbouring villages been consulted with regard to the noise and traffic pollution? Heavy traffic would have to access the already congested rural roads.
- Site E2333A is unreasonable use of the green belt.
- It is too big and does not reflect the settlement's size & character. It would damage irretrievably an area increasingly known for outdoor recreation & leisure tourism and destroy valuable farmland. At least the area north of the A636 should be rejected.
 - Support proposed allocation 16.79ha of CWDCL land for employment. However, site smaller area than 25.7ha promoted. Site is unable to deliver scale of development required by market and deemed appropriate in this location by Council to deliver Spatial Growth Strategy and Economic Strategy.
 - Council have calculated site is capable of delivering 52,115 sq m of employment land. This floorspace density is unlikely to be achievable due to topography and need to create development plateaus. Additional technical information on physical characteristics of CWDCL land demonstrate topography and landscape characteristics have a significant bearing on gross to net development area ratio and density of development achievable. This

- with the need to deliver a longstanding and defensible Green Belt Boundary means that a significantly larger allocation area is required in order to deliver 52,115 sq m of employment land.
- CWDCL feasibility work has shown net developable area of intended allocation likely only to deliver in the order of 35,100- 37,250 sq m of commercial floorspace some 14,865 to 17,000 sq m less than amount required.
 - JLL's Market Assessment has demonstrated that there is significant latent demand for employment
 - space in this location that, if accommodated on the Site, would create a critical mass resulting in an
 - employment land delivery rate that would warrant an allocation area capable of delivering in the
 - order of 52,000 sq m (565,000 sq ft) to 62,000 sq m (665,000 sq ft).
 - CWDCL land would if allocated, deliver scale of floorspace for market demand and is deliverable and viable.
 - Clayton West is distinctive in South Kirklees given prime position on A636 and proximity to M1. Location makes it attractive to regional and national occupiers, sustainable and accessible option for expanding local businesses.
 - Proposed allocation will not fully respond to existing negative commuting patterns, Rural Kirklees. Highly sustainable location of site in relation to rest of rural Kirklees and to Clayton West provides opportunity to deliver sustainable employment opportunities.
 - Need to take account of area's environmental constraints and sensitivities including topography. CWDCL and land would have better regard to issues than proposed allocation, can be extended without adverse implications.
 - Proposed policy wording suggests site lies within Flood Zone 3a. Incorrect. No part of proposed allocation or CWDL land lies within Flood Zone 3.
 - No environmental constraints to development which cannot be overcome.
 - Landscape character and visual appraisal of CWDCL land confirmed commercial development could take place in such a way magnitude of change would be low, negligible. Grade II Parkland Landscape of Bretton Hall, development of CWDCL land not considered to have any material impact on the character of the parkland, or its setting. Scheduled Monument of Bentley Grange, no material impact upon character or setting.
 - CWDCL object to Plan's failure to identify an appropriately sized site that will deliver a flexible,
 - market-facing employment opportunity capable of meeting the objectively assessed business needs
 - of the area in full (as required by NPPF, Paragraphs 17, 20 and 21), addressing current patterns of out
 - migration and supporting the creation of sustainable communities.
 - Northern boundary of CWDCL land would create a stronger, more defensible Green Belt boundary than proposed boundary which will be inconsistent with strategy for meeting identified requirements for sustainable development. Will need to be altered at end of plan period (or before) (contrary to para 85) to accommodate medium to longer term development needs. Draft Local

Plan does not identify any "safeguarded land" between urban area and Green Belt in order to meet longer term needs beyond Plan Period.

- CWDL land appropriate, sustainable and deliverable. Promotes sustainable development when assessed against Council's sustainability criteria. Will provide significant amount of new employment floorspace providing new job opportunities locally and address significant out migration from Clayton West and South Kirklees. Will deliver sustainable rural communities in accordance with Council's Spatial Strategy. Conclusion also true for Council proposed allocation to a lesser extent, Council's suggested Green Belt boundary is less able to meet five purposes of Green Belt, does not deliver a defensible long standing boundary to north of site.
- Don't believe you are co-operating with the local community. Try a local referendum. I guarantee that the majority of local voters (ie the ones truly affect) would vote against your proposals.
- The proposals are unsound because they do not take proper account of the dangers to road users of such a significant development on the edge of a village. There can already be significant disruption from traffic trying to access the Halcyon site. This additional development will significantly increase traffic and congestion.
- A cancellation of all proposals for development and a retention of the green belt.
- It does not meet the criteria for legal compliance.
- It is not based on robust and credible evidence.
- It is not the most appropriate strategy when considered against alternatives.
- It has not considered cross boundary/inter authority issues.
- It has not consulted widely and community engagement has been limited.
- Residents in the nearby villages of West Bretton and Calder Grove have not been made aware of the proposals. Both are within the Wakefield MC area and the former is also the home of the internationally recognised Yorkshire Sculpture Park. Traffic exiting the M1 at exits 38 and 39 already chokes these villages especially for 2 to 3 hours in both early morning and early evening.
- The site is Greenbelt land which forms a green buffer between adjacent local communities.
- Brownfield sites are available within the locality which could be developed to provide the smaller start up units for which there is a demand.
- The Vision and Objectives Section of the KMC Strategies and Policies Document recognises the natural beauty and heritage of this area, yet these plans would ultimately lead to it's destruction
- There has been only minimal if any involvement of the local communities. Two information sessions, neither of which was widely publicised, were held in Huddersfield and Dewsbury, a tedious journey, especially for those using public transport. Access to the plans via the Internet is also bad practice being predicated on the flawed assumption that this is available to all and that they have the skills to access and negotiate an unusually difficult and unwelcoming site.
- The site will add to air and noise pollution.
- Large areas of the site are already subject to persistent and lengthy periods of flooding.
- The 3 Enterprise Zones already being developed in Kirklees would provide more

suitable locations.

- There is limited demand for large industrial units in Kirklees.
- There are many more convenient and cost effective sites available along the M1 corridor. Steep hills and the narrow and the often congested A636 is unsuitable for even more HGV traffic.
- Loss of valuable agricultural land and associated flora and fauna.
- Further destruction of the visual amenity. The artificial terraces created to accommodate the huge sheds cannot be hidden and will be seen from the Yorkshire Sculpture Park and surrounding areas.
- The Dearne and Holme Valleys have great potential for more tourism and this development will spoil the gateway to these areas.
- Over 5,000 new houses are planned for Kirklees Rural adding to the many hundreds of houses recently built, or undergoing construction. Infrastructure and the facilities essential for public health are already compromised; the proposals are therefore unsustainable.
- Notably it does not;
- Improve the health of local people,
- Secure an effective transport network,
- Protect and enhance the character of the landscape.
- Protect and enhance recreation facilities and areas of open space Provide the housing that meets local demand.
- Provide start up opportunities for local entrepreneurs.
- E2333a at Clayton West is an unsound allocation which fails to meet many of the requirements within Para 182 of the NPPF. Furthermore it ignores Kirklees' own proposed Planning Policies and Local Plan guidelines.
- The Plans do not ensure sustainable development for either Kirklees or Kirklees Rural and are therefore unsound, particularly with regard to National Policy, (para 182, NPPF).
- There seems to have been no consultation with Wakefield or Barnsley councils, which have much bigger, flatter sites, within a few miles, and much closer to the M1 motorway.
- E2333a is Green Belt land, which should only be used for development in exceptional circumstances. Replacing an adjacent employment site with one in the Green Belt can by no means be considered exceptional circumstances. There are other brownfield sites in the area, which could be used including H3325a.
- Part of the site floods even in the summer with run-off from the higher part, which often covers the main A636 road.
- The link to the M1 from Clayton West (A636) is a single carriage way which gets very busy at peak times and winds through the village of West Bretton, home to the Yorkshire Sculpture Park.
- The site is currently good agricultural land, with crops in rotation, and should be kept as such.
- Clayton West is a small village and adding a huge industrial complex to it would ruin the character of it.
- The inclusion of the site goes against many of the clauses of the NPPF, which is the government policy which is supposed to be the framework for local plan design. The

plan is aspirational but not realistic as required by the NPPF.

- Furthermore, we do not consider that the Council have effectively discharged their duty to cooperate with neighbouring authorities. In particular we believe that there are better placed employment sites closer to the M1 within Wakefield and Barnsley which could better accommodate any employment need and we feel that the Council should have worked more closely with these neighbouring authorities in order to look at the potential of the M1 junctions for employment uses.
- In addition residents in the Wakefield Villages which would be used to access these allocations are unaware of the proposals and this supports our view that there has been insufficient cross boundary consultation on this Local Plan.
- We do not consider that the identified housing and employment needs are based on objectively assessed development requirements.
- We consider that there has been an over estimation of the “objectively assessed housing need”; an under estimation of the brownfield land supply; an over estimation of the necessity for green field land allocations; and over estimation of the necessary industrial land allocations; and an over estimation of the necessary green belt land release.
- The proposed allocation of large areas of Green Belt such as site E2333a, whilst allowing existing employment sites within the area such as H3325a to be re-allocated from employment to housing land is not the most appropriate strategy.
- There are brownfield sites within the area which could accommodate the proposed development and this would represent a more preferable strategy/approach. The efficient use of brownfield sites should be encouraged and the Local Plan fails to fully explore the brownfield options available. We therefore do not consider that the Publication Version of the Local Plan is justified in accordance with the NPPF.
- The proposed allocation would not serve an economic role as the site is not located within the right place to support growth. Site E2333a is located within the Green Belt and within a rural area which lacks infrastructure. There is insufficient infrastructure already and it could not cope with the proposed developments. There appears to be no proposal to improve infrastructure.
- The proposed allocation would not serve a social role. The proposed allocation is not well serviced and the allocation would not assist in supporting the health, social or cultural wellbeing of current or future occupiers of the area.
- The proposed allocation would also not serve an environmental role. The allocation would fail to protect or enhance the natural, built and historic environment. In fact we consider that the proposed allocation would have a negative impact on the natural, built and historic environment.
- Sufficient information is not available to show that the reduction in developable area will be sufficient to protect, conserve and enhance this priority habitat. The site is a haven for wildlife and migratory birds. Deer, foxes, buzzards, owls, Canada geese are all present. There are also lapwings on the corner of the field. Last year 5/6 storks were nesting in the trees next to the river behind Adare.
- Part of the site is in flood zone 3. The whole of the area suffers from surface water flooding and has been waterlogged during recent bad weather. These issues need to be addressed and in addition it is understood sites in Flood Zone 1 are available.
- Development would result in the loss of high quality agricultural land.

- There is a lack of need for the sites and a lot of sequentially preferable sites closer to the M1 at Junctions 36, 37 and 39, therefore if allocated the site would be likely to come under pressure to be changed to residential land. The site is 6 miles from J39 of the M1 and not particularly accessible. Northbound traffic will have to pass through West Bretton on constricted roads.
- The Local Plan does not appear to be effective and we question the deliverability of the plan over the plan period.
- The proposed Local Plan is aspirational but not realistic as required by the NPPF.
- The proposed allocations of site H3325a would not represent sustainable development in accordance with the NPPF.
- The site fulfils the role and function of Green Belt set out in NPPF.
- The Council have not sufficiently demonstrated why the land should be removed from the Green Belt in accordance with the requirements set out within paragraph 82 of the NPPF and the proposed allocation does not accord with para 84 of NPPF.
- This would represent a substantial extension of employment zone into open country. The northern half of the site is on higher ground so potentially is much more prominent.
- Land is very fertile and in full crop.
- Thriving wildlife on site, hares, skylark, rabbits, ground nesting birds, grey partridge, pheasants, barn and tawny owl, herons, ducks, newts, bats, badger set.
- Land floods on both sides of A636. River Dearne struggles with excess rains and bursts its banks onto the land, hard surfacing the area will compound the problem.
- Sewers run across the land and flood in heavy rain fall.
- Traffic congestion will increase (A636) and traffic through Bretton as cars travel to the M1. Access not suitable for development of this size.
- Adjacent site was rejected for development due to close proximity to sculpture park. H2333a is closer.
- Tourism will decrease.
- Plenty of empty factories in the Barnsley area.

Cooper Bridge – E1832c

- Leeds City Councils Highways Section confirmed that no recent discussions had taken place on the proposal at Chidswell and that they continue to have significant concerns – which have not been addressed – about the impact this industrial and housing development would have on the A653 corridor.
- Little evidence exists that a clear infrastructure plan exists to consider the impact of the proposal on Junctions 25 and 28 of the M62 and the impact on education and healthcare facilities.
- Removing the site from Green Belt breaches obligations in NPPF to retain the Green Belt except in exceptional circumstances.
- The development of this area has the potential to affect several elements which contribute to the significance of the Grade II Registered Historic Park and Garden at Kirklees Park and the numerous designated heritage assets within it. These include three Grade I and four Grade II* Listed Buildings.
- No evaluation of what contribution this site makes to the significance of the numerous heritage assets in this area or what harm might result to those elements which contribute to the significance of these assets by its eventual development.

There is a need for a robust assessment of the impact which this allocation might have upon those elements which contribute to the significance of these assets.

- The original allocation was supported by a very comprehensive evaluation of the potential impact which the development of this area might have upon the numerous heritage assets in its vicinity. This revised layout proposes a very different development area to that originally evaluated in the 2013 Heritage Impact Assessment. Need to update the 2013 assessment. The Interim Summary – Heritage Assessment does not do this.
- The NPPF makes it clear that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. The NPPF makes it clear that Scheduled Monuments and Grade I and II* Listed Buildings are considered to be heritage assets of the highest significance where substantial harm or loss should be wholly exceptional.
- The need to conserve those elements which contribute to the significance of the many designated heritage assets in this area (in line with the advice in Paragraph 132 of the NPPF) may significantly constrain the quantum of developable land or the uses that might be appropriate upon it. The evidence available does not support this.
- Consultation with local people has not been effective as the Council did not arrange local community consultation meetings to raise awareness of the Plan and explain how the draft Local Plan would impact on particular towns and villages. The Council appears to be promoting (via the West Yorkshire Authority) a major new transport development (North Kirklees Orbital) which does not appear to feature in the draft Local Plan, this again calls into question the legal compliance of the process.
- Whilst the development of the former waste water treatment works is sound and consistent with national policy, the land behind the Three Nuns is not considered sound. Mirfield Moor has outline permission for industrial development and is for sale years after first marketed, the land has important historical links, will impact on the historic park and gardens and Kirklees Hall, is an important piece of open space for recreation and habitats and is likely to increase flooding and impact residential amenity.
- The site is not justified due to impact of prospective site engineering works:
 - several hectares of the site would be lost to development due to roads, reconfigure and sustainable drainage
 - a phased development is unlikely due to the levels of the site. Provision of bridges, flood balancing structures along Nun Brook would mean the site has to be constructed all at once.
 - the Kilmartin illustration of the plateaux shows that the site is arguably four sites in close proximity served off a single access
 - unclear whether very large buildings could be constructed partially on made (raised) ground and partially on solid cut leading to additional construction costs.
 - two large gas mains cross the site
 - not clear whether there are mining issues associated with the site
 - the implementation of sustainable drainage would impact on the landscape and effectively destroy Nun Brook
 - mitigation to address visual impact of the buildings harmful

- the site includes land and access in Calderdale
- the illustrative layout assumes the site is one level plateau
- unclear whether a secondary access is required
- In conclusion it would appear that to develop the site (not including highway connection and traffic costs) would be very costly on the public and private purse; so much so that if development was more expensive than sites elsewhere then the land will not be brought forward. If the profitability of the site is shown to be marginal, the owner may not even be willing to sell the land after all.
- The site is not viable as the buyer must reimburse the vendor 40% of any uplift in land values attributable to the development of the land. A GVA commissioned report on CIL supports this. The reports by Jones Lang LaSalle and Dove Haigh Phillips (available with the core strategy) observed that the land will not be developed if it cannot be done so profitably. And both are unequivocal; the site cannot be developed without public sector assistance including very large scale funding.
- Spen Valley Civic Society respectfully invites the Inspector to consider the following matters:
 - the site location is in open countryside
 - the site is nowhere near an existing or proposed rail station
 - the site has poor public transport links
 - the location is heavily congested in all directions
 - development of the site would generate significant car journeys.
 - the site is not close to a pool of labour
 - it is far too dangerous to cycle to this location
 - The site is not an extension to an existing built up area. It is an island site within the green belt.
 - Railways are irrelevant to this site.
 - Lack of public transport and poor frequency of service.
 - 4. Traffic congestion - heavy and lengthy congestion at all three junctions around and at Cooper Bridge. Additionally, congestion from Cooper Bridge along the A62 at peak times
 - If the Three Nuns site were to be developed and if it were to generate significant employment (itself a point of debate) then inevitably it would attract very many more car and HGV journeys. Not only from the north and the south but via the M62 and Jn 25 to the west.
 - 6. The generated car journeys would be quite lengthy because the Three Nuns site is not close to major residential areas.
 - The main arterial roads are far too busy for cycling to be seriously entertained. The cycle lane on the A62 is painted on the footway. Paras 10.62-10.66 (Transport – Sustainable Travel – Strategies and Policies) can't be taken seriously re: cycling and walking.
 - Concern that the identified transport schemes will be achieved given other strategic highway projects in West Yorkshire and funds required from site developer. Question the impact on CIL if a contribution is made to this site.
 - Consider that the highway implications for traffic in the Cooper Bridge and the wider area should be re-examined and examine how these issues are addressed and judge whether they are adequate, realistic and affordable in all respects:.

- In view of existing congestion between Cooper Bridge, the M62 and Brighouse how is this to be dealt with?
- What works are planned at M62 Jn 25 to enable traffic to enter and exit?
- What are the traffic implications of the major (but smaller) urban extension planned by Calderdale at Brighouse (Thornhill) and the one by KMC at Bradley?
- What is the role and purpose of the planned new M62 24A junction?
- What are the highway works planned for the A62 to address existing congestion north and south of Cooper Bridge?
- What is the design for the junction and access road for the development site? NOTE there are drawings in the Supporting Evidence and Background Information section which show an access outside of Kirklees in Calderdale.
- How much is all this going to cost?
- Where is the money coming from?
- The Local Plan is unsound because the site location is not a sustainable location for development, contrary to national policy.
 - Insufficient consideration has been given to brownfield sites
 - Need for this large industrial site is not proven - MX129 and MX1911 should be returned to employment allocations and would provide sufficient provision and remove the need for E1832c
 - Community objections to this proposal - at all consultation stages - have continually been ignored
 - The allocation conflicts with the Council's own local plan policy in relation to protection and enhancing existing green infrastructure assets, and minimising fragmentation of green infrastructure networks
 - Site E1832c conflicts with the Kirklees Trees and Woodland Strategy and the Kirklees Environment Unit report.
 - Allocation fails to fully recognise the significance of the Kirklees Priory site
 - Inconsistent approach applied to the implications of development on scheduled ancient monuments
 - Significant impact upon the landscape
 - Significant impact upon the historical setting of a nationally significant site
 - Impact upon good quality agricultural land
 - Impact upon woodland - some of which is ancient - hedgerows and streams
 - No mention of the Landscape Character Assessment undertaken by the Council which assessed this site as moderate to high condition, and overall described as 'a tranquil farmed landscape with extensive, far reaching views'. Allocation is contrary to the studies recommendations
 - Impact upon PROWS which are of historical significance
 - 4 different boundaries have been considered for this site.
 - Different green belt assessment outcome for the alternative rejected options which relate to this development to accepted option E1832c. Assessment has clearly been adapted to suit outcome.
 - The Council concluded that no exceptional circumstances exist to release land from the green belt for the rejected options for this development. This conflicts with the outcome for the accepted site option E1832c where the conclusion claims exceptional circumstances do exist

- Impact upon the green corridor down the Calder Valley affecting woodland and priority wildlife habitats
 - Impact of E1832c is greater than previous accepted option E1832 which was included in the draft local plan
 - E1832c is not the most appropriate as no consideration has been given to reasonable alternatives
 - Highways England has stated the cumulative impact of all the housing, employment and mixed use allocations will have a significant adverse traffic impact on the Strategic Road Network in West Yorkshire and its junction with the local primary road network. One employment site with major individual adverse impact is Cooper Bridge.
 - Impact of air, noise and light pollution
 - Site impacts upon priority wildlife habitats but there is no plan to preserve these habitats
 - There is no plan in place to resolve Historic England's concerns in relation to heritage impacts
 - Part of the site option extends into Calderdale
 - The cost of infrastructure requirements would make this site undeliverable
 - Site is undeliverable due to constraints in relation to planning, funding, highways and topography
 - The number of mitigation measures required to offset the heritage impact makes the site undeliverable
 - Site E1832c would conflict with and not enable the delivery of key strategic objectives within the local plan
 - At the draft local plan stage Historic England concluded there had been insufficient evaluation of what impact the loss of currently open areas and their subsequent development might have upon heritage assets. Required mitigation may result in reduced development capacity or make a site largely undevelopable.
 - Proposed development fails to demonstrate the exceptional circumstances required to release land from the green belt. Three options for this site were rejected on these grounds, therefore the accepted option should also have been rejected.
 - Site plays a vital role in maintaining a green corridor along the Calder valley and is categorised as "strategic green infrastructure" by Natural England. This kind of area as identified by Natural England is supported by NPPF guidance. Kirklees Council fails to take this into account.
 - Site conflicts with NPPF 7. No evidence has been provided to demonstrate that sustainable development in terms of the historic environment can be delivered.
- This proposal is going to have a dramatic negative impact on the people in and round the sites but also those in Morley and Outwood.
 - The Greenbelt in this part of the country has been under continuous attack from development proposals and this is yet another proposed reduction in our already limited and precious green space. The proposals fail to detail where the exceptional circumstances occur that justify building on Greenbelt. As such, the proposal to include both sites as Significant Development Sites is in breach of the National

Planning Policy Framework requirement to retain Greenbelt and release it on only exceptional circumstances.

- In breach of the National Planning Policy Framework requirement to retain Greenbelt and release it on only exceptional circumstances.
- Development on the waterworks site south of the road would be acceptable but the greenfield site north of the road is a major intrusion into countryside and reduces openness in the local landscape.
- In terms of overall sustainability the combined Kirklees and Calderdale proposed allocations are not sustainable in view of the transport impacts (and in addition to the local environmental impact on existing greenfield sites). Both authorities should be required to produce a combined sustainability assessment to demonstrate how they believe the proposals can be delivered without adverse impacts on generated traffic, local and strategic highways congestion, travel-to-work carbon emissions, and loss of Greenbelt functionality.
- Object - on cumulative traffic impact grounds, in both Kirklees and Calderdale, and on the M62:
- The Bradley Park Masterplan Delivery Statement Part 1 identifies the traffic impact for the site on its own, current capacity constraints at junctions, queuing and congestion at the signalised junction where Bradley Road intersects with the A62. Support allocation text that there is the potential for a severe impact on the operation of the Strategic Road Network. However, this does not take into account cumulative impact of development including the impact of H351 and E1832c and high level of development in Calderdale.
- Adjacent site H351 which is part of the Bradley Park Masterplan': the combined number of new housing units at both H1747 and H351 would be 1,938. As at December 2016 the number of new units proposed across the district boundary on the two adjacent possible Calderdale urban extension sites – Woodhouse: 1,223 units, and Thornhill Lane: 1,926 units see Strategic Vision for South East Calderdale, WSP Nov 2016 - total 3,149 in Calderdale, which when set alongside the Kirklees housing proposals would bring the number of proposed new units to 5,087 in both districts. This very high weight of new housing should have been explicitly referred to, but is not. Additionally the adjacent and allocated employment site at Cooper Bridge E1832c, identified at 33-35 ha and 161,000 square metres capacity, should also have been explicitly referred to.
- It is this combined cumulative transport impact that should be assessed in relation to site H1747. But such proposals also operate in the opposite direction. By increasing road traffic demand to a very considerable extent at this location alongside the M62 they also apply pressure to authorities such as Highways England to increase capacity and accessibility on the strategic highway network (beyond that now been provided by the smart motorways programme) which will consequently undermine the sustainability of overall transport and climate change policies, both in this local plan and beyond (see: 'Development proposals will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site.')

Green belt boundary changes

3.16 The following table shows a breakdown of responses on the Green belt boundary changes document:

Site/Paragraph	Support	Object	Total
0411_01	0	1	1
1612_01	0	1	1
1612-03	6	0	6
1712-02	0	1	1
1809_01	0	1	1
2026_01	1	0	1
2027_01	1	0	1
2415_05	1	0	1
AGB2072	0	1	1
AGB2074	1	0	1
CCMX1905i	0	1	1
H233	0	1	1
H634	0	1	1
RGB2137	0	1	1
RGB2613	0	1	1
RGB2702	0	1	1
RSSGB102	0	1	1
RSSGB28	0	1	1
RSSGB39	0	1	1
RSSGB46	0	1	1
RSSGB64	0	1	1
RSSGB91	0	1	1

3.17 The Tables below form a summary of support/objection against Plan tests including legal compliance, duty to co-operate and soundness:

Green Belt Boundary Changes	Support	Objection
Legal Compliance	27	0
Duty to co-operate	27	0
Soundness	10	17

Green Belt Boundary Changes	Support	Objection
Positively prepared	2	7
Justified	2	10
Effective	2	1
Consistent with national policy	2	7

- 3.18 A total of 27 representations were received:
- 13 relating to specific advertised changes proposed as a result of the exercise to digitise the Green Belt boundary;
 - 7 relating to specific small sites;
 - 2 relating to 'add land to the Green Belt' options;
 - 2 relating to 'remove land from the Green Belt' options; and
 - 3 site specific Green Belt comments relating to accepted Green Belt development options. These comments have been responded to within the Allocations and Designations document.
- 3.19 Comments received relating to specific advertised changes proposed as a result of the exercise to digitise the Green Belt boundary, were largely in support of the document. Objections related to specific instances where there is disagreement as to the exact placing of the position of the Green Belt boundary.
- 3.20 7 representations were received objecting to the council's decision not to amend the position of the Green Belt boundary to remove from the Green Belt small sites submitted to the council for consideration.
- 3.21 One representation was received in support of the acceptance of option AGB2074 to add land to the Green Belt at Newsome in the vicinity of Castle Hill. One representation was received objecting to the rejection of option AGB2072 to add land to the Green Belt at Hade Edge. 2 representations were received objecting to the rejection of options RGB2613 and RGB2702 to remove land from the Green Belt at Almondbury and Birkenshaw.
- 3.22 Green belt responses on Strategy and Policies 19.5 and Green belt boundary changes are outlined in Appendix 8.

Rejected Site Options Rejected site options

- 3.23 The Tables below form a summary of support/objection against Plan tests including legal compliance, duty to co-operate and soundness:

Rejected Sites Report	Support	Objection
Legal Compliance	1244	0
Duty to co-operate	1243	1
Soundness	752	492

Rejected Sites Report	Support	Objection
Positively prepared	6	88
Justified	6	476
Effective	5	14
Consistent with national policy	5	392

- 3.24 A total of 1264 representations were received relating to 213 different site options. Supporting comments following the rejections of site options were received on a number of site options. Sites that received the greatest number of supports are H1701 and H575. The strategic green infrastructure and associated housing options: SGI2109, SGI2115, SGI2115 H136, H189, H250, H251, H252, H253, H254, H256 and H257 also received a number of supports through the consultation process.
- 3.25 96 sites received one comment objecting to the rejection of a site primarily from site promoters. Local Green Space LocGS2721 received a large amount of objections. 366 representations were received objecting to the council’s decision to reject this site as local green space.
- 3.26 The Rejected Site Options Report core document CD15 sets out the reasons for the rejection proposed site options and was consulted on at the draft Local Plan stage.
- 3.27 A breakdown of responses on the Kirklees Publication Draft Local Plan – Rejected Sites Options document is outlined at Appendix 6.

Sustainability Appraisal

- 3.28 For a full list of consultee responses and the council’s response see Submission Document SD8: Kirklees Local Plan: Publication Draft Sustainability Appraisal Report - Schedule of Responses April 2017.
- 3.29 The Tables below form a summary of support/objection against Plan tests including legal compliance, duty to co-operate and soundness:

Sustainability Appraisal	Support	Objection
Legal Compliance	55	14
Duty to co-operate	68	1
Soundness	5	64

Sustainability Appraisal	Support	Objection
Positively prepared	1	6
Justified	0	61
Effective	2	0
Consistent with national policy	2	22

- 3.30 The overwhelming majority of comments relate to the scoring of sites against SA objectives, there has been very few specific comments on the appraisal of the strategy and policies. Comments have also been received on the methodology used to undertake the SA.

3.31 **SA General Comments:**

- The SA report is unclear in terms of how it has been undertaken and how consistently judgements have been made
- The assessment should be more technical, with one consultee proposing a scoring from 1-10 against the SA objectives and a weighting of the SA objectives
- The SA is a technical document that is difficult to interpret
- The SA is flawed given the limited consideration to existing employment sites
- Concern raised over uncertainty in relation to impact upon the historic environment
- There have been comments made in relation to the interpretation of the heat mapping used to inform decision making
- The sustainability appraisal is flawed and inconsistent

3.32 Site specific comments on the SA have been raised on the following sites disagreeing with the scoring against specific SA Objectives:

Residential:

- H8 – SA Objective 6
- H38 - SA Objective 6
- H69 – SA Objective 1, SA Objective 3, SA Objective 4, SA Objective 5, SA Objective 6, SA Objective 7, SA Objective 8, SA Objective 9, SA Objective 10, SA Objective 11, SA Objective 12, SA Objective 13, SA Objective 14, SA Objective 15, SA Objective 16, SA Objective 17, SA Objective 19
- H91 – SA objective 10
- H125 – SA Objective 3, SA Objective 5
- H138 – SA Objective 8, SA Objective 10, SA objective 14
- H168 – SA Objective 3
- H288a – SA Objective 1, SA Objective 3, SA Objective 4, SA Objective 5, SA Objective 6, SA Objective 7, SA Objective 9, SA Objective 10, SA Objective 11, SA Objective 12, SA Objective 13, SA Objective 14, SA Objective 16, SA Objective 19
- H357 - SA Objective 8, SA Objective 14
- H358 – SA Objective 3, SA Objective 8, SA Objective 10, SA Objective 16
- H442 – SA Objective 1, SA Objective 3, SA Objective 4, SA Objective 5, SA Objective 6, SA Objective 7, SA Objective 8, SA Objective 10, SA Objective 11, SA Objective 12, SA Objective 13, SA Objective 14, SA Objective 15, SA Objective 16, SA Objective 17, SA Objective 19
- H584 – SA Objective 1, SA Objective 3, SA Objective 4, SA Objective 5, SA Objective 6, SA Objective 8, SA Objective 11
- H1747 – SA Objective 19
- H2730a - SA Objective 5, SA Objective 8, SA Objective 12, SA Objective 13, SA Objective 14, SA Objective 16

Employment:

- E1831 - SA Objective 10, SA Objective 15
- E1832c - SA Objective 19

Minerals

- ME2248 (a,b,c) and ME2314 – SA Objective 5, SA Objective 9, SA Objective 11, SA Objective 12, SA Objective 13
- ME2568 and ME3324 - SA Objective 11, SA Objective 12, SA Objective 13, SA Objective 14

Mixed Use

- MX1914 - SA Objective 1, SA Objective 3, SA Objective 4, SA Objective 5, SA Objective 6, SA Objective 8, SA Objective 10, SA Objective 12, SA Objective 13, SA Objective 14, SA Objective 15, SA Objective 16, SA Objective 17

Gypsy and Travellers and Traveling Showpeople

- GTTS2487 - SA Objective 3, SA Objective 5, SA Objective 16

Strategic Green Infrastructure

- SGI2115a and SGI2109 – rejection supported

Comments in relation to cumulative impacts and consistency of scoring of residential options:

- H31, H664, H616, H638, H2730, H2684a, H1679 (cumulative effects)
- H31, H616, H638, H664, H1679, H2684a, H2730a - SA Objective 1, SA Objective 5, SA Objective 10, SA Objective 11, SA Objective 12, SA Objective 14, SA Objective 19 (Consistency)
- H47 and H314 – SA Objective 6 and SA Objective 13 (Consistency)
- H68, H288, H288a, SL2170A, SL2170B (Consistency)

Appendix 1 Specific and general consultees

Specific Consultees

Barnsley MC Planning and Transportation Service
Bradford MC Department of Transportation, Design
British Telecom
Calderdale and Huddersfield NHS Foundation Trust
Calderdale MB Council
Cawthorne Parish Council
Denby Dale Parish Council
Dunford Parish Council
Environment Agency
Gunthwaite and Ingbirchworth Parish Council
Greater Huddersfield Clinical Commissioning Group
High Hoyland Parish Council
High Peak Borough Council
Highways England
Historic England
Local Enterprise Partnership
Locala Community partnership
Holme Valley Parish Council
Homes and Communities Agency
Kirkburton Parish Council
Leeds City Council (Planning and Development services)
Meltham Town Council
Mid Yorkshire Hospitals NHS Trust
Mirfield Town Council
Mobile Operators Association
National Grid
Natural England
Network Rail
NHS England North
NHS Property Services
North Kirklees Clinical Commissioning Group
Northern Gas Networks
Oldham MBC Strategic Planning and information
Peak District National Park Authority
Ripponden Parish Council
Saddleworth Parish Council

Sitlington Parish Council
South West Yorkshire Foundation Trust
The Coal Authority
Tintwistle Parish Council
West Bretton Parish Council
West Yorkshire Police Authority
West Yorkshire Police Estates
West Yorkshire Police Traffic Support
Yorkshire Water

General Consultees

4 Resourcing
Abel Woodhead and Sons Ltd
Adlington
Mineral Products Association
Albion Mount Medical Practice
Alciun Homes
Allsops
Almondbury (Castle Hill) Civic Associates
Almondbury Wesleyan Cricket Club
AMEC
Arca
Huddersfield and District Archaeological Society
Arcus Consulting
Arriva Yorkshire Ltd
Asda Stores Ltd
Associated Waste Management Limited
BAM Construction Ltd - North East
Barnsley MC Planning and Transportation Service
Barratt and David Wilson Homes
Barratt Homes
Batley & Dewsbury Green Party
Batley and Birstall Civic Society
Batley Central Methodist Church
Batley Community Alliance
Batley Grammar School
Bellway Homes (Yorkshire) Ltd
Ben Rhodes Trust
Benjamin, Bentley and Partners
BGM Plastics Limited
Bilfinger GVA
Birds Edge Countryside (BECside) Charitable Trust
Birdsedge and District Opposition to Large Turbines (BOLT)
Birkenshaw Village Association

Birstall Village Improvement Group
Black Cat Fireworks Ltd
Bodyzone Fitness Centre
Bowesfield Construction Ltd
Bradford MC Department of Transportation,
Design and Planning
Bradley Park Golf Club
BREEAM Technical Consultant: Government BRE
Global
Brighthouse Civic Trust
Brighthouse Estate Co. Ltd
British Geological Survey
British Sign and Graphics Association (BSGA)
British Telecom
British Wind Energy Association
Brockholes Action Group
Brockholes Village Trust
Brook Group Holdings Ltd
Burton Environment Group (BEG)
Calderdale and Kirklees South West Yorkshire
Foundation Trust
BWEA Renewable UK
Cadvis 3D
Calderdale and Huddersfield NHS Foundation
Trust
Calderdale Saddle Club
Campaign for Real Ale
Campaign to Protect Rural England (CPRE)
Canal and River Trust
Catholic Diocese of Leeds
Cawthorne Parish Council
CCL Building Civil Structural Design Group
CEMEX UK Properties
CFK Developments
Chartnell Ltd
Chemical Business Association
City of York Council
Clayton Fields Action Group
Clayton West Cricket Club
Clayton West Development Company Limited
Cleckheaton Action Group
Cleckheaton Bowling Club Ltd
Colne Valley Carbon Reduction Action Group
Colne Valley Green Party
Colne Valley Museum
Commercial Developments Projects Limited
Committee of Longwood Village Group
Community Steering Group for Sustainable Local
Development
Confederation of British Industry (CBI)
Connect Housing
Consort Homes (Northern) Ltd
Consulting With a Purpose
Contact Campaign for Better Transport - West
Yorkshire (previously Transfort 2000)
Co-Operative Group
Cornwell Partnership
CPW (Yorkshire) Ltd
Crossroads Truck & Bus Ltd
Crown Estate Office
Custom Telecom Ltd
Cyclists Touring Club (CTC)
D Mate and Sons
D Noble Ltd
Dalton Black Horse Resident Association
Darren Smith Builders Ltd
Dartmouth Estate
Dave Whelan Sports Ltd
David Brown Tractor Club
David Wilson Homes
Dawson Fabrics
Defence Estates
Deighton and Brakenhall Initiative Limited
Denby Dale and Cumberworth W I
Denby Dale Labour Party
Denby Dale Parish Council
Denby Dale Parish Environment Trust
Denby Village Conservation Group
Department for Constitutional Affairs
Department for Environment, Food and Rural
Affairs
Design Council: CABE
Design Management Limited
Development Director Termrim Construction Ltd
Dewsbury District Golf Club
Dialogue
Diocese of Wakefield
Disabled Golf Association
Dortech Architectural Systems Ltd
Dransfield Properties Ltd
Dunford Parish Council
Dynamic Capital UK Ltd

Dyson Industries Limited
E Bottomley and Sons Ltd
EE
Elliott Estates Ltd
Emley Millennium Green
Empire Knight Group Ltd
Enterprise Inns Plc
Environment Agency
Environment Kirklees
Environmental Services Association
Equality and Human Rights Commission
Eric Roberts and Sons
Eshton Property Development
Eurofur Fabrics Ltd
Evergreener Investments llp
F and W Drawing Services
Fairclough Homes
Farnley Country Park Foundation
Farnley Estates Ltd
Farnley Tyas Community Group
Ferndale Residents Association
Fields in Trust
Fixby Residents Association
Fixby Residents Organisation (FRO)
Flockton Green W.M.C & Institute
Forestry Commission England
Fox Lloyd Jones Limited
Friends of Beaumont Park
Friends of Hepworth School
Friends of Storthes Hall Woods
Friends of the Earth (Huddersfield)
G and A Ellis
G.M.B. Council Offices
Garganey Trust
General Confederation of UK Coal Producers (CoalPro)
Geo. H Haigh and Co Ltd
Geoplan Limited (Marshalls Natural Stone)
George Wimpey Strategic Land
Gibson Taylor Tranzol
Glint
GMI Estates Ltd and Stead Commercial
Golf Foundation
Golf Monthly Magazine
Governors Meltham Moor Primary School
Grant Thornton
Grantley Developments Ltd
Great Lime Holdings Ltd
Greater Huddersfield Clinical Commissioning Group
Greater Manchester Ecology Unit
Green Alert in Lepton
Greetings Limited
Grimescar residents
Grove Hall Properties
Growing Newsome
Gunthwaite and Ingbirchworth Parish Council
GWSN Limited
H.G. Kippax and Sons Ltd
H31 Resident Group
Hallam Land Management Limited
Harlow and Milner
Harrison Gardener and Co. Ltd
Harron Homes (Yorkshire) Ltd
Hartley Property Trust
Hartley Quality Homes
Harworth Estates
HD8 Network
Heckmondwike Bowling Club
Heckmondwike Labour Party
Heckmondwike United Reformed Church
Help Save Holmbridge
Henderson Retail Warehouse Fund
Henry Boot
Hepworth Community Association
Her Majesty's Court Service
High Hoyland Parish Council
High Peak Borough Council
High Point Estates
Highways Agency
Highways England
Historic England
HJ Banks and Co.Ltd
Holdsworth Group
Holme Valley Business Association
Holme Valley Land Charity
Holme Valley North Labour Party
Holme Valley Parish Council
Holme Valley Vision Network
Holmfirth Community Forum
Holmfirth Enterprise and Development (H.E.A.D)
Holmfirth Transition Town (HoTT)

Home Builders Federation Ltd	Kirkburton Labour group
Home Office Direct Communications Unit	Kirkburton Parish Council
Honley Civic Society	Kirklees Active Leisure
Honley High School	Kirklees Bridleways Group and Arrow
Housing Corporation	Kirklees Campaign Against Climate Change
Howden Clough TRA	Kirklees Community Action Network
Huddersfield Bangladeshi Muslim Association	Kirklees Community Association
Huddersfield Christian Fellowship	Kirklees Conservative Group
Huddersfield Civic Society	Kirklees Environment Partnership
Huddersfield Friends of the Earth, Holmfirth	Kirklees Federation of Tenants and Residents
Transition Town and Marsden and Slaithwaite	Association
Transition Towns	Kirklees Green Party
Huddersfield Penistone Sheffield Rail Users	Kirklees Health and Wellbeing Board
Association	Kirklees Older People's Network
Huddersfield Ramblers	Kirklees Older People's Network (Denby Dale)
Huddersfield Town Centre Partnership Ltd	Kirklees Older People's Network (Newsome)
Huddersfield Town FC	Kirklees Partnership
Indigo Planning	Kirklees Stadium Development LTD
Institute of Directors, Yorkshire	KMRE Group
IWA West Riding Branch	KPH Plant Hire Ltd
J Cartwright and R Pilling and P Whiteley	Lady Heaton Drive Action Group
J H Walter	Lafarge Tarmac
J L Brierley Ltd	Landmark Information Group
J. Holmes & Sons	L'arche Developments (Yorkshire) Ltd
Jade Windows	LCF Law
Jane Simpson Access Ltd	Leeds Bradford International Airport
Jebson Construction Ltd	Leeds City Council
John Edward Crowther Ltd	Leeds GATE
John Radcliffe and Sons Ltd	LEVER Technology Group PLC
Johnson Brook	Lexi Holdings Plc
Johnsons Wellfield Quarries Ltd	Lidl UK GmbH
Jones Homes (Northern) Ltd	Lightcliffe Academy
Jones Homes (Yorkshire) LTD	lightcliffe gc
JSC Pipework & Mechanical Services Ltd	Limes Developments Limited
Junction Property Ltd	Lindley Methodist Church
K Hall & Sons	Lindley Moor Action Group
K.C.Oakes and Sons	Lingards Community & NHW Association
KCS Development Ltd	Linthwaite Hall Sports and Social Club
Keep Holmfirth Special	Little Gomersal Community Association
Keep Our Rural Spaces	Liversedge AFC
Keep Roberttown & Hartshead Rural Committee	Local Enterprise Partnership Leeds City Region
KeyLand Developments Ltd	Local Plans Home Builders Federation
Kier Ventures Limited	Local Representative National Landlords
Kirkburton & Highburton Community Association	Association
Kirkburton and District Civic Society	Longwood Village Group
Kirkburton Civic Society	Lovell Johns

Lovell Partnerships
Lower Denby Estates
M D Belpont Ltd
Manr Building Services
Marcol Group
Mark Oliver Homes
Marsden and Slaithwaite Transition Town (Mastt)
Marsh Community Forum
Martin House Trust
Martin Walsh Associates
McCarthy & Stone Retirement Lifestyles LTD
Meltham and District Civic Society
Meltham Community Action Network
Meltham Moor Primary School
Meltham Town Council
Metallizers Limited
Mid Yorkshire Chamber of Commerce
Mid Yorkshire Hospitals NHS Trust
Milen Care
Mill Properties Ltd
Miller Homes
Miller Strategic Land
Millstream Ltd
Minerals and Waste Policy Hertfordshire County Council
Mirfield Conservative Party Association
Mirfield Labour party
Mirfield Town Council
MJC Design
Mobile Operators Association
Moorhouse Trust
Morley Borough Independents
Morley Town Council Planning Committee Morley
Town Council
Morses Club Ltd
MP for Batley and Spennings
MP for Colne Valley
MP for Huddersfield
MP for Morley and Outwood
MSL
National Amusements Limited
National Children's Centre
National Federation of Gypsy Liaison Groups
National Grid
Natural England
Natural England
Nature After Minerals Planning Adviser RSPB
Needhams Solicitors
Nether End Farm (Denby Dale) Ltd
Network Rail
New River Capital Ltd
Newsmith Farms Ltd
Newsome Tenants and Residents Association
Newsome Ward Community Forum
NHS Commissioners
NHS Property Services
Nick Ryden Motor Engineers
NJLee Ltd
Norman Littlewood and Sons (Properties) Ltd
Norrithorpe URC
North Country Homes Group Limited
North East, Yorkshire and the Humber The
National Deaf Children's Society
North Kirklees Clinical Commissioning Group
North Kirklees Green Party
Northern Design Partnership
Northern Gas Networks
Northern Trust
npower renewables
NTL Group Ltd
Occupational Therapist Princess Royal
Community Health Centre
Office Manager Inspect Asbestos Solutions
Older Peoples Partnership Board
Oldham Council
Optica Group
Organisation Details
Orion Homes Limited
Outlane Golf Club Ltd
Owens Corning Veil UK Ltd
P4 Planning Limited
Paddock Community Forum
Pakistan and Kashmir Welfare Association
Pakistan Association Huddersfield
Parkwood Ventures LLP
Peak District National Park Authority
Pegasus Group
Penmoor UK Ltd
Pennine Domestic Violence Group
Persimmon Homes West Yorkshire
Planning Prospects Ltd
Plantation Developments Limited

Planware Ltd
Plot of Gold Ltd.
Plotolders Land Management Group Ltd
Portman Land Ltd
Premier Autos
Preserve Honley and Brockholes
Priory Assets Management LLP
Public Health (Wellbeing and Communities)
Radcliffe Developments (Farnley) Ltd
Raikes Lane Birstall
Raja Properties Ltd
Ramblers Organisation
Ravensthorpe Action Group
Ravensthorpe Community Centre Ltd
Raw Materials Manger (Clayware) Wavin UK
(Holdings) Limited
Redrow Homes and Portman Land Ltd
Redrow Homes Yorkshire
Regions and Country CEMVO
Reliance Precision Limited
Replan (UK) Ltd
Ripponden Parish Council
River 2015 Charity
Road Haulage Association
Robert Halstead Chartered Surveyors
Roberttown Residents Committee
Roberttown Women's Institute
Robuild Ltd
Royal National Institute of Blind People
S Swift pp CDP Ltd
Saddleworth Parish Council
Saddleworth Travel
Sadeh Lok Housing Association
Safer Stronger Communities
Safia Association
Sainsbury's Supermarkets Ltd

Salendine Nook School Council
Samuel Wordsworth Trust
Save Mirfield
Savile Estate
Saxonmoor Ltd
Schofield, Schofield and Pask
Scholes Future Group
Scholes Residents Association
Selby District Council

Seneca Overseas Ltd
Shadwell Developments Ltd
Shawcosult (1995) Ltd
Shelley Community Association
Shelley High School
Shepley and District Naturalists Society
Shepley Mothers Union
Shepley Village Association
Sitlington Parish Council
Skelmanthorpe Community Action Group
SKI3V - Tour Operator
Society for the Blind
Soothill & District Community Forum & Batley
Community Alliance
Southdale Homes Group
Spenn Valley Civic Society
Spenn Valley Civic Trust
Spenn Valley Model Engineers
Spenn Valley Properties
Spennborough Locality North Kirklees Primary Care
Trust
Sport England
Sporta
Sputnik Limited
Stainton Planning
Standard Holdings
Stephensons Estate Agents
Stewart Ross Associates
Stirling LLP and Scotfield RBS
Stirling Scotfield LLP
Stocksmoor Action for Openspace Retention
Stocksmoor Village Association
Strandwick Properties Limited
Strata Homes
Strategy to Succeed Ltd
Stratus Environmental
Sustrans
Syngenta
Taleem Centre
Tangent Properties
Tarmac
Taylor Wimpey UK Ltd
Team Vicar Dewsbury Team Parish
Tesco Stores Ltd
The Benefice of High Hoyland, Scissett and
Clayton West

The Church Commissioners for England	Trust Wide Estate South West Yorkshire
The Coal Authority	Foundation Trust
The Directorate of Airspace Policy	Ubrique
The Garden Trust	UK Coal
The Gypsy Council	UK Outdoor Fitness
The Knavesmere Trust	Ultralife Healthcare Ltd
The Lawn Tennis Association	University of Huddersfield
The Mid Yorkshire Chamber of Commerce and Industry Ltd	University of Huddersfield Students' Union
The Myers Group	Unknown Holgate Construction Ltd
The National Trust	Urban Evolution
The Netherton & South Crosland Action Group	Uster Haigh Ltd
The Ogden Group	Valley Wind
The Penine Property Partnership	Vernon & Co
The Pheasant Pension Fund	Vernon Property Developments
The Planning Bureau Ltd	Vernon Property LLP
The Planning Inspectorate	Vodafone and O2
The Ramblers' Association	W H Brook and sons
The Showmen's Guild of Great Britain	Wakefield Council
The Theatres Trust	Wakefield Diocese
The Three Acres Inn & Restaurant	Wakefield MDC
The Traveller Movement	Walker Morris LLP
The United Reform Church Heckmondwike	Wavin Ltd
The Woodland Trust	Welcome to Yorkshire
Thornhill Estates	Wellhouse Methodist Church
Thornhill Lees Action Group	West Bretton Parish Council
Thornhill Lees Community Action Group	West Yorkshire Archaeology Advisory Service
Thornton and Ross	West Yorkshire Biodiversity Coordinator West Yorkshire Ecology
Thornton Kelly	West Yorkshire Combined Authority
Threadneedle Property Investments Ltd	West Yorkshire Ecology
Three	West Yorkshire Fire and Rescue Service
Three Valleys Sports + Development Community Trust	West Yorkshire Geology Trust
Thurstonland Village Association	West Yorkshire Police Authority
Tintwistle Parish Council	West Yorkshire Police Estates
Together Housing Group	West Yorkshire Strategic Health Authority
Town Team Slaithwaite and Marsden Renaissance Market Town Initiative	Westborough High, Dewsbury
Towndoor Ltd	Wharfedale Finance Company Ltd
Townsend Planning Consultants	White Young Green
Trans Pennine Trail	WIFC
Transformation Locala	Wilkinson Hardware Stores Ltd
Transport 2000	Wilson Armitage and Sons Ltd
Transport Planner (Policy) Metro	WM Morrison Supermarkets Plc
Transport Planner Metro (WYPTE)	Wolverhampton and Dudley Breweries Ltd
Traveller Law Reform Coalition	Woodhead Investments
	Woodsome Hall Golf Club Limited
	Woodville Nurseries

Wooldale Methodist Free Church
Woollen Spinners (Hudds) Ltd
Wrose Developments
YAS NHS Trust
Yewtree Associates
Yorkshire Developers Ltd
Yorkshire Gardens Trust
Yorkshire RSPB

Yorkshire Union of Golf Clubs
Yorkshire Water
Yorkshire Water Services Ltd
Yorkshire Waterway Unit
Yorkshire Wildlife Trust
Z Hinchliffe & Sons Ltd
Zion Baptist Church

Appendix 2 Distribution List of Local Plan Summary leaflets

DESTINATION	LEAFLETS	LEAFLET STAND	POSTERS
69 elected member packs	20 per pack 1380 in total	-	3 per pack 207 in total
Huddersfield Customer Service Centre Civic Centre 3 Huddersfield	1000	3	3
Dewsbury Service Centre The Walsh Building Dewsbury	1000	2	3
Huddersfield Town Hall Reception	500	2	3
Dewsbury Town Hall Reception	500	2	3
Cleckheaton Town Hall Reception	500	2	3
Almondbury Library	100	1	1
Batley Library	100	1	2
Birkby & Fartown LIC	100	1	1
Birstall LIC	100	1	1
Cleckheaton Library	100	1	1
Chestnut Centre Deighton LIC	100	1	1
Dewsbury LIC	100	2	3
Golcar Library	100	1	1
Heckmondwike Library	100	1	1
Holmfirth LIC	500	2	2
Honley Library	100	1	1
Huddersfield LIC	250	2	3
Kirkburton Library	100	1	1
Kirkheaton Library	100	1	1
Lindley LIC	100	1	2
Marsden LIC	250	1	2
Meltham LIC	100	1	1
Mirfield Library	500	2	3
Ravensthorpe Greenwood Centre	100	1	1
Rawthorpe & Dalton LIC	100	1	1
Shepley LIC	100	1	1
Skelmanthorpe LIC	100	1	1
Slaithwaite Library	100	1	1
Office for requests	50	5	5
TOTALS	8330	43	260

Remainder of leaflets (1,670) for use at drop in sessions/re-stock

Appendix 3 Publication Draft Local Plan Consultee Letter



Planning Policy Group
PO Box B93
Civic Centre 3
Market Street
Huddersfield
HD1 2JR

Email:

local.development@kirklees.gov.uk

Tel: 01484 221000

Website:

www.kirklees.gov.uk/planningpolicy

Date: 3 November 2016

Ref: Publication Draft Local Plan
consultee

Dear Consultee

CONSULTATION ON KIRKLEES PUBLICATION DRAFT LOCAL PLAN AND COMMUNITY INFRASTRUCTURE LEVY (CIL)

The council is contacting you regarding the above documents as you are on the council's Local Plan/CIL consultation database, as having made comments on previous stages or have expressed an interest in being informed about the next stages of these documents.

The Council prepared a Draft Local Plan document and a Community Infrastructure Levy (Preliminary Draft Charging Schedule) last year and consulted widely on these between November 2015 and February 2016. The council has taken into account representations made.

I am writing to advise you that the council will publish its Publication Draft Local Plan and Community Infrastructure Levy (Draft Charging Schedule) for consultation on 7th November 2016.

Following the close of the consultation period, we will consider your comments. Once the council is satisfied the Local Plan and CIL meet the relevant tests for their preparation, we will formally submit them to the Government for inspection. At this point an examination in public will take place. Further to the examination in public, it is anticipated that the Local Plan and CIL will be adopted in early 2018.

Kirklees Publication Draft Local Plan ***When and what you can comment on***

The consultation period runs for a six week period, from **9am Monday 7th November to 5pm Monday 19th December 2016**.

The Publication Draft Local Plan documents consist of:

- Publication Draft Local Plan – Strategy and Policies
- Publication Draft Local Plan – Allocations and Designations (and associated maps)

The following documents are also available for consultation and comments can be made on them:

- Rejected Options
- Sustainability appraisal (including Habitat Regulations Assessment)
- Green belt boundary changes

The documents may be viewed on the Council's web-site at:
www.kirklees.gov.uk/localplan, or at the council's offices:

Location/address	Opening times
Huddersfield Customer Service Centre, Civic Centre 3, Huddersfield HD1 2TG	Mon-Wed and Fri 9:00am to 5:00pm Thurs, 10:00am to 5:00pm
Dewsbury Customer Service Centre, The Walsh Building, Town Hall Way, Dewsbury WF12 8EE	Mon-Fri, 9:00am to 5:00pm

What comments can be made on

At this stage, comments can only be made on the "soundness" of the Plan and legal compliance.

Regulations state that a local planning authority should submit a plan for examination which it considers to be "sound". The soundness tests are defined by the government and are:

Positively prepared:

This means that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified:

The plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.

Effective:

The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy:

The plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

The plan must also be 'legally compliant', which means it has been prepared in accordance with planning regulations and the council's adopted Statement of Community Involvement and Local Development Scheme. The plan should be compliant with the 'Duty to Cooperate' which requires local planning authorities to constructively engage with neighbouring local authorities and other designated bodies over strategic cross-boundary matters, and should be supported by the preparation of a 'Sustainability Appraisal' (and subject to Habitat Regulations Assessment).

Using the standard form

At this stage, you need to comment on legal compliance and the soundness of the plan (as outlined above). To make it simpler, we ask you to make your comments using our standard form rather than free-form text. The standard form is the Planning Inspector's preferred format and will assist in the consideration of your comments. Using the form to submit your comments also means that you can register your interest in speaking at the Examination in Public if you wish. The Inspector will normally, only invite people who have submitted a representation at this stage to speak at the Examination in Public. Guidance notes on how to complete the form will be available via our website:

www.kirklees.gov.uk/localplan

How to comment on-line

Our preferred method of completing the standard form is through our online consultation system (Objective). If you have received this letter directly by e-mail or post, then you have an account registered already. Please contact us at:

local.development@kirklees.gov.uk if you do not know your user name. Comments can be made via the following link: <http://kirklees.gov.uk/consultplanningpolicy>

The system has the facility for you to feedback comments directly to us on-line without the need to print or go to a central location to view the documents. It also has the advantage that once registered you will receive automatic notifications of future consultations and you can chose which types of documents you wish to be consulted on. You can view the Publication Draft Local Plan and other consultation documents through this system. Our website www.kirklees.gov.uk/localplan also contains copies of these documents along with supporting information and maps.

How to comment by Email or post

Comments forms and guidance notes are also available to download via our website at:

www.kirklees.gov.uk/localplan and should be sent to:

E-mail to: local.development@kirklees.gov.uk

Post to:
Planning Policy Group
PO Box B93
Civic Centre 3
Market Street
Huddersfield
HD1 2JR

Community Infrastructure Levy (CIL)

The council is also consulting on the Community Infrastructure Levy (CIL). CIL is a charge that councils can choose to apply to new developments in their area. The money collected from the CIL can be used to support development by funding the infrastructure that the council, local communities and neighbourhoods deem necessary.

The CIL Draft Charging Schedule is also published for a period of six weeks, from **Monday 7th November to Monday 19th December 2016**. The document and its supporting evidence may be viewed on the council's web-site at www.kirklees.gov.uk/localplan, or at the council's offices outlined above. Please note that this consultation is separate from the Local Plan process, although it is closely related to the implementation of the Plan.

Comments can be made on our on-line consultation system (Objective) via the following link: <http://kirklees.gov.uk/consultplanningpolicy> or on a comments form which is available on our website at: <http://kirklees.gov.uk/localplan>

Comments can also be emailed and posted to the council using the contact details set out above. Please clearly mark whether your comments relate to the Local Plan or to the Community Infrastructure Levy.

All responses on both the Publication Draft Local Plan and the Community Infrastructure Levy will be publicly available and **cannot** be treated as confidential (including submitted evidence). All representations will be made available for public inspection and will be processed in accordance with the Data Protection Act 1998. Anonymous representations will not be accepted. Your contact details will also be provided to the Planning Inspectorate in order that the Planning Inspector can contact you regarding the Examination in Public process.

If you have any queries regarding consultation, please contact the Planning Policy Team by e-mail at: local.development@kirklees.gov.uk.

Yours sincerely,



Richard Hollinson
Policy Group Leader

Appendix 4 Copy of Public Notice for the Publication Draft Local Plan

Kirklees Council
Local Plan Development Plan: Publication Stage 2016
Statement of Representations Procedure

In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, the following provides information about the Kirklees Publication Draft Local Plan and consultation process.

Title of Document: Kirklees Publication Draft Local Plan

Subject matter and area covered: Kirklees Council has prepared the Kirklees Publication Draft Local Plan for public consultation from **9 am, 7 November 2016 to 5pm, 19 December 2016**. The Publication Draft Local Plan sets out a spatial planning and policy framework for the whole of Kirklees (excluding the area within the Peak District National Park) up to 2031. It includes a long-term vision and strategic objectives, a spatial strategy, policy framework and a monitoring and implementation framework to deliver the strategy. The level of development over the period is identified together with site allocations and designations. The Local Plan sets the context for other Local Development Documents which must be in conformity with it.

The Publication Draft Local Plan documents consist of:

- Publication Draft Local Plan Strategy and Policies
- Publication Draft Local Plan – Allocations and Designations (and associated maps)

The following documents are also available for consultation:

- Rejected options
- Sustainability appraisal (including Habitat Regulations Assessment)
- Community Infrastructure Levy – Draft Charging Schedule
- Green Belt Boundary Changes

Inspection of documents: Copies of the consultation documents and maps will be available to view on our website at kirklees.gov.uk/localplan and in printed format at the following locations from 7th November:

Location/address	Opening times
Huddersfield Customer Service Centre, Civic Centre 3, Huddersfield HD1 2TG	Mon-Wed and Fri 9:00am to 5:00pm Thurs, 10:00am to 5:00pm
Dewsbury Customer Service Centre, The Walsh Building, Town Hall Way, Dewsbury WF12 8EE	Mon-Fri, 9:00am to 5:00pm

You can also visit a Local plan Drop-in session, where we can help you to register your views:

- 12pm to 8pm, Tuesday 22 November 2016
Dewsbury Town Hall Reception Room
- 12pm to 8pm, Tuesday 29 November 2016
Huddersfield Town Hall Reception Room

Consultation period: Representations are invited on the Publication Draft Local Plan for a period of six weeks beginning at 9am on Monday 7 November 2016 and ending 5pm on 19 December 2016.

Representations should be made using the council's online system at:

kirklees.gov.uk/consultplanningpolicy

You can also send your comments by e-mail to: local.development@kirklees.gov.uk

Or by post to:

Planning Policy Group
PO Box B93
Civic Centre 3
Market Street
Huddersfield
HD1 2JR

All written and e-mail responses should be made on our standard representation form as this is the preferred format of the Planning Inspectorate. The representation form together with guidance notes will be available at the locations listed above and on the council's website at: www.kirklees.gov.uk/localplan

Representations should focus on whether the Publication Draft Local Plan is:

- Legally compliant
- Sound (i.e. positively prepared, justified, effective and consistent with national policy)
- Complies with the duty to co-operate

Representations may also be accompanied by a request to be notified at a specific address of any of the following:

- That the Kirklees Local Plan has been submitted for independent examination
- The publication of the recommendations of the person appointed to carry out an independent examination of the Kirklees Local Plan
- The adoption of the Kirklees Local Plan

Representations will be published on the Council's consultation website and made available for inspection on request. Representations cannot therefore, be treated as confidential.

Further information or help

If you require further help, please e-mail: local.development@kirklees.gov.uk

Appendix 5 Late Representations

Event Name	Person ID	Full Name	Agent ID	Agent Name	Type_Sub	Response Date	Rep ID	Consultation Point
PDLP - Strategies and Policies	1049286	Mr Nicholas Willock	1049237	Mr Nicholas Willock	E-Mail	20-Dec-16	PDLP_SP584	Policy PLP 11
PDLP Allocations & Designations	942190	Mr Andrew Brook			Letter	20-Dec-16	PDLP_AD1179	E2333a
PDLP Allocations & Designations	942735	Mr Darren Oldham			E-Mail	03-Feb-17	PDLP_AD1653	H178
PDLP Allocations & Designations	943076	Mr Jason McCartney MP			Letter	21-Dec-16	PDLP_AD3689	1.8
PDLP Allocations & Designations	945969	Mr Paul Stringer			E-Mail	20-Dec-16	PDLP_AD1466	H1747
PDLP Allocations & Designations	961687	Diane Porritt			E-Mail	27-Jan-17	PDLP_AD2223	H489
PDLP Allocations & Designations	965798	GAIL			E-Mail	26-Jan-17	PDLP_AD3267	H2684a
PDLP Allocations & Designations	965798	GAIL			E-Mail	26-Jan-17	PDLP_AD3268	H2730a
PDLP Allocations & Designations	965798	GAIL			E-Mail	26-Jan-17	PDLP_AD3269	H31
PDLP Allocations & Designations	966685	Mr Nigel Metcalfe			Letter	21-Dec-16	PDLP_AD999	H358
PDLP Allocations & Designations	966689	Sophie Metcalfe			Letter	21-Dec-16	PDLP_AD993	H358
PDLP Allocations & Designations	966692	Jill Metcalfe			Letter	21-Dec-16	PDLP_AD990	H358

Event Name	Person ID	Full Name	Agent ID	Agent Name	Type_Sub	Response Date	Rep ID	Consultation Point
PDLP Allocations & Designations	968688	Mr Ian Austerberry			Letter	28-Dec-16	PDLP_AD3840	ME1965a
PDLP Allocations & Designations	972931	Mr Nicholas Webster			Letter	21-Dec-16	PDLP_AD3169	H597
PDLP Allocations & Designations	972931	Mr Nicholas Webster			Letter	21-Dec-16	PDLP_AD3170	SL3359
PDLP Allocations & Designations	972931	Mr Nicholas Webster			Letter	21-Dec-16	PDLP_AD3168	H297
PDLP Allocations & Designations	1050442	John Gallagher			Letter	20-Dec-16	PDLP_AD1502	H789
PDLP Allocations & Designations	1050446	Louise Roche			Letter	20-Dec-16	PDLP_AD2735	H297
PDLP Allocations & Designations	1050446	Louise Roche			Letter	20-Dec-16	PDLP_AD2736	H597
PDLP Allocations & Designations	1050446	Louise Roche			Letter	20-Dec-16	PDLP_AD2737	SL3359
PDLP Allocations & Designations	1050451	Anne Ellis			Letter	20-Dec-16	PDLP_AD1415	ME1965a
PDLP Allocations & Designations	1050453	Doreen Aitkin			Letter	20-Dec-16	PDLP_AD1501	H789
PDLP Allocations & Designations	1050455	Ben Stansfield			Letter	20-Dec-16	PDLP_AD1500	H789
PDLP Allocations & Designations	1050458	Christine Barstow			Letter	20-Dec-16	PDLP_AD2215	H761
PDLP Allocations & Designations	1050975	Alan Stephenson Brown			Letter	21-Dec-16	PDLP_AD2670	SL3359
PDLP Allocations	1050975	Alan			Letter	21-Dec-16	PDLP_AD2669	H597

Event Name	Person ID	Full Name	Agent ID	Agent Name	Type_Sub	Response Date	Rep ID	Consultation Point
& Designations		Stephenson Brown						
PDLP Allocations & Designations	1050975	Alan Stephenson Brown			Letter	21-Dec-16	PDLP_AD2668	H297
PDLP Allocations & Designations	1050977	Karen Heaton			Letter	21-Dec-16	PDLP_AD3570	SL2170a
PDLP Allocations & Designations	1050977	Karen Heaton			Letter	21-Dec-16	PDLP_AD3571	SL2170b
PDLP Allocations & Designations	1053435	Matt Winterburn			Letter	23-Dec-16	PDLP_AD3842	SL2170a
PDLP Allocations & Designations	1053435	Matt Winterburn			Letter	23-Dec-16	PDLP_AD3843	SL2170b
PDLP Allocations & Designations	1053435	Matt Winterburn			Letter	23-Dec-16	PDLP_AD3841	H288a
PDLP Allocations & Designations	1053436	Stephen Wilson			Letter	05-Jan-17	PDLP_AD3848	SL3359
PDLP Allocations & Designations	1053436	Stephen Wilson			Letter	05-Jan-17	PDLP_AD3846	H297
PDLP Allocations & Designations	1053436	Stephen Wilson			Letter	05-Jan-17	PDLP_AD3847	H597
PDLP Allocations & Designations	1053439	Denise Mallinson			Letter	05-Jan-17	PDLP_AD3844	H789
PDLP Allocations & Designations	1053947	Mr Derek Mallinson			Letter	05-Jan-17	PDLP_AD3845	H789
PDLP Allocations & Designations	1057951	Carol Cowgill			E-Mail	20-Dec-16	PDLP_AD1799	H1747
PDLP Allocations	1059671	Laura Newill			E-Mail	31-Dec-16	PDLP_AD1417	H790

Event Name	Person ID	Full Name	Agent ID	Agent Name	Type_Sub	Response Date	Rep ID	Consultation Point
& Designations								
PDLP Allocations & Designations	1059726	Nick Hughes			E-Mail	29-Dec-16	PDLP_AD1468	H1747
PDLP Allocations & Designations	1059842	Sean Oates			E-Mail	25-Jan-17	PDLP_AD1654	H1747
PDLP Allocations & Designations	1059925	Kevin Frain			E-Mail	06-Jan-17	PDLP_AD1703	UGS1016
PDLP Allocations & Designations	1060849	Ruth Owen			Letter	10-Feb-17	PDLP_AD3580	H796
PDLP Allocations & Designations	1060849	Ruth Owen			Letter	10-Feb-17	PDLP_AD3579	H172
PDLP Allocations & Designations	1067812	Mr R A Shaw			E-Mail	27-Jan-17	PDLP_AD3592	SL2163
PDLP Allocations & Designations	1075019	Mr & Mrs Bonas	1075016	Mr N P Charlton	Letter	06-Mar-17	PDLP_AD3703	UGS886
PDLP Allocations & Designations	1076080	Mr Paul Hainsworth			E-Mail	28-Mar-17	PDLP_AD3819	H49a
PDLP Green Belt Boundary Changes	945266	Mr David Hallas	961268	Adrian Wilson	E-Mail	20-Mar-17	PDLP_GBBC68	RSSGB64
PDLP Green Belt Boundary Changes	1075132	Mr Richard Holroyd			Letter	03-Apr-17	PDLP_GBBC67	RSSGB46
PDLP Rejected Site Options	953703	Mr David Storrie	942001	Mr David Storrie	E-Mail	07-Mar-17	PDLP_RSO1268	H653
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO477	H252

Event Name	Person ID	Full Name	Agent ID	Agent Name	Type_Sub	Response Date	Rep ID	Consultation Point
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO468	SGI2109
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO481	H136
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO480	H250
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO479	H253
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO471	SGI2115a
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO478	H254
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO470	SGI2115
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO476	H257
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO475	H256
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO474	H188
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO473	MX3371
PDLP Rejected Site Options	968522	Mr Mark Schofield			E-Mail	23-Dec-16	PDLP_RSO472	MX2681
PDLP Rejected Site Options	972931	Mr Nicholas Webster			Letter	21-Dec-16	PDLP_RSO1200	LocGS2721
PDLP Rejected Site Options	1028892	Mr Adrian Saxton			E-Mail	28-Feb-17	PDLP_RSO1269	H530

Event Name	Person ID	Full Name	Agent ID	Agent Name	Type_Sub	Response Date	Rep ID	Consultation Point
PDLP Rejected Site Options	1050446	Louise Roche			Letter	20-Dec-16	PDLP_RSO1052	LocGS2721
PDLP Rejected Site Options	1050971	Tracy North			Letter	21-Dec-16	PDLP_RSO1265	H357
PDLP Rejected Site Options	1050975	Alan Stephenson Brown			Letter	21-Dec-16	PDLP_RSO1029	LocGS2721
PDLP Rejected Site Options	1053436	Stephen Wilson			Letter	05-Jan-17	PDLP_RSO1280	LocGS2721
PDLP Rejected Site Options	1067812	Mr R A Shaw			E-Mail	27-Jan-17	PDLP_RSO1251	H149
PDLP Rejected Site Options	1067812	Mr R A Shaw			E-Mail	27-Jan-17	PDLP_RSO1252	H561
PDLP Rejected Site Options	1067812	Mr R A Shaw			E-Mail	27-Jan-17	PDLP_RSO1250	H125
PDLP Rejected Site Options	1093027	Chartford Homes	1093025	Mr Chris Atkinson	E-Mail	13-Apr-17	PDLP_RSO1279	H352
PDLP Rejected Site Options	1093027	Chartford Homes	1093025	Mr Chris Atkinson	E-Mail	13-Apr-17	PDLP_RSO1278	H3

Appendix 6 – Breakdown of Support/Objection by document/document part

Strategy and Policies

Site/Para	Title	Support	Object	Total
1.1		0	6	6
1.2		1	7	8
1.3		0	1	1
1.4		1	2	3
1.5		0	1	1
1.22		0	2	2
1.26		1	1	2
1.27		1	0	1
1.31		0	1	1
1.33		0	1	1
1.38		0	2	2
Policy PLP 1	Presumption in favour of sustainable development	17	3	20
3.1		1	0	1
3.2		1	0	1
3.5		0	1	1
3.7		1	0	1
3.8		0	1	1
3.13		1	0	1
3.14		0	2	2
3.17		1	0	1
3.19		1	0	1
4.2		0	1	1
4.3		0	1	1
4.2	Vision	1	0	1
Vision for Kirklees		5	6	11
4.3	Strategic Objectives	1	0	1
4.5		3	5	8
5.1		1	1	2
5.5		0	11	11
Policy PLP 2	Place shaping	17	6	23
5.1	Huddersfield	1	0	1
5.7		0	1	1
Place Shaping - Huddersfield		0	2	2

Site/Para	Title	Support	Object	Total
Figure 3	Huddersfield sub-area	0	1	1
5.2	Dewsbury and Mirfield	1	0	1
Place Shaping - Dewsbury and Mirfield		1	1	2
5.3	Batley and Spen	1	0	1
Place Shaping - Batley and Spen		1	1	2
5.4	Kirklees Rural	1	0	1
Place Shaping - Kirklees Rural		0	6	6
Figure 6	Kirklees Rural sub-area	0	2	2
6.1	Spatial development strategy	1	0	1
Table 1		1	9	10
6.1		5	33	38
6.2		0	1	1
6.3		0	6	6
Policy PLP 3	Location of new development	19	14	33
Policy PLP 4	Providing infrastructure	14	10	24
6.18		0	1	1
6.2		0	1	1
Policy PLP 5	Master planning sites	3	21	24
Policy PLP 6	Safeguarded land (Land to be safeguarded for potential future development)	1	22	23
6.27		0	1	1
6.3		0	1	1
Policy PLP 7	Efficient and effective use of land and buildings	13	14	27
6.36		0	1	1
7.1		1	1	2
7.5		0	3	3
7.6		0	1	1

Site/Para	Title	Support	Object	Total
7.8		0	6	6
7.13		0	3	3
Table 3	Meeting the employment land requirement	1	0	1
Policy PLP 8	Safeguarding employment land and premises	3	4	7
Policy PLP 9	Supporting skilled and flexible communities and workforce	3	4	7
Policy PLP 10	Supporting the rural economy	1	8	9
8.1	Housing strategy	0	1	1
8.4		0	3	3
8.6		2	14	16
8.7		0	1	1
8.8		0	4	4
8.12		0	6	6
8.14		0	4	4
Table 5	Meeting the housing requirement	9	15	24
8.15		0	1	1
8.17		1	1	2
8.2		1	1	2
Figure 7	Housing Trajectory	0	1	1
8.23		0	2	2
8.24		9	0	9
8.26		0	2	2
8.27		0	1	1
Policy PLP 11	Housing Mix and Affordable Housing	11	19	30
8.33		0	1	1
Policy PLP 12	Accommodation for Travellers	0	3	3
9.1		0	1	1
Policy PLP 13	Town centre uses	1	10	11
Policy PLP 14	Shopping frontages	0	3	3
Policy PLP 15	Residential use in town centres	2	1	3
Policy PLP 16	Food and drink uses and the evening economy	0	3	3

Site/Para	Title	Support	Object	Total
9.26		0	1	1
9.28		0	1	1
Policy PLP 17	Huddersfield Town Centre	1	1	2
Policy PLP 18	Dewsbury Town Centre	1	2	3
10.1		1	1	2
10.9		0	1	1
Policy PLP 19	Strategic transport infrastructure	4	11	15
10.31		0	1	1
10.32		0	1	1
10.34		1	4	5
10.39		0	1	1
10.43		0	2	2
10.44		0	1	1
10.46		0	1	1
10.47		0	1	1
10.54		0	1	1
Policy PLP 20	Sustainable travel	2	3	5
Policy PLP 21	Highway safety and access	0	6	6
10.77		0	1	1
Policy PLP 22	Parking	0	1	1
Policy PLP 23	Core walking and cycling network	2	2	4
11.1		1	0	1
Policy PLP 24	Design	3	8	11
11.4		1	0	1
Policy PLP 25	Advertisements and shop fronts	1	0	1
12.1		0	2	2
Policy PLP 26	Renewable and low carbon energy	2	5	7
12.13		1	0	1
Policy PLP 27	Flood risk	0	7	7
Policy PLP 28	Drainage	0	3	3
13.3		0	1	1
13.4		0	1	1

Site/Para	Title	Support	Object	Total
Policy PLP 30	Biodiversity & Geodiversity	4	6	10
Policy PLP 31	Strategic Green Infrastructure Network	4	3	7
Policy PLP 32	Landscape	4	1	5
Policy PLP 33	Trees	1	2	3
13.36		1	0	1
Policy PLP 34	Conserving and enhancing the water environment	1	0	1
14.1		0	2	2
Policy PLP 35	Historic environment	1	5	6
14.7		1	0	1
15.1		0	1	1
15.3		0	2	2
15.4		0	1	1
Policy PLP 36	Proposals for mineral extraction	2	2	4
Policy PLP 37	Site restoration and aftercare	1	1	2
Policy PLP 38	Minerals safeguarding	2	2	4
15.26		0	1	1
Policy PLP 39	Protecting existing and planned minerals infrastructure	2	1	3
15.28		0	1	1
Policy PLP 40	Alternative development on protected minerals infrastructure sites	0	2	2
Policy PLP 41	Proposals for exploration and appraisal of hydrocarbons	1	1	2
Policy PLP 42	Proposals for production of hydrocarbons	0	3	3
15.35		0	1	1
Policy PLP 44	New waste management facilities	1	0	1
Policy PLP	Safeguarding waste	0	1	1

Site/Para	Title	Support	Object	Total
45	management facilities			
Policy PLP 47	Healthy, active and safe lifestyles	2	1	3
Policy PLP 48	Community facilities and services	2	3	5
Policy PLP 49	Educational and health care needs	1	5	6
17.22		0	1	1
17.25		0	1	1
Policy PLP 50	Sport and physical activity	2	0	2
Policy PLP 51	Protection and improvement of local air quality	1	3	4
Policy PLP 52	Protection and improvement of environmental quality	0	1	1
Policy PLP 53	Contaminated and unstable land	2	1	3
19.1		0	1	1
19.2		0	1	1
19.5		0	32	32
19.7		0	1	1
Policy PLP 56	Facilities for outdoor sport, outdoor recreation and cemeteries	1	1	2
Policy PLP 59	Infilling and redevelopment of brownfield sites	2	3	5
19.31		0	1	1
Policy PLP 60	The re-use and conversion of buildings	1	0	1
Policy PLP 61	Urban green space	1	4	5
19.44		0	2	2
Policy PLP 62	Local green space	1	0	1
Policy PLP 63	New open space	2	2	4
20.9		0	1	1
Picture PLP Monitoring Indicators - Strategy		0	1	1

Site/Para	Title	Support	Object	Total
and Policies				

Allocations and Designations

The following table shows a breakdown of responses on the Kirklees Publication Draft Local Plan – Allocations and Designations document:

Site/Paragraph	Support	Object	Total
1.1	2	0	2
1.2	0	1	1
1.3	0	1	1
1.4	0	1	1
1.8	0	1	1
2.1	1	3	4
E1837	1	0	1
E1879	1	0	1
E1873	1	1	2
E1831	0	12	12
E1985a	1	1	2
E1832c	2	11	13
E2333a	1	24	25
E1866	0	1	1
E1871	0	1	1
B&S15 Priority Employment Areas	0	1	1
B&S3 Priority Employment Areas	0	1	1
B&S4, B&S16, B&S3, B&S15 Priority Employment Areas	1	0	1
Table Batley & Spenneth Priority Employment Areas	1	0	1
HUD23 Priority Employment Areas	0	1	1
Table Kirklees Rural Priority Employment Areas	0	3	3
4.1	1	2	3
H31	1	45	46
H2684a	1	56	57
H2730a	1	60	61
H616	0	3	3
H684	0	17	17
H1679	0	9	9
H87	0	2	2

Site/Paragraph	Support	Object	Total
H351	1	8	9
H519	1	51	52
H734	0	2	2
H809	0	2	2
H1647	0	1	1
H1656	0	2	2
H1657	0	2	2
H1747	1	39	40
H94	1	3	4
H102	1	6	7
H481	0	1	1
H660	1	6	7
H764	0	1	1
H1783	1	1	2
H737	1	0	1
H215	0	2	2
H121	0	1	1
H201	0	1	1
H202	0	2	2
H292	0	14	14
H623	0	2	2
H706	0	2	2
H789	0	99	99
H790	0	11	11
H1694	1	1	2
H101	0	2	2
H1811	0	1	1
H1935	1	0	1
H2594a	1	2	3
H3405	1	0	1
H1728a	0	2	2
H307	2	0	2
H367	1	0	1
H559	1	4	5
H813	1	0	1
H2148	1	0	1
H85	2	0	2
H95	2	1	3
H269	2	0	2
H1754	1	0	1
H2646	0	1	1
H46	0	1	1
H3379	0	1	1

Site/Paragraph	Support	Object	Total
H2089	3	27	30
H40	0	7	7
H794	0	1	1
H758	2	4	6
H1938	1	0	1
H323	0	2	2
H11	2	2	4
H138	0	34	34
H172	1	1	2
H173	0	1	1
H193	0	1	1
H203	2	0	2
H224	1	1	2
H531	1	2	3
H601	1	1	2
H761	0	15	15
H796	1	1	2
H218	1	1	2
H49a	2	10	12
H69	1	141	142
H508	1	1	2
H509	0	7	7
H640	0	3	3
H708	0	1	1
H783	0	1	1
H198	0	1	1
H442	1	46	47
H489	0	6	6
H567	0	1	1
H591	0	18	18
H2159	0	4	4
H2537	0	1	1
H2627	0	1	1
H2667	0	7	7
H213	0	1	1
H221	0	1	1
H356	0	2	2
H738	0	2	2
H763	0	1	1
H1776	1	0	1
H2649	0	1	1
H2652	1	0	1
H17	0	1	1

Site/Paragraph	Support	Object	Total
H39a	1	1	2
H72	0	3	3
H222	2	3	5
H233	1	12	13
H358	2	62	64
H454a	2	6	8
H498	1	3	4
H502	1	3	4
H634	0	8	8
H688	1	2	3
H689	0	5	5
H690	1	7	8
H768	0	2	2
H1784	0	3	3
H3325a	1	11	12
H116	0	1	1
H199	0	1	1
H549	0	1	1
H550	0	2	2
H779	0	1	1
H814	0	1	1
H3395	0	2	2
H67	0	2	2
H129	1	1	2
H178	0	1	1
H200	0	1	1
H2586	1	0	1
H342	0	2	2
H343	0	2	2
H584	1	2	3
H664	1	3	4
H786	0	3	3
H47	0	3	3
H50	0	5	5
H130	0	1	1
H288a	1	104	105
H294	0	1	1
H297	1	381	382
H597	0	382	382
H626	0	79	79
H715	0	5	5
H727a	0	3	3
H728	0	4	4

Site/Paragraph	Support	Object	Total
H729	0	3	3
H730	0	4	4
H2585	1	1	2
H44	1	0	1
H70	1	0	1
H120	7	7	14
H313	2	16	18
H339	0	1	1
H518	9	7	16
H538	1	0	1
H583	2	1	3
H609	1	1	2
H638	0	9	9
H652	5	2	7
H817	1	1	2
H1774	0	1	1
GTTS1957	0	1	1
GTTS2487	0	7	7
5.1	1	0	1
MX1903	1	1	2
MX1930	1	1	2
MX2101	1	0	1
MX1911	1	3	4
MX1906	1	0	1
MX1929	0	2	2
MX3394	1	2	3
MX1905	3	36	39
MX3349	1	1	2
MX1920	1	0	1
MX1912a	0	4	4
6.1	0	1	1
6.3	0	1	1
6.8	0	1	1
6.15	0	1	1
7.1	0	1	1
TS1	1	0	1
TS2	0	2	2
TS3	1	1	2
TS4	2	0	2
TS5	1	1	2
TS8	0	1	1
TS9	0	3	3
TS10	0	1	1

Site/Paragraph	Support	Object	Total
TS11	0	2	2
LWS6, LWS7, LWS9, LWS7 Local Wildlife Sites	1	0	1
LWS1 Local Wildlife Sites	1	0	1
SM00475 Ancient Monuments	0	2	2
CA57, CA30 Conservation Areas	1	0	1
AS906/2, AS97/2. Archaeological Sites	1	0	1
Table Batley & Spen Archaeological Sites	1	0	1
10.1	1	0	1
ME1965b	0	3	3
ME2248a	1	57	58
ME2259	1	2	3
ME2267a	1	3	4
ME2312a	1	3	4
ME2312b	0	3	3
ME2314	1	46	47
ME1965a	0	333	333
ME2240	1	1	2
ME2241	1	1	2
ME2242	1	1	2
ME2243	0	3	3
ME2244	0	2	2
ME2245	0	3	3
ME2246	0	3	3
ME2247	0	2	2
ME2248b	0	52	52
ME2248c	0	55	55
ME2249	0	2	2
ME2250	0	1	1
ME2251	1	1	2
ME2252	0	1	1
ME2253	0	2	2
ME2254	0	1	1
ME2255	0	2	2
ME2256	0	1	1
ME2257	0	1	1
ME2258	0	1	1
ME2263	0	5	5
ME2265	0	2	2

Site/Paragraph	Support	Object	Total
ME2568	28	18	46
ME1966	1	2	3
ME1975	9	2	11
ME3324	9	4	13
MI3398	0	1	1
MI3399	0	1	1
MI3403	0	1	1
MI3404	0	1	1
11.1	1	0	1
WS24	0	1	1
WS27	0	1	1
WS33	0	2	2
WS34	0	1	1
WS36	0	2	2
WS14	0	1	1
WS16	0	4	4
12.1	0	1	1
12.2	1	0	1
MDGB2134	2	4	6
SL2176	0	2	2
SL2177	0	1	1
SL2161	0	1	1
SL2194	0	1	1
SL2268	0	1	1
SL2271	0	1	1
SL2201	0	1	1
SL2163	0	6	6
SL2197	0	1	1
SL2202	0	1	1
SL2290	0	1	1
SL2167	0	6	6
SL2184	0	1	1
SL2284	0	1	1
SL3396	0	1	1
SL2331	0	1	1
SL2166	0	1	1
SL2170a	0	94	94
SL2170b	0	95	95
SL2187	0	1	1
SL2189	0	1	1
SL2191	0	4	4
SL3359	0	376	376
SL2297	1	0	1

Site/Paragraph	Support	Object	Total
SL2195	0	1	1
SL2196	0	1	1
SL2173	0	19	19
SL2164	0	1	1
SL3356	0	18	18
SL3357	0	3	3
SL3358	0	5	5
UGS1042, UGS2489, UGS1043, UGS1267, UGS1269, UGS1044, UGS1045, UGS1804, UGS1046, UGS1047, UGS1266, UGS964, UGS965, UGS1254, UGS967, UGS1477, UGS966, UGS1316, UGS968, UGS969, UGS970, UGS963.	1	0	1
UGS1068	0	2	2
UGS1804	0	1	1
UGS2917	72	0	72
UGS973	0	2	2
UGS1016	1	0	1
UGS2151	0	1	1
UGS1168	0	1	1
UGS1240	0	1	1
UGS851	0	1	1
UGS1214	0	1	1
UGS1251	0	1	1
UGS1281	1	0	1
UGS886	0	1	1
UGS928	1	0	1
UGS936	0	1	1
SGI2110	0	2	2

Rejected Sites

Site/Paragraph	Support	Object	Total
E1840	1	0	1
E1850	1	0	1
E1851	1	0	1
E1881	0	1	1
E1985	0	1	1
E1985b	1	0	1

Site/Paragraph	Support	Object	Total
E1992	2	0	2
E2333	0	1	1
E2700	0	1	1
GTTS1955	0	1	1
GTTS1956	0	1	1
GTTS1959	0	1	1
GTTS1963	1	0	1
GTTS2042	0	1	1
GTTS2044	0	1	1
GTTS2045	0	1	1
GTTS2047	0	1	1
GTTS2051	0	1	1
GTTS2055	0	1	1
GTTS2057	0	1	1
GTTS2060	0	1	1
GTTS2061	0	1	1
GTTS2064	1	0	1
GTTS2065	1	0	1
H111	2	0	2
H113	1	0	1
H115	0	2	2
H125	0	1	1
H136	28	0	28
H137	1	0	1
H141	1	0	1
H143	1	0	1
H149	0	2	2
H160	3	0	3
H161	1	0	1
H163	1	0	1
H164	1	0	1
H168	0	1	1
H169	0	1	1
H170	1	0	1
H1701	77	0	77
H1713	1	0	1
H1738	1	0	1
H1742	1	0	1
H177	0	5	5
H1792	1	2	3
H1796	5	0	5
H1797	3	0	3
H1798	3	0	3

Site/Paragraph	Support	Object	Total
H1810	3	0	3
H1813	1	0	1
H184	0	1	1
H185	0	1	1
H188	16	0	16
H189	22	0	22
H226	7	1	8
H226A	6	0	6
H227	1	1	2
H231	1	1	2
H240	3	0	3
H243	3	0	3
H247	1	0	1
H249	0	1	1
H250	28	0	28
H251	26	0	26
H252	29	1	30
H253	27	0	27
H254	31	1	32
H255	1	0	1
H2551	0	1	1
H256	22	0	22
H256a	5	0	5
H257	24	0	24
H2572	3	0	3
H2590	3	1	4
H2595	0	1	1
H2596	0	1	1
H2598	0	1	1
H26	0	1	1
H260	1	0	1
H2600	0	1	1
H2601	0	1	1
H261	3	0	3
H262	1	0	1
H263	1	0	1
H2638	0	1	1
H2639	3	0	3
H264	1	0	1
H2640	3	0	3
H265	1	0	1
H2684	2	0	2
H27	0	1	1

Site/Paragraph	Support	Object	Total
H2714	0	1	1
H2730	2	0	2
H2731	0	1	1
H274	1	0	1
H275	1	0	1
H279	1	0	1
H288	5	0	5
H29	0	1	1
H291	1	0	1
H298	0	1	1
H29a	0	1	1
H3	1	2	3
H309	0	1	1
H311	1	0	1
H314	0	1	1
H315	1	1	2
H32	2	0	2
H322	0	2	2
H322a	0	1	1
H330	0	1	1
H3325	0	1	1
H334	2	0	2
H3387	0	1	1
H352	1	1	2
H357	2	2	4
H362	0	1	1
H366	0	1	1
H37	1	0	1
H41	1	0	1
H450	1	0	1
H455	2	0	2
H457	1	2	3
H458	1	3	4
H459	1	1	2
H460	3	0	3
H464	3	0	3
H466	1	0	1
H471	0	1	1
H472	1	0	1
H475	0	2	2
H476	0	1	1
H482	3	0	3
H493	1	1	2

Site/Paragraph	Support	Object	Total
H497	3	0	3
H500	1	1	2
H505	1	1	2
H510	0	1	1
H517	1	1	2
H520	3	0	3
H522	1	0	1
H523	0	1	1
H524	0	1	1
H525	0	1	1
H530	0	1	1
H546	3	0	3
H552	1	0	1
H557	1	1	2
H558	1	0	1
H561	0	1	1
H564	12	1	13
H571	0	1	1
H575	105	1	106
H586	1	1	2
H594	0	2	2
H596	0	1	1
H598	0	1	1
H6	1	0	1
H602	1	0	1
H603	1	0	1
H606	1	0	1
H644	2	0	2
H649	0	1	1
H65	0	1	1
H653	0	2	2
H659	2	0	2
H666	0	1	1
H672	1	1	2
H673	1	0	1
H674	0	1	1
H675	1	2	3
H692	1	0	1
H71	0	1	1
H745	3	0	3
H76	1	1	2
H77	0	1	1
H78	1	0	1

Site/Paragraph	Support	Object	Total
H78a	0	1	1
H79	1	0	1
H8	4	1	5
H84	1	0	1
H90	0	1	1
H91	0	1	1
H93	0	1	1
H97	0	1	1
LocGS2126	0	1	1
LocGS2129	0	1	1
LocGS2130	0	1	1
LocGS2721	0	366	366
LocGS2723	0	1	1
LWS111	0	1	1
ME1970	2	0	2
ME1971	2	0	2
ME1972	2	0	2
MX1902	1	0	1
MX1904	0	1	1
MX1908	1	0	1
MX1914	4	0	4
MX1924	0	1	1
MX1925	0	1	1
MX2681	11	0	11
MX3371	10	0	10
SGI2109	25	0	25
SGI2115	38	0	38
SGI2115a	26	0	26
SL2280	1	0	1
SL2286	4	0	4
SL2293	1	0	1
SL2300	4	0	4
SL2732	0	1	1
SL2916	0	1	1
Whole Document	1	0	1

Sustainability Appraisal

Site/Paragraph	Support	Object	Total
11.1	1	0	1
4.1	0	1	1
E1831	0	1	1
E1832c	0	1	1
GTTS2487	0	2	2
H136	1	0	1
H138	0	3	3
H168	0	1	1
H1747	0	1	1
H228a	0	1	1
H2684a	0	1	1
H2730a	0	2	2
H288a	0	10	10
H31,H664, H616, H638, H2730, H2684a, H1679	0	1	1
H314	0	1	1
H358	0	4	4
H38	0	1	1
H442	0	5	5
H584	0	1	1
H69	0	5	5
H8	0	1	1
H91	0	1	1
ME2248a	0	1	1
ME2248b	0	1	1
ME2248c	0	1	1
ME2314	0	1	1
ME2568	0	1	1
ME3324	0	1	1
MX1924	0	1	1
Para. 2.31	0	1	1
Paragraph 12.137	0	1	1
Paragraph 12.57	0	1	1
Paragraph 4.68	0	1	1
Paragraph 5.50	0	1	1
Paragraph 6.62	0	1	1
Paragraph 9.42	0	1	1
PDLP Sustainability Appraisal	0	1	1
SGI2109	1	0	1
SGI2115a	1	0	1
SL2163	0	1	1
SL2170a	0	2	2

Site/Paragraph	Support	Object	Total
SL2170b	0	2	2
Table 12.4	0	1	1

Appendix 7 – Summary of Main Issues

Summary of Main Issues - Strategies and Policies

Paragraph/Site	Representation IDs	Summary of Main Issues
1.1	SP588, SP630, SP617, SP21, SP139, SP708	Inadequate consultation on the plan in the light of the level of change from the draft Local Plan. The Plan is incapable of adapting to change. Greater clarity required with regard to compliance with EU Directive on Sustainability. Review of the plan system is required at national and local level.
1.2	SP189, SP505, SP188, SP717, SP615, SP718, SP583, SP685	Inadequate consultation on the plan in the light of the level of change from the draft Local Plan and held over the Christmas holidays. Little evidence that the views of the public have been listened to. The council's website was confusing and difficult to use.
1.22	SP578, SP649	Constituents local knowledge and insight should be highly valued.
1.26	SP585, SP523	Failure to satisfy Dtc - overall housing and industrial development is excessive and aspirational making the plan unrealistic and undeliverable. Impact of large scale green belt release has not been properly considered.
1.27	SP466	Support for reference to the Leeds City Region Local Enterprise Partnership Strategic Economic plan setting the context for economic development.
1.3	SP684	Loss of greenfield land by not having a plan.
1.31	SP628	The Local Plan needs to progress to keep up with the Combined Authority.
1.33	SP620	The Plan needs to reflect the NHS strategic review to create better health and social care models in Kirklees. Need to consider hospital provision.
1.38	SP797, SP706	In the HRA report completed for the draft Local Plan, Natural England agreed that should the site come forward in the next plan period for development, further Appropriate Assessment would be required. The Council should have instigated the next stage of the HRA process as agreed with Natural England. Kirklees only responded following validation of planning application on the site, which was too late in 2016 – so a bird survey will have to be scheduled in March to August 2017. The HRA report 2016 updated from the 2015 report has put forward the results of a desk study on only one of the birds from those listed as qualifying features of the protected sites, as sufficient measure of mitigation for retaining the proposed reallocation. This measure is insufficient and does not consider the extensive body of research on bird foraging which the Bradford Core Strategy has used in its HRA. It is important to take a precautionary approach to such assessment and only countenance a conclusion of no adverse effect where there is strong evidence to show that the condition (conservation status) of a site will not be reduced. Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. For further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Paragraph/Site	Representation IDs	Summary of Main Issues
1.4	SP522, SP90, SP93	Dtc has not occurred. Inadequate consultation as consultation leaflets should have been delivered to every home.
1.5	SP420	The Plan time frame is incorrect and should be 2033 not 2031.
3.1	SP445, SP611, SP448, SP387, SP393, SP423, SP378, SP653, SP665	1 support for phasing. Various objections to phasing mechanism as it is considered inappropriate given the Government policy to substantially boost the supply of housing; this is particularly so given our view of the Council's failure to address the objectively assessed housing needs of the District. Phasing may be appropriate where this is a simple factor of infrastructure delivery planning. The phasing schedules set out are not realistic or enforceable. Development sites should only be allocated on a rolling six year horizon. No windfall allowance between 2015 and 2022. Evidence suggests this is a faulty assumption. Construction industry does not have the capacity or capability to deliver. Miller Homes would object if the phasing table was to be used to phase or manage the release of sites. The Plan needs to be clear that the Table at Appendix 3 is not a phasing policy. There is no reason why site H94 cannot come forward earlier and we suggest 2018/19 would be appropriate. Likely site H2730a will be submitted in whole or in part shortly after the Plan's adoption.
3.13	SP69	Support reference to out commuting and the need to create better paid jobs.
3.14	SP670, SP629	There needs to be more joined up thinking as the pieces of the Northern Powerhouse jigsaw are being placed is effective planning is to take place. Paragraph 3.14 of the strategies and policies document is simply not true. There is a large amount of out-commuting from Kirklees Rural. There is an increased level of congestion and pollution - often outside schools. The road (A636) is highly dangerous and restricted.
3.17	SP744	Support town centres as destinations as well as shopping areas (Historic England)
3.19	SP745	Support the identification of mineral extraction as an issue that the plan needs to address (Historic England)
3.2	SP742	Support the protection of the distinctive character of Kirklees as an issue that the plan needs to address (Historic England).
3.5	SP137	Para 3.5 recognises that there will be differences over parts of Kirklees but there are no ward-based predictions. Presumably the information is available and if so we would like to see it. We are also aware that there are challenges to the housing figures.
3.7	SP743	Support the recognition of brownfield land and its contribution to the plan. Kirklees has a number of historic buildings which are vacant or disused. There future use should be a consideration of the plan (Historic England).
3.8	SP624	The plan needs to take account of NHS England's strategic review. Different models could be looked at to create a better health and social care model in Kirklees. Need to be aware of bigger picture for future developments with regard to hospital provision in Huddersfield and Calderdale NHS trust.

Paragraph/Site	Representation IDs	Summary of Main Issues
4.2	SP335	Paragraph 4.2 is not a spatial vision but a wish-list of broad, generic outcomes. PLP 2 is meaningless and therefore ineffective. It is linked to the sub-area boxes which list the strengths and weaknesses found in those sub-areas. There is a total absence of any sense of how the type, location or design of new developments will be place-specific and will contribute to the improvement of those places. The Spatial Development Strategy says nothing about how new development will enable the settlement pattern to become more sustainable. The plan is a 'more of the same' approach to motorway-based employment development, low-density car-dependent neighbourhoods, an undermining of the regeneration and revitalisation of town centres and a failure to address the challenges of climate change and air quality.
4.3	SP614	The plan claims in section 4.3 that "A series of early engagement activities were undertaken to allow individuals to contribute to the vision". This is simply not true!! One half-day workshop was held in June 2014, involving members of the public, landowners and developers. Follow-up workshops and other opportunities for input were promised but never materialised. Every formal Council meeting involving the Local Plan has been heavily stage managed to constrain political opposition and public debate.
4.5	SP533, SP666, SP593, SP503, SP175, SP71, SP469, SP462	Support strategic objectives. Support strategic objective 3. The Plan as drafted does not set out how it will deliver the Strategic Objectives set out the Draft Plan. Strategic Objective 4 sets out the aim to provide new homes which meet the needs of the community and references the delivery of affordable housing. It is suggested that this objective is expanded to include elderly housing in order to reflect the need identified within the evidence base and to ensure the interests of Kirklees residents are clear within the Local Plan. The plan does mention urban regeneration in Huddersfield and Dewsbury, but it is not currently a strategic objective and there is a general lack of hard, practical commitment to urban regeneration throughout the plan. Specific reference should be made to the ability of new housing developments to deliver a number of other economic, social and environmental objectives. These should include creating sustainable communities, increased delivery of affordable homes, delivering significant financial contributions and employment opportunities through capital expenditure, sustaining and improving the labour market, provision of funding towards public services through new homes bonuses & council tax payments and safeguarding and enhancing areas of environmental quality through management schemes.
5.1	SP594, SP424	Support revised layout of the plan which is much clearer. The plan fails to set out a clear vision for each of the 'planning district' and/or the many discrete and diverse communities within those districts. In some cases the identified districts, the place shaping vision needs to be taken down to a more detailed level. A place shaping vision needs to be set out clearly in the plan.
5.5	SP596, SP220, SP219, SP214, SP213, SP622, SP215, SP212, SP216, SP217, SP218	The boundaries of the sub-areas are district committee areas, rather than being determined by size, character, role or function. There is a lack of detail as to how these relate to distribution of development. Each character area needs a different planning style and approach. The areas used are too large and not sufficiently homogenous to be used a planning district. They bear no relation to Natural England's Natural Character areas. They contains areas with contrasting social, environmental and economic characteristics.

Paragraph/Site	Representation IDs	Summary of Main Issues
5.7	SP178	The housing plan undemocratic. There is no way you have taken on board people's worries and concerns regarding over extended essentials such as schools, doctors etc. The council has allowed the Lindley area to decimated. Concerns about essentials such as schools, doctors etc. It is your responsibility is to make sure truly affordable houses are built, and this means not building on prime land especially when cheaper land is available.
6.1	SP380, SP545, SP197, SP238, SP232, SP237, SP426, SP608, SP604, SP589, SP566, SP231, SP365, SP632, SP530, SP413, SP618, SP317, SP320, SP336, SP72, SP230, SP321, SP395, SP233, SP234, SP235, SP236, SP148, SP171, SP174, SP318, SP322, SP319, SP401, SP650, SP669, SP696	5 x Strategy is supported. The level of OAN should be nearer 2,000 dpa. New sites have been introduced and there has been little opportunity to comment on them e.g. 12 sites in Dearne valley and 1 in Hade Edge. The distribution of development is not justified. The actual housing distribution evidenced in the Allocations and Designations Paper appears to be based on the Location of their Identified Supply. The Spatial Development Strategy should recognise the inherent need to review Green Belt boundaries and subsequently release Green Belt land. At the heart of the NPPF is a presumption in favour of sustainable development. The distribution of housing should accord with the approach set out within the spatial development strategy (amended to identify quantum of housing). Huddersfield and Dewsbury would only represent 38.5% of Local Plan housing total, this does not match concentrating development in Huddersfield and Dewsbury. Total for Huddersfield has reduced from 34.6% to 22.5%. Green belt - the plan uses 587 ha of green belt for housing delivery, without any further justification. The claim that the plan only sacrifices 2% of Green Belt misconstrues the place specific nature of Green Belt. Much of the Green Belt is in the western part of Kirklees and protected by statutory designations, so the Green Belt designation in the rural fringes and between urban areas is more important. If the review of the green belt is fundamentally flawed it indicates that the distribution strategy and the proposed site allocations are unsound. This is important as the Council's strategy is to 'step-over' urban green space sites in preference to green belt release. More significant quantities of land, including green belt, should be released close to Huddersfield as the major town in the district, provider of education and skills training, generator of employment in services and industry and transport hub. To allow opportunities for people to enjoy a better quality of life and affordable housing in the buoyant housing market of the rural settlements, (the majority of which are former mill and mining towns), the majority of safeguarded land identified in the UDP should be brought forward in preference to green belt releases in the north east of the district. Small scale green belt releases should also be brought forward here. The constraints identified in the rural areas have been significantly exaggerated and not properly addressed. Green belt releases in Batley and Spen and Dewsbury and Mirfield should be significantly scaled down. The release of significant areas of green belt land for housing and employment in Batley and Spen and Dewsbury and Mirfield is not the most appropriate strategy. It is not in accordance with national policy in relation to the green belt, sustainability and the buoyancy of housing markets in Huddersfield and the many sustainable settlements in the rural areas. Concerns regarding how the Spatial Development Strategy has been interpreted in the Cleckheaton area and the distribution of housing allocations in the Batley & Spen sub-area. Concerned at the level of housing proposed in Cleckheaton (1,291 dwellings) which does not reflect the size, status, function and sustainability of the settlement. Green belt release sites are proposed elsewhere in district ahead of non-green Belt sites such as New Lane, Cleckheaton. More future based proactive thinking is needed and should be built into the general strategy from the beginning. The Alternative Strategy Group should be an inclusive group made up of councillors, officers, doctors, business people and professionals and their ideas could be tested out in the council but also with resident opinion polls or in forum/focus groups made up of people living in the four

Paragraph/Site	Representation IDs	Summary of Main Issues
		<p>character areas in Kirklees. There is no evidence of a settlement appraisal, therefore it is unclear how allocations have been distributed. It is not possible to interrogate the appropriateness of the housing requirement. This lack of transparency makes it difficult to comment. Objection to the removal of specific housing distribution requirements for each of the District's Sub-Areas. Sub-Area distribution figures need to be flexible in respect of how they are utilised in 5-year housing calculations. The identification of such targets provides the development industry with appropriate guidance in respect of identifying future development sites and provides further clarity that the housing needs of each Sub-Area (including affordable homes) can be delivered. Review the distribution of housing in the Kirklees Rural Sub-Area. Identify housing allocations in Shelley, in accordance with the Spatial Development Strategy. Paragraph 4.2 is not a spatial vision but a wish-list of broad, generic outcomes. PLP 2 is meaningless and therefore ineffective. It is linked to the sub-area boxes which list the strengths and weaknesses found in those sub-areas. There is a total absence of any sense of how the type, location or design of new developments will be place-specific and will contribute to the improvement of those places. The Spatial Development Strategy says nothing about how new development will enable the settlement pattern to become more sustainable. The plan is a 'more of the same' approach to motorway-based employment development, low-density car-dependent neighbourhoods, an undermining of the regeneration and revitalisation of town centres and a failure to address the challenges of climate change and air quality. Concerned that the pattern of employment allocations may imply a drift of employment location away from urban river / rail corridors and towards the motorway.</p>
6.18	SP18	<p>The current local plan does NOT contribute to infrastructure delivery on several fronts. It will destroy local wildlife, clog up the roads, place young and old at risk, contribute nothing to recreational facilities, overwhelm health and education facilities and present a H&S hazard.</p>
6.2	SP613, SP652	<p>The Infrastructure Delivery Plan does not reference the strategic highway through Dewsbury Riverside which will act as the Ravensthorpe Relief Road. Significant investigations undertaken into delivering a strategic highway have shown that the road can be delivered, it reduces congestion along the A644 and has benefits in terms of journey time savings. The route should therefore be included in the Infrastructure Delivery Plan to allow for delivery of this economically significant road scheme. Concerned that IDP has schemes with vague extended timescales, contains unfunded and uncommitted schemes, no obvious correlation between development and IDP commitments, transport investment focuses too strongly on large regional schemes. The plan relies on a naïve expectation about the level of funding from CIL and S.106 contributions. Bodies not bound by Local Plan can make their own decisions that are not consistent with the plan, e.g. Huddersfield & Dewsbury hospitals.</p>
6.27	SP599	<p>The council's justification is a self-defeating, circular and false argument because it means that Green belt boundaries will be ravaged today, so that they can be maintained in this form in 15 years. We have no idea and cannot predict what the world or Government policy look like in 15-30 years. The fundamental point of guidance in NPPF is that Councils are expected to maintain green belt boundaries, not use the words as justification for dismantling them.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
6.3	SP595, SP323, SP590, SP513, SP179, SP531, SP518	<p>It is unrealistic to assume that previously developed land will become available for redevelopment. The allowance made for windfall is unreasonably large. The sequential approach to land release is not consistent with national policy (NPPF para.111). The Plan prioritises rather than encourages the re-use of land. Previously developed land is not always the most sustainable option and should not always be given priority over the delivery of suitable Green Belt release sites. Sequential approach to the release of sites is incorrect and flawed. Sites in unsustainable locations should not be ranked ahead of urban extensions. The Plan currently identifies proposed safeguarded land with the capacity for approximately 4,000 dwellings (Policies and Strategies document, para. 6.30). This is significantly less than the 15 years supply the Plan will need to identify and it is likely that Green Belt boundaries would need to be reviewed again in 2031, contrary to para 85 of NPPF. It is paramount that Kirklees Council limits the amount of greenfield and Green Belt land for building, in favour of brownfield sites; this is especially the case in the Holme Valley. The plan gives unbalanced weight to excessively aspirational economic development and is inflexible to adapt to changes, this leads to an over-estimation of objectively assessed housing need, under estimation of brownfield land supply, over estimation of green field and green belt allocations and over estimation of industrial land allocations. The sequential approach to selecting sites for development does not provide an overview of the sustainability of locations for development. Specifically, greenfield sites within settlements have priority over urban extensions whereas the reality is that an urban extension may be a more sustainable location (considering all relevant factors), and more consistent within the overarching strategy, compared to a greenfield site in for example a rural settlement. Urban green space or green belt land should only be released in the most exceptional circumstances, when the specific development is absolutely necessary and there is no other alternative. Urban regeneration offers an obvious alternative to large scale green belt land releases and is also necessary in its own right. Any proposed development must be perceived as providing something as good as, or better than, the original land use. The relatively high proportion of green belt / legally protected land in the district may offset the OAN, this would be entirely consistent with NPPF.</p>
6.36	SP598	<p>If the Council were to place a proper strategic focus on urban regeneration and brownfield development, whilst restricting green belt releases and taking a pragmatic, effective approach to plan management, housing numbers and land allocations, it is more than likely that the District's housing and employment land requirements will be met, without any significant urban extensions in to the Green Belt</p>
7.1	SP567, SP478	<p>Support Paragraphs 7.1 - 7.14. The Kirklees Economic Strategy is an inadequate document. It is yet to be approved by the Council as an approved document, so unsure how Local Plan can be predicated on an approved document.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
7.13	SP564, SP510, SP728	<p>The economic strategy suggests an evolutionary improvement for Holmfirth, but there is no strategy to encourage any growth. Danger of Holme Valley becoming commuter belt to Leeds, Manchester and Sheffield. There is a distinct omission in the Local Plan which gives little consideration to several employment sectors including tourism, creative and service industries that contain high numbers of micro businesses. As a consequence the land supply provisions are dominated by manufacturing, office and logistics. A greater emphasis should be placed on the growth in jobs in sectors other than precision engineering and advanced manufacturing. We recognise the importance of these to the overall economy of the district and believe more attention should be given to other sectors that also offer potential for growth. It is considered that the predicted growth in jobs fail to appreciate the potential value from other sectors, particularly tourism, craft and home-based working (for example in the business and professional services sector) and micro and small organisations.</p>
7.5	SP603, SP627, SP88	<p>The employment strategy is unsound as there is no strategic economic assessment to underpin it and it has not justified its employment strategy in the context of the wider West Yorkshire economy. The council should explain what the employment strategy is for West Yorkshire, what is special about the strategy within Kirklees, how this capitalises on local circumstances and how it is distinguishable from other districts. The economic strategy presented in order to give greater clarity to overall planning objectives: promote growth in advanced technologies and promote new intellectual and creative industries linked with Huddersfield University. Developments in artificial intelligence and agricultural innovation should be considered. The Council's Economic Development Strategy is deeply unconvincing on many levels, especially at a time when public sector funding is subject to severe Central Government constraint.</p>
7.6	SP92	<p>Leeds City Council has submitted comments indicating its concerns for traffic on the A653 and there may be a funding shortfall which implies a lack of duty to cooperate. While no comments from Calderdale have been found about the A644, it is clear that Cooper Bridge has the most problems to surmount, given the number of specially commissioned reports and the extra text material throughout the documentation. The employment strategy is not justified as several of the proposed locations for employment raise serious access and traffic issues including Chidswell and Cooper Bridge. Essentially, the Local Plan is unsound because the provision of new employment land relies on difficult to deliver sites. If the sites are held to be unsuitable for planning policy, technical and/or highway reasons, or if non viable and unaffordable then the council's employment land strategy is in trouble. If the local authority is left with insufficient land due to the inclusion of difficult to deliver sites then this would be damaging to local employment prospects. It would be a more secure strategy to identify sites which are smaller and easier to deliver. The Local Plan does not justify why a few large sites have been chosen instead of more but smaller sites, better distributed around Kirklees. Concerned that if the Cooper Bridge site is found at examination to be soundly identified and deliverable (etc) but it subsequently transpires in the years ahead it is unattractive to developers and too costly (for any one of several or a combination of reasons) then the strategy is in trouble.</p>

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7.8	SP432, SP562, SP501, SP165, SP89, SP727	<p>The KES objective of 75% employment rate is flawed as it does not take into account self-employment. The KES does not offer a robust basis for economic aspirations of the Local Plan. A combined employment rate including self-employed is 77%. Maintaining this would require 14,282 more jobs or 22,888 if an 80% rate is achieved. Therefore the Local Plan should assume this job growth figure. The employment land requirement is not realistic, is aspirational and over ambitious. The council's attitude to the retention of land in historic employment use has been consistent. Almost without exception land in employment use which has become available through an end to its industrial use has been allowed to become residential and, rarely, other uses. The plan is unsustainable as no extra jobs are being created for the increased number of residents. 23,000 jobs figure is a significant drop from the previously stated 32,200 jobs over the plan period in the Draft Local Plan. Although the plan housing and job requirements now appear to align the aspiration within the much lower job creation figure is questioned. The projected increase in employment rate, based on historic trends, evidence from Kirklees' previous performance and current forecasts, in our view, is unrealistic and unattainable. We believe a figure of 70% employment rather than 75% is more achievable. Within the justification for the previous Draft Plan it suggested that over the Plan period some 265ha of employment land would be required. In our view it is appropriate that the Plan seeks to allocate sufficient land for the Plan period and beyond in a mix of appropriate locations across the District.</p>
8.12	SP597, SP730, SP637, SP675, SP681, SP663	<p>Insufficient evidence in the Housing Technical Paper to justify a windfall allowance equivalent to 26%. There is no assessment whether windfalls will continue to provide a reliable source of supply in the future. Windfall delivery is likely to reduce in future years with a local plan in place and up to date SHLAA. As such the council are not allocating sufficient land to meet objectively assessed housing needs. Windfalls have accounted for majority of housing completions and there is no sign of this tailing off. The Local Plan risks eschewing a historically reliable source of supply. Not including windfall allowance from 2017-21 directly contradicts evidence of windfall as a reliable, ongoing source of supply. Monitoring and an up to date brownfield register would help create 'plan-led windfalls'. The number of windfalls could increase if the council placed a proper strategic, robust and practical focus on masterplanned urban regeneration of the older and larger urban areas. The council could plan for a minimum windfall allowance of zero in year 1, rising linearly to 900 dwellings in year 5 and thereafter (the historic norm). The council have failed to identify a windfall allowance in first 5 years of the plan, not in accordance with NPPF para 48.</p>

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8.14	SP612, SP74, SP101, SP12	The figure of 21,324 new homes is totally unjustified as it fails to take into account household formation and the pattern for larger household sizes. The proposed housing requirement should be expressed as a minimum to reflect national planning policy by using the words 'at least'. This will make it clear that the overall housing requirement figure is not seen as a maximum, reflecting national planning policy to boost significantly housing supply. This will ensure that growth is planned for positively over the Plan period. As the employment land requirement is reduced in the PDLP it does appear that there could be a risk of increased out-commuting. It can be made sound if capacity enhancements additional to schemes included in the Roads Investment Strategy and any other committed schemes are implemented. The schemes identified by the WYIS should be identified in the IDP. Development sites should only be allocated on a rolling six year horizon. It is not fair, necessary or practical to release specific sites for development more than six years in advance, given the huge uncertainties in accurately forecasting the District's housing and industrial development needs, or brownfield land availability, over longer time frames. It will massively discourage brownfield development and developers will simply "cherry pick" the best green field sites. Allocation will also lead to increased land-banking.
8.15	SP625	A major concern is why so many empty properties are not being reconditioned and used first before any further housing considerations are being proposed. This should be given immediate priority.
8.17	SP177, SP164	1 x Support. A more rigorous site selection process needs to take place.
8.2	SP546, SP732	1 x support. Concerned that proposed allocations from green belt will not provide housebuilding at a sufficient rate to make a meaningful contribution to land supply. This is true of Bradley and Chidswell allocations where allocations in adjoining authority areas presents risk of market saturation. This damages the strategic case for taking such sites out of the Green Belt. Reconsider the strategic case for Green Belt changes, on the basis that the deletions currently proposed have not been justified by the evidence, will detract from urban regeneration and are unlikely to contribute to boosting housing supply in a timely fashion. Revisit the Duty to Cooperate to show clearly how the combined effects of development proposals close to the boundaries between Kirklees, Leeds and Calderdale are to be managed and will deliver sustainable outcomes.
8.23	SP547, SP504	The section does not provide any clear guidance upon when a full or partial review would be triggered. Support for the mechanisms identified in Paragraph 8.26 in respect of situations where the Council cannot identify a 5-year supply of deliverable housing land. However an additional mechanism should be included within the list in the relation to the release of safeguarded land and a potential subsequent review of the Local Plan. There should be trigger points within the plan that would release safeguarded land should the Council not be able to demonstrate a 5 year supply of housing land.
8.24	SP301, SP295, SP300, SP294, SP293, SP299, SP296, SP298, SP297	9 x support.

Paragraph/Site	Representation IDs	Summary of Main Issues
8.26	SP671, SP480	Wording of fourth bullet point is ambiguous, where it refers to the preparation of development briefs and masterplans for larger sites. Council already includes a policy for masterplanning sites (PLP5). Assumed that Council is referring to sites not allocated as part of emerging Local Plan, which would be subject to a masterplan as part of Local Plan process. As currently worded, this part of the Plan is not effective. Support for key mechanisms where the Council cannot identify a 5-year supply of deliverable housing land. An additional mechanism should be included to refer to safeguarded land and a potential review of the Local Plan.
8.27	SP605	A low windfall allowance and over-allocation of green field sites would lead to growth of developer land banks. It is wrong to adopt a plan that will lead to more building on green field and green belt land than is strictly necessary and/or gives planners and developers the free choice to build on green field instead of brown field land.
8.33	SP84	Kirklees are not upholding their own Policy H10, which states that new developments must have 15% of affordable homes.
8.4	SP601, SP636, SP521	Critique of Objectively assessed needs. It is considered that the Publication Draft Local plan figure of 1,730dpa is considered a minum and should increase to 1,833 per annum. Further it is not considered appropriate to fully reduce past migration rates by ignoring UPC; to do so will underestimate net migration going forward and ultimately future housing needs. On this basis we consider it would be reasonable to adopt a mid-point between the demographic need excluding UPC and the demographic need including UPC i.e. 1,460 dwellings per annum. The economic adjusted OAN figure of 1,730 dwellings per annum represents the lowest in the range of jobs-led scenarios assessed by the SHMA. Paragraph 6.26 of the SHMA states that “an uplift on the baseline demographic scenario would be necessary to support jobs-led scenarios, with a range of between 1,730 and 1,999 dwellings each year”. National Planning practice Guidance (paragraph 018) advises that Plan makers should make an assessment of projected economic/job growth and adjust the housing requirement upwards where required to support this growth. This is reiterated by guidance produced by the Planning Advisory Service in conjunction with Peter Brett Associates which recognises that from Local Plan Inspector’s advice, it is clear that if demographic projections do not provide enough resident workers to fill the projected workplace jobs they should be adjusted upwards until they do. The OAN figure of 1,730 dwellings per annum assumes that economic activity rates from the 2011 census remain constant, with uplifts applied in the 60-69 age groups to account for state pension age changes. This assumes that older age groups will work until state retirement age and that this will be sufficient to off-set the need for younger in-migrants to sustain the economic objectives of the plan, however there is little evidence to support these assumptions. In order to avoid an undersupply in housing we consider that the upper range employment led target of 1,999 dwellings per year should be regarded as the OAN for Kirklees. The plan and SHMA fail to make the case that Kirklees district can be considered as the most appropriate housing market area. It would be more realistic to look on Kirklees as two distinct areas.

Paragraph/Site	Representation IDs	Summary of Main Issues
8.6	SP691, SP384, SP543, SP602, SP561, SP635, SP390, SP85, SP146, SP112, SP479, SP729, SP403, SP678, SP673, SP698	<p>2 x support. There has been an over-estimation of the housing requirement and under-estimation of brownfield land. The identified housing and employment needs are based on objectively assessed development requirements. The proposed Local Plan is aspirational but not realistic as required by the NPPF. The housing requirement does not take account of Brexit and other factors. Timescale should be shorter to factor in unpredictable elements. Households are projected to increase 1,400 per annum between 2014 and 2039. It is considered that insufficient weight has been given to market signals in accordance with the advice within the PPG in respect to the rate of development, rents, overcrowding and affordability. The Local Plan Expert Group (LPEG report) suggests a 10% uplift should be applied in these circumstances. MSL, Taylor Wimpey, Strata Homes, Jones Homes welcome the housing requirement increase but concerns how the figure was derived including: 2014 SNHP can be used as a starting point but there should be consideration whether headship rates should be modified, particularly for the 25-44 years old age group as identified in the LPEG report. More realistic assumptions should be applied. The proposed housing requirement is based on the lowest end of economic growth aspirations so should be reviewed. SHMA only provides a cursory consideration of land prices in considering whether an uplift is required. Issues to be considered include: rates of development (lower than national trend), rents (risen considerably quicker than most comparator areas therefore 10% uplift recommended by LPEG), overcrowding (above the national average) and affordability (imbalance of 1,049 dwellings). It is considered that the 2012-SNHP, the 2014-SNHP have been depressed due to financial crisis of 2007-2008 and the subsequent recession - considered that effects are having some impact on household formation rates.</p>
8.7	SP723	<p>No consideration appears to have been given to the impact of the recession on the propensity of the 25-34 year old age group to form new households. As the recession and the policy direction of government to provide intervention start to fade - starter homes/help to buy - headship rates are likely to increase. this needs to be reflected in a higher dwelling requirement. Proposed dwelling requirement of 1,730 does not take account of this. Shortfall in affordable housing on an annual basis. Neither SHMA nor Local Plan set out a specific number of affordable homes that need to be delivered over the plan period. There appears to be a fundamental disconnect between the housing requirement, the need for affordable housing and the delivery mechanism. A policy intervention to provide more homes to support an improvement to the employment rate is counter-productive as it will lead to a supply of homes for people not working in Kirklees and increase rates of out-commuting and additional workers moving into Kirklees but not improving rate of employment in Kirklees. The modelling of employment and housing growth is complicated and could be simplified by comparing the ratio of the existing population to numbers of dwellings and jobs. Applying this to population increase and changes to job provision would result in a range of 910 to 1,495 homes per annum.</p>
8.8	SP638, SP674, SP680, SP662	Publication Draft Local Plan (1,730dpa) is considered the minimum level of
9.1	SP75	future housing need in Kirklees and falls short of meeting the OAN as set out in PPG.

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9.26	SP118	Kentucky Fried Chicken (Great Britain) Limited seeks to maintain a family-friendly environment within its restaurants and has a good track record of designing schemes and working with local communities to encourage positive behaviour in and around its stores. It considers a risk-based approach to implementing design features and systems is appropriate and that permission should rarely be refused due to a perceived risk of anti-social behaviour where all such reasonable mitigation measures are proposed. The text should be amended to ensure that permission should rarely be refused due to a perceived risk of anti-social behaviour where all such reasonable mitigation measures are proposed.
9.28	SP116	Kentucky Fried Chicken (Great Britain) Limited agrees with any reasonable, fair and evidence-based strategy that has an objective of increasing the availability of healthy diet and exercise choices. It cannot agree with (a) distance or (b) arbitrary concentration criteria. This is because there is no evidence of a link between poor health outcomes and the proximity of food and drink uses to any type of receptor. Should evidence be available of a particular concentration of such uses that may be harmful to health (whether retail or human), then this should be presented and reflected in a specific percentage threshold in the policy.
10.1	SP52, SP483	1 x support. The original plan had a policy DLP23 Core road and bus route Policy - the policy was supported by a policy justification section. THIS policy or anything relating to appears to be missing from this version of the LP. This plan has not been properly consulted upon and therefore does not comply with the NPPF
10.31	SP129	Objection is made to Policy PLP19 and the related policy justification in paragraphs 10.31-32 on the grounds that they are fundamentally unsustainable in terms of generating increased and embedded volumes of road traffic, increased and embedded journeys to work by car, increased climate change emissions; and also that they are contradictory, as policy paragraph 1 states that 'Development will be strategically placed along core networks where available ... which will be improved and maintained where possible to reduce congestion and reliance on the private car'. Consequently the policy is both increasing reliance on private car at the same time as it claims that it is reducing it. Similarly paragraph 10.32 refers contradictorily to '... reduce congestion and implement the user hierarchy approach in all schemes to encourage a modal shift from private car use.' It is possible that the WYIS may underestimate the overall impact of Local Plan development in Kirklees and, depending on the eventual mix of sites and land uses, the list of additional schemes to be included in the IDP may well change if any further capacity enhancement schemes are found to be necessary.' There is no reference to the scale of TEMPRO measured forecast traffic growth across the period of the plan.

Paragraph/Site	Representation IDs	Summary of Main Issues
10.32	SP130	<p>Objection is made to Policy PLP19 and the related policy justification in paragraphs 10.31-32 on the grounds that they are fundamentally unsustainable in terms of generating increased and embedded volumes of road traffic, increased and embedded journeys to work by car, increased climate change emissions; and also that they are contradictory, as policy paragraph 1 states that 'Development will be strategically placed along core networks where available ... which will be improved and maintained where possible to reduce congestion and reliance on the private car'. Consequently the policy is both increasing reliance on private car at the same time as it claims that it is reducing it. Similarly paragraph 10.32 refers contradictorily to '... reduce congestion and implement the user hierarchy approach in all schemes to encourage a modal shift from private car use.' It is possible that the WYIS may underestimate the overall impact of Local Plan development in Kirklees and, depending on the eventual mix of sites and land uses, the list of additional schemes to be included in the IDP may well change if any further capacity enhancement schemes are found to be necessary.' There is no reference to the scale of TEMPRO measured forecast traffic growth across the period of the plan.</p>
10.34	SP337, SP77, SP79, SP132, SP683	<p>1 x support. There are some inconsistencies between the Strategic Road Network Improvements listed in the 'Strategies and Policies' document and the 'Allocations and Designations' document. Agree with the statement in paragraph 10.37 that: 'The overall scale of development proposed in the Local Plan does have a significant adverse traffic impact on the operation of the SRN in West Yorkshire and its junctions with the local primary road network. The list of potential schemes in the final version of the Highways England West Yorkshire Infrastructure Study (WYIS) has changed with some new schemes added and others revised or removed. For the purposes of the Local Plan, we consider that detailed descriptions of the schemes will not be necessary and that a simple list of locations should suffice. Comments refer to paragraph 10.34 to 10.46. The road capacity increases perpetuate the road-dependence of economic development and ignores evidence that shows that additional road capacity just adds more vehicles to the network and so does not tackle congestion or the problem of air pollution.</p>
10.39	SP80	<p>The identified requirements should be consistent with the lists of schemes identified in the section 10 of the strategy and policies document and set out below under the section relating to the West Yorkshire Infrastructure Study</p>
10.43	SP78, SP133	<p>The scheme is a West Yorkshire Plus Transport Fund (WY+TF) scheme and not a Highways England scheme. This should be made clear in the wording (as is acknowledged in the Infrastructure Delivery Plan Addendum. Object - on cumulative traffic impact grounds, in both Kirklees and Calderdale, and on the M62, and in the context of proposed site allocations H351, H1747 and E1832c (alongside the proposed urban extension sites in Brighouse, Calderdale). Implication that Junction 24a proposal is also not necessarily required in the period up until 2030. That approach does not appear to be consistent with the proposals for the Bradley Road housing allocation in Kirklees (H351/H1747), or the adjacent Woodhouse urban extension proposal in Calderdale, which have all pointed to the 'severe adverse impacts' of the traffic growth associated with these developments.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
10.44	SP131	Objection is made to Policy PLP19 and the related policy justification in paragraphs 10.31-32 on the grounds that they are fundamentally unsustainable in terms of generating increased and embedded volumes of road traffic, increased and embedded journeys to work by car, increased climate change emissions; and also that they are contradictory, as policy paragraph 1 states that 'Development will be strategically placed along core networks where available ... which will be improved and maintained where possible to reduce congestion and reliance on the private car'. Consequently the policy is both increasing reliance on private car at the same time as it claims that it is reducing it. Similarly paragraph 10.32 refers contradictorily to '... reduce congestion and implement the user hierarchy approach in all schemes to encourage a modal shift from private car use.' It is possible that the WYIS may underestimate the overall impact of Local Plan development in Kirklees and, depending on the eventual mix of sites and land uses, the list of additional schemes to be included in the IDP may well change if any further capacity enhancement schemes are found to be necessary.' There is no reference to the scale of TEMPRO measured forecast traffic growth across the period of the plan.
10.46	SP338	Comments refer to paragraph 10.34 to 10.46. The road capacity increases perpetuate the road-dependence of economic development and ignores evidence that shows that additional road capacity just adds more vehicles to the network and so does not tackle congestion or the problem of air pollution. Comments refer to paragraph 10.34 to 10.46. The road capacity increases are in direct contradiction of local authorities' carbon reduction obligations and are therefore not legally compliant.
10.47	SP339	Comments refer to paragraphs 10.47 to 10.57. No meaningful linkage is made between rail connectivity and the provision of housing and employment development.
10.54	SP11	RailPlan7 is unsound because it makes no mention of Mirfield Railway Station which is the third busiest station in Kirklees and the sole link with London. This station has shortcomings related to disabled access and parking.
10.77	SP67	There should be an inclusion of a policy statement which makes it clear to developers that no new rail crossings will be permitted, that proposals which increase the use of level crossings will generally be resisted and where development would prejudice the safe use of a level crossing an alternative bridge crossing will require to be provided at the developers expense.
10.9	SP83	The Local Plan makes no provision for additional roads, doctor's surgeries, dental practices, schools
11.1	SP438	Good design an intrinsic element of sustainable development; the Estate is supportive of good design.
11.4	SP764	Support - This sets out a good summary of the wealth and significance of Kirklees' heritage assets together with the other elements which help to define the distinct identity of this part of West Yorkshire. As such, it helps to demonstrate precisely why the strategy of the plan needs to set out a robust framework to safeguard those elements which contribute to the character of the area (Historic England)

Paragraph/Site	Representation IDs	Summary of Main Issues
12.1	SP342, SP135	The Local Plan is very likely to worsen Kirklees' carbon emissions and is therefore not fit for purpose in relation to reducing and mitigating climate change impacts. This section of the Plan - and also the Transport section - makes no reference to the need to reduce (and therefore to plan the reduction over the long term of) carbon emissions from transport. As such it is ignoring the explicit warnings of the Committee on Climate Change in their 2016 Progress Report to Parliament. Paragraphs 12.1 - 12.5 do not make reference to the need to reduce carbon emissions from transport contrary to paragraph 93 of the NPPF. In fact the spatial approach of the Plan is to do just the opposite : by planning and encouraging the location of new housing and employment development sites alongside the M62 corridor (see our comments on PLP 19) it must have the effect of increasing carbon emissions from transport. No supporting evidence has been included as to what will be the consequence in terms of quantified change in carbon emissions from this proposed spatial pattern of development.
12.13	SP767	Support - Castle Hill is a defining feature of Kirklees. In determining those areas where renewable energy developments might be appropriate it is essential that consideration is also given to the guidelines which are set out in the Castle Hill Setting Study (Historic England)
13.3	SP703	Wildlife safeguarded area and green infrastructure . The borders of the River Dearne have been given status as Wildlife Safeguarded Areas and Green Infrastructure, yet this protection ceases at the A629, completely ignoring the potentially fragile headwaters of the River Dearne and Park Dike. Why not continue this protection right to the start of the River Dearne and Park Dike? This shows either a lack of research and local knowledge on behalf of Kirklees Metropolitan Council, or a deliberate omission.
13.36	SP114	1. Clarify what the figure of 1.5% refers to: "representing 18% of the woodlands in the district or 1.5%". Consider using the Woodland Trust's Access to Woodland Standard to quantify how much new woodland you feel is needed.
13.4	SP704	Wildlife safeguarded area and green infrastructure . The borders of the River Dearne have been given status as Wildlife Safeguarded Areas and Green Infrastructure, yet this protection ceases at the A629, completely ignoring the potentially fragile headwaters of the River Dearne and Park Dike. Why not continue this protection right to the start of the River Dearne and Park Dike? This shows either a lack of research and local knowledge on behalf of Kirklees Metropolitan Council, or a deliberate omission.
14.1	SP54, SP87	Holmfirth Conservation Area without an appraisal was identified by English Heritage as 'at risk and in decline' in 2009. No strategy has been put in place by Kirklees to reverse trend. Local Plan does not set out 'a positive strategy for the conservation and enjoyment of the historic environment' as required by NPPF.
14.7	SP770	Support - The Castle Hill Setting Study provides a robust framework against which to assess the appropriateness of any development proposals in the vicinity of that monument. Consequently, we welcome the requirement that development proposals in and around Castle Hill will be guided by the advice set out in that Study.

Paragraph/Site	Representation IDs	Summary of Main Issues
15.1	SP343	Refer to the attached Minerals Evidence Paper. There is insufficient evidence that either the need for the significant increases in allocations, or the weight that should be given to their potential impacts, has been adequately demonstrated. Extensions to existing operations make them effectively permanent operations and their cumulative impact cannot be mitigated by restoration programmes.
15.26	SP705	Why have certain policies been changed which would have further protected the site? The whole of Kirklees is now a Mineral Safeguarding Area. The need for buffer zones has been removed.
15.28	SP66	The allocation of Hillhouses Yard as safeguarded mineral infrastructure is not supported. It is not clear from the justification as to why the whole site has been given over to possible aggregates use given there has been no dialogue between any potential aggregates user and Network Rail. The status of the yard is one of a strategic freight site (one protected on privatisation in the 1993 Railways Act for freight use, subject to periodic review) but not exclusively for the minerals industry. It further should be noted there is no extant connection off the main line. To re-connect to the network would cost in excess of £2 million which is a significant investment unlikely to be funded by a single aggregates user. Note is taken of policy PLP 40 which set out criteria by which the site could be developed for alternative uses but there is no justification put forward why the site should be retained as being safeguarded for mineral use. There is a reference to allocations on the basis of the minerals background paper (which makes no mention of facilities) and "discussions with users" Bearing in mind it is considered to be operational railway land in any event (save for the lone waste recovery facility on part of the site) other railway uses can be re-introduced into the yard without the need for consent and indeed it is likely to be needed for works associated with the Trans Pennine Upgrade and electrification by 2023. However in order to retain flexibility of uses on the site in planning terms our preference would be for the designation to be removed, leaving the site unallocated, which would be in line with previous discussions made by Network Rail to the Council prior to the publication of the Draft Plan.
15.3	SP606, SP701	Concerned about the open-ended nature of section 15 of the policies document. It appears to allow new mineral extraction proposals to be brought forward anywhere, anytime, in order to satisfy a perceived national demand. Sites without willing land owners should not have been included in the plan. It has mislead the public into thinking there is a threat when there isn't one. This diverts public attention from other potentially unsuitable sites. Why were some mineral extraction sites rejected? Around half of the published policies (32) have had significant amendments and 2 have been completely removed from the Local Plan - without being properly consulted upon. Sites have been added to the Local Plan which were not part of the consulted upon plan. Why were some minerals extraction sites rejected even when they were only a small number of objectors?
15.35	SP455	There is a mismatch of text in 15.35 regarding the use of gas tankers/road transportation with the operation of 'small fields' and the presumptive requirement for use of pipelines in criterion 'f'. The scale of fields (presumably meaning oilfields) should be defined and/or subject to an appropriate threshold and the non-use of pipelines should be fully justified with supporting evidence.
15.4	SP450	The evidence base is stated to include 'Minerals Need Assessment' but this document has not been made available.

Paragraph/Site	Representation IDs	Summary of Main Issues
17.22	SP56	The council has no regard to any possible contingency arrangements and/or alternative strategies should its calculation of the likely number of school age children arising from 850+ homes (in Lepton / Fenay Bridge) be incorrect. The council has calculated only 42 children of school age will be generated by the 850+ houses that it plans for our area. This figure has been calculated using inaccurate data.
17.25	SP136	The council has no regard to any possible contingency arrangements and alternative strategies should its calculation of the number of people needing to attend the local GP service and the health service as a whole due to the Huddersfield Royal infirmary being closed in the near future. In addition it has failed to develop an infrastructure delivery programme and action plan or include suitable monitoring arrangements.
19.1	SP49	I am most disappointed that KMC have chosen to remove a whole policy DLP Policy 55 Development in the Green belt. This plan has not been properly consulted upon and therefore does not comply with the NPPF.
19.2	SP127	The figure identified in relation to the proportion of the district overall that lies within the green belt is highly misleading as most of this is focused in the rural areas. This is not soundly linked to evidence, nor does it properly reflect national policy nor the functions of the green belt.
19.31	SP180	By disregarding a potential source of housing land (limited infilling in smaller green belt settlements), the plan fails to be prepared positively. Generally, in their analysis of over-washed settlements, the Council consider the necessity of an historic core in order to qualify as a "village". There is no justification or coherent rationale for this. The analysis of over-washed settlements and conclusions regarding sustainability take no account of the proximity and availability of employment. Travel to work is an important element of travel demand. The analysis also does not look at shops, services and other facilities nearby to the villages only within the village themselves. The plan does not make provision for limited infilling in villages which is identified as an exception to the presumption against development within the Green Belt by paragraph 89 of the NPPF. The justification for excluding limited infilling in villages (and limited affordable housing) is not sound evidentially and is not consistent with National Planning Policy Guidance. Paragraph 19.31 should be deleted and the plan should make provision for appropriate infill development in villages washed over by Green Belt.
19.44	SP679, SP682	It is of concern that individual site assessments are not included within the Open Space study. It is therefore difficult to understand the evidence base justifying the rating that individual sites have been given.
19.5	SP740, SP735, SP773, SP386, SP441, SP416, SP609, SP392, SP407, SP406, SP311, SP313, SP315, SP689, SP449, SP312, SP314, SP415, SP731, SP316, SP648, SP623, SP741, SP733, SP639, SP641, SP668, SP738, SP736, SP737, SP734, SP739	See separate report.

Paragraph/Site	Representation IDs	Summary of Main Issues
19.7	SP65	Paragraph 19.7 does not mirror the advice given in the NPPF paragraph 90 by including reference to development which is deemed appropriate in the green belt. This also includes development required in association with local transport requirements which can demonstrate a need for a Green Belt location (which is of relevance to Network Rail). The assumption in the following policies, concentrating almost exclusively on buildings and conversions, gives the impression that all other forms of development are inappropriate, which is not the case. Although there is reference to "other uses of land" this may more helpfully be expanded to include the uses listed in the NPPF, rather than have selected a few for further discussion and being the subject of specific policies.
20.9	SP610	It is extremely confusing and impractical to monitor the plan against over 100 parameters, over half of which have no specific measurable target. It is little more than monitoring for monitoring's sake and it serves no practical management purpose.
Accommodation for Travellers - Policy PLP 12	SP64, SP461, SP710	Figures in justification questioned, following alterations to definition of gypsies and travellers. Implications of revised definition need to be considered when setting out 5 year and 6-10 year need figures. Those living in bricks and mortar should be excluded from requirements. There are too many sites in certain areas such as Newsome and Birstall.
Advertisements and shop fronts - Policy PLP 25	SP765	We support this Policy which will help to ensure that the design of any new or replacement shop fronts or advertisements retains the distinctive character of the Plan area. We particularly welcome the requirement that traditional shop fronts should be retained and restored. The town centres of Kirklees contain a number of fine examples of traditional shop fronts which make a valuable contribution to the townscape character. This should help to ensure that these distinctive elements of the District are not lost.
Alternative development on protected minerals infrastructure sites - Policy PLP 40	SP45, SP376	Approach to identifying and safeguarding Minerals Infrastructure Sites lacks evidence and is inconsistent with the aims and objectives of the Plan towards the regeneration and rejuvenation of Dewsbury. The concept of retaining and safeguarding all Minerals Infrastructure Sites in this area is incompatible with the Vision for the South Dewsbury area. As such, the policy should have added flexibility. The restrictions on development within 100m of protected minerals sites are onerous. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Policy PLP40 to that consulted upon DLP41.
Batley and Spen - 5.3	SP751	Support strengths/opportunities for Batley/Spen

Paragraph/Site	Representation IDs	Summary of Main Issues
Biodiversity & Geodiversity - Policy PLP 30	SP798, SP553, SP591, SP586, SP363, SP39, SP143, SP115, SP489, SP575	3 x support. Support policies PLP30-PLP35. Some of the sites identified for housing will have an adverse effect on local wildlife and flora, will add to light pollution and compromise the vistas across the Valley. Amend first paragraph, insert wording underlined: “The council will seek to protect and enhance the biodiversity and geodiversity of Kirklees, including the range of international, national and locally designated wildlife and geological sites, Habitats and Species of Principal Importance and the Kirklees Wildlife Habitat Network. However, in some instances this may not be possible, which is set out below:.....”. The This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Biodiversity and Geodiversity Policy PLP30 to that consulted upon DLP31. Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. The plan does not appear to demonstrate required level of cooperation with Peak Park Planning Authority, neighbouring authorities and agencies concerned with protection and conservation of South Pennine Moorlands. The plan makes no mention of IMSACAP, SCOSPA, 'Pennine Prospects' or related conservation programmes.
Community facilities and services - Policy PLP 48	SP651, SP47, SP795, SP491, SP1	2 x support. Many sports venues would 'fail' the viability test included within this Policy 48 and would, therefore, be put at risk. Policy PLP 50 protects sport and leisure facilities so to include them within Policy PLP 48 is unnecessarily confusing. The inclusion of sports venues within this policy’s remit leaves them vulnerable to loss, rather than actually offering them a level of protection equivalent to para.74 of the NPPF. Amend PLP 48 to reflect NPPF paragraph 74, or clarify that the policy scope does not include sports venues. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are differences between the current Community facilities Policy PLP48 to that consulted upon DLP48. PLP48 does not go far enough to ensure community facilities are not lost, in accordance to NPPF para 70.
Conserving and enhancing the water environment - Policy PLP 34	SP459	PLP30 to PLP35 - We fully support these policies.
Contaminated and unstable land - Policy PLP 53	SP558, SP160, SP9	2 x Support PLP53 Contaminated and unstable land as it will ensure that developers fully consider land stability and potential impacts on canal infrastructure as required by paragraphs 120 – 121 of the National Planning Policy Framework (NPPF). Objection to the reference in the policy to the need for applicants to provide a number of contamination assessments within their planning applications where relevant. This matter relates to the Council’s Validation Criteria and thus isn’t necessarily a matter that should be included within a Local Plan policy. The Council’s Validation Criteria can be updated as required and more frequently than a Local Plan policy.

Paragraph/Site	Representation IDs	Summary of Main Issues
Core walking and cycling network - Policy PLP 23	SP571, SP509, SP359, SP3	While PDL23 is supported, it is proposed that the proposals map is amended to include a safeguarded route for canals. We support this policy, but would restate our objection that many development locations are not well-suited to making the policy effective. Whilst we welcome the proposed new cycle and walking route through the Holme Valley and hope this will build on the work of River 2015 in utilising the river corridor for a flatter and more accessible route, non-vehicular transport opportunities are limited by topography. Locating houses on the Valley slopes and hilltops does not encourage walking or cycling. The access roads are narrow, many with no footpaths and limited off street parking. Even though rural school routes are marked, parents have concerns about their and their children's safety. Other locations are available for housing that would encourage cycling and walking, with the associated health benefits.
Design - Policy PLP 24	SP789, SP763, SP550, SP439, SP499, SP360, SP634, SP35, SP4, SP162, SP488	2 x support. Policy over complicated. First paragraph, only one form of development masterplan necessary to ensure a site is adequately designed. Design reviews, not clear who would review design. Risk that delays in process could undermine delivery of development. Part a, policy does not function, if for example there is no heritage asset of note. No reference to what degree townscape", "heritage assets" and "landscape" is defined. Would only apply to sites with particular heritage issues, covered by policy PLP35. Part d, di and iv not relevant to site, a strategic greenfield extension. Policy does not allow any specific reference to where they may not be of relevance to particular sites. Number of requirements in policy likely to add significant costs to development proposals including the use of innovative construction materials and techniques, the provision of charging points for electric vehicles, and the provision of public art. No reference to viability, design requirements likely to be onerous and should be removed. Consider how much south facing roof space on any development can be expanded to include, wherever possible, Passivhaus methods or the next best alternatives that are realistically & cost effectively achievable. As the canal network forms a key part of the urban and rural landscape of Kirklees, the plan should include a separate policy and additional text to focus on waterway design. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Design Policy PLP24 to that consulted upon DLP24. There should also be clear guidance given to builders about style and use of local materials. "To use local stone" is not enough. There needs to be a strategic planning group in all the regions of Kirklees to look at style and design of buildings in their immediate areas. This group, surely, has got to involve our own professional planners but could also listen to what contractors want to do and have greater input into design outcomes. Strongly support this policy, but would wish to add further text.
Dewsbury and Mirfield - 5.2	SP750	Support strengths/opportunities for Dewsbury/Mirfield
Dewsbury Town Centre - Policy PLP 18	SP762, SP357, SP31	1 x support. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are differences between the current Dewsbury Town Centre Policy PLP18 to that consulted upon DLP18. The town centre policies should be supplemented by a policy for increasing residential populations in town centres and other concentrations of business and employment that have excellent public transport and pedestrian connections.

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Drainage - Policy PLP 28	SP552, SP569, SP159	While the policy is generally supported, in practice (as set out), there are a number of issues that should be clarified. In accordance with NPPF technical guidance, a 30% uplift would generally only be applicable where a 70 year design life is required. Cannot see how adequate mitigation measures or the measures needed to cope with increased sewage and large volumes of water can be afforded or taken practically, if the number of houses proposed in the Plan is built up the Valley sides and on the hilltops. Developments should include more tree planting as trees are known to be effective in flood prevention / contributing to a reduction of greenhouse gases.
Educational and health care needs - Policy PLP 49	SP616, SP555, SP507, SP529, SP167, SP492	1 x support. Health care facilities not currently listed within Preliminary Draft Regulation 123 List. Education provision provided is that which is agreed to be necessary and accords with paragraph 204. Table 3, Kirklees CIL Draft Regulation 123 list refers to "primary and secondary provision for Chidswell Strategic Site (MX1905)". Not clear whether this relates to on or off site provision. This is being proposed prior to any detailed consideration of education requirements for area. The schools within the Parish are either full or close to capacity. The projected figure for new children in the area appears to be underestimated, compared with the actual situation. Health centres are also running at full capacity and would struggle to cope with additional patients. Kirklees Council needs to liaise with the NHS on the siting of new housing developments to ensure that all residents continue to have access to the health services they need. CIL should be used towards funding improvements to existing educational facilities. PLP50 does not reference the use of CIL to improve education or health facilities and accordingly the policy creates confusion in respect of delivery of identified needs. The policy should be reviewed in light of the Council's future adoption of CIL. There is no analysis of the allocation of new housing or the provision of local services in the Holme Valley.
Efficient and effective use of land and buildings - Policy PLP 7	SP757, SP540, SP195, SP200, SP283, SP277, SP282, SP431, SP565, SP276, SP350, SP25, SP26, SP86, SP61, SP275, SP281, SP278, SP280, SP279, SP111, SP113, SP161, SP477, SP642, SP667, SP465	12 x support. A net density of 35 dwellings per hectare (dpha) is too low to qualify as sustainable development because it does not adequately support the viability of public transport and local amenities. Net density should be increased to between 45 and 60 dpha. The net density of the neighbourhood is crucial to its viability so new development often needs to be built to a much higher density in order to raise the average density overall. The principal key to higher densities is good design. The density has increased from 30 (in DLP) to 35 without substantive evidence. This density is a gross density and gives a false picture of what density is achievable. A density of at least 35 is not achievable. Gross and net areas are largely the same. No site has been reduced to take account of the need for on site POS and other infrastructure. The net developable area is typically 65-70% of the gross site area. May constrain development on strategic mixed used sites necessary for plan to meet development requirements. Why can the many properties (derelict & similar) not be restored to habitable conditions first before seeking out new sites to build upon? The efficient use of brownfield sites should be encouraged and the Local Plan fails to fully explore the brownfield options available. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Efficient and effective use of land and buildings PLP7 to previous consultation including the increase in net density of dwellings from 30 to 35.

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Facilities for outdoor sport, outdoor recreation and cemeteries - Policy PLP 56	SP50, SP792	1 x support. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between Policy PLP56 to that consulted upon DLP58.
Flood risk - Policy PLP 27	SP551, SP362, SP37, SP712, SP711, SP646, SP581	<p>The policy needs to be tighter. Flood zones in the Holme Valley are based on modelling not actual events. Important flood events have not been kept by the Council or the Environment Agency. As a result flood risk sites can and are being built on. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Flood Risk Policy PLP27 to that consulted upon DLP28. The use of brownfield sites in river valleys is crucial to sustainable place-making. The policy should be amended to allow master-planning to reduce flood risk. Additional text should be included in the policy as follows: "Where the re-use of urban brownfield sites is desired within areas at flood risk, masterplans will be produced to combine flood management with green infrastructure measures to enable development that not re-uses the land but also reduces the flood risk in the catchment." Object to identifying the whole of Kirklees as the starting point for the sequential test. Such an approach would not take into account the housing needs of different sub-areas. If evidence for smaller search areas is to be required on every occasion this would lead to unnecessary expense and delay. The policy fails to take into consideration the ability of developers to have flood risk maps amended through challenge to the EA. Using the whole district as the starting point for the area of search is contrary to national planning guidance. This says that for individual planning applications where there has been no sequential testing of the allocations in the development plan, or where the use of the site being proposed is not in accordance with the development plan, the area to apply the Sequential Test across will be defined by local circumstances relating to the catchment area for the type of development proposed.</p>
Food and drink uses and the evening economy - Policy PLP 16	SP119, SP94, SP327	<p>Criterion a, e and f are not applicable to betting shop proposals. Supporting paragraphs 9.27, 9.28 and 9.29 highlight policy is not appropriate to betting shops as refer to hot food takeaways, litter issues, obesity and outdoor eating and drinking areas. Policy as worded will mislead those seeking to assess proposal against policy, make it unmeasurable. Criteria b not appropriate, potential for anti-social behaviour already dealt with under the Licensing Act, is a matter that cannot really be dealt with under the Planning System. Policy is inappropriately grouping uses that cannot be assessed from a planning perspective in the same way, as operation and benefits associated with these uses are entirely different. The policy should include a specific maximum of 10% of take away units. This seems better than the rather woolly statements in DLP16.". The policy does not set out how harm to character, function, vitality and viability will be assessed; does not set out specific numbers, distributions or proximities of other food and drink uses and does not explain how the potential for anti-social behaviour will be assessed and is therefore not consistent with NPPF paragraph 154 because these details are not provided.</p>
Healthy, active and safe lifestyles - Policy PLP 47	SP790, SP410, SP125	2 x support. Part (j) of the policy does not provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

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Highway safety and access - Policy PLP 21	SP549, SP408, SP34, SP486, SP414, SP520	<p>Concerns with the policy which states that 'new development will not be permitted if it adds to highway safety problems or in the case of development which will generate a substantial amount of trip generation, cannot be adequately served by the existing local highway network.' This policy is not considered to be in accordance with paragraph 32 of the Framework which makes clear that improvements can be undertaken within the transport network and that development should only be prevented or refused or transport grounds where the residual cumulative impacts of development are so severe that they cannot be mitigated. Inconsistencies between the Strategic Road Network Improvements listed in the 'Strategies and Policies' document and the 'Allocations and Designations' document. Development should not be held up awaiting infrastructure provision. If development complies with tests set out in NPPF and CIL regs, then development should proceed before planned infrastructure improvements. Contributions should be compliant with CIL Regulation 122, i.e. they must be necessary to make the development acceptable in planning terms and fairly and reasonable related in scale and kind to the development. Policy PLP 21 is not considered to be fully compliant with NPPF paragraph 32. Third paragraph repeats those set out in first two paragraphs. Save for second sentence inclusion not justified. Highway safety only one part of consideration, policy title should be amended. Policy does not make sense, in second sentence. If read in isolation criteria do not allow for any potential improvements to the local highway network, which could adequately mitigate any potential impact, as referred to in bullet point b of the same policy. Parts d to h inclusive relate to layout and design issues, more appropriate to be located with other design issues. Third paragraph includes reference to need to avoid a "detrimental impact" on highway safety and local highway network. No reference in NPPF to "detrimental". This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Highways and access Policy PLP21 to that consulted upon DLP21.</p>
Historic environment - Policy PLP 35	SP769, SP460, SP512, SP42, SP7, SP573	<p>1 x support. The lack of reference to "the historic canal network" in PLP35 in the Policy and supporting text is not compliant with NPPF Section 12 to ensure that heritage assets are fully considered. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Historic environment Policy PLP35 to that consulted upon DLP36. A conservation area appraisal is necessary for Holmfirth Town Centre to ensure that the policy is able to 'ensure that proposals within conservation areas conserve those elements which have been identified as contributing to their significance in the relevant Conservation Area Appraisal'. It would make easier for users of the Plan if Criterion 2 only dealt with non-designated archaeology with other non-designated heritage assets included in a separate Criterion. It would make easier for users of the Plan if Criterion 3.c only dealt with the heritage assets that are of especial importance to the character of Kirklees with Heritage at Risk included in a separate Criterion. Paragraph 135 of the NPPF makes it clear that when assessing the impact of development upon a non-designated heritage asset, a balanced judgement will be required. Therefore, the Criterion on non-designated heritage assets will need a slight amendment.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Housing Mix and Affordable Housing - Policy PLP 11	SP306, SP548, SP385, SP304, SP437, SP334, SP511, SP498, SP303, SP352, SP633, SP527, SP307, SP60, SP781, SP138, SP302, SP398, SP308, SP305, SP584, SP481, SP404, SP576, SP371, SP310, SP660, SP309, SP725, SP647	<p>Support. Evidence from CIL study suggests that a large proportion of the district would be unviable if 20% requirement imposed. Glossary must be amended to include 'Starter Homes' . Housing should look to address loneliness problems for older residents, as discussed in Scottish Parliament report. What do we mean specifically about rental and shared ownership contracts and affordable housing? PLP 11 will not be effective in delivering a sufficient stock of affordable housing and is therefore not fit for purpose. Housing mix - Support the need to deliver a mix of housing taking account of SHMA but targets in SHMA should be viewed as indicative because SHMA is a snapshot in time. Rigid requirements not appropriate. Factors such as viability, site characteristics and market demands should be taken into account and there is likely to be a need for an element of aspirational housing. Affordable housing - Support for the removal of "at least" from the affordable housing requirement and the retention of the viability clause. The viability of a 20% target across the district is questioned as the CIL viability work indicates such a rate may not be viable across the whole district so should be lowered in some areas (including Huddersfield and Dewsbury). The policy does not refer to the impending introduction of Starter Homes and implications should be considered before submission. The Local Plan does not accord with the indicative targets within SHMA. Evidence in SHMA is only one factor and the policy should reflect market information and demand indicators as most housing will be provided by the private sector. The blanket 20% affordable target across the district raises concerns about the viability of schemes in low value urban areas of Huddersfield and Dewsbury. It would be important for policy to take into consideration the impending introduction of starter homes. No mention of current urgent need for provision of affordable rural housing for purchase or rent. Village of High Flatts, at least 8 elderly people in need and 2 people travel in as part of employment would also benefit. Use of the Community Land Trust model would serve to ensure the affordability in perpetuity. Provision of small two bedroomed single story dwellings, specifically designed for the elderly, will in most cases free up larger dwellings making them available for larger families, highlighted in 2008 Taylor report. Taylor Wimpey support the principle of a broad mix of housing, however the Local Plan should not dictate the housing mix across the District. The requirement for sites over 10 dwellings or 0.4ha to specifically reflect proportions set out in SHMA is onerous and prescriptive. The 20% affordable housing target across Kirklees is potentially unjustified as evidence supporting the Community Infrastructure Levy suggests difficulties achieving 20% especially In lower value areas. Objection to the wording in the 2nd paragraph. Market demand should be referenced as a key driver in housing mix as developers need to deliver houses that will sell and which will therefore deliver the required obligations. This is particularly important in respect to affordable homes. The policy should not include design requirements in respect of specialist needs as these are now incorporated within Building Regulations. The Local Plan should not include requirements that are covered by none-planning legislation.</p>
Housing strategy - 8.1	SP658	<p>Concerns with the sources of housing supply identified to meet the housing requirement. It is considered there is an over reliance on windfall supply of 450 dwellings per annum from year 2020 onwards. There is no strategic housing policy relating to the housing requirement or minimum annual requirement for the District.</p> <p>There is no reference within the delivery and implementation section of the housing strategy to a trigger which would implement a full or partial Local Plan review. The only mention of a partial review relates to windfall rate being potential lower than anticipated.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Housing Trajectory - Figure 7	SP344	The Housing Trajectory should only be based on the anticipated flow of completions. The graph as presented is a hypothetical rate at which sites may become available for development, rather than a profile of the rate at which housing will be delivered.
Huddersfield - 5.1	SP749	Support strengths/opportunities for Huddersfield
Huddersfield sub-area - Figure 3	SP97	Golcar is within the Huddersfield settlement and should be identified as part of the Huddersfield sub-area (which is the prime focus for new homes) within the Plan. This is entirely justified by the Council's own evidence, set out in the Technical Paper: Spatial Development Strategy and Settlement Appraisal, November 2016 which specifically identifies/assesses Golcar as part of the Huddersfield settlement. The Plan should recognise the potential for Golcar to make a greater contribution to Kirklees' future housing needs.
Huddersfield Town Centre - Policy PLP 17	SP761, SP356	1 x support. The town centre policies should be supplemented by a policy for increasing residential populations in town centres and other concentrations of business and employment that have excellent public transport and pedestrian connections.
Infilling and redevelopment of brownfield sites - Policy PLP 59	SP559, SP442, SP443, SP181, SP697	1 x support. The adoption of arbitrary tests relating to height of new buildings and limiting them to no greater than existing footprint is unjustified. These matters should be left to the discretion and professional judgement of the planning officer and based on individual circumstances of planning application. The policy is not positively prepared because it does not allow limited development that would allow appropriate development within Green Belt villages that would otherwise be acceptable in terms of the NPPF. Provisions within the policy which exceed the national requirements are not justified, are too prescriptive and should leave the judgement to planning officers on a case by case basis.
Kirklees Rural - 5.4	SP752	Support strengths/opportunities for Kirklees Rural
Kirklees Rural sub-area - Figure 6	SP176, SP96	Golcar is within the Huddersfield settlement and should be identified as part of the Huddersfield sub-area (which is the prime focus for new homes) within the Plan. This is entirely justified by the Council's own evidence, set out in the Technical Paper: Spatial Development Strategy and Settlement Appraisal, November 2016, which specifically identifies/assesses Golcar as part of the Huddersfield settlement. No individual appraisal of Golcar has been undertaken. The Plan should recognise the potential for Golcar to make a greater contribution to Kirklees' future housing needs. The proposal to identify an industrial corridor through Scissett and Clayton West is not only inappropriate and insensitive to the local character and distinctiveness of the villages, but is in conflict with many of the objectives and policies of the Draft Local Plan and it should be removed from the Plan.
Landscape - Policy PLP 32	SP768, SP457, SP6, SP145, SP490	4 x support.
Landscape Sensitivity - Very Small Turbines - Map 5	SP10	The requirement for wind turbines and solar is not justified.
Local green space - Policy PLP 62	SP793	Support

Paragraph/Site	Representation IDs	Summary of Main Issues
Location of new development - Policy PLP 3	SP777, SP381, SP536, SP419, SP346, SP198, SP192, SP326, SP247, SP241, SP246, SP427, SP240, SP388, SP367, SP23, SP63, SP396, SP239, SP245, SP242, SP243, SP244, SP149, SP110, SP170, SP173, SP163, SP755, SP474, SP402, SP655, SP643	<p>19 x support. Encouraged by the approach towards the Location of New Development however the level of housing provision in Cleckheaton does not reflect its role and function. Green Belt sites are proposed for release elsewhere in the district ahead of non Green Belt sites such as New Lane, Cleckheaton. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Location of new Development policy PLP3 differs considerably to that consulted upon DLP2. For instance there is no mention of protection for the greenbelt has been removed. Policy PLP3: Location of New Development is supported in principle. However, the Settlement Appraisal (Technical Paper 2016) is flawed to the extent that the distribution of development and site allocations sit uncomfortably against the matters identified in Policy PLP3. on the openness of the Green Belt compared to existing development, which arises in the case where development takes place on previously developed land within the Green Belt. The policy fails to provide clear and unambiguous guidance, therefore it is not capable of directing growth and determining development proposals. PLP3 (2c) is not consistent with the emphasis of development towards large, strategic sites that are predominantly in greenfield locations. Criterion 2(b) of policy PLP3 should make reference to the release of non-allocated sites in order to maintain a supply of specific deliverable sites in accordance with national policy. There is no certainty that all of the Council's proposed housing allocations will deliver the number of homes needed to meet the District's identified housing requirements. The wording of Criterion 2(c) of policy PLP3 suggests that the Council will seek to phase the development of previously developed land ahead of greenfield sites. Such an approach would not enable the delivery of the District's housing requirements. Notwithstanding this point our client supports the reference in the criterion where the wording states "subject to maintaining a five-year supply of housing land and to delivering the overall housing and jobs requirements". Encouraged by the approach towards the Location of New Development however the level of housing provision in Shelley does not reflect its role and function. The criteria allow for the potential for housing allocations in smaller settlements in the Kirklees Rural area. No new homes are proposed in Shelley in the Plan period which does not reflect the size, status and sustainability of the settlement. The proposed general distribution between the four sub areas is too vague. The Local Plan should identify settlements that are of a size, function and character to deliver sustainable housing and employment growth. Brownfield sites should be promoted through the Local Plan. The Spatial Development Strategy text refers to the provision of 31,140 new dwellings between 2013 and 2031, this is not included within a Strategic Policy. Encouraged by the approach towards the Location of New Development however the level of housing provision in Batley does not reflect its role and function. Green Belt sites are proposed for release elsewhere in the district ahead of non Green Belt sites such as White Lee Road, Batley. Policy inconsistently worded, doesn't reflect need to ensure the development plan housing and employment needs over the plan period are met by a range of sources of land, including strategic mixed use allocation. Wording of this policy is too flexible. It is not consistent with House of Commons and Local Government Committee view that development can only be sustainable if it is accompanied by the infrastructure to support it. The site at Chidswell is poorly located in terms of healthcare facilities.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Masterplanning sites - Policy PLP 5	SP756, SP538, SP348, SP193, SP194, SP265, SP259, SP264, SP429, SP258, SP526, SP182, SP62, SP100, SP788, SP779, SP257, SP263, SP262, SP260, SP261, SP476, SP369, SP656	<p>4 x support. It is assumed that this Policy will relate to sites over a certain threshold but it is unclear from the current wording. Policy PLP 5 is framed as an open ended requirement for a comprehensive masterplanning and consultation exercise “prior to the submission of a planning application.” There is no clear indication of the scale or nature of development to which this would apply, and as such it invites universal application to all proposals. The policy infers a masterplan is required for all developments regardless of size and type. It is unnecessary to prepare a masterplan in some circumstances. The agreement of a masterplan before submission will place an undue burden on developers. The policy should only relate to sites of a significant size. The policy is onerous and unreasonable, particular for small-medium sites. It is essential that the local community has confidence that when development takes place it is consistent with the master-plan, and that amenities are provided up-front to ensure that master-planned developments begin to function as sustainable neighbourhoods from the outset. The policy appears to replicate pre-application negotiation and public consultation which usually takes place prior to the submission of major proposals, neither of which is mandatory, as well as the informational requirements of a Design and Access Statement. The requirements are too detailed and too onerous and open to differing interpretation. The policy is flawed and will add a layer of delay and difficulty to development coming forward. The policy does not stipulate the size/scale of development that the policy would apply to. It could also be misinterpreted to read that master-plans need to be agreed prior to the submission of planning applications. Object to part a) as the need to submit a phasing and implementation plan would be too early in the planning process, especially in relation to outline applications. Object to part j) and the need to include appropriate employment and community facilities as these may not be relevant to the scheme. Object to part n) as the Local Plan should not contain any policies that infer or require the delivery of design standards above those prescribed within Building Regulations. The Local Plan should not seek requirements which are covered by other non-planning legislation. Object to the final paragraph as the submission of a management plan at this stage is too early in the planning process, especially in relation to outline applications. Such matters are usually dealt with by planning condition or are attached to Section 106 Agreements. An applicant may also choose to provide the information within their Design & Access statement. Part n referring to energy efficiency should be covered through Building Regulations as set out in the Housing Standards Review. Part h could be included within phasing and implementation plan, part a. Repetition, not necessary.</p>
Meeting the employment land requirement - Table 3	SP140	Support

Paragraph/Site	Representation IDs	Summary of Main Issues
Meeting the housing requirement - Table 5	SP692, SP726, SP774, SP544, SP201, SP292, SP286, SP436, SP291, SP700, SP525, SP497, SP285, SP185, SP102, SP284, SP290, SP289, SP287, SP288, SP690, SP677, SP709, SP724	<p>6 x support. The Council should put measures in place to encourage / force building companies to build on sites with permission. The Council's housing requirement appears to be inconsistent with its own Economic Strategy, particularly in relation to future employment growth. The housing growth strategy being pursued is not supported by the Plan's own evidence base. Some allocated land will not be delivered in practice; no 'lapse rate' buffer has been applied to allocated housing sites. The 10% lapse rate and demolitions allowance are supported. However the Council appears to be heavily reliant on windfalls. The plan should allocate sufficient land to address OAN and windfalls that occur should be considered as a bonus. When allocating land it would be appropriate for the council to utilise a buffer of 20% consistent with LPEG recommendations to allow flexibility in supply. The Council should increase their housing requirement and allocate more sites. The requirement of allocations for 21,324 units is not effective in ensuring the Plan requirement is met, nor does it provide flexibility to deal with changing circumstances. No explanation given why the Council are predicting 27% fewer jobs than in DLP. The affordable requirement represents 60% of annual housing requirement. Additional housing land will help offset the identified net shortfall to provide additional affordable homes. Comments made on the density assumptions being too high mean that evidence needs to be provided to this effect. Whilst a discount is applied to sites with approval, no allowance is made for allocations. It is normal practice for a 20% allowance to be made to provide a buffer of sites, to ensure sufficient land is available. No explanation why Council prefer SENS1 model to Core model for jobs led housing figure. Concerned about large windfall allowance, whilst this is a reduction on past delivery this is based on a time with no up-to-date plan and prohibition on greenfield land. Research from NLP indicates that the average build rates are 161 dwellings. This would suggest lead in times in Local Plan are ambitious and potentially unrealistic, particularly in case of H2089 as Dewsbury is not a strong market area. Plan period should be extended to 2034. The demolitions allowance in Table 5 is not challenged but would need to be extended to a proposed revised plan end date of 2033/34. Support for the 10% discount rate in respect of the inevitable non-implementation of existing planning permissions but object to the removal of the 5% flexibility rate on allocations to ensure choice and competition in the market for land. The Local Plan does not include any flexibility in respect of delivery of housing allocations. As a result of these changes, table 5 should be amended (full proposed revised table set out in the representation, paragraph 6.17) to show that 40,856 new homes are required from housing allocations in the draft Local Plan. This is 19,532 more homes than the 21,324 currently identified in the Publication Draft Local Plan. Challenge to the windfall allowance showing 4,950 homes from windfall between 2020-2031. There will be a significantly higher level of windfall in the transition between an out of date plan and the new Local Plan but this will decrease following the publication of the Local Plan. The inclusion of a windfall allowance suggests the Council's approach to safeguarding other uses will fail and the delivery of housing to meet needs will rely on unknown sites coming forward for development at an unknown point in time. To deliver the level of identified windfalls would have implications for delivery of the plan. Having an up-to-date plan with allocations and SHLAA evidence base is justification to move away from past trends. The 21,324 requirement identified for land to be allocated in the Local Plan is a minimum figure and does not provide a realistic buffer of potential sources of housing supply to ensure requirement is met in full. The 20% buffer in the LPEG report should be given careful consideration. The housing target currently being planned for may not be sufficient to meet OAN due to the reliance on large strategic sites and windfall allowance. Argument from Strata Homes in draft plan that 635 homes with planning permission [applying 10% lapse rate]</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
		<p>will not be built and that brownfield sites will not be developed for various reasons including cost cannot be accepted given that the only reasons for releasing site H442 is the lack of alternative sites. Support the inclusion of a buffer, however buffer should be higher. We also note that the supply of housing identified to be provided from windfall development totals almost 16% of the remaining housing requirement. We would suggest that additional evidence is provided to confirm that this delivery will occur. OAN should be higher. Council will not have 5 year land supply due to constraints on supply. There is no policy that explicitly sets out the housing requirement. To ensure that the DPD is clear to future users of the document, it is considered that this significant omission should be addressed. Further analysis required to assess where the sources of windfall will come from. Failure to deliver this level of windfall will undermine the strategy of the plan - plan will be ineffective. The draft Local Plan only allocates sufficient sites to accommodate in the order of 21,371 dwellings, which is 47 dwellings more than the Local Plan requirement and therefore does not make provision for sufficient flexibility or the allocation of a wide choice of sites to enable housing needs in the area to be met in full. The proposed housing requirement should be expressed as a minimum to reflect national planning policy by using the words 'at least'. This will make it clear that the overall housing requirement figure is not seen as a maximum, reflecting national planning policy to boost significantly housing supply. This will ensure that growth is planned for positively over the Plan period. There is no evidence that the windfall requirement is justified. A lack of justification why the 2014 sub-national projections are the most appropriate for Kirklees over the plan period.</p>
Minerals safeguarding - Policy PLP 38	SP772, SP44, SP153, SP519	<p>2 x support. The inclusion of a 250m buffer zone around all safeguarded sites is inappropriate and is contrary to NPPF (para.143). This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Minerals safeguarding Policy PLP38 to that consulted upon DLP38. For instance the whole section regarding buffer zones/stand off distances.</p>
New open space - Policy PLP 63	SP560, SP51, SP794, SP493	<p>2 x support. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are differences between the current New Open Space Policy PLP63 to that consulted upon DLP65. Question over the role of the Community Infrastructure Levy (CIL) with regards to the implementation of the policy. CIL payments should be utilised towards funding improvements to existing formal strategic and recreational facilities on account of their value to both existing and future residents of the District. Unless sites are of a sufficient size to require the delivery of a new formal recreational facilities in order to cater for the capacity of the development itself. However, Draft Policy PLP63 does not reference the use of CIL to improve recreational facilities and accordingly the policy creates confusion in respect of the delivery of identified needs in these areas.</p>
New waste management facilities - Policy PLP 44	SP782	Support
Parking - Policy PLP 22	SP487	Parts e to h inclusive can be adequately allowed for in policy PLP24 (Design) rather than separating the issue.

Paragraph/Site	Representation IDs	Summary of Main Issues
Picture PLP Monitoring Indicators Strategy and Policies	SP783	It is not clear why only loss of archaeological sites is being monitored. Moreover, it is also not clear what is meant by “sites of archaeological importance”. This Indicator should be expanded to cover all designated heritage assets.
Place shaping - Policy PLP 2	SP776, SP379, SP447, SP418, SP196, SP229, SP223, SP534, SP228, SP425, SP222, SP366, SP22, SP221, SP394, SP224, SP225, SP226, SP227, SP748, SP470, SP400, SP654	<p>17 supports. There is no individual sub area policy stating the amount of development required within each sub area. The opportunity to revitalise and rejuvenate Dewsbury has not transcended through the Plan in relation to other policies and allocations. As such, the plan is internally inconsistent. The policy provides factual information, which is not helpful to developers. May points are strategic and of little relevance to a specific development. There is scope for policy to link to other Local Plan policies. The policy seeks to describe wide and diverse area sand lacks meaningful cross-referencing. The policy does not provide a clear indication of how a decision maker should react to a proposal - para 154. of NPPF. Paragraph 4.2 is not a spatial vision but a wish-list of broad, generic outcomes. PLP 2 is meaningless and therefore ineffective. It is linked to the sub-area boxes which list the strengths and weaknesses found in those sub-areas. There is a total absence of any sense of how the type, location or design of new developments will be place-specific and will contribute to the improvement of those places. The Spatial Development Strategy says nothing about how new development will enable the settlement pattern to become more sustainable. The plan is a ‘more of the same’ approach to motorway-based employment development, low-density car-dependent neighbourhoods, an undermining of the regeneration and revitalisation of town centres and a failure to address the challenges of climate change and air quality. Policies for employment, housing and transport as proposed cannot be implemented without harming air quality. Support place shaping approach on a sub-area basis but should recognise that the Kirklees Rural area has rail links to the south, the Dearne Valley and eastern areas have good M1 links and gentle slopes in the east provide opportunities to expand settlements. This context creates the opportunity to allocate sufficient sites in the eastern areas of Kirklees Rural.</p>
Place Shaping Batley and Spen	SP472, SP695	1 x support. Location on the border between Dewsbury and Mirfield and Batley and Spen subareas.
Place Shaping Dewsbury and Mirfield	SP2, SP471	<p>Support the reference to enhancing the river and canal corridor in the Dewsbury and Mirfield Place shaping section for leisure, recreation, health, mental well-being and a car free transport option. Reference to building on a strategic location supported, whilst referencing Dewsbury town centre as a location for development to assist in regeneration. However, benefits to Dewsbury of supporting strategic employment sites in locations outside of town centres should be equally recognised. Existing role of centres supported through job creation, Gross Value Added generation, raising the profile and attractiveness of area to investment. New housing will help to address high levels of inequality between strong and weak housing market areas. Site represents opportunity to secure range and mix of employment units in a sustainable location, excellent transport links, accessible to existing services in Dewsbury and Batley. Masterplan shows how site can be brought forward, combined with Chidswell to create a new cohesive, sustainable settlement.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Place ShapingHuddersfield	SP621, SP693	<p>The plan is unsound as it does not fully reflect the characteristics of Kirkheaton as a place now or in the future. It fails to bring together all available evidence and analysis to form a spatial strategy for Kirkheaton. There is a lack of placemaking at an individual settlement level. The plan does not bring together individual proposals for Kirkheaton or assess either their cumulative impact or the overall implications for placemaking. It is unsophisticated in terms of the analysis of need for land for housing or other purposes and in relation to the identification of suitable sites. In Kirkheaton, there is a need for housing for the elderly, a greater emphasis on small sites within the built-up area of the village and release of peripheral sites. There is an absence of adequate provision for economic activities, including home-work units. The plan fails to provide any analysis and assessment of the implementation of its proposals, especially in relation to the spatial integrity of Kirkheaton. The plan fails to produce a strategy for the rate of development sites, a priority order of release and development of sites and an assessment of all sites. There is no discussion of the consequences for the availability and capacity of social and economic infrastructure. As a consequence, Kirkheaton would be subject to unjustified and damaging effects. There is little or no attention to the impact of development proposals on the Green Belt, open space provision, historic and heritage features, the management of the natural environment adjacent the countryside and overall traffic management. The plan fails to provide evidence that will enable Kirkheaton to become a sustainable community as defined in national planning policy. Good design for Huddersfield required.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Place Shaping Kirklees Rural	SP506, SP563, SP619, SP720, SP719, SP579	<p>The Local Plan for Kirklees is north Kirklees centric. It is a Plan which provides no vision or real opportunity for the economic development of rural south Kirklees and the towns, villages and rural settlements located there. The Local Plan, if approved, will give rise to a net loss of employment land in Holme Valley South and a net increase in the number of new dwellings. There will be no major transport infrastructure improvements during the life time of the plan to accommodate the increase in traffic movements, for the inhabitants of this part of Kirklees are largely reliant on the use of private cars. Bus and rail services are infrequent and unreliable with poor connectivity which means those people who commute to Leeds, Manchester, Sheffield, etc are reliant on cars. The emphasis for the plan is on Huddersfield and north Kirklees and that is where the infrastructure will be concentrated. Apart from one concession to look to invest in a new congestion relief scheme in the centre of Holmfirth, there are no other infrastructure schemes in Holme Valley South or rural south Kirklees. Greenbelt land should continue not to be built and conserved, brownfield sites should be given planning priority. Development should be through infill and small sites. Green corridors between communities should be maintained. Historic villages and farm complexes should be conserved. Combi-builds should be included. Hydro electricity units could be installed and windmills decommissioned. Links to the Sculpture Park and Hepworth Gallery could be made. The land allocated for employment use in the Valley has remained the same for a considerable number of years. Very little action has been taken by council to improve employment prospects in Holme Valley. The plan seeks to allocate Bridge Mills for housing, despite it being in business use. More should be made of valley bottom sites, to provide land for mixed developments. Agreed that there need to be adequate housing to meet future needs of local people, but fear Local Plan will encourage larger, more expensive houses on greenfield / green belt land. Work done as part of the development of the Holme Valley Parish Council's Neighbourhood plan described the nature of the Holme Valley: The plan will merge settlements, change small rural communities into urban environments, increase traffic and flood risk. This will alter the valley forever meaning that it will no longer be the place that is renowned internationally for its stunning beauty. In developing its Local Plan, Kirklees Council has made the strategic decision to combine the Holme and Colne Valleys along with Denby Dale and Kirkburton areas into one group, Kirklees Rural. In doing so, the individual identities and characteristics of these areas will be ignored.</p>
Presumption in favour of sustainable development - Policy PLP 1	SP775, SP345, SP190, SP191, SP417, SP211, SP205, SP210, SP206, SP204, SP421, SP203, SP207, SP208, SP169, SP172, SP209, SP467, SP514, SP463	18 x support. The policy repeats NPPF. In accordance with NPPG it should be deleted. Key policies for employment, housing and transport as proposed cannot be implemented without harming air quality.
Proposals for exploration and appraisal of hydrocarbons - Policy PLP 41	SP452, SP156	1 x support. The potential impacts from large numbers of lorry movements (used to bring large volumes of water to site) and their effect on highways and local amenity is not dealt with specifically as a likely significant adverse impact.

Paragraph/Site	Representation IDs	Summary of Main Issues
Proposals for mineral extraction - Policy PLP 36	SP771, SP607, SP43, SP151	2 x support. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Mineral Extraction Policy PLP36 to that consulted upon DLP37. The new policy contains additional criteria. The policy seems to have been disregarded in the allocation of multiple quarry sites in the rural scarp around Shepley, Birdsedge, Cumberworth, Denby Dale, Skelmanthorpe and Shelley. The council should look again at the new quarry site allocations and examine their impact on communities and environment. The policies and allocations relating to the location and scope of quarry operations are far too market driven and wholly dependent on the voluntary co-operation of quarry operators.
Proposals for production of hydrocarbons - Policy PLP 42	SP453, SP46, SP157	The Coal Authority objects to criteria f. and h. which are considered to lack justification and to not accord with the NPPF. The plan users may find it helpful if the text were to be clear on what role the Mineral Planning Authority has in relation to hydrocarbon extraction and what matters fall to be controlled by other regulators. Other plans have done this which seems to have been helpful. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are differences between the current Productions of hydrocarbons Policy PLP43 to that consulted upon DLP42. The policy should be widened to include the impact of increased lorry movements and the protection of designated areas. A buffer zone is required to protect the setting of the Peak District National Park. Net zero impact is an unacceptably low aspiration in terms of criteria 'h'.
Protecting existing and planned minerals infrastructure - Policy PLP 39	SP8, SP154, SP375	Support the safeguarding of the minerals infrastructure sites as outlined in PLP38 Minerals Safeguarding as this approach would ensure that wharf sites are protected to allow the movement of waterborne freight in accordance with National Policy. Review the approach towards protecting mineral infrastructure sites in Dewsbury and Ravensthorpe.
Protection and improvement of environmental quality - Policy PLP 52	SP557	Objection to the reference in the policy to the need for applicants to provide a number of environmental assessments within their planning applications where relevant. This matter relates to the Council's Validation Criteria and thus isn't necessarily a matter that should be included within a Local Plan policy. The Council's Validation Criteria can be updated as required and more frequently than a Local Plan policy.

Paragraph/Site	Representation IDs	Summary of Main Issues
Protection and improvement of local air quality - Policy PLP 51	SP556, SP364, SP48, SP134	<p>1 x support. The first paragraph of this policy is not consistent with the requirement of the Air Quality directive 2008 that annual mean limit value levels for nitrogen dioxide cannot lawfully exceed 40µgm³ after 1st January 2010. (This has recently been the subject of two Supreme Court judgements in April 2015 and November 2016, as a result of which the national air quality plan has been required to be revised - anticipated to be published in July 2017). So paragraph 18.7, whilst referring to Part IV of the Environment Act 1995 etc relating to AQMAs should also refer to the fundamental requirement, which the Plan must respect, to secure compliance with the Directive in timescales which according to the Supreme Court judgement of 2nd November 2016 will be between 2018-20. The Local Plan must be consistent with all the requirements of that judgement. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Air quality Policy PLP51 to that consulted upon DLP51. Objection to the reference in the policy to the need for applicants to provide an air quality assessment within their planning applications where relevant. This matter relates to the Council's Validation Criteria and thus isn't necessarily a matter that should be included within a Local Plan policy. The Council's Validation Criteria can be updated as required and more frequently than a Local Plan policy.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Providing infrastructure - Policy PLP 4	SP778, SP382, SP537, SP347, SP256, SP250, SP255, SP428, SP249, SP631, SP73, SP108, SP82, SP24, SP248, SP251, SP252, SP253, SP254, SP475, SP574, SP368, SP516, SP640	<p>14 x support. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Providing Infrastructure PLP4 to that consulted upon DLP3. Kirklees are not doing enough to collect developer contributions. As currently drafted Wakefield Council does not consider this policy to be sound. The policy is not justified in terms of dealing with potential impacts on the local highway network. Although Wakefield recognises that Kirklees, as set out in the letter from Mr. Hollinson on 13 th December 2016, consider that there 'is a reasonable prospect that mitigation measures can be brought forward on the network in both authorities' the Council still consider there is a need to formally recognise in the Local Plan that local highway infrastructure outside of Kirklees may be impacted by development in Kirklees and that mitigation may need to be provided. Wakefield is particularly concerned that the cumulative impact of development at Clayton West and Skelmanthorpe and on the Owl Lane / Chancery Road Roundabout near Ossett has not been considered and it is therefore not possible to determine if mitigation measures will be required as a result. The Transport Modelling Technical Paper contains no evidence that possible impacts outside of the Kirklees boundary have been considered. CIL should be much more integrated with the plan, with a lower rate charged for brownfield sites. CIL payments should be taken before building begins, year on year planning is not sufficient. The emphasis on large strategic sites clustered close to motorway junctions places disproportionately large infrastructure requirements in terms of the range of functions described in paragraph 6.15. Either the need to fulfil infrastructure requirements will slow down the delivery of development, or the pressure to accelerate the rate of development will lead to planning permissions being granted without adequate infrastructure provision, especially when the viability of developer contributions is being constantly challenged. Objection to the wording in the 2nd paragraph of policy PLP 4. A further sentence should be included to ensure that the Council will assess development against the policy in a flexible manner, especially in respect of larger development schemes which include major infrastructure. Potential for significant impact on local infrastructure, traffic, public transport, services including schools and health services needs to be taken into account. Policies which seek developer contributions, such as Policy PL4, should be properly tested for their effects on development viability and supported by an adequate evidence base.</p>
Renewable and low carbon energy - Policy PLP 26	SP766, SP361, SP36, SP716, SP142, SP715, SP582	<p>2 x support. The suggestion that the entire Kirklees Planning Authority boundary is suitable for some scale of wind turbine development is not true. There are landscapes which should now be protected. The policy should reflect what exists now including all approvals and not be based on landscape studies from the past when the landscape looked very different. We therefore believe the policy is not sound because it relies on an old, out of date assessment. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Renewable and low carbon energy Policy PLP26 to that consulted upon DLP 27. There is general support for the policy, but it requires amendment and additional criteria.</p>
Residential use in town centres - Policy PLP 15	SP760, SP355, SP626	<p>2 x support. The town centre policies should be supplemented by a policy for increasing residential populations in town centres and other concentrations of business and employment that have excellent public transport and pedestrian connections.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Safeguarded land (Land to be safeguarded for potential future development) - Policy PLP 6	SP383, SP539, SP199, SP274, SP268, SP430, SP273, SP349, SP495, SP267, SP389, SP600, SP780, SP266, SP272, SP271, SP269, SP270, SP754, SP657, SP676, SP517, SP464	<p>1 x support. The quantum of safeguarded land will not be effective in ensuring the Green Belt boundaries do not require further amendments at the next Local Plan review. HBF consider that a 15 year time horizon post plan period (to 2046) should be adopted for safeguarded land to accord with the NPPF preference for local plans to be over a 15 year time horizon. Although there may be other sources of supply beyond the local plan and evidence base do not provide assurances. This policy will be ineffective unless the intended protection against development during the plan period is properly implemented. Safeguarded sites have proved very vulnerable to speculative planning permissions granted on the basis of the lack of a five-year housing land supply. This is allowing short-term land supply issues to prejudice the pool of safeguarded sites for the long term. The policy should advise on when safeguarded land would be released to maintain a five year supply of housing land at end of plan period, rather than just on review of the Local Plan. It is appropriate that the Local Plan seeks to meet objectively assessed development needs for the plan period. However, the plan needs to look for at least a 15 year period up to 2046 (or 2051 with amended plan period). While other sources of supply may arise, no evidence of what / where these are is available. The plan should allocate 12 years supply of Safeguarded Land to ensure Green Belt boundary endures beyond plan period. The identification of safeguarded land should be based on the identified objectively assessed housing needs and not identified housing allocations. This is to ensure that these needs are fully met. The Council's proposed 115 hectares of safeguarded land would equate to 3,450 homes. Accepting the 2,000 additional homes from strategic site allocations, this would identify a safeguarded land quantum of 5,450 homes. However, an additional 10 years' worth of potential development land designated as Safeguarded Land would be appropriate in order to provide a total 25-year period from adoption to ensure Green Belt permanency. On the basis of an identified annual housing land requirement of 2,076 homes, this would equate to a need to designate 20,760 homes as safeguarded land, an additional 15,310 homes to that currently proposed by the Council. The policy lacks reference to a trigger that would release safeguarded land should the Council fail to show a 5 year supply of housing land as well as a full or partial review of the plan. Whilst it is noted that the status of safeguarded land sites will only change through a review of the Local Plan, Gladman consider that it is necessary that this policy be linked to the Council's monitoring, so that in the event of a significant shortfall in housing delivery, this will prompt the Council to undertake a Local Plan review in a timely manner. We do however consider that not enough safeguarded land is identified if the Green Belt boundaries are to endure well beyond the end of the plan period as stated in the NPPF. Concerns about the appropriateness of a number of the areas which have been identified under the provisions of this Policy. The policy should advise on when safeguarded land would be released to maintain a five year supply of housing land at end of plan period, rather than just on review of the Local Plan. Green belt boundaries will be subject to continual 'roll-back' at every planning cycle and safeguarded land will become the first irrevocable allocation in the land supply chain. The safeguarded land allocations have never been objectively assessed and there is no evidence to show that they would be required for development in the next plan period. There is no justification to allocate any safeguarded land.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Safeguarding employment land and premises - Policy PLP 8	SP541, SP433, SP202, SP27, SP183, SP370, SP351	4 x support. PLP 8 makes no reference to 'Economic Development'. Approach towards identifying and safeguarding Priority Employment Areas lacks evidence and is inconsistent with the aims and objectives of the Plan towards regenerating and rejuvenating Dewsbury and Ravensthorpe and its riverside areas. The concept of retaining and safeguarding vast swathes of land in South Dewsbury is incompatible with the vision and improvements proposed in the area such as the potential new strategic highway. Miller Homes support the concept of retaining employment within the area but the policy must be flexible. The justification in the employment technical paper is not robust and does not explain the decision making process. Sites were assigned Red, Amber, Green ratings but all appear to have been designated as Priority Employment Areas. The evidence base is not available, open and transparent regarding the designated of the sites. For consistency and to provide certainty the terminology ("employment generating uses") should be used uniformly throughout parts 2, 2a and 2b of the policy. The approach to employment land outside the Priority Employment Areas is explained at paragraph 7.18, however, this is not embodied in policy. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Safeguarding employment land and premises PLP8 to that consulted upon DLP8.
Safeguarding waste management facilities - Policy PLP 45	SP377	The approach towards identifying and safeguarding Waste Management Facilities lacks evidence and is inconsistent with the aims and objectives of the Plan towards regenerating and rejuvenating Dewsbury and Ravensthorpe and its riverside areas. The designation of large areas of Waste Sites in the heart of Dewsbury and Ravensthorpe is incompatible with the Vision for the South Dewsbury area. Safeguarded waste management facilities along the River Calder in Dewsbury and Ravensthorpe should be re-designated to accord with the aims and objectives of the Plan and Vision for the area. Review the approach to safeguarding Waste Management Facilities in Dewsbury and Ravensthorpe.
Shopping frontages - Policy PLP 14	SP759, SP30, SP354	This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Shopping frontages Policy PLP14 to that consulted upon DLP14. Its intention regarding traditional shop fronts is unclear as it appears to give applicants the opportunity to do either of the options set out (and makes this Criterion inconsistent with other Policy in the plan – such as Policy PLP17 Criterion i for example). Shop front design is already satisfactorily covered in Policy PLP25. Kirklees has a number of fine traditional shop fronts which make an important contribution to the local street scene. It is important that these are retained and refurbished wherever practicable.
Site restoration and aftercare - Policy PLP 37	SP451, SP152	1 x support. There is strong support for the requirement to allow mineral working subject to enhancement benefits through restoration, but the policy should be supported by a further requirement for landscape enhancement consistent with the Kirklees District Landscape Character Assessment.
Spatial development strategy - 6.1	SP753	We support the way in which the development strategy seeks to deliver the Plan's Vision and objectives through the Spatial Development Strategy, especially the constraint of growth around Castle Hill and the Registered Battlefield at Adwalton Moor. This will help to ensure that two of the most important designated heritage assets of the District are safeguarded.
Sport and physical activity - Policy PLP 50	SP791, SP411	2 x support

Paragraph/Site	Representation IDs	Summary of Main Issues
Strategic Green Infrastructure Network - Policy PLP 31	SP554, SP456, SP40, SP5, SP409, SP144, SP374	3 x support. Miller Homes understands and supports the concept of the Mirfield Promenade but is keen to understand the evidence base for the proposal and what it is seeking to achieve in order to reflect this in the Dewsbury Riverside masterplan. The evidence base for the proposal is not available therefore there is no justification. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Strategic Green Infrastructure Policy PLP31 to that consulted upon DLP32. Objection to the lack of flexibility provided within the policy in association with the provision of criteria where the development of Strategic Green Infrastructure sites may be appropriate in certain circumstances.
Strategic Objectives - 4.3	SP747	Strategic Objective 2 - We support the intention within this Strategic Objective to strengthen the role of the town centres and support their vitality and viability. The centres of the three town centres identified are all Conservation Areas and contain many heritage assets. It is essential that the viability and vitality of these areas are maintained since this will support their heritage assets remaining in active use, encourage underused and vacant floorspace to be brought back into use, and support continued investment in the repair and maintenance of these buildings. Strategic Objective 8 - We support this Strategic Objective. The environmental assets of Kirklees, especially its historic environment, make an important contribution towards the District's sense of place, the quality of life of its communities, and to the economic well-being of the area. It is wholly appropriate, therefore, that their protection and enhancement is identified as one of the Plan's Strategic Objectives. Strategic Objective 9 - We support this Strategic Objective especially the promotion of the re-use of existing buildings. How the Plan secures the reuse of Kirklees' vacant buildings is identified as being one of the issues that it will need to address. It is particularly important that new uses are found for those vacant and underused buildings which contribute to the distinct identity of their local area. Strategic Objective 10 - The plan area is a major supplier of quality building stone. Therefore, we support this Strategic Objective.
Strategic transport infrastructure - Policy PLP 19	SP508, SP446, SP391, SP528, SP32, SP166, SP76, SP714, SP147, SP128, SP570, SP713, SP484, SP373, SP580	3 x support. There will be no major transport infrastructure improvements during the life time of the plan to accommodate the increase in traffic movements, for the inhabitants of this part of Kirklees are largely reliant on the use of private cars. Bus and rail services are infrequent and unreliable with poor connectivity which means those people who commute to Leeds, Manchester, Sheffield, etc are reliant on cars. The emphasis for the plan is on Huddersfield and north Kirklees and that is where the infrastructure will be concentrated. Apart from one concession to look to invest in a new congestion relief scheme in the centre of Holmfirth, which we lobbied for, there are no other infrastructure schemes in Holme Valley South or rural south Kirklees. Miller Homes is encouraged by Policy PLP19 and the identification of the Mirfield to Dewsbury to Leeds and North Kirklees Growth Zone but objects to the non-identification of the strategic highway through Dewsbury Riverside which will act as a Ravensthorpe Relief Road. A plan of the scheme is within the representation. The Plan fails to recognise the existing known traffic hot spots in Honley, New Mill and Holmfirth. It also neglects the difficulties caused by parking and traffic volumes on the main trunk roads running through the Valley. Steep sides, narrow Valley bottoms, narrow roads, with limited scope for widening, limited space of off road parking for existing houses and major trunk roads, characterize the Valley. The latter take the burden of cross-Pennine traffic when there are problems on the M62 and A629. Objection is made to Policy PLP19:- the overall approach of policy PLP 19, and the related policy justification in paragraphs

Paragraph/Site	Representation IDs	Summary of Main Issues
		<p>10.31-32 on the grounds that they are fundamentally unsustainable in terms of generating increased and embedded volumes of road traffic, increased and embedded journeys to work by car, increased climate change emissions; and also that they are contradictory, as policy paragraph 1 states that 'Development will be strategically placed along core networks where available ... which will be improved and maintained where possible to reduce congestion and reliance on the private car'. Consequently the policy is both increasing reliance on private car at the same time as it claims that it is reducing it. Similarly paragraph 10.32 refers contradictorily to '... reduce congestion and implement the user hierarchy approach in all schemes to encourage a modal shift from private car use.' The proposed focusing of development locations alongside the M62 motorway in the policy statement 'The Council is committed to ensuring that new developments have safe and convenient access to the West Yorkshire Key Route Network where possible, the main arterial routes and the West Yorkshire Core Bus Network that connect the region', and in paragraph 10.32: 'The council will seek to encourage development that is strategically placed along these core routes ... '. Additionally paragraph 10.44 further supports the possible additional provision of more road capacity: ' It is possible that the WYIS may underestimate the overall impact of Local Plan development in Kirklees and, depending on the eventual mix of sites and land uses, the list of additional schemes to be included in the IDP may well change if any further capacity enhancement schemes are found to be necessary.' This is the exact opposite of an approach seeking to locate development activity in more sustainable locations over the longer term. It is also short termist in that it will fill up increased capacity on the M 62 corridor that is now being made available at considerable cost. When these increased traffic volumes then proceed onto the local highway network, increasing congestion there, they will create economic disbenefits to businesses, towns, and individuals. There is no reference to the scale of TEMPRO measured forecast traffic growth across the period of the plan. Highways England considers that the Road Investment Strategy (RIS) schemes detailed on page 100 of the document should also be contained in section 4 of the policy wording. In addition, TS11 'Strategic Road Network Improvements' should differentiate between the schemes contained in the RIS and those contained in the Highways England West Yorkshire Infrastructure Study (WYIS). This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Strategic transport infrastructure Policy PLP19 to that consulted upon DLP19. The policy is sound but clarification is sought on the scope of transport infrastructure projects, particularly works on the A62 / A652 / Smithies Moor Lane junction. Transport strategy fails to consider the impact of both current and proposed development on the A636 and other feeder roads such as the B6116. There are no transport mitigation strategies within the Local Plan for the Holme Valley area to offset the increased transport requirements resulting from the allocation of new housing and commercial activities.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Supporting skilled and flexible communities and workforce - Policy PLP 9	SP672, SP542, SP340, SP434, SP496, SP141, SP155	<p>3 x support. Retail should be acknowledged as a employment generating use, as per NPPF Annex 2. Support for the amended wording to add "where possible" but remaining concerns that significant emphasis is placed on the requirement to contribute to the creation of local employment opportunities to support growth in the overall population of local residents in education or training. This should not be a planning obligation and would impact on viability. Many housebuilders already have their own training programmes. The approach to employment land supply is not justified by the economic evidence. The important aspirations to supply jobs for a growing population and to reduce workless-ness appear to exist in isolation from the employment land strategy as set out in Chapter 7. Detailed evidence is submitted as part of this representation in the Core Evidence attachment. Object to the inference within the policy that an agreement to deliver employment and training opportunities will be required. This can be read as meaning an agreement in the form of a planning obligation. This would place a further burden on developments and be a constraint to development when considered alongside all other requirements.</p>
Supporting the rural economy - Policy PLP 10	SP341, SP435, SP568, SP28, SP168, SP722, SP721, SP686, SP688	<p>1 x support. Existing employment sites within Holmfirth should be protected and not allocated for housing. The local plan does not include sound policies to support the rural economy or tourism. There is a higher incidence of people running businesses from home in the rural areas, but to support this Kirklees Council needs to roll out broadband quicker than at present. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Supporting the Rural Community PLP10 to that consulted upon DLP10. The approach to employment land supply is not justified by the economic evidence. The important aspirations to supply jobs for a growing population and to reduce workless-ness appear to exist in isolation from the employment land strategy as set out in Chapter 7. Detailed evidence is submitted as part of this representation in the Core Evidence attachment.</p>
Sustainable travel - Policy PLP 20	SP358, SP33, SP150, SP485, SP687	<p>2 x support. Third paragraph and final paragraph starting "for larger schemes" say the same thing. Not necessary to include both. Council does not define what it means by "major planning applications" and "larger schemes". This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Sustainable Travel Policy PLP20 to that consulted upon DLP20. The policy will not be effective because most of the proposed housing locations are not well connected to the employment locations by means other than the car. Growth of employment land round motorway junctions is contrary to the objectives of PLP20.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Table 1	SP535, SP699, SP494, SP577, SP91, SP98, SP109, SP473, SP515, SP707	<p>1 x support. Plan fails to meet the needs of the district. A disproportionate amount of housing has been allocated to three large sites; insufficient housing has been allocated in smaller, sustainable locations. Gladman believe that any housing figure proposed must be considered as a 'minima' rather than as a ceiling for development. While it is supported that major settlements continue to play a key role in the accommodation of future development within the borough, this should not be at the expense of ensuring that the housing and employment needs of other settlements are met. The Plan should not ignore the fact that sustainable growth can be accommodated in rural communities. There has been an over-estimation of the housing requirement and under-estimation of brownfield land. The 5,000 in Dewsbury and Mirfield is a considerable increase on previous local plan. The proposed housing requirement figures should be expressed as a minimum figure (i.e. using the words 'at least'), to reflect national planning policy to boost significantly housing supply. Golcar is within the Huddersfield settlement and should be identified as part of the Huddersfield sub-area, which is the prime focus for new homes, within the Plan. There is no evidence to provide justification for site of this size at H2089. The plan seeks to focus growth in urban areas of Huddersfield and Dewsbury. The proposal does not comply with green belt purposes in national policy. New housing will not deliver regeneration benefits to Dewsbury. No evidence to suggest alternative sites closer to Dewsbury town centre have been considered. South Kirklees has links to Manchester, Sheffield, Wakefield & Barnsley and Leeds. Those that commute to Leeds do so via the M1 at junction 39 which provides good access to London and the South, this pattern of commuting is not recognised in the plan in terms of it's infrastructure improvement proposals. Kirklees is well placed to develop itself as in the centre of the Northern Powerhouse, with it's links across the three conurbations of Manchester, Leeds and Sheffield but this plan shows no ambition in this regard. The plan neglects the needs of the rural south Kirklees and will deliver in a reduction in employment land, an increase in housing but no infrastructure investment which is unsustainable. HBF welcome the increase in the housing requirement since the draft Local Plan and the overall methodology for deriving the housing need and requirement figure is generally considered appropriate. However, there are a number of concerns in relation to the assumptions applied within the methodology - see comment PDLP_SP497. The Council's approach fails to place sufficient emphasis on whether sites are sustainably located and could provide for sustainable development. Instead, too much emphasis is given to supposed 'constraints' which would be addressed in a very straightforward manner at planning application stage. Despite being identified as a highly sustainable location, and having a strong housing market, a disproportionately low number of proposed dwellings is allocated to Mirfield. Objection to the Spatial Development Strategy's lack of emphasis in respect of the benefits of housing delivery. Support for the removal of the sequential approach to the selection of appropriate housing sites but concerned that it has been removed so that the Council can seek to progress with new sites/settlements that are detached from the existing settlement areas of the District ahead of urban extensions.</p>
The re-use and conversion of buildings - Policy PLP 60	SP444	Support

Paragraph/Site	Representation IDs	Summary of Main Issues
Town centre uses - Policy PLP 13	SP758, SP324, SP184, SP29, SP187, SP186, SP158, SP482, SP372, SP353, SP524	<p>1 x support. The Local Plan evidence base (the WYG Kirklees Retail Capacity Study Update (2016)) recognises there is capacity for additional retail floorspace. However, there are no Local Plan allocations to meet such needs. The Local Plan should provide a positively worded policy to meet such needs in the most suitable location. PLP13 is not the most appropriate strategy for managing town centre use proposals and the policy approach is not based on proportionate evidence. Draft Policy PLP13 should be revised to reflect the role of such retail destinations and their function in meeting particular retail requirements. The detail of any sequential assessment should be proportionate to the circumstances of the application. Information on a business model can be informative but should not be a policy requirement and it is inappropriate for a policy to specify that all such assessments should have an extensive audit trail. Furthermore, regeneration and economic benefits are relevant in the overall planning balance, but are not a direct requirement for the sequential test. The draft policy is not supported by robust evidence. The suggested lower threshold stems from the WYG Retail Capacity Study for Kirklees District (2014), subsequently updated in August 2016 (the Kirklees Retail Capacity Study Update (2016)). However, both studies conclude that centres in Kirklees (and in particular, Huddersfield) are generally healthy. Junction 27 area has a key role to play in the shopping centre hierarchy of the borough as set out in detail in previous representations, January 2016. Developed over more than 20 years as a key retail and leisure destination, already has a significant level of restaurant and leisure provision. Concern regarding the level of evidence and justification required to justify new local centres as part of sustainable urban extensions. The approach is onerous particularly when the policy requests sequential and impact assessments. This conflicts with the H2089 Dewsbury Riverside allocation which includes the delivery of new community hubs. Object to number of policy tests within fourth paragraph. These do not apply to proposals such as Chidswell proposing significant residential development. Table includes a list of defined centres. Assumed that these are existing centres only, if assumption is not correct, object to exclusion of new local centres. Paragraph 24. A local centre within MX1905 is being promoted as part of mixed use site and therefore in accordance with an up-to-date Local Plan. A sequential test as defined in policy should not be required in the case of MX1905. Same issue equally applies to Impact Assessment. The thresholds in the policy are considered to be too low, prescriptive and a potential barrier to investment. The NPPF threshold of 2,500 sq m has undergone extensive consultation and determines whether a proposal will have a 'significantly adverse' impact on vitality and viability. The strategy and the policy should acknowledge the role of existing retail parks. Business models aren't available on speculative applications. It is inappropriate to specify such an audit trail. The floorspace threshold does not provide justification for thresholds set out for comparison goods or other non-retail uses. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Town centre uses policy PLP13 to that consulted upon DLP13. In parts A, B and C of the policy it is stated that proposals which do not comply with the sequential test, or would have a significant adverse impact on centres, "will not be supported. here is no need for this wording, and it should be removed. Policy PLP 13 is too complex and includes matters which are not consistent with national policy. In particular, for main town centre uses the policy requires development to be of an appropriate scale, assist in retaining market share, enhance visitor experience and supporting existing businesses. None of these factors are identified in the NPPF as matters relevant to the determination of proposals located within town centres. The policy is therefore more onerous than national policy and cannot be justified.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
Trees - Policy PLP 33	SP458, SP440, SP41	1 x support. This plan has not been properly consulted upon and therefore does not comply with the NPPF. There are significant differences between the current Trees Policy PLP33 to that consulted upon DLP34. Policies on trees and tree cover should have regard to the function of woodland, particularly where (coniferous) plantations and woodland is grown as a crop.
Urban green space - Policy PLP 61	SP399, SP796, SP412, SP126, SP405	1 x support. The urban greenspace policy appears to apply regardless of whether the allocated land allows public access or provides public benefit. It is difficult to understand the Council's justification for the proposed increase in the extent of the urban greenspace, particularly within the context of a severe housing shortage and the need to identify sufficient land for all types of development over the plan period to 2031. The extent of the proposed urban greenspace provision within Kirklees substantially exceeds any normal requirement for accessible public open space within an urban area. Whilst the policy is a criteria-based policy similar to paragraph 74, there is a crucial distinction between the two elements. Paragraph 74 does not apply to land with a broader green space function but rather to land with a recreational function. Broader green space functions are addressed in paragraphs 109 – 123 of the Framework. The inclusion of areas that contribute to character, quality and visual amenity of the local area and wildlife value within policy PLP61 is therefore inconsistent with Framework paragraph 74. The approach to urban greenspace, local greenspace and green infrastructure needs to be refined and strengthened, particularly in the Batley and Spen and Dewsbury and Mirfield areas. Additional areas of local greenspace and green infrastructure, as the stronger designations, need to be identified in this area to ensure that greenspace in all its forms is retained, due to its particular significance in these areas in relation to health and environmental quality. Again the approach is skewed to the disadvantage of areas that are already disadvantaged in this respect. The need to amend the approach also applies to the sections on local greenspace and strategic green infrastructure areas. It is vital that a more robust approach is taken to the retention of greenspace in already disadvantaged areas of the district, if the plan is to reduce health inequalities and carry any credibility with residents in this part of the district. Exception 'e' of Policy PLP 61 weakens the protective strength of the policy by allowing proposals which result in a substantial community benefit that clearly outweighs the harm resulting from the loss of the existing green space. The policy does not clearly define the parameters of this exception.
Vision - 4.2	SP746	Support the vision
Vision for Kirklees	SP532, SP664, SP587, SP592, SP502, SP70, SP422, SP572, SP117, SP468, SP694	5 x support. The current skewed and perverse overall approach of the plan is not properly justified as the most appropriate strategy and is not supported by evidence. The vision is laudable but the plan as it stands contradicts this. The vision is rather long and verbose. It is difficult to understand, remember, support and 'flow through' into more detailed aspects of the plan. Vision should be a simple clear vision or single strap-line. There is often a huge gulf between high level statements in vision and interpretation of them elsewhere in the plan. There is a difference between strategy and implementation. Current land allocations fail to meet the requirements of the proposed policies in the Council's policies and strategies document. Too little throughout the document within 'Delivery and Implementation' sections about how the Council/Planning Department will monitor and control their policies and developers' activities. Policies too loosely worded and open to interpretation to deliver stated visions and objectives for the area. The Local Plan's proposed plan period should be increased to 2033/2034 to enable a 15 year time horizon from the proposed adoption date of 2018. An additional 10 years' worth of safeguarded land should be designated in order to provide a total 25 year period from adoption to ensure green belt permanency.

Summary of Main Issues- Allocations and Designations

Paragraph/Site	Representation IDs	Summary of Main Issues
1.1	AD939, AD3155	Coal Authority - Supports allocations in the Plan. National Grid has no comments to make on the the Plan.
1.2	AD284	Insufficient local infrastructure to support the proposed level of development.
1.3	AD272	Too much development is proposed in HD3 area of Huddersfield. There is insufficient infrastructure to support it.
1.4	AD2061	The scale and distribution of development is unsustainable. Green belt should be protected. Insufficient infrastructure to support proposed level of development. Lack of objectively assessed needs and assessment of impact of development. Inadequate appraisal of safeguarded land. Development proposed in areas of flood risk. Impact upon natural environment and heritage assets. Plan is unrealistic and undeleiverable.
1.8	AD3689	Lack of infrastructure to support development including employment, education, access to health. Impact of noise and air pollution is not addressed. Safe, effective transport networks are not guaranteed. Plan will degrade the character and qulaity of the landscape.
2.1	AD2936, AD3683, AD3684, AD2350	Distribution of employment is unsustainable. The focus of employment is in Huddersfield with a loss of opportunities in south Kirklees which has an increase in housing. Existing employment sites in the Holme Valley should be protected. Environment Agency - support reference to no development in flood zones.
4.1	AD3619, AD1357, AD2351	Environment Agency support reference to no development in flood zones. The plan should contain explicit reference to student housing needs and the priority for affordable, high quality stock in the town centre. Priority of provision of affordable starter homes for graduates and empty nesters to trade down. Include Marsh Mills Business Centre, Luck lane, Huddersfield as a housing allocation in the Local Plan.
5.1	AD2353	Environment Agency support reference to no development in flood zones.
6.1	AD3620	There should be explicit reference to and consideration of student housing needs with a preference for affordable but high quality stock in town centre accommodation close to campus. 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.
6.15	AD30	Use vacant upper floors.
6.3	AD1435	Division into primary and secondary frontages misunderstands the nature of change taking place in small towns. Successful towns such as Holmfirth have new types of uses filling the older shops including hairdressers, cafes which would by definition be excluded from the Local Plan primary frontages. Primary shopping frontages are at the expense of the other frontages which are defined as secondary which may impact on the retail offer and property values. Many larger retails premises are outside the primary shopping frontage.
6.8	AD29	Use vacant upper floors throughout the town centre

Paragraph/Site	Representation IDs	Summary of Main Issues
7.1	AD3622	A significant number of students live at home and commute to campus. Transport link to campus a key concern. Need to consider public transport to campus, parking provision, electric vehicle charging points. Walking and cycling: cycle travel in town centre difficult, and can feel unsafe. Ring road and main routes bisect and disconnect campus from the town. Consider how traffic could be reduced to better connect campus to town and encourage sustainable transport choices.
10.1	AD2354	We are satisfied that those sites identified to be partially located within flood zones 2 and/or 3 stipulate that no development will take place within the flood zones.
11.1	AD2355	We are satisfied that those sites identified to be partially located within flood zones 2 and/or 3 stipulate that no development will take place within the flood zones.
12.1	AD3621	There should be explicit reference to and consideration of student housing needs with a preference for affordable but high quality stock in town centre accommodation close to campus. 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.
12.2	AD2356	We are satisfied that those sites identified to be partially located within flood zones 2 and/or 3 stipulate that no development will take place within the flood zones
Ancient Monuments - SM00475	AD72, AD214	SM00475 is not the accurate area as marked on the plan for this Historic monument. SM00475 is described on the Historic England website as List Entry Number 1005786, this was re-assessed on 31st March 2016 and the correct area is on the website.
Archaeological Sites - AS906/2, AS97/2.	AD2519	Support the Councils Allocation for Archaeological Sites at AS906/2, AS97/2.
Archaeological Sites - Table Batley & Spen	AD336	Additional text should be included with the list of archaeological sites to indicate that the list is not exhaustive but contains those sites believed to be of such potential significant regional archaeological importance as to warrant preservation. It would be helpful to add that details of these sites & all other known archaeological sites are held in the West Yorkshire Historic Environment Record which is maintained by the West Yorkshire Archaeology Advisory Service (WYAAS) and is available for consultation.
Conservation Areas - CA57, CA30	AD2520	We support the Councils boundaries of the Conservation areas in Birstall and East Bierley.
E1831	AD582, AD506, AD955, AD1178, AD1396, AD696, AD499, AD94, AD1985, AD1770, AD1997, AD2465	The proposal will not achieve the economic, environmental and social objectives of sustainable development. There is insufficient road, health and education infrastructure to support this development. Whitechapel Road is very busy and with the enlarged Whitcliffe Mount School due to open will exacerbate local road issues. Building industrial units on this land would potentially cause noise, light, odour and waste nuisance to local residents and the wider community.
E1832c	AD798, AD925, AD532, AD531, AD641, AD3606, AD3697, AD1771, AD1752, AD1742, AD2367, AD2304, AD2364	See Main Report - Cooper Bridge
E1837	AD3695	Support for reference to Scheduled Monument and requirement for a Heritage Impact Assessment.

Paragraph/Site	Representation IDs	Summary of Main Issues
E1866	AD3829	Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to this site.
E1871	AD1131	Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew.
E1873	AD512, AD2521	The Local Plan is unsound by reason of conflict with national policy and the protection of heritage. The proposal will impact upon Nunn Wood, Kirklees Hall and the historic value of the area as described by the Brontes. Support for the employment allocation.
E1879	AD3696	Support for recognition of site's proximity to Listed Building.
E1985a	AD375, AD2292	Support the inclusion of the safeguarded land for the Chain Bar improvement scheme on the policy maps which appears to reflect the scheme land requirement identified by Highways England. Support for the allocation from the site promoter.
E2333a	AD719, AD757, AD992, AD751, AD654, AD635, AD439, AD1194, AD1369, AD1419, AD1406, AD1179, AD1429, AD355, AD208, AD234, AD111, AD3102, AD3586, AD3698, AD1986, AD2012, AD1317, AD1772, AD1452	See Main Report - Land to the east of, Park Mill, Wakefield Road, Clayton West, Huddersfield
GTTS1957	AD1030	This site is more suitable than GTTS2487 to accommodate housing need for travellers.
GTTS2487	AD340, AD634, AD1024, AD1768, AD2535, AD1965, AD2063	Inefficient & unnecessary use of land. Inadequate site investigations - potential safety, contamination and drainage issues. There is little need for traveller accommodation within Birstall; a site already exists 3 miles away in Leeds. Unclear site allocation methodology. Rejected sites should be reconsidered. Other sites score more positively in the Sustainability Appraisal and would be more appropriate allocations for traveller sites. Site is located remotely from existing settlements and does not provide good access to schools, healthcare, shops & other community facilities. It is not suitable for residential use. Perceived risks to local businesses and employment areas.
H101	AD3818, AD3714	Site is located in close proximity to an Ancient Scheduled Monument. Loss of this area and its development may impact on its setting. The proposed allocation site is within two of the fields which are leased from Kirklees Council, as part of our Stirley Community Farm holding.
H102	AD946, AD965, AD961, AD13, AD3704, AD1739, AD2093	Lack of local road, health and education infrastructure. Local wildlife will be affected. Brownfield sites should be allocated first. Jobs are needed in Netherton and improvements to local centre. Site is located opposite a Scheduled Ancient Monument, development may affect its setting. Support for allocation of this site from the site promoter.
H11	AD632, AD448, AD2526, AD2236	Development of the site is not appropriate due to inadequate access from already congested road. This is the third development with access off Field Head Lane – at capacity. In addition, cumulative impact of traffic and traffic congestion at Birstall. Birstall is meant to have a village feel and cannot support more development. Protect as green belt.
H116	AD3740	Risk of harm to setting of conservation area. Request for further assessment.

Paragraph/Site	Representation IDs	Summary of Main Issues
H120	AD1451, AD746, AD2906, AD3764, AD1329, AD1343, AD1657, AD1706, AD1708, AD1675, AD1753, AD1683, AD1712, AD2511	The barn at 18 Manor Road is a Grade II Listed Building. This site lies within the boundary of the Farnley Tyas Conservation Area. Impact on local infrastructure - schools, public transport, local shops and facilities. Impact on highways, due to increased traffic. Loss of green belt - exceptional circumstances do not exist. Seven representations in support of this allocation.
H121	AD1749	Lack of adequate road, health and education infrastructure.
H129	AD1182, AD1795	Concern re. impact on openness of landscape. Support for site includes evidence on 'deliverability' and 'suitability'.
H130	AD3757	Risk to setting of conservation area & heritage assets - request for further assessment.
H138	AD1290, AD1036, AD975, AD697, AD661, AD630, AD727, AD692, AD787, AD452, AD461, AD1291, AD1293, AD1232, AD1204, AD1148, AD1132, AD1203, AD1039, AD301, AD449, AD364, AD334, AD363, AD1808, AD1446, AD1397, AD1829, AD2534, AD2510, AD2147, AD2165, AD2345, AD2361	The site is not justified on the grounds of: Two accesses required. Cumulative transport impacts, air and noise pollution. Concerns about nearby chemical factory implications for environmental protection. Noise and odour. Traffic congestion around Mill Street traffic lights and land to Mill Street, highway safety/pedestrian safety, highway capacity – roads have to cope with four schools. Roads cannot cope with additional 500 vehicles in the area. Inadequate school places and health, impact on protected woodland and wildlife. Overdevelopment and impact on village. High risk coal referral area. Flood risk and poor drainage infrastructure. There are several natural springs on site. Water culverts. Loss of football field, trees and hedges. Protect green spaces/protect for sport – last area of green space in Birstall. Failure of previous applications calls into question feasibility of the site
H1647	AD3631	Loss of green belt. Insufficient evidence to demonstrate mitigation accompanying H138 will secure sustainable development. Allocation is contrary to SA objective 8 as would result in a loss of a well-used football pitch. Net loss of recreation space. Allocation contrary to NPPF paragraph 74 as it does not demonstrate that the existing playing fields on land to south of Mill would be replaced by equivalent or better provision. Allocation is contrary to SAO4 and NPPF paragraph 4 promoting sustainable transport. Contrary to NPPF paragraph 157. Plans should contain clear strategy. Contrary to NPPF paragraph 182 does not meet the tests of soundness. UDP highlighted problems around Junction 29. Lower Blacup/Field Head Farm performs better than this site. Promotion of unsustainable sites that contribute to green belt or poor performance of SA are not justified. Birstall already has sufficient housing stock for sale and houses should be built where they are required with infrastructure to support them. No demand for homes as 93 for sale in Birstall. Plenty of empty homes to develop instead. There are areas in Batley and Huddersfield where derelict buildings should be used
H1656	AD1224, AD3627	Develop brownfield sites. Loss of green spaces. Lack of time for local residents to make objections. People unaware that they have to object for a third time.
H1657	AD1223, AD3628	No evidence that Kirklees has consulted with Calderdale Council. Proposed site is at odds with Councils own objectives. This open space used for outdoor recreation purposes and would destroy the Green belt. Site has a number of natural habitats. Pollution levels will increase in the area and local infrastructure will not cope. Use brownfield sites first. The site will contribute to localised flooding in the area.
H1679	AD1080, AD1134, AD1098, AD2916, AD3635, AD3824, AD3613, AD3700, AD1793	Development could harm setting of Listed Buildings. Inadequate road, education and health infrastructure in the area. Attach this site to neighbouring site option to provide for a defensible green belt boundary. Consider brownfield sites first.

Paragraph/Site	Representation IDs	Summary of Main Issues
H1694	AD3713, AD1746	Site located adjacent to listed buildings. Site may impact on the setting of the listed building. There is inadequate road, health and education infrastructure to support the development.
H17	AD235	Site should be retained as an employment site, rather than allocating adjacent green belt land for employment. Inconsistent application of green belt & transport policies. Tourism hub not considered.
H172	AD3579, AD2525	Site should be retained for business or light industry. Increased amount of traffic in the village, on a weekend and evening on street parking is very bad.
H1728a	AD381, AD3721	Site is located in close proximity to Castle Hill. Development may affect the setting of this Ancient Scheduled Monument. Development of this site will need to be phased in line with proposed Policy PLP4 that requires investment in infrastructure and new development to be coordinated to avoid detrimental impact on the motorway.
H173	AD2532	Proposal will add to road congestion and air quality issues in the area.
H1747	AD1197, AD981, AD781, AD796, AD886, AD947, AD694, AD714, AD736, AD602, AD659, AD1652, AD1218, AD1022, AD1466, AD263, AD349, AD369, AD96, AD59, AD103, AD221, AD359, AD62, AD2946, AD3577, AD3828, AD3625, AD3454, AD3702, AD3574, AD1799, AD1792, AD1813, AD1840, AD1468, AD1686, AD1654, AD1482, AD2197	See Main Report - Bradley Park
H1754	AD703	Support for cooperation. Request for cooperation to continue.
H1774	AD3766	The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of Thurstonland Conservation Area.
H1776	AD12	Support for allocation of site.
H178	AD1653	Concerns re. placement of green belt boundary.
H1783	AD669, AD206	Support for the housing allocation.
H1784	AD755, AD543, AD207	Proposal is unsustainable since need/benefits do not outweigh adverse impacts. Loss of amenity, loss of green belt, impact on public rights of way. Impacts on ecology and biodiversity. UK BAP Priority Habitat. Inadequate transport infrastructure. Inadequate community infrastructure (esp. schools & healthcare). Inadequate utilities and sewerage. 'High coal risk' location. Increased flood risk from surface water run-off. Urbanisation of rural community.
H1811	AD3716	Site is adjacent listed buildings. Development may be detrimental to their setting.
H193	AD2528	This would extend development into the Green Belt for no logical reason and would need to be served by an access road which would join Dewsbury Road on the point of a busy junction.
H1935	AD3717	Site is adjacent to listed buildings. Development of the site may impact on setting of these buildings.
H1938	AD3726	Site is within a Conservation Area. Support for inclusion of reference in the constraints section.

Paragraph/Site	Representation IDs	Summary of Main Issues
H198	AD3739	Thornbush Farm to the south of this site is a listed building. Development of this site may affect its setting.
H199	AD3743	Risk of harm to setting of heritage assets. Request for further assessment.
H200	AD3831	Disagreement with screening assessment in table 4.4 of HRA report. Concerns re.potential loss of habitat for golden plover & curlew.
H201	AD1747	Lack of adequate road, health and education infrastructure.
H202	AD3707, AD1748	The site is adjacent to a listed building. Development may affect the setting of this listed building. There is a lack of local road, health and education infrastructure.
H203	AD3727, AD2524	Site adjoins the listed church. Support for the reference for the requirement for a Heritage Impact Assessment.
H2089	AD1067, AD373, AD732, AD429, AD412, AD1037, AD21, AD223, AD356, AD523, AD338, AD352, AD678, AD266, AD268, AD522, AD271, AD23, AD3839, AD2961, AD3838, AD3317, AD3523, AD3814, AD1982, AD1815, AD1789, AD1688, AD1842, AD1484	Consultation summary document implies that H2089 is in Dewsbury, rather than Mirfield; local community has been misled.Council hasn't made changes in response to previous consultation.Green belt should be retained to prevent merging of Mirfield, Ravensthorpe & Thornhill Lees. Also concerns re. sprawl and encroachment. Lack of exceptional circumstances to justify removal of area from green belt.Landscape Character Assessment is 'unsuitable' and should be reviewed.Proposal is not a 'natural extension' to the urban area. Shape of proposed allocation should be reconsidered. Failure to fully consider all brownfield sites. Lack of evidence as to how the proposal will lead to the regeneration of Dewsbury.Environmental impact, including increased pollution. Impact on nature/wildlife/biodiversity. Area is a UK BAP Priority Habitat. Proximity to Local Wildlife Site. SGI2110 is 'overwashed' by H2089 and should be removed from the housing allocation to improve clarity. Lady Wood should be clearly identified.Impact on highway network, both within and outside of Kirklees; increase in traffic congestion. Lack of detail re. proposed improvements to transport infrastructure.Plan should specifically require improvements to Dewsbury Railway Station.Lack of sufficient community infrastructure. Support for requirement to provide new schools.Suggestion to include District & Local Centres as part of the allocation; amend allocation to 'mixed use'.Unacceptable reduction in green space within the Mirfield Ward.Impact on leisure & recreation (walking, horse-riding, cycling etc.).Flood risk, particularly on Steanard Lane. Part of site lies within high risk coal referral area. Impact on future residents from existing adjacent waste site.Timescale for delivery is 'very ambitious'.Support for allocation of site.
H213	AD3709	Impact of allocation upon heritage assets; need for further assessment.
H2148	AD700	Support for cooperation. Request for cooperation to continue.
H215	AD3632, AD3706	Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area and to the Listed Building, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to their significance of these designated heritage assets. Concerns have not been discussed with adjoining Calderdale Council or local residents. The allocation does not comply with the plans Vision and Objectives. All available brownfield sites and other alternatives must be used prior to the destruction of green belt land. It will destroy the Green belt. Open spaces are used for social outdoor purposes and contribute to the semi-rural ambience of parts of Fixby and Birkby. Impact on wildlife. Impact on local infrastructure - doctors, schools, roads. High pollution levels that already exist will be made worse. Flooding for buildings and roads is a problem now this will only get worse.

Paragraph/Site	Representation IDs	Summary of Main Issues
H2159	AD793, AD638, AD1811, AD1836	The area has at least three deep mine shafts which could cause subsidence. These shafts are also the home to many wildlife including bats. The land is contaminated with spoil from the pit which stood on the land. The land and the surrounding area support a large amount of local wildlife. The local schools are fully subscribed and it is difficult for many parents to get a place in them. Headlands School especially has major problems with traffic and parking at the start and the end of the day. The access to this proposed site is through streets which are already congested. The added burden of extra traffic would be dangerous. Both Darley Road and Lower Hall Close are not suitable for the use of large vehicles. They're both narrow residential roads where children play and residents park their cars. Darley Road is very steep in places and there is a great difference in the height of it and the proposed development. Lower Hall Close has a right angled bend and also very narrow roads unsuitable for large vehicles. At the end of Darley Road there is a public footpath from Halifax Road to Bradford Road. During periods of high rainfall large volumes of water run down Darley Road and Denby Close adding to the water in the River Spen. Water also runs off the designated area but much is soaked up by the vegetation. The Lower Blacup Farm site (H366) performs better than this site. The promotion of unsustainable sites that contribute to Green Belt purposes or poor performance in the SA are not justified in preference to release of this site. The Fieldhead Farm site performs better than this site. The promotion of unsustainable sites that contribute to Green Belt purposes or poor performance in the SA are not justified in preference to release of this site.
H218	AD3732, AD2529	Site is adjacent to a listed building. Support reference to this in the constraints section of the report. Development of this land will significantly intensify housing in this area and add to the already major highway congestion issues at Birkenshaw roundabout and on the A58. Proposal will have an impact on air quality in the area.
H221	AD3712	Impact of allocation upon heritage assets; need for further assessment.
H222	AD765, AD1082, AD737, AD708, AD1987	Loss of greenfield land. Extra pressure on existing infrastructure. Risk of flooding. Impact on rural character. Support for cooperation. Request for cooperation to continue. Support for allocation of site.
H224	AD451, AD2527	Traffic congestion and Parking in Bridge Street. Drainage. Struggling local provision, doctors, schools. Impact on wildlife. Coal mining area. Scale of development and impact of 250 on area. Negative impact on already stretched part of Birstall. Excessive local population.
H233	AD673, AD498, AD539, AD655, AD1381, AD1100, AD317, AD197, AD43, AD310, AD308, AD3279, AD2366	Lack of or inadequate public consultation. Inadequate community infrastructure to cope with proposed growth. Inadequate highways infrastructure & access/road safety issues. Site should be retained as green belt. No 'special circumstances' to justify removal from green belt. Brownfield land should be developed first. Impact of development on skyline & character. Urbanisation of rural community. Increased risk of flooding. Potential issues with 'overbearing' and loss of privacy. Support for allocation of site includes clarification that access issues can be resolved.

Paragraph/Site	Representation IDs	Summary of Main Issues
H2537	AD623	Elderly residents who do not have access to the internet are unaware of the proposal, as are many residents who are directly affected. The green belt should be retained on this site. There are other sites in Gomersal which should be used. The schools in Gomersal are full to capacity and although the plan mentions road improvements there is no evidence of how the already over-crowded roads around Cliffe Lane will cope with the extra volume of traffic. Development would impact on the adjoining scout camp and on local wildlife.
H2585	AD443, AD3763	Support for this site allocation. Access and highway constraints. The development of the mill pond would be contrary to NPPF .
H2586	AD3752	Support for inclusion of requirement for heritage impact assessment.
H2594a	AD1081, AD382, AD3718	Site is located in close proximity to listed buildings. Loss of this area and its development may impact on its setting. Lack of local road, health and education infrastructure to support this development.
H2627	AD1351	Scale of proposed development is disproportionate to the size of the village. Local Plan is unsound in relation to the evidence base. Regarding this, there is support for the detailed representations being made by Scholes Future Group. The plan is unsound as it fails to adequately address NPPF paragraphs 17, 28, 30, 34, 38, 72, 76, 77, 55, 109, 157 therein. Regarding this, there is support for the detailed representations being made by Scholes Future Group. H297, H597, SL3359 should be changed to Local Green Space.
H2646	AD3736	Support for requirement for heritage impact assessment. Constraints section needs to identify that site is close to a listed building.
H2649	AD3723	Impact of allocation upon heritage assets; need for further assessment.
H2652	AD469	Support for allocation of site.
H2667	AD805, AD473, AD1350, AD3749, AD3827, AD1400, AD1733	The communication of your proposals has been lacking, announced discreetly to avoid objections. The online process to object is too complicated and lengthy. The site is not justified on the grounds of: The land should be used for recreation, such as Sports Clubs for weekend and evening use, other areas of Kirklees have far superior facilities, the road infrastructure could not cope with extra traffic at peak times when traffic is already backed up along Oxford Road to Hilltop lights, the schools are already at fully capacity and an influx of families would mean a new school had to be built, there are local listed buildings which would look out of place in a residential area and are far more appearing with rural land around them, effect on value of property, adverse impact on residential amenity due to noise and loss of views, over development of 48 houses on a small site, adverse impact on local highways and infrastructure, traffic issues at Hilltop, highway safety - junction onto Oxford Road near to Gomersal Primary School will be a danger to young children and families walking to school, out of character with the area and impact on a listed building, cumulative traffic impacts of H591, H489, H2667, H2627 and sites with planning permission in the Gomersal area. Pollution from additional traffic would be dangerous and impacts on wildlife. 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.

Paragraph/Site	Representation IDs	Summary of Main Issues
H2684a	AD573, AD258, AD108, AD1383, AD748, AD1062, AD1083, AD610, AD767, AD676, AD666, AD682, AD724, AD444, AD383, AD520, AD417, AD740, AD687, AD397, AD432, AD477, AD509, AD530, AD545, AD1248, AD1125, AD1303, AD1150, AD1138, AD1147, AD415, AD332, AD455, AD472, AD220, AD422, AD466, AD401, AD502, AD483, AD230, AD202, AD3264, AD3267, AD2913, AD3810, AD3820, AD3298, AD3610, AD1796, AD1958, AD1916, AD1684, AD1759, AD2251, AD2344	Lack of infrastructure to support development including employment, education, access to health. Impact of noise and air pollution is not addressed. Safe, effective transport networks are not guaranteed. Plan will degrade the character and quality of the area. Lack of consultation around the re-configuration of the site option. Council previously rejected site options and then accepted them again.
H269	AD721, AD3735	Support for inclusion of requirement for heritage impact assessment. Support for cooperation. Request for cooperation to continue.
H2730a	AD574, AD112, AD229, AD750, AD1063, AD1084, AD611, AD792, AD1384, AD766, AD667, AD675, AD680, AD518, AD726, AD445, AD384, AD420, AD742, AD689, AD433, AD478, AD546, AD578, AD398, AD529, AD688, AD510, AD526, AD1249, AD1127, AD1305, AD1151, AD1139, AD1146, AD416, AD471, AD333, AD456, AD474, AD421, AD261, AD402, AD503, AD100, AD183, AD485, AD107, AD200, AD3265, AD3268, AD3259, AD2912, AD3811, AD3821, AD3299, AD3609, AD3699, AD1959, AD1756, AD2333	Lack of infrastructure to support development including employment, education, access to health. Impact of noise and air pollution is not addressed. Safe, effective transport networks are not guaranteed. Plan will degrade the character and quality of the area. Lack of consultation around the re-configuration of the site option. Council previously rejected site options and then accepted them again. Impact on wildlife and protected species. Access to the site has not been secured through legal agreements
H288a	AD392, AD1878, AD2346, AD1289, AD1252, AD985, AD9, AD2969, AD2935, AD3559, AD3563, AD3593, AD3758, AD3047, AD3373, AD3569, AD3390, AD3399, AD3414, AD3386, AD3411, AD3429, AD3432, AD3391, AD3426, AD3396, AD3423, AD3420, AD3489, AD3492, AD3403, AD3402, AD3408, AD3417, AD3465, AD3462, AD3529, AD3573, AD3535, AD3549, AD3552, AD3546, AD3651, AD3542, AD3532, AD3841, AD3646, AD3836, AD3666, AD3566, AD3665, AD3555, AD3480, AD3472, AD3486, AD3435, AD3483, AD3327, AD3448, AD3477, AD3456, AD3452, AD3438, AD3445, AD3442, AD3468, AD3459, AD3346, AD3499, AD3508, AD3505, AD3502, AD3496, AD3514, AD3511, AD3519, AD3526, AD3522, AD3379, AD3364, AD3355, AD3370, AD3352, AD3349, AD3376, AD3343, AD3337, AD3369, AD3358, AD3340, AD3361, AD3539, AD1791, AD1989, AD1263, AD1440, AD1441, AD1266, AD1269, AD1660, AD1665, AD1672, AD2499, AD2347, AD2363	Not in a sustainable location. Represents a disproportionate increase in the size of the village and does not provide access to a range of transport choices and local services. Lack of local facilities (local shops, amenities, healthcare and services) and reliance on the private car. Impact on SPA/SAC/SSSI not fully taken into account. Impact on wildlife and protected species. Impact on DEFRA Priority Habitats. Potential impact on bats using Moreton Wood. Impact on Bird Diversity Areas which are identified as under threat.
H292	AD399, AD423, AD1373, AD935, AD1069, AD1315, AD141, AD3708, AD1998, AD1353, AD1375, AD1716, AD1718, AD1751	The site lies adjacent to listed building and within a conservation area. The site may impact upon its setting. Congestion and lack of local infrastructure is already a problem in this area. Hollyfield Avenue is very narrow with parked cars, more houses here would be detrimental to highway safety. There are considerable drainage issues related to the site which would be at risk of flooding.

Paragraph/Site	Representation IDs	Summary of Main Issues
H294	AD3759	This site adjoins the boundary of the Netherthong/Deanhouse. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of this area.
H297	AD1518, AD1517, AD1057, AD642, AD657, AD515, AD475, AD3107, AD2735, AD3159, AD3168, AD2695, AD2132, AD2168, AD1436, AD1576, AD1543, AD1525, AD1538, AD1562, AD1456, AD1546, AD1581, AD1559, AD1553, AD1566, AD1565, AD1550, AD1532, AD1285, AD1536, AD1004, AD1256, AD1374, AD177, AD193, AD3103, AD3115, AD3124, AD3162, AD3134, AD3131, AD3138, AD3096, AD3128, AD3072, AD3075, AD2981, AD3068, AD3151, AD2951, AD2847, AD3143, AD3202, AD3156, AD3121, AD3080, AD3046, AD2868, AD2871, AD2874, AD2986, AD3028, AD3032, AD2989, AD3165, AD3062, AD3212, AD2850, AD2974, AD2889, AD2939, AD3145, AD2698, AD1825, AD1861, AD1921, AD3216, AD3220, AD3224, AD3118, AD2965, AD3099, AD3093, AD3090, AD3111, AD3086, AD3083, AD3238, AD3194, AD3188, AD3231, AD3003, AD3013, AD2668, AD2943, AD2665, AD2726, AD2729, AD2732, AD2744, AD2686, AD2723, AD2711, AD2892, AD2886, AD2856, AD2844, AD2898, AD2747, AD2681, AD2714, AD2783, AD2768, AD2777, AD2807, AD2717, AD2774, AD2798, AD2674, AD2689, AD2705, AD2771, AD2708, AD2808, AD2701, AD2832, AD2816, AD2671, AD2753, AD2801, AD2750, AD3022, AD3007, AD3018, AD3059, AD2977, AD2990, AD2978, AD2792, AD2998, AD3056, AD3041, AD3001, AD3051, AD2859, AD3016, AD2995, AD2957, AD2795, AD3010, AD3036, AD2960, AD3025, AD2954, AD2865, AD2901, AD2838, AD2880, AD2877, AD2822, AD2862, AD2895, AD2853, AD2947, AD2841, AD2883, AD2762, AD2825, AD2765, AD2835, AD2804, AD2819, AD2780, AD2811, AD2789, AD2786, AD2829, AD3230, AD3846, AD3639, AD3671, AD3672, AD3173, AD3225, AD3210, AD3182, AD3193, AD3176, AD3171, AD3241, AD3476, AD3207, AD3181, AD3187, AD3201, AD3597, AD2759, AD1849, AD1881, AD1885, AD1897, AD1830, AD1856, AD1843, AD1900, AD1864, AD1930, AD1911, AD1852, AD2073, AD1892, AD1936, AD1877, AD1891, AD1867, AD1846, AD1907, AD1914, AD2089, AD2070, AD1904, AD1803, AD1915, AD1939, AD1924, AD2151, AD2161, AD2113, AD2148,	Previous planning appeal decision in 1996 on part of H597 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. 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. The north-east corner of H597 susceptible to flooding. 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). Potential for impact on nearby listed building. 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. More brownfield sites should be included before using green belt land.Delete H597 and designate H297, H597 and SL3359 as Local Green Space

Paragraph/Site	Representation IDs	Summary of Main Issues
	AD2081, AD1931, AD2107, AD1927, AD1872, AD2099, AD2085, AD1828, AD2127, AD1368, AD1467, AD2564, AD2642, AD2738, AD2280, AD2190, AD1695, AD1690, AD1582, AD1555, AD1529, AD1571, AD1673, AD1575, AD2493, AD2540, AD2449, AD2322, AD2319, AD2466, AD2445, AD2429, AD2425, AD2435, AD2418, AD2472, AD2467, AD2487, AD2475, AD2441, AD2641, AD2552, AD2478, AD2544, AD2480, AD2547, AD2453, AD2462, AD2457, AD2316, AD2490, AD2484, AD2428, AD2421, AD2444, AD2438, AD2555, AD2395, AD2385, AD2623, AD2583, AD2587, AD2659, AD2604, AD2612, AD2634, AD2579, AD2631, AD2654, AD2586, AD2501, AD2647, AD2505, AD2629, AD2558, AD2565, AD2570, AD2662, AD2602, AD2653, AD2648, AD2677, AD2720, AD2692, AD2756, AD2595, AD2741, AD2678, AD2618, AD2615, AD2561, AD2609, AD2626, AD2599, AD2576, AD2638, AD2195, AD2307, AD2124, AD2114, AD2102, AD2110, AD2572, AD2128, AD2265, AD2261, AD2201, AD2158, AD2310, AD2179, AD2276, AD2184, AD2140, AD2144, AD2154, AD2206, AD2164, AD2090, AD2136, AD2169, AD2079, AD2272, AD2178, AD2284, AD2311, AD2401, AD2404, AD2287, AD2413, AD2380, AD2290, AD2368, AD2592, AD2538, AD2303, AD2187, AD2294, AD2269, AD2210, AD2412, AD2297, AD2374, AD2300, AD2258, AD2383, AD2377, AD2389, AD2392, AD2325, AD2371, AD2407, AD2396	
H307	AD702, AD2240	Previous concerns regarding school place provision in relation to this site have been addressed through co-operation and co-operation should continue to share data on school place planning. It is essential that as planning applications are submitted on this allocation and Wakefield Council is consulted so possible impacts on education provision can be considered and mitigation suggested, if necessary. Support for the allocation from the site promoter.
H31	AD1382, AD1061, AD1078, AD609, AD519, AD665, AD619, AD674, AD723, AD396, AD442, AD426, AD739, AD685, AD431, AD476, AD527, AD507, AD1247, AD1128, AD1300, AD1149, AD1143, AD1137, AD414, AD465, AD331, AD453, AD480, AD259, AD500, AD400, AD486, AD231, AD201, AD3269, AD3263, AD2914, AD3809, AD3822, AD3611, AD1790, AD1957, AD1908, AD1760, AD2331	Lack of local infrastructure to support development including transport, employment, education, access to health. Impact of noise and air pollution is not addressed. Safe, effective transport networks are not guaranteed. Will add to congestion on Penistone Road. Plan will degrade the character and quality of the area. Impact of house values.

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H313	AD1066, AD756, AD1064, AD1065, AD1077, AD887, AD292, AD811, AD952, AD950, AD883, AD860, AD1241, AD176, AD3326, AD2911, AD3767, AD2072	Loss of green belt land and the character of the village. Impact on local infrastructure - schools and medical services. Impact on highways/parking. Impact on drainage. Impact on the Conservation Area. Develop brownfield sites first. Could result in urban sprawl and villages merging together. Two representations in support for this site allocation, one from the site promoter.
H323	AD7, AD8	Objection to building on this area of land due to the negative impact it will have on: wildlife, existing local population, air pollution, existing traffic congestion, local schools and health service provision, health and wellbeing.
H3325a	AD763, AD717, AD996, AD385, AD1370, AD1420, AD1407, AD3277, AD3139, AD3587, AD2014, AD1454	Inadequate community consultation. Site allocation methodology flawed. Loss of local employment land. Site adjoins an area of green belt which is proposed for release. Insufficient justification for housing allocation. Query housing & employment OANs. Unsustainable location. Alternatives have not been properly evaluated. Lack of community infrastructure. Cross-boundary issues have not been fully evaluated. Cumulative effects of this allocation and other local developments is disproportionate to size of village. Sprawl. Cumulative effects on highways network. Increased traffic congestion. Impacts on natural beauty and heritage of area. Impacts on wildlife. Flood plain. Support for allocation of site.
H3379	AD3741	Concern re. impact on heritage assets - request for further assessment.
H339	AD2921	Loss of an existing employment site - which would lead to the loss of local jobs.
H3395	AD27, AD3750	Roads are congested. Impacts on wildlife habitats and established dog-walking route. Risk of harm to setting of conservation area - request for further assessment.
H3405	AD3719	Site includes a listed building. Support for inclusion in constraints section and the requirement for a Heritage Impact Assessment.
H342	AD28, AD3832	Concerns re. increased congestion and road safety issues. Disagreement with screening assessment in table 4.4 of HRA report - concerns re. potential loss of habitat for golden plover & curlew.
H343	AD3753, AD3833	Disagreement with screening assessment in table 4.4 of HRA report - concerns re. potential loss of habitat for golden plover & curlew. Risk of impact upon setting of conservation area - request for further assessment.
H351	AD797, AD358, AD101, AD3701, AD1812, AD1804, AD1685, AD1480, AD1839	Site may impact on setting of nearby listed buildings. Surface water drainage is a problem in this area. Access points proposed to the site and the adjoining site will be a problem in terms of highway safety. The site is unsustainable as there are no local services/facilities nearby. Lack of local health and education infrastructure.
H356	AD3834, AD3715	Impact of allocation upon heritage assets; need for further assessment. Disagreement with screening assessments HRA report.

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H358	AD571, AD1319, AD809, AD605, AD875, AD953, AD783, AD782, AD744, AD621, AD707, AD454, AD425, AD1278, AD1310, AD1051, AD1299, AD999, AD971, AD968, AD990, AD993, AD970, AD983, AD1060, AD989, AD967, AD969, AD807, AD864, AD867, AD879, AD881, AD933, AD1026, AD1070, AD1244, AD1210, AD18, AD165, AD287, AD226, AD264, AD86, AD90, AD89, AD97, AD91, AD75, AD78, AD182, AD163, AD20, AD3320, AD3812, AD1988, AD1992, AD1404, AD1242, AD1246, AD1262, AD1714, AD1455, AD2183	Inadequate consultation process, lack of community involvement. Questions re. cross-boundary consultation.Lack of evidence to support proposal. Sustainability Appraisal methodology is flawed. Inadequate community infrastructure, esp. schools & doctors.Inadequate road infrastructure: congestion, parking constraints, road safety, site access constraints. Limited public transport. Access difficulties for emergency services. Increased air pollution.Low water pressure & inadequate drainage. Poor internet speeds. Risk of subsidence due to historic mining. Increased flood risk.Impact on green space at Millenium Green. Impact on character of village. Obstruction of views. 'Overlooking'/intrusion. Loss of recreational land. Impacts on adjacent cricket pitch & playground. Public right of way across land. Allocation as green space or allotments would be preferable. Impact on wildlife/ecology. Brownfield sites (eg derelict mills) should be used first.Potential deliverability issues due to 'ransom strip'. Construction process will be disruptive.Support for cooperation. Request for cooperation to continue.Support for allocation of site.
H367	AD699	Support. Request for cooperation to continue.
H39a	AD716, AD304	Increased traffic congestion. Local infrastructure inadequate for increased population. Increased flood risk.
H40	AD758, AD648, AD470, AD664, AD446, AD482, AD3747	Concerns re. harm to setting of historic assets. Urban sprawl and merging of settlements. Extra pressure on road and rail infrastructure; increased traffic congestion. Lack of local community infrastructure (esp. schools & health). Impact on local wildlife. Flood risk. Former coal mining area. Potential site contamination. Inadequate public consultation.
H44	AD2925	Support for this site allocation.
H442	AD1279, AD1034, AD645, AD1020, AD972, AD1049, AD1099, AD607, AD738, AD380, AD575, AD884, AD1309, AD1355, AD1476, AD1097, AD1021, AD1096, AD1094, AD1174, AD1123, AD936, AD360, AD1409, AD1118, AD1159, AD1280, AD1207, AD1316, AD1120, AD1104, AD1119, AD1107, AD1176, AD1117, AD1254, AD288, AD69, AD67, AD122, AD3742, AD1973, AD1802, AD1385, AD1399, AD1711, AD2502	Area will be left without open space. Area already experiences a large influx of traffic through Roberttown. Local primary schools could not accommodate this potential influx of inhabitants. Area would see a deterioration in "village life" as we become part of urban sprawl. Old Hall Farmhouse to the north-west of this site is a Grade II* Listed Building. The loss of this area and its subsequent development could harm elements which contribute to the significance of this building.The information about this site does not include the objections that were made at the draft stage and gives the impression that there have been no objections when there were many. Traffic - speed and volume of traffic, Beauty of the area spoiled, School and medical centre is over subscribed, No NHS dentists, Noise and light pollution. Website is not user friendly - difficulties submitting comments. Use brownfield sites first. There is no detailed analysis of highways impact - poor public transport and lack of services in the village. Exceptional circumstances for development in the Green Belt can't be demonstrated.
H454a	AD710, AD745, AD5, AD110, AD3278, AD1974, AD1788, AD1668	Contradiction of points 4, 7 & 8 of the Sustainability Appraisal.Cumulative effect of this and other local developments will lead to substantial growth of the small settlement.Impact of adjoining cricket club on new residents.Development may lead to closure of Clayton West Cricket Club because of (i) conflict due to adjacent housing, (ii) land ownership issues.Creation of 'farm within a housing estate'.Site should be allocated as Urban Green Space.Support for cooperation. Request for cooperation to continue.
H46	AD379	Due to its proximity to other proposed developments, there may be a need for this site to contribute to additional schemes identified in IDP.

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H47	AD1671, AD2514, AD2337	Impact on character & setting of village, reduction in landscape value, impact on tourism. Loss of agricultural land. Highways infrastructure inadequate. Limited capacity of utilities, esp. sewers & drainage. Increased risk of flooding. Lack of community infrastructure, esp. schools, healthcare. Inappropriate mix of housing proposed.
H481	AD1860	The development of the site for residential use would have a potentially adverse impact upon the commercial viability of Black Cat fireworks business.
H489	AD1349, AD125, AD68, AD164, AD138, AD2223	Church Lane is already dangerous with too much traffic queuing at the lights at Hill Top. This site is too close to Hill Top to have adequate Visibility Splays. New residential development in this area will result in noise pollution affecting residents of the new housing over the longer term. Parents already park on the pavement all the way down Church Lane to walk and collect their child from Gomersal Middle School. This is dangerous and buses nor other traffic can get past. Ambulance and disabled access markings are up and down Church Lane. More housing and traffic is unsustainable in Church Lane. Cumulative traffic impacts of H591, H489, H2667, H2627 and sites with planning permission in the Gomersal area. Pollution from additional traffic would be dangerous. Impacts on wildlife.
H498	AD709, AD196, AD1669, AD2062	Contradiction of points 4, 7 & 8 of the Sustainability Appraisal. Development may lead to closure of Clayton West Cricket Club because of (i) conflict due to adjacent housing, (ii) land ownership issues. Impact of adjoining cricket club on new residents. Need to relocate existing riding stables. Site should be allocated as Urban Green Space. Support for cooperation. Request for cooperation to continue.
H49a	AD671, AD802, AD572, AD427, AD346, AD16, AD17, AD15, AD1981, AD3819, AD1995, AD2064	Not been notified via communication from the Kirklees council and only got the original proposal via a flier. Oddfellows St can't be upgraded as it is too narrow at the Scholes Lane End. Removing this plot of land from the Green Belt does not protect additional green belt release.
H50	AD192, AD3685, AD3686, AD3604, AD2515	Loss of employment land and local jobs. Increased commuting - social & environmental consequences. Risk to heritage asset.
H502	AD1074, AD715, AD307, AD1787	Increased traffic congestion. Poor street lighting. Increased risk of flooding due to disruption of natural drainage. Impact on views from main road - suggestion that this could be mitigated by not developing southern strip of site (ie use the strip as access road). Support for cooperation. Request for cooperation to continue.
H508	AD1969, AD3733	The site lies adjacent to listed building. The site may impact upon its setting. Support for the allocation from the site promoter.
H509	AD593, AD320, AD3331, AD1831, AD1809, AD1724, AD2508	Objection to the allocation. Area is already gridlocked at rush hour and it takes 20 minutes to drive from Barm Road to Chain Bar on a morning. There is not enough parking in Cleckheaton Town Centre. Noise and dirt from construction will affect quality of life. Risk of flooding on the site. Local health and education infrastructure will not cope. Use brownfield sites before greenfield sites.

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H518	AD1162, AD1453, AD1164, AD747, AD2907, AD3765, AD1330, AD1344, AD1658, AD1682, AD1705, AD1709, AD1676, AD1754, AD1713, AD2512	Site specific considerations needs to set out a requirement that any buildings which make a positive contribution to the character of Farnley Tyas Conservation Area should be retained. Impact on the historic environment. Impact on local infrastructure - school places, no local shops or facilities, lack of public transport. Impact on highways, due to the increase in traffic. Loss of green belt land. Nine representations in support of this site allocation.
H519	AD591, AD1292, AD155, AD979, AD885, AD583, AD683, AD681, AD367, AD679, AD663, AD617, AD467, AD410, AD404, AD462, AD534, AD537, AD536, AD954, AD964, AD1380, AD1219, AD1122, AD1364, AD1166, AD1356, AD580, AD554, AD413, AD353, AD361, AD366, AD124, AD147, AD156, AD245, AD265, AD354, AD199, AD162, AD198, AD325, AD136, AD137, AD3576, AD3624, AD3561, AD1358, AD1681, AD1395, AD2274	No evidence that Kirklees has consulted with Calderdale Council. Proposed site is at odds with Councils own objectives. This open space used for outdoor recreation purposes and would destroy the Green belt. Site has a number of natural habitats. Pollution levels will increase in the area and local infrastructure will not cope. Use brownfield sites first. The site will contribute to localised flooding in the area. The Kirklees Way passes through this site.
H531	AD330, AD3728, AD2516	Site lies adjacent to East Bierley Conservation Area. Development in this locatio may impact on the setting of the Conservation Area. This would be a significant extension to the village into the Green Belt which would dramatically change the character of the village. Support for the allocation from the site promoter.
H538	AD2924	Support for this site allocation.
H549	AD552	Inadequate road infrastructure. Increased congestion & carbon emissions. Inadequate community infrastructure (esp. schools & healthcare). Impact on character of village. Risk to bat habitats.
H550	AD26, AD3745	Congestion on access roads. Risk of harm to setting of conservation area & heritage assets - request for further assessment.
H559	AD377, AD733, AD3, AD2496, AD2242	Increase in traffic congestion. Need to coordinate vehicular access with delivery of Site MX1905. Potential impact on Strategic Road Network - need to ensure mitigation measures. Risk to wildlife and countryside. Proposed new green belt boundary is not clearly defined and will enable merging of settlements. Support for allocation of site.
H567	AD3744	By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development.
H583	AD704, AD2910, AD1990	Support noted for the allocation of site H583. The continued co-operation with Wakefield on school place planning is acknowledged and supported. The A635 Barnsley Rd and has already seen significant development within recent years. The traffic is already an issue in this village and it suffers from very poor air quality with many HGVs using the village as a shortcut to the M1 despite the signage precluding its use. The village lacks the infrastructure to cope with the additional traffic and the local school will not be able to accommodate the increase in numbers. If this is to be sustainable, a relief road would be needed but this is not proposed in the plan.

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H584	AD160, AD3754, AD2509	Support for site allocation. 30 and 32 Gynn Lane 40 metres to the west of this area are Grade II Listed Buildings. The loss of this area and its subsequent development could harm elements which contribute to the significance of these buildings. By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of these Listed Buildings or what harm might result to those elements which contribute to their significance by its eventual development. The site's inclusion is not justified because the SA assessment of the site is inaccurate for a number of SA Objectives including; SA Objectives 1, 3, 4, 5, 6, 8, 11 and 12.
H591	AD1411, AD982, AD608, AD803, AD768, AD1393, AD1336, AD1427, AD1379, AD1160, AD1243, AD1245, AD411, AD105, AD3304, AD3746, AD1947, AD1390	This area lies close to the boundary of the Gomersal Conservation Area. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of this area. The methodology used for the sustainability appraisal heatmap admits (2.30) it's based on "subjective assessments" and assumptions. The plan still has brownfield in rejected sites close to h591. Also it h591 cannot be considered the most appropriate site with having 300+ houses on Cliffe Lane in recent years, without further road infrastructure, the alternative brownfield sites in Gomersal will deliver sufficient housing for this village. The local road, health and education infrastructure cannot cope with further development in this area. Housing capacity has increased from the draft plan without further consultation. Support for the site from the site promoter.
H597	AD1059, AD640, AD652, AD622, AD516, AD479, AD2736, AD3160, AD3112, AD2108, AD2134, AD2697, AD1438, AD1563, AD1544, AD1526, AD1540, AD1578, AD1464, AD1584, AD1554, AD1569, AD1567, AD1548, AD1537, AD1533, AD1522, AD1551, AD1519, AD1286, AD1560, AD1017, AD1377, AD194, AD178, AD3141, AD3116, AD3135, AD3129, AD3125, AD3163, AD3132, AD3060, AD3073, AD3108, AD3097, AD3076, AD2984, AD2952, AD3157, AD3152, AD3144, AD3081, AD3069, AD3122, AD2869, AD3048, AD2872, AD3147, AD3232, AD3029, AD2987, AD2932, AD3033, AD3166, AD3214, AD2875, AD3066, AD3105, AD2991, AD2975, AD2851, AD2941, AD2890, AD3217, AD2745, AD2700, AD1826, AD1862, AD2094, AD2149, AD1922, AD3221, AD3228, AD3760, AD3169, AD2760, AD3005, AD3119, AD2966, AD3091, AD3100, AD3094, AD3087, AD3084, AD3205, AD3239, AD3196, AD3189, AD3234, AD3014, AD2666, AD2730, AD2669, AD2733, AD2727, AD2712, AD2687, AD2724, AD2893, AD2887, AD2899, AD2857, AD2845, AD2848, AD2718, AD2715, AD2709, AD2675, AD2682, AD2769, AD2784, AD2775, AD2778, AD2814, AD2799, AD2706, AD2772, AD2833, AD2690, AD2703, AD2944, AD2817, AD2672,	Previous planning appeal decision in 1996 on part of H597 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. 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. The north-east corner of H597 susceptible to flooding. 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). Potential for impact on nearby listed building. Unsustainable location for development (NPPF 6 / NPPF 7 / NPPF 55) specifically in relation to low carbon, biodiversity, waste & pollution, climate change, greenhouse gases,

Paragraph/Site	Representation IDs	Summary of Main Issues
	AD2751, AD2809, AD2754, AD2802, AD2748, AD3008, AD3020, AD2979, AD3023, AD2993, AD2793, AD2999, AD3052, AD3042, AD3002, AD3017, AD2996, AD2982, AD2860, AD2958, AD2839, AD3057, AD3011, AD3037, AD2963, AD3026, AD2955, AD2866, AD2902, AD2863, AD2878, AD2823, AD2948, AD2896, AD2854, AD2881, AD2842, AD2884, AD2790, AD2766, AD2830, AD2828, AD2805, AD2836, AD2763, AD2781, AD2820, AD2787, AD2796, AD2812, AD3847, AD3640, AD3669, AD3670, AD3211, AD3175, AD3226, AD3184, AD3178, AD3185, AD3172, AD3242, AD3195, AD3191, AD3208, AD3203, AD3515, AD1850, AD1882, AD1898, AD1858, AD1886, AD1835, AD1865, AD1844, AD1938, AD1903, AD1869, AD1895, AD1912, AD1879, AD1847, AD1854, AD1893, AD1909, AD1917, AD1901, AD1905, AD1925, AD1928, AD1918, AD1941, AD2152, AD2074, AD2162, AD2117, AD1933, AD1874, AD2131, AD2082, AD2087, AD1832, AD2100, AD1371, AD1470, AD2488, AD2485, AD2566, AD2459, AD2684, AD2610, AD2619, AD2739, AD2192, AD2181, AD1700, AD1692, AD1583, AD1556, AD1577, AD1530, AD1573, AD1674, AD2494, AD2541, AD2323, AD2320, AD2436, AD2430, AD2426, AD2419, AD2473, AD2468, AD2448, AD2476, AD2442, AD2469, AD2553, AD2643, AD2482, AD2451, AD2479, AD2574, AD2545, AD2455, AD2463, AD2491, AD2432, AD2548, AD2317, AD2422, AD2439, AD2399, AD2387, AD2446, AD2588, AD2624, AD2584, AD2660, AD2606, AD2613, AD2633, AD2636, AD2580, AD2657, AD2590, AD2503, AD2506, AD2571, AD2649, AD2630, AD2603, AD2655, AD2568, AD2663, AD2721, AD2693, AD2651, AD2757, AD2742, AD2679, AD2600, AD2562, AD2596, AD2639, AD2616, AD2627, AD2550, AD2556, AD2577, AD2559, AD2645, AD2308, AD2305, AD2198, AD2203, AD2125, AD2121, AD2111, AD2104, AD2267, AD2335, AD2262, AD2076, AD2159, AD2277, AD2185, AD2155, AD2207, AD2142, AD2145, AD2091, AD2080, AD2137, AD2171, AD2166, AD2273, AD2194, AD2129, AD2288, AD2291, AD2285, AD2313, AD2402, AD2405, AD2415, AD2381, AD2369, AD2593, AD2414, AD2295, AD2301, AD2188, AD2270, AD2397, AD2298, AD2282, AD2375, AD2384, AD2211, AD2390, AD2393, AD2378, AD2259, AD2175, AD2372, AD2326, AD2408	<p>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. More brownfield sites should be included before using green belt land. Delete H597 and designate H297, H597 and SL3359 as Local Green Space</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
H601	AD2531, AD2498	The [site is] served from Whitehall Road (the same roundabout) which we believe will have significant detrimental impact on the Whitehall Road (A58) and surrounding highway network. This will be compounded by the addition of the Merchant Fields site (H69 in Cleckheaton Ward) which will also be served by Whitehall Road. (A58). Support from site promoter.
H609	AD705, AD2909	We understand that air quality around Whitehall Road (A58) is extremely poor (some of the worst in Kirklees and West Yorkshire) and believe that the Council's Environmental Health department is deliberately holding off discussing what action to take or declaring an Air quality Improvement area so as not to jeopardise these proposals. On public Health grounds we believe these proposals should be rejected.

Paragraph/Site	Representation IDs	Summary of Main Issues
H616	AD1130, AD3825, AD1762	<p>The land is quality, lowland farm and meadow land which provides good grazing and arable. It provides habitat for the biodiversity and wildlife, including mammals, birds, insects, plant species. The land supports and protects the woodland. The woodland supports and protects Human Population. It is necessary part of the ecosystem to provide Oxygen and Clean Air. It provides Quality Air levels. It supports the Clean Air Act. Object to the permanent damage to the environment and urban sprawl and creating a conurbation. The traffic congestion is already significant, dangerous and to levels which are not safe. Site H616 is one of a number of sites proposed for housing development in the Lepton and Fenay Bridge area. The totality of these developments will put unsustainable pressure on the local community. The site is unsustainable in conjunction with the other proposed sites but may be acceptable if it were the only development. The Local Plan process has been difficult to follow. The Council initially rejected this, and other sites in the Lepton/Fenay Bridge area on the grounds that there can be no justifications for removing the sites or any part of them from the green belt. The council then reconfigured the site(s) on the grounds that the need for housing outweighed the need for green belt. They are the same sites, so this is not logical. Why reject them twice and then INCLUDE them in the plan? The Council has failed to properly assess the impact on the local infrastructure including education or traffic. The entrance road of this site is already congested with parking and traffic at drop off & pick up times at the local private nursery, school breakfast and after school club and the JI&N School all of which are in a few hundred yards. This road is used for the 19 houses to travel to town, to the M1 and M62 motorways and Wakefield, so is already busy. The 2 local schools are full to capacity. Some local residents cannot get both their siblings into either of the 2 schools and have to travel to another area with one of the siblings. Lepton Great Wood is adjacent to this site, and any development will result in the destruction of natural habitats, with a dramatic impact on local biodiversity. The Council has not taken into consideration the effect that the whole Plan, which includes this site (H2684a with 286 houses) AND sites H638 (30 houses), Site H2730a (312houses), Site H31,(68 houses) Site H684,(123 houses) and Site H616,(32 houses) which are in very close proximity. They will increase the population of Lepton and Fenay Bridge by 28%, which impacts on all the above points. The developments rely entirely on third party agreements, which are not even in place yet. The Council is only speculating that the developments can go ahead. The Council is contravening its own policies and the National Planning Policy Framework because it has failed to give adequate and appropriate consideration of the infrastructure requirements generated by the Plan. In relation to this site in 2001 a Government Inspector ruled that "I have come to the planning judgement that it is part of the countryside which is desirable to keep PERMANENTLY open and that any development of the site would encroach into the countryside and I am satisfied that there is no compelling reason to exclude the site from the Green Belt"</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
H623	AD3710, AD1744	<p>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). Potential for impact on nearby listed building. 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. More brownfield sites should be included before using green belt land.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
H626	AD677, AD643, AD1405, AD435, AD2315, AD1234, AD1222, AD1426, AD224, AD31, AD133, AD148, AD233, AD98, AD106, AD184, AD4, AD84, AD120, AD181, AD3292, AD3582, AD3270, AD3266, AD3284, AD3271, AD3296, AD3835, AD3275, AD3294, AD3303, AD3295, AD3287, AD3302, AD3276, AD3293, AD3297, AD3301, AD3283, AD1953, AD1944, AD2011, AD1945, AD1948, AD1967, AD1949, AD1964, AD1966, AD1960, AD2009, AD1970, AD1961, AD1955, AD1951, AD1954, AD1962, AD1937, AD1952, AD1946, AD1956, AD1950, AD1398, AD1732, AD1726, AD1730, AD1729, AD1728, AD1758, AD2513, AD2343, AD2500, AD2266, AD2065, AD2332, AD2339, AD2060, AD2279, AD2338, AD2340	<p>Highways safety is a great concern: 23 new homes means 40+ more cars and there are no footways or verges on roads leading from the A6024 to the site. Smithy Lane and Dobb Top Lane leading to the site is a Rural School route. The walking bus for the local school uses this road as well as school children walking to the primary school or accessing public transport to secondary school. Residential on street parking limits many secondary access roads to single file traffic. Bank Lane, Smithy Lane and Dobb Top Road are old cart roads and cannot be widened. Agricultural vehicles and horseriders make the roads busier. A well used West Yorkshire Cycle Route runs along Dobb Top Road which leads to the site. Bankfield Drive has a gradient of 1:5 and Laithe Bank 1:6, before joining narrow Dobb Top Road with no vertical platform. The main exit route is via Smithy Lane with no visibility as a left hand turn is made from Bankfield Drive. The alternative route goes along narrow twisty roads past Hinchliffe Mill School including severe vertical alignment issues and restricted visibility at the junction with the A6024. Access for emergency vehicles is already restricted. Other sites using the same access roads have been deemed “unsuitable for any intensification of use” e.g. SL2188 which would use the same access roads. Photographs have been provided in the main representation. The gradient of local roads causes additional problems during periods of inclement weather with cars sliding down steep slopes. In bad weather there are not enough passable roads for residents from both sides of the A6024 to park safely. Wider congestion beyond the site on the A6024 entering Holmfirth and exacerbated by tourist attractions in the local area with no improvements proposed to road infrastructure in the area for the next 15 years. Building of houses on this site was previously turned down by Kirklees and an Inspector for the Department of Environment because it would create an “increased hazard to other road users and pedestrians”. Since this time over 135 new houses have been built in Holmbridge including 38 along the minor road network on the H626 side of the valley. Very limited access to public transport in the area and not commercially viable to extend the bus services. The site is within 600 metres of the Peak District National Park and development of H626 would be detrimental to the character of the surrounding area and destroy the visual amenity. Yorkshire Water treatment works had to be built underground to preserve this very view – Europe’s first underground treatment works. A well used public footpath runs along the top of the field providing views of the landscape. Potential impacts on tourism. The proposal would be detrimental to the biodiversity of the area. The site is within the 2.5km buffer of the South Pennine Moor Special Protection Area and is a habitat for many species of wildlife therefore should be protected from development. The site is in close proximity to Local Wildlife Sites. Other concerns relate to drainage of the land (large spring running through the site causing flooding to the fields in wet weather), inadequate school places (school is full and no potential to expand) and access to health services (doctor and dentist capacity and lack of local access to a hospital). The council have not listened to the views of the community. Contrary to the NPPF, specifically paragraphs 17 (core planning principles), 28 (supporting a prosperous rural economy), 29, 30, 35, 37 ((promoting sustainable transport), 72, 75 (promoting healthy communities), 109, 110 (conserving and enhancing the natural environment), 155, 157 (local plans) and is unsustainable. Consultation approach inconsistent with NPPF paragraph 155 and 157.</p>
H634	AD749, AD540, AD1101, AD293, AD318, AD285, AD2, AD3280	Delete H597 and designate H297, H597 and SL3359 as Local Green Space

Paragraph/Site	Representation IDs	Summary of Main Issues
H638	AD1126, AD222, AD3823, AD2103, AD2084, AD1764, AD2120, AD2115, AD2362	Lepton has already been subject to housing development. Impact on highways from additional traffic causing congestion. Site access cannot be achieved. Impact on local infrastructure - school places and doctors surgeries. Increase in flood risk. This is a old mining area. Impact on wildlife and woodland. This will destroy green belt land. Impact on drainage. Japanese Knotweed on site. Power lines cross the site. Use brownfield sites. Lack of co-operation with local residents. Impact of construction traffic and noise. Will create urban sprawl.
H640	AD579, AD1996, AD1983	This is not a sensible use of this site at the present time. It is currently a live industrial site and there have been no indications that the users wish to relocate
H652	AD1076, AD762, AD978, AD804, AD800, AD2920, AD2360	Five representations in support of the allocation, one is from the site promoter. Impact on highways due to additional traffic. Impact on drainage. Inappropriate use of the Green Belt in contravention of NPPF.
H660	AD945, AD966, AD962, AD14, AD1740, AD1786, AD2411	There is inadequate road, health and education infrastructure. Netherton will merge with both Honley and South Crosland. Brownfield sites to be considered before greenfield. Support for the allocation from the site promoter.
H664	AD1392, AD270, AD3755, AD2497	Conservation area. Risk to setting of heritage assets - request for further assessment. Road infrastructure inadequate (congestion, safety, parking). Sewage and rainwater drainage systems overloaded ; increased risk of flooding. Lack of community infrastructure (schools, health). Loss of open space, impact on wildlife. Brownfield sites should be used first. Support for site includes evidence on deliverability.
H67	AD3751, AD3830	Disagreement with screening assessment in table 4.4 of HRA report. Concerns re.potential loss of habitat for golden plover & curlew. Risk to setting of heritage asset - request for further assessment.
H684	AD249, AD1079, AD779, AD791, AD615, AD618, AD691, AD1386, AD1129, AD257, AD2915, AD3826, AD3300, AD3612, AD1797, AD1761, AD2348	Inadequate road, health and education infrastrucutre to support the development. Consider brownfield sites before these. Development will have a negative impact on woodland and habitats in the area.
H688	AD1075, AD713, AD3724	Increased traffic congestion. Increased risk of flooding due to disruption of natural drainage. Impact of allocation upon heritage assets; need for further assessment. Support for cooperation. Request for cooperation to continue.
H689	AD541, AD10, AD204, AD42, AD3725	Lack of community consultation. Impact on character of village. Urbanisation of rural area. Impact of allocation upon heritage assets; need for further assessment. Inappropriate development of green land. Loss of green belt is not outweighed by adverse impacts. Threat to wildlife, ecology & biodiversity. BAP Priority Habitat. Threat to existing public right of way. Inadequate transport infrastructure (roads & public transport). Increased road congestion. Road safety issues. Lack of community infrastructure (esp. schools). 'High coal risk' location. Inadequate utilities & sewerage. Increased flood risk from surface water.

Paragraph/Site	Representation IDs	Summary of Main Issues
H69	AD584, AD603, AD806, AD606, AD844, AD843, AD840, AD841, AD839, AD838, AD851, AD850, AD852, AD827, AD378, AD567, AD550, AD868, AD826, AD823, AD822, AD829, AD830, AD831, AD832, AD833, AD835, AD836, AD828, AD814, AD824, AD815, AD816, AD817, AD818, AD819, AD821, AD1048, AD1045, AD1038, AD1033, AD1418, AD1042, AD1043, AD1040, AD862, AD1439, AD1161, AD1437, AD1165, AD858, AD849, AD846, AD853, AD854, AD855, AD857, AD865, AD871, AD877, AD880, AD856, AD847, AD848, AD892, AD878, AD918, AD926, AD927, AD928, AD929, AD915, AD914, AD930, AD903, AD896, AD897, AD889, AD898, AD899, AD916, AD902, AD888, AD904, AD905, AD906, AD907, AD909, AD911, AD901, AD845, AD1170, AD684, AD612, AD825, AD577, AD321, AD3305, AD3332, AD3330, AD3618, AD3623, AD3615, AD3616, AD3617, AD3493, AD3474, AD3583, AD3608, AD3585, AD3614, AD3306, AD3383, AD3308, AD1273, AD2254, AD2248, AD2255, AD2257, AD1461, AD1473, AD1447, AD1731, AD1721, AD1723, AD2249, AD2253, AD2245, AD2247, AD2219, AD2239, AD2228, AD2225, AD2221, AD2226, AD2230, AD2229, AD2231, AD2233, AD2235, AD2237, AD2222	The size of the site is not justified on the grounds of: flood risk and drainage issues- resulting from Mazebrook and Spen Becks, highway capacity/traffic congestion especially A58 and M62, air pollution, lack of public transport, alternative sites exist - Westgate, Cleckheaton. There should have been a separate consultation for residents in the area. Consultation process flawed. Loss of green belt – urban sprawl and protection of the wildlife – merger of Hunsworth and Cleckheaton.
H690	AD368, AD542, AD980, AD370, AD11, AD205, AD41, AD3729	<p>Lack of community consultation.</p> <p>Inadequate transport infrastructure (incl. roads & public transport).</p> <p>Increased road congestion. Access and road safety concerns</p> <p>Lack of community infrastructure (esp. schools & healthcare).</p> <p>Inadequate utilities & sewerage.</p> <p>Flood risk. Land instability. Former mining area.</p> <p>Impact of allocation upon heritage assets; need for further assessment.</p> <p>Impact on local landscape character. Urbanisation of rural community.</p> <p>Impact on local wildlife, including bats. Uk BAP Priority Habitat.</p> <p>Inappropriate development of green land - benefits do not outweigh adverse effects.</p> <p>Support for allocation of site. - highway capacity/traffic congestion especially A58 and M62</p> <ul style="list-style-type: none"> - air pollution - lack of public transport - alternative sites exist - Westgate, Cleckheaton
H70	AD2922	Support for this site allocation.

Paragraph/Site	Representation IDs	Summary of Main Issues
H706	AD3711, AD1743	The plan has taken into account the full impact on local amenities and infrastructure such as local schools, primary care health services and the road networks. The proposed development in the Lindley and Quarmby area will have a significant impact on open green space, the heritage of the area with particular reference to the several listed buildings in the area. By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the 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.
H708	AD3734	The site lies adjacent to listed building. The site may impact upon its setting.
H715	AD372, AD2931, AD3761, AD3658, AD3657	This area adjoins the boundary of the Netherthong/Deanhouse Conservation Area. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of this area. No suitable access to the site. Netherthong is a historic rural village, cut off from the main arterial routes. Impact on local highways - they are not suitable to cope with a significant increase in traffic, they are narrow. Impact on wildlife. Negative impact on the village. Impact on school place provision.
H72	AD1073, AD656, AD306	Impact on highways due to the generation of additional traffic and the pressure that will have on existing junctions. Disruption of natural drainage could lead to new problems with Fenay Beck. Inadequate local infrastructure - schools, medical facilities. Potential for flooding from Park Dike. This is green belt and development here has previously been disregarded. Skelmanthorpe has seen a huge amount of development in the last few years relative to the size of the village. The development map has been labelled in a very misleading fashion.
H727a	AD3602, AD3673, AD3674	Local highway constraints - site access, will add a significant number of cars to a very substandard road network in close proximity to Holmfirth High School where road safety is an issue and will impact on New Mill Junction where the A635 meets the A616. Impact on local infrastructure - school places.
H728	AD83, AD3656, AD3655, AD3603	Local highway constraints - site access, will add a significant number of cars to a very substandard road network in close proximity to Holmfirth High School where road safety is an issue and will impact on New Mill Junction where the A635 meets the A616. Impact on local infrastructure - school places.
H729	AD3600, AD3677, AD3678	Impact on highways, due to the generation of additional cars on a a very substandard road network in close proximity to Holmfirth High School where road safety is an issue and the impact on New Mill Junction where the A635 meets the A616. Impact on local infrastructure - school places.

Paragraph/Site	Representation IDs	Summary of Main Issues
H730	AD3762, AD3601, AD3675, AD3676	This area lies adjacent to the Wooldale Conservation Area. The loss of this currently-open area and its subsequent development could harm elements which contribute to the significance of this area. Impact on highways - increased number of cars on a very substandard road network in close proximity to Holmfirth High School where road safety is an issue and impact on New Mill Junction where the A635 meets the A616. Impact on local infrastructure - school places.
H734	AD1220, AD3630	No evidence that Kirklees has consulted with Calderdale Council. Proposed site is at odds with Councils own objectives. This open space used for outdoor recreation purposes and would destroy the Green belt. Site has a number of natural habitats. Pollution levels will increase in the area and local infrastructure will not cope. Use brownfield sites first.
H737	AD2066	Support for the housing allocation.
H738	AD559, AD3720	Impact of allocation upon heritage assets; need for further assessment. Reduction of green corridor between settlements. Inadequate local infrastructure. Increased congestion and pollution. Impact on local bat habitat.
H758	AD698, AD551, AD326, AD6, AD1834, AD1810	Site will add to congestion, road safety problems, health and well being of residents, air pollution, available green space and wildlife. Local road, health and education infrastructure will not cope with this development. Cumulative impact of other development in the area will add to traffic using A653, Leeds and Kirklees Council need to work together to minimise increase in traffic congestion. The promotion of unsustainable sites that contribute to Green Belt purposes or poor performance in the SA are not justified in preference to release of this site.
H761	AD735, AD633, AD794, AD447, AD450, AD171, AD3730, AD3637, AD3633, AD1475, AD2533, AD2215, AD2214, AD2205, AD2209	Not enough information had been provided about the impact of the site, including impacts on highways, schools and local employment opportunities. The site lies adjacent to a listed building and Birstall Conservation Area. Development in this location could impact on their setting. There are concerns about flood risk, roads, gridlock and the capacity of schools, doctors, dentists and hospitals to cope with the increase in population. Site on Field Head Lane would be more sustainable as accessible via main road leading on to by-pass. It is also earmarked for less housing which would put less strain on local schools and health. Raikes Lane not designed for the volume of traffic. Would increase HGV traffic.
H763	AD3722	Impact of allocation upon heritage assets; need for further assessment.
H764	AD3705	The site is adjacent to a listed building. Development may affect the setting of this listed building
H768	AD759, AD3738	Increased traffic congestion. Flood risk. Impact of allocation upon heritage assets; need for further assessment.
H779	AD3748	Risk to setting of heritage assets - request for further assessment.
H783	AD3737	The site lies adjacent to listed buildings. Development of the site may impact upon its setting.

Paragraph/Site	Representation IDs	Summary of Main Issues
H786	AD33, AD273, AD3756	Risk of harm to setting of conservation area. Request for further assessment. Proposed density too high. Lack of infrastructure, concerns re. congestion, road safety, parking. Existing sewers & drains inadequate; increased risk of flooding. Loss of open space, impact on wildlife, TPO on large tree on site.
H789	AD1501, AD1500, AD1499, AD1498, AD1505, AD801, AD1496, AD1494, AD1486, AD1487, AD1488, AD1489, AD1490, AD1492, AD1491, AD1497, AD1485, AD1507, AD1513, AD1514, AD1493, AD1504, AD1503, AD1511, AD1506, AD1509, AD1502, AD1512, AD1508, AD1510, AD1588, AD1590, AD1600, AD1589, AD1495, AD142, AD1599, AD1614, AD121, AD1597, AD1596, AD1595, AD1607, AD1610, AD1594, AD1603, AD3844, AD3845, AD2000, AD1352, AD1434, AD1608, AD1628, AD1609, AD1601, AD1630, AD1631, AD1606, AD1605, AD1604, AD1629, AD1618, AD1613, AD1620, AD1639, AD1623, AD1622, AD1638, AD1598, AD1619, AD1627, AD1637, AD1612, AD1602, AD1626, AD1633, AD1621, AD1632, AD1645, AD1636, AD1593, AD1592, AD1634, AD1617, AD1616, AD1635, AD1591, AD1611, AD1640, AD1641, AD1644, AD1643, AD1642, AD1615, AD1680, AD1679, AD1750, AD2252, AD1625	<p>There was inadequate opportunity to comment during the consultation stages. No direct communication was sent out other than information from local councillors.</p> <p>Use of websites and placing information in libraries is only acceptable if the public are directly advised that information is available.</p> <p>The plan is not compliant with NPPF paragraph 155 – early engagement.</p>
H790	AD289, AD948, AD195, AD294, AD324, AD297, AD123, AD1307, AD1417, AD1719, AD1745	No direct communication was sent out other than information from local councillors.
H794	AD24	Inadequate road infrastructure. Inadequate drainage. Not enough school places.
H796	AD3580, AD2523	<p>Use of websites and placing information in libraries is only acceptable if the public are directly advised that information is available.</p> <p>The plan is not compliant with NPPF paragraph 155 – early engagement.</p>
H809	AD1221, AD3629	No evidence that Kirklees has consulted with Calderdale Council. Proposed site is at odds with Councils own objectives. This open space used for outdoor recreation purposes and would destroy the Green belt. Site has a number of natural habitats. Pollution levels will increase in the area and local infrastructure will not cope. Use brownfield sites first. The site will contribute to localised flooding in the area.
H813	AD701	Support for cooperation. Request for cooperation to continue.
H814	AD874	Increased traffic congestion. Lack of community infrastructure (schools, healthcare, shops). Proposals should include social housing.
H817	AD706, AD2908	Impact of additional traffic. Air quality issues. HGVs use the village as a shortcut to the M1. The village lacks infrastructure to cope with the additional traffic. The local school will not be able to accommodate the increase in numbers (school place provision). This is not sustainable.
H85	AD720, AD1980	<p>Support for allocation of site.</p> <p>Support for cooperation. Request for cooperation to continue.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
H87	AD1225, AD3626	Site will destroy the Green Belt. Supports a variety of recreation uses and natural habitats. Local road, health and education infrastructure will not support this level of growth in this area. Use brownfield sites first.
H94	AD963, AD960, AD3262, AD1968	Lack of local road, health and education infrastructure. Local wildlife will be affected. Brownfield sites should be allocated first. Jobs are needed in Netherton and improvements to local centre.
H95	AD722, AD3731, AD1984	Concern re. impact on heritage assets. Support for allocation of site. Support for cooperation. Request for cooperation to continue.
Local Wildlife Sites - LWS1	AD329	Support Local Wildlife Sites LWS1, LWS2 and LWS3
Local Wildlife Sites - LWS6, LWS7, LWS9, LWS7	AD2518	Support the Councils Allocation for Local Wildlife sites at LWS6, LWS7, LWS9, LWS7
MDGB2134	AD391, AD1459, AD741, AD232, AD3784, AD1659	Storthes Hall – 1 x support. 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 alongside other accepted housing sites. 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. 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. 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. 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'.
ME1965a	AD1516, AD49, AD248, AD76, AD1325, AD1181, AD1196, AD644, AD604, AD774, AD616, AD1091, AD1011, AD639, AD658, AD785, AD712, AD731, AD620, AD614, AD772, AD786, AD776, AD769, AD777, AD728, AD775, AD511, AD743, AD351, AD637, AD393, AD365, AD371, AD374, AD525, AD557, AD556, AD560, AD629, AD764, AD790, AD441, AD436, AD424, AD437, AD403, AD430, AD409, AD428, AD535, AD491, AD514,	The council has ignored objections made at DLP consultation. The site naming is misleading. There are gaps in the analysis of the site, much of which has been based on a study carried out in 2012. Figures used in various minerals reports contradict one another. Kirklees has not been objective in its assessments of all ME sites as the site naming of sites in close proximity to existing quarries has been labelled land to the north of or east of etc. The allocation fails to comply with aspects of the Local Plan. Conflicts with the objectives set out in the Council's Joint Health and Wellbeing Strategy, Kirklees Economic Strategy and the Equality Impact Assessment. Assessment of the site assumed Dearne Grange

Paragraph/Site	Representation IDs	Summary of Main Issues
	AD1794, AD1798, AD3104, AD2968, AD2970, AD2281, AD2312, AD1422, AD1402, AD1415, AD1410, AD1428, AD1474, AD1646, AD1481, AD1572, AD1655, AD1541, AD1535, AD1477, AD1478, AD1479, AD1547, AD1457, AD1450, AD1520, AD1524, AD1528, AD1044, AD1140, AD1469, AD1448, AD1298, AD1302, AD1183, AD1185, AD984, AD974, AD1180, AD342, AD778, AD808, AD810, AD1186, AD1342, AD1272, AD1430, AD344, AD290, AD227, AD299, AD562, AD568, AD39, AD40, AD44, AD45, AD350, AD463, AD438, AD419, AD126, AD37, AD38, AD135, AD140, AD35, AD32, AD54, AD157, AD275, AD278, AD279, AD283, AD298, AD286, AD291, AD250, AD274, AD269, AD255, AD267, AD295, AD343, AD322, AD335, AD339, AD434, AD345, AD341, AD296, AD305, AD302, AD319, AD309, AD93, AD104, AD92, AD81, AD102, AD70, AD55, AD56, AD73, AD60, AD66, AD82, AD74, AD77, AD79, AD80, AD113, AD114, AD116, AD117, AD50, AD115, AD88, AD118, AD119, AD134, AD57, AD95, AD251, AD46, AD61, AD191, AD58, AD538, AD277, AD146, AD71, AD99, AD63, AD65, AD53, AD253, AD36, AD34, AD47, AD139, AD64, AD252, AD3114, AD3150, AD3127, AD3110, AD3137, AD3148, AD3154, AD3089, AD3063, AD2937, AD2938, AD2904, AD2905, AD2919, AD2929, AD2923, AD2940, AD3199, AD3245, AD1806, AD3079, AD3031, AD3039, AD3044, AD3050, AD3064, AD3078, AD3065, AD3045, AD2973, AD3035, AD3040, AD3140, AD2949, AD2927, AD3681, AD3682, AD3840, AD3636, AD3634, AD3282, AD3252, AD3249, AD3255, AD3223, AD3253, AD3244, AD3251, AD3254, AD3250, AD3180, AD3200, AD3218, AD3236, AD3247, AD3248, AD3246, AD3813, AD1805, AD1800, AD1870, AD2017, AD1801, AD2068, AD2008, AD1999, AD1976, AD2004, AD2002, AD2003, AD2001, AD2067, AD2007, AD2006, AD2005, AD2010, AD2013, AD2051, AD1816, AD2232, AD1755, AD1678, AD1689, AD1670, AD1656, AD1661, AD1757, AD1741, AD1707, AD1725, AD1677, AD1710, AD1785, AD1449, AD1737, AD1717, AD1734, AD1738, AD1691, AD1715, AD1727, AD1722, AD2530, AD2543, AD2582, AD2598, AD2608, AD2621, AD2622, AD2220, AD2218, AD2213, AD2217, AD2227, AD2224, AD2086, AD2241, AD2244, AD2015, AD2016, AD2116, AD2256, AD2238, AD2246, AD2264, AD2119, AD2139, AD2157, AD2170, AD2180, AD2234, AD2202, AD2141, AD2334, AD2352, AD2359, AD2200	<p>was uninhabited. The mineral is not rare/ there is no need or demand for the mineral. The mineral is of poor quality. BGS maps show that this site is not on a sandstone bed. Due to new types of building materials being used in construction, the need for this mineral is declining. No account has been taken of cross-boundary supplies. No consideration has been given to the cumulative impact of all the quarries operating in the area. The council states that there should be a presumption in favour of granting planning permission where land is a natural extension of an existing quarry - this is contrary to national policy. Site option has not been promoted by the site owner in accordance with NPPG. Allocation does not comply with NPPF. Negative impact upon the green belt. Impact upon landscape and the setting & character of Birds Edge. None of the historical or more recent quarry operations have been restored / or are being restored to a countryside state. Quarries in the local area have historically failed to comply with mitigation measures secured as part of their planning permission. The prior extraction of mineral should be required for all housing and industrial developments. Impact upon biodiversity. Development of the site will affect exposed receptors. Two water courses - The River Dearne and Park Dike – run through the site and are category one constraints. Due to the topography of the land surface water drains into both water courses; these water courses will be sensitive to any external interference from development. The water courses feed the mill ponds that serve Hinchliffe Mills which could lead to the potential loss of employment. Minerals extraction would result in the loss of a farm and negatively impact neighbouring farms or agricultural land. The economic benefit is negated by a combination of significant economic losses. Noise, dust and light pollution. Impact on highways (lanes are not suitable etc.). Impact on schools, recreational activities and residential homes. Impact on the Trans Pennine Trail and PROWs. The allocation is a breach of the Human Rights Act. Impact upon the setting of the Castle Hill Ancient Scheduled Monument. Roman Iron mining sites of Burnt Cumberworth. Request that the land be part of the Wildlife Habitat Network, Green Infrastructure Network and left as green belt for the use of farming.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
ME1965b	AD1092, AD2054, AD1784	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Justification of need is questionable. Heavy vehicles will cause damage to roads & kerbs.
ME1966	AD254, AD3837, AD2041	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Concerns re. adequacy of evidence on SPA bird habitats. Support for allocation.
ME1975	AD998, AD1214, AD1155, AD1156, AD1201, AD210, AD3782, AD2042, AD1328, AD1389, AD1414	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Risk of impact on setting of conservation area - request for further assessment. Support for allocation from site promoters and local residents; established local employer.
ME2240	AD662, AD2018	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Support for allocation – site is permitted & operational, and works within an approved scheme.
ME2241	AD212, AD2019	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Support for allocation – site is permitted & operational, and works within an approved scheme.
ME2242	AD213, AD2020	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Support for allocation – site is permitted & operational, and works within an approved scheme.
ME2243	AD1000, AD730, AD2021	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads. Concern that site restoration will not occur after extraction.

Paragraph/Site	Representation IDs	Summary of Main Issues
ME2244	AD1001, AD2022	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads.</p>
ME2245	AD1002, AD1025, AD2023	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads.</p> <p>Impact of noise on residents of Wellhouses/ Cartworth Moor.</p>
ME2246	AD1003, AD1027, AD2024	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads. Impact of noise on residents of Wellhouses/ Cartworth Moor.</p>
ME2247	AD1005, AD2025	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
ME2248a	AD650, AD313, AD594, AD653, AD586, AD585, AD1012, AD548, AD631, AD561, AD405, AD496, AD501, AD1337, AD1311, AD1365, AD1321, AD1345, AD1647, AD1255, AD1257, AD1142, AD1294, AD1229, AD1133, AD893, AD799, AD1281, AD1421, AD1236, AD1431, AD1113, AD1253, AD1191, AD484, AD143, AD129, AD149, AD153, AD547, AD459, AD244, AD236, AD3776, AD3322, AD3281, AD3584, AD1857, AD1823, AD1975, AD2053, AD1360, AD1274, AD1331, AD1442, AD1765, AD1696, AD1782	<p>Consultation process flawed and inadequate.</p> <p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt.</p> <p>Cumulative effects of this and other local minerals sites have not been considered. Full EIA should have been undertaken. Negative impacts on local wildlife, including pollution of watercourse - potential loss of biodiversity.</p> <p>Permanent impact on landscape - full reparation unlikely. Extraction of abundant minerals is unnecessary and excessive.</p> <p>Site is near to housing and primary school. Health & safety concerns relating to noise, vibrations, air pollution and heavy traffic. Dust pollution will be exacerbated by prevailing westerly wind. Other safety concerns relate to historic mining of land & gas pipe running across site.</p> <p>Loss of local amenity & health/recreational use (walkers, horse-riders, cyclists). Specific loss of Eunice Lane playing field. Impact on setting of conservation area and heritage assets. Support for inclusion of requirement for HIA. Impacts on tourism & local house prices.</p> <p>Contravention of NPPF paras. 7, 14, 17, 112, 114, 144, 145, 150, 151, 152.</p>
ME2248b	AD597, AD647, AD592, AD588, AD1013, AD771, AD563, AD788, AD408, AD494, AD493, AD1340, AD1366, AD1312, AD1322, AD1347, AD1649, AD1258, AD1275, AD1304, AD1296, AD1135, AD1230, AD812, AD894, AD1282, AD1237, AD1423, AD1114, AD1144, AD1432, AD1192, AD505, AD128, AD150, AD311, AD457, AD242, AD280, AD238, AD3323, AD3272, AD3589, AD1822, AD1868, AD1977, AD2026, AD1334, AD1362, AD1443, AD1766, AD1698	<p>Consultation process flawed and inadequate. SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt. Cumulative effects of this and other local minerals sites have not been considered. Full EIA should have been undertaken.</p> <p>Negative impacts on local wildlife - potential loss of biodiversity. Permanent impact on landscape - full reparation unlikely. Extraction of abundant minerals is unnecessary and excessive. Site is near to housing and primary school. Health & safety concerns relating to noise, vibrations, air pollution and heavy traffic. Dust pollution will be exacerbated by prevailing westerly wind. Other safety concerns relate to historic mining of land & gas pipe running across site. Loss of local amenity & health/recreational use (walkers, horse-riders, cyclists). Loss of playing field. Impact on setting of conservation area and heritage assets. Impacts on tourism & local house prices. Contravention of NPPF paras. 7, 14, 17, 112, 114, 144, 145, 150, 151, 152.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
ME2248c	AD599, AD590, AD1014, AD649, AD773, AD553, AD566, AD564, AD601, AD789, AD407, AD495, AD1367, AD1341, AD1313, AD1323, AD1348, AD1650, AD1276, AD1259, AD1297, AD1175, AD1231, AD895, AD813, AD1283, AD1238, AD1424, AD1115, AD1433, AD1145, AD1189, AD508, AD145, AD127, AD151, AD316, AD458, AD243, AD281, AD239, AD1873, AD3324, AD3273, AD3590, AD1824, AD1978, AD2027, AD1363, AD1306, AD1335, AD1444, AD1767, AD1699, AD1781	<p>Consultation process flawed and inadequate.</p> <p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt.</p> <p>Cumulative effects of this and other local minerals sites have not been considered. Full EIA should have been undertaken. Negative impacts on local wildlife - potential loss of biodiversity.</p> <p>Permanent impact on landscape - full reparation unlikely. Extraction of abundant minerals is unnecessary and excessive.</p> <p>Site is near to housing and primary school. Health & safety concerns relating to noise, vibrations, air pollution and heavy traffic. Dust pollution will be exacerbated by prevailing westerly wind. Other safety concerns relate to historic mining of land & gas pipe running across site.</p> <p>Loss of local amenity & health/recreational use (walkers, horse-riders, cyclists). Loss of playing field.</p> <p>Impact on setting of conservation area and heritage assets. Impacts on tourism & local house prices.</p> <p>Contravention of NPPF paras. 7, 14, 17, 112, 114, 144, 145, 150, 151, 152.</p>
ME2249	AD1006, AD2028	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads.</p>
ME2250	AD2029	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p>
ME2251	AD2030, AD211	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Support for allocation – site is permitted & operational, and works within an approved scheme.</p>
ME2252	AD2031	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
ME2253	AD1007, AD2032	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads.
ME2254	AD2033	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.
ME2255	AD1029, AD2034	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Impact of noise on residents of Wellhouses/ Cartworth Moor.
ME2256	AD2035	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.
ME2257	AD2036	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.
ME2258	AD2037	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.
ME2259	AD3777, AD2055, AD1780	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Site-specific impacts on biodiversity, hydrology & river function. Lack of access. Support for inclusion of requirement for HIA.
ME2263	AD1090, AD1008, AD734, AD2038, AD1779	SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads. Damage to roads & kerbs. Concern that site restoration will not occur after extraction. Query as to whether allocation is an existing permission.

Paragraph/Site	Representation IDs	Summary of Main Issues
ME2265	AD1009, AD2039	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Concerns re. permission in principle applying to allocated minerals sites. Large areas of land to be taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads.</p>
ME2267a	AD1010, AD3778, AD2056, AD1776	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Justification of need is questionable. Cumulative impacts of this and other local minerals sites will be significant.</p> <p>Concern that Local Plan minerals allocations will be given permission in principle. Large areas of land taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads.</p> <p>Support for inclusion of requirement for HIA.</p>
ME2312a	AD1015, AD3779, AD2057, AD1777	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Justification of need is questionable. Cumulative impacts of this and other local minerals sites will be significant.</p> <p>Concern that Local Plan minerals allocations will be given permission in principle. Large areas of land taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads.</p> <p>Support for inclusion of requirement for HIA.</p>
ME2312b	AD1016, AD2058, AD1778	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Justification of need is questionable. Cumulative impacts of this and other local minerals sites will be significant. Concern that Local Plan minerals allocations will be given permission in principle. Large areas of land taken out of green belt. Impact on landscape. Loss of agricultural land. Impact on residential amenity. Increased HGV traffic on minor roads.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
ME2314	AD144, AD312, AD587, AD651, AD595, AD589, AD1018, AD565, AD406, AD497, AD1876, AD1338, AD1314, AD1324, AD1346, AD1648, AD1260, AD1277, AD1141, AD1295, AD1227, AD1177, AD890, AD1284, AD1239, AD1425, AD1116, AD1190, AD490, AD130, AD154, AD460, AD246, AD282, AD237, AD3780, AD3325, AD3274, AD3591, AD1979, AD2059, AD1361, AD1332, AD1445, AD1763, AD1697, AD1783	<p>Consultation process flawed and inadequate.</p> <p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Concerns re. permission in principle applying to allocated minerals sites.</p> <p>Cumulative effects of this and other local minerals sites have not been considered. Full EIA should have been undertaken. Negative impacts on local wildlife, including in adjacent ancient woodland - potential loss of biodiversity.</p> <p>Permanent impact on landscape - full reparation unlikely. Extraction of abundant minerals is unnecessary and excessive.</p> <p>Site is near to housing and primary school. Health & safety concerns relating to noise, vibrations, air pollution and heavy traffic. Dust pollution will be exacerbated by prevailing westerly wind.</p> <p>Loss of local amenity & health/recreational use (walkers, horse-riders, cyclists). PROW crosses site.</p> <p>Impact on setting of conservation area and heritage assets. Support for inclusion of requirement for HIA.</p> <p>Impacts on tourism & local house prices.</p> <p>Contravention of NPPF paras. 7, 14, 17, 112, 114, 144, 145, 150, 151, 152.</p>
ME2568	AD489, AD976, AD994, AD1228, AD1217, AD1226, AD1047, AD1215, AD941, AD1251, AD924, AD1152, AD1121, AD1153, AD1205, AD1208, AD1209, AD1199, AD1212, AD1184, AD1158, AD1173, AD1195, AD1198, AD1168, AD203, AD241, AD240, AD3321, AD3781, AD3638, AD3643, AD2040, AD1387, AD1308, AD1394, AD1326, AD1320, AD1412, AD2454, AD1233, AD1240, AD1250, AD1775, AD2341, AD2342	<p>Consultation process flawed and inadequate.</p> <p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered.</p> <p>Concerns re. permission in principle applying to allocated minerals sites.</p> <p>Negative impacts on local wildlife (incl. in watercourse) - potential loss of biodiversity. Visual impact on landscape.</p> <p>Site is too close to housing. Health & safety concerns relating to noise, air pollution and heavy traffic.</p> <p>Dust pollution will be exacerbated by prevailing wind. Roads are not suitable for heavy vehicles.</p> <p>Impact on setting of conservation area and heritage assets. Support for inclusion of requirement for HIA.</p> <p>Impacts on local house prices.</p> <p>Support for allocation as a significant & established provider of local employment.</p>
ME3324	AD492, AD1213, AD997, AD1200, AD1154, AD1157, AD209, AD3783, AD3642, AD2043, AD1388, AD1327, AD1413	<p>SA for minerals allocations appears to contravene Local Plan Aims & Objectives. Timeframe, scale of extraction & land restoration 'ill-considered' - no robust strategy. Impacts on green belt and local communities (including health, recreation, open space, PROWs, landscape & historic environment) have not been fully considered. Risk of impact on setting of conservation area - request for further assessment. Concern re. loss of green belt land. Negative impacts on local residents include noise, dust (exacerbated by prevailing wind), heavy traffic. Reduction in house prices. Consultation process inadequate. Support for allocation from site promoters and local residents; established local employer.</p>
MI3398	AD3312	Allocation as Minerals Infrastructure is incompatible with the Vision for Dewsbury, since it will prevent the site from being used for more positive regeneration purposes.

Paragraph/Site	Representation IDs	Summary of Main Issues
MI3399	AD3310	Allocation as Minerals Infrastructure is incompatible with the Vision for Dewsbury, since it will prevent the site from being used for more positive regeneration purposes.
MI3403	AD1401	Site is currently in use as operational railway land - no justification for allocation as Minerals Infrastructure.
MI3404	AD3311	Allocation as Minerals Infrastructure is incompatible with the Vision for Dewsbury, since it will prevent the site from being used for more positive regeneration purposes.
MX1903	AD386, AD3768	Site is located adjacent to listed buildings. Support the reference to the requirement for a Heritage Impact Assessment. Development will need to be phased in line with proposed policy PLP4 to prevent any detrimental impact on the motorway.
MX1905	AD711, AD834, AD931, AD910, AD613, AD729, AD695, AD693, AD646, AD558, AD570, AD1318, AD1056, AD1068, AD859, AD1124, AD1235, AD1416, AD1376, AD488, AD48, AD327, AD487, AD217, AD3256, AD3285, AD3318, AD1841, AD2962, AD3319, AD3607, AD3286, AD1814, AD1687, AD1483, AD1773, AD2358, AD2365, AD2243	See Main Report - Chidswell
MX1906	AD3772	Site is located adjacent to listed buildings. Support the reference to the requirement for a Heritage Impact Assessment.
MX1911	AD1736, AD3771, AD3575, AD1735	The site contains numerous listed buildings. The loss of the area and its development may impact on their setting. Proposal is at odds with Councils own objectives. Support for the development from the site promoter. Concern expressed as to the potential anticipated yield of the site as reflected in PDLF.
MX1912a	AD3599, AD3775, AD3679, AD3680	Site is adjacent to Hepworth Conservation Area and listed church. Development of this site may affect the setting of these heritage assets. Site will have an impact on the New Mill junction A616. There is inadequate local road, health and education infrastrucutre to support this development.
MX1920	AD3774	Site is within Marsden Conservation Area. Support for requirement of a Heritage Impact Assessment.
MX1929	AD636, AD784	It is unsound to locate housing here as it results in coalescence between Mirfield and Robertown and reduces the distinctiveness and openness between settlements. This site has clearly not been needed for employment land and should be identified as safeguarded land. The indicative site capacity is too low. To allow flexibility on design and mix, the indicative capacity should be increased. We suggest to 180 dwellings. When allocating sites it is Government policy and generally good practice to make the best possible use of those sites. This would comply with Government guidance in the NPPF to make effective use of land.
MX1930	AD3769, AD1853	Support for reference to the requirement for a Heritage Impact Assessment due to a number of listed buildings nearby. The site should be re-allocated for residential development and not mixed use development.
MX2101	AD3770	Support for the reference to the requirement for a Heritage Impact Assessment as the site has a number of listed buildings nearby and is located within the Town Centre Conservation Area.

Paragraph/Site	Representation IDs	Summary of Main Issues
MX3349	AD387, AD3773	Site contains a listed building. Support for reference to the requirement for a Heritage Impact Assessment. Development of this site will need to be phased in line with proposed Policy PLP4 that requires investment in infrastructure and new development to be coordinated to prevent a detrimental impact on the motorway junction.
MX3394	AD912, AD328, AD1774	Support for continued co-operation between Leeds and Kirklees to address transport issues. Land at Chidswell should be deleted.
Priority Employment Areas - B&S15	AD780	The designation of B and S 15 as a PEA cannot be justified by the criteria set for this policy. It is an isolated, poor site, severely constrained. Buildings on the site were put up in an incremental way leading to over development of the site and a loss of amenity for adjoining residential properties. Current buildings are a considerable scale and highly obtrusive and objectionable.
Priority Employment Areas - B&S3	AD1963	Removal of the IKEA warehouse from Priority Employment Area reference B&S3 and the boundary amended accordingly.
Priority Employment Areas - B&S4, B&S16, B&S3, B&S15	AD2522	Support the Councils Priority employment areas at sites B&S4, B&S16, B&S3, B&S15.
Priority Employment Areas - HUD23	AD2250	Object to the designation of Site HUD23 as a PEA as it should be identified as an Employment Area in order to ensure compliance with the National Planning Policy Framework (the 'Framework) and provide adequate flexibility to enable alternative uses on the site should this be necessary in the future
Priority Employment Areas - Table Batley & Spen	AD376	Support the inclusion of the safeguarded land for the Chain Bar improvement scheme on the policy maps which appears to now accurately reflect the scheme land requirement identified by Highways England.
Priority Employment Areas - Table Kirklees Rural	AD3687, AD3688, AD3605	Existing employment sites within Holmfirth should be protected and not allocated for housing.
Safeguarded waste management sites - WS14	AD179	A large area is shown as being safeguarded waste management that is not currently used for waste management. Of the area to the south of the viaduct shown safeguarded, only a quarter is used for waste management. The map includes several other businesses and an access road to these.
Safeguarded waste management sites - WS16	AD3594, AD3071, AD761, AD276	Remove WS16 from the Plan. Policy PLP46 would sterilise the farm in perpetuity for waste purposes only. The existing business is not a waste site - it is a renewable energy anaerobic digestion (AD) biogas plant, which is farm diversification. The local plan does not include policies to support rural economy or a tourism policy. This is a 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. Kirklees has not considered cross boundary and inter authority issues on waste.

Paragraph/Site	Representation IDs	Summary of Main Issues
Safeguarded waste management sites - WS24	AD3816	WS24 inclusion of cobbled area is not part of the scrap yard.
Safeguarded waste management sites - WS27	AD3313	The designation of large areas of Waste Sites in the heart of Dewsbury and Ravensthorpe is incompatible with the Vision for the South Dewsbury area. Safeguarded waste management facilities along the River Calder in Dewsbury and Ravensthorpe should be re-designated to accord with the aims and objectives of the Plan and Vision for the area. Particular concerns with WS33, WS36 and WS27.
Safeguarded waste management sites - WS33	AD3694, AD3690	The designation of large areas of Waste Sites in the heart of Dewsbury and Ravensthorpe is incompatible with the Vision for the South Dewsbury area. Safeguarded waste management facilities along the River Calder in Dewsbury and Ravensthorpe should be re-designated to accord with the aims and objectives of the Plan and Vision for the area. Particular concerns with WS33, WS36 and WS27.
Safeguarded waste management sites - WS34	AD3691	The designation of large areas of Waste Sites in the heart of Dewsbury and Ravensthorpe is incompatible with the Vision for the South Dewsbury area. Safeguarded waste management facilities along the River Calder in Dewsbury and Ravensthorpe should be re-designated to accord with the aims and objectives of the Plan and Vision for the area. Particular concerns with WS33, WS36 and WS27.
Safeguarded waste management sites - WS36	AD3692, AD3693	The designation of large areas of Waste Sites in the heart of Dewsbury and Ravensthorpe is incompatible with the Vision for the South Dewsbury area. Safeguarded waste management facilities along the River Calder in Dewsbury and Ravensthorpe should be re-designated to accord with the aims and objectives of the Plan and Vision for the area. Particular concerns with WS33, WS36 and WS27.
SGI2110	AD22, AD3309	Miller Homes understands and supports the concept of the Mirfield Promenade but is keen to understand the evidence base for the proposal and what it is seeking to achieve in order to reflect this in the Dewsbury Riverside masterplan. The evidence base for the proposal is not available therefore there is no justification. The plan is unsound due to the lack of clarity regarding the boundary of SGI2110 as it relates to Lady Wood and housing allocation H2089. The boundary of SGI2110 is shown yellow on the proposals map and is supposed to be hatched across but this is unclear, particularly where it includes Lady Wood which is also shown within housing allocation H2089.
SL2161	AD464	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.

Paragraph/Site	Representation IDs	Summary of Main Issues
SL2163	AD524, AD1261, AD521, AD25, AD3804, AD3592	Unwilling landowner. 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. 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 - 3 x This site should be re-designated as Urban Greenspace. Allocate as a housing option - 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.
SL2164	AD3803	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.
SL2166	AD3795	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.
SL2167	AD1052, AD1172, AD1167, AD1163, AD1171, AD51	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. 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. Lack of local health and education infrastructure to support the development.

Paragraph/Site	Representation IDs	Summary of Main Issues
SL2170a	AD1889, AD2349, AD2971, AD2933, AD3556, AD3560, AD3374, AD3054, AD3392, AD3388, AD3412, AD3409, AD3397, AD3421, AD3430, AD3424, AD3418, AD3394, AD3400, AD3490, AD3406, AD3415, AD3487, AD3404, AD3460, AD3463, AD3570, AD3595, AD3540, AD3550, AD3544, AD3527, AD3530, AD3533, AD3842, AD3647, AD3644, AD3547, AD3660, AD3553, AD3564, AD3659, AD3478, AD3347, AD3469, AD3466, AD3433, AD3481, AD3436, AD3494, AD3427, AD3328, AD3484, AD3453, AD3449, AD3443, AD3439, AD3446, AD3257, AD3473, AD3457, AD3260, AD3653, AD3506, AD3503, AD3517, AD3500, AD3567, AD3497, AD3509, AD3524, AD3520, AD3512, AD3356, AD3384, AD3380, AD3365, AD3353, AD3377, AD3344, AD3341, AD3371, AD3338, AD3367, AD3350, AD3359, AD3362, AD3537, AD1993, AD1267, AD1270, AD1264, AD1666, AD1662	Access to the site would cross a footpath and existing footpath to three properties, development would further exacerbate existing problems.
SL2170b	AD2357, AD2972, AD2934, AD3375, AD3557, AD3562, AD3055, AD3796, AD3385, AD3393, AD3389, AD3395, AD3410, AD3413, AD3431, AD3422, AD3419, AD3425, AD3488, AD3491, AD3398, AD3464, AD3401, AD3407, AD3405, AD3461, AD3416, AD3596, AD3528, AD3571, AD3534, AD3548, AD3551, AD3541, AD3531, AD3545, AD3843, AD3648, AD3554, AD3645, AD3663, AD3568, AD3565, AD3664, AD3479, AD3470, AD3455, AD3434, AD3482, AD3467, AD3485, AD3329, AD3428, AD3450, AD3447, AD3437, AD3444, AD3440, AD3458, AD3475, AD3348, AD3258, AD3654, AD3507, AD3504, AD3498, AD3501, AD3495, AD3510, AD3513, AD3518, AD3525, AD3521, AD3382, AD3351, AD3357, AD3354, AD3366, AD3342, AD3378, AD3345, AD3372, AD3339, AD3368, AD3538, AD3360, AD3363, AD3261, AD1890, AD1994, AD1265, AD1268, AD1271, AD1667, AD1663	Wildlife impact, the site is 500m from Peak District National Park and 200m from SPA.
SL2173	AD218, AD225, AD754, AD1086, AD576, AD533, AD957, AD1188, AD347, AD303, AD215, AD3289, AD2918, AD3802, AD3650, AD1943, AD2071, AD2330, AD2328	Issues with highway capacity and parking on Far Bank already. There is no capacity at the first school to accommodate growth. There is no provision for an adequate access. 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. No provision for health care. There are available brownfield sites as an alternative. There are drainage and flood issues. There is little employment in this area. Change of this land would affect the wildlife and water table.

Paragraph/Site	Representation IDs	Summary of Main Issues
SL2176	AD1169, AD3785	<p>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. Drainage would be a problem, land is very wet. Underground streams cross the site, diverting these could cause damage to private land or property. Increased traffic would cause problems.</p>
SL2177	AD1693	<p>The site should be re-allocated as a housing option.</p>
SL2184	AD3791	<p>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.</p>
SL2187	AD3797	<p>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.</p>
SL2189	AD3798	<p>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.</p>
SL2191	AD2928, AD3799, AD3661, AD3662	<p>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. The evidence for school places has not been calculated properly. It is a gross under estimation. 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.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
SL2194	AD3786	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.
SL2195	AD3800	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.
SL2196	AD3801	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.
SL2197	AD3790	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.
SL2201	AD3789	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.
SL2202	AD2536	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.
SL2268	AD3787	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.

Paragraph/Site	Representation IDs	Summary of Main Issues
SL2271	AD3788	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.
SL2284	AD3792	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.
SL2290	AD2537	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.
SL2297	AD2434	The site should be re-allocated as a housing option.
SL2331	AD3794	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.

Paragraph/Site	Representation IDs	Summary of Main Issues
SL3356	AD753, AD1087, AD718, AD555, AD581, AD958, AD1187, AD348, AD300, AD219, AD216, AD228, AD3290, AD2917, AD3652, AD1940, AD2069, AD2329	<p>Issues with traffic and parking on Far Bank. The First School is at capacity. Issues with site access and conflicts with other users. Limes Developments Ltd considers that the access issues can be rectified and the site should be a housing allocation. Other site concerns include: drainage issues, local amenities at capacity. 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 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 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. 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 in 12.1 of the PDLP which states that implementation of the policy should take into account any impact on climate change factors. There are brownfield sites within the Kirkburton and Shelley area that have not been utilised. 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.</p>
SL3357	AD1088, AD87, AD394	<p>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 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. 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. Safeguarded land sites would have negative implications for infrastructure when they go ahead.</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
SL3358	AD1089, AD85, AD395, AD2926, AD3815	<p>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. The proposed allocation is immediately adjacent to Shepley Mill Wood Ancient Woodland and Upper and Lower Stones Wood Local Wildlife Site and has the potential to lead to significant impacts. 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 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. 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. Safeguarded land sites would have negative implications for infrastructure when they go ahead.</p>
SL3359	<p>AD1058, AD517, AD3070, AD2696, AD3113, AD3161, AD2109, AD2728, AD2135, AD1564, AD1545, AD1579, AD1527, AD1542, AD1465, AD1549, AD1585, AD1568, AD1557, AD1570, AD1561, AD1539, AD1534, AD1523, AD1552, AD1521, AD1287, AD1019, AD1378, AD951, AD180, AD3136, AD3142, AD3117, AD3130, AD3126, AD3164, AD3074, AD3149, AD3133, AD3061, AD3098, AD3077, AD2985, AD3109, AD3158, AD3153, AD3123, AD3146, AD3082, AD3049, AD2876, AD2870, AD2873, AD2849, AD3030, AD3034, AD2988, AD3215, AD3167, AD3067, AD2992, AD2976, AD2891, AD2852, AD2942, AD3219, AD2953, AD2746, AD2699, AD2731, AD3598, AD2150, AD1923, AD3222, AD3229, AD3170, AD3235, AD3085, AD3120, AD3106, AD3101, AD3092, AD3088, AD3006, AD3095, AD3206, AD3240, AD2967, AD3190, AD2840, AD3197, AD3015, AD2667, AD2664, AD2737, AD2670, AD2734, AD2713, AD2688, AD2725, AD2900, AD2894, AD2888, AD2858, AD2719, AD2716, AD2785, AD2683, AD2770, AD2749, AD2779, AD2676, AD2776, AD2800, AD2758, AD2710, AD2815, AD2707, AD2773, AD2691, AD2704, AD2752, AD2818, AD2673, AD2810, AD2755, AD2803, AD2846, AD3009, AD3024, AD2994, AD3021, AD3053, AD2794, AD3000, AD2980, AD3043, AD3004, AD3038, AD3019, AD2879, AD2956, AD2861, AD2959, AD2997, AD2964, AD3058, AD3012, AD3027, AD2983, AD2950, AD2864, AD2867, AD2903, AD2834, AD2797, AD2945, AD2897, AD2882, AD2843, AD2885, AD2855, AD2791, AD2767, AD2824, AD2837, AD2827, AD2806, AD3233, AD2764, AD2782, AD2813, AD2831, AD2821, AD2788,</p>	<p>Previous planning appeal decision in 1996 on part of H597 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. 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. The north-east corner of H597 susceptible to flooding. 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). Potential for impact on nearby listed building. 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. More brownfield sites should be included before using green belt land. Delete H597 and designate H297, H597 and SL3359 as Local Green Space</p>

Paragraph/Site	Representation IDs	Summary of Main Issues
	AD3848, AD3641, AD3667, AD3668, AD3177, AD3198, AD3213, AD3183, AD3227, AD3179, AD3174, AD3243, AD3186, AD3192, AD3204, AD3209, AD3516, AD1851, AD1883, AD1827, AD1899, AD1859, AD1863, AD1845, AD1888, AD1838, AD1871, AD1866, AD1932, AD1935, AD1896, AD1848, AD1913, AD1880, AD1855, AD1894, AD1902, AD1910, AD1920, AD1906, AD2761, AD1919, AD1926, AD1942, AD2075, AD2153, AD2163, AD1934, AD1875, AD2118, AD2083, AD2088, AD2101, AD2133, AD1929, AD1833, AD1372, AD1472, AD2420, AD2551, AD2427, AD2575, AD2567, AD2546, AD2685, AD2620, AD1694, AD1701, AD1574, AD1702, AD1558, AD1531, AD1587, AD1580, AD2495, AD2542, AD2452, AD2324, AD2321, AD2431, AD2471, AD2443, AD2437, AD2474, AD2450, AD2489, AD2477, AD2470, AD2554, AD2549, AD2481, AD2483, AD2461, AD2456, AD2464, AD2440, AD2492, AD2433, AD2388, AD2318, AD2423, AD2447, AD2400, AD2486, AD2625, AD2589, AD2607, AD2585, AD2637, AD2581, AD2661, AD2569, AD2658, AD2591, AD2635, AD2614, AD2656, AD2504, AD2507, AD2573, AD2650, AD2632, AD2605, AD2722, AD2597, AD2644, AD2680, AD2652, AD2560, AD2694, AD2743, AD2601, AD2563, AD2611, AD2617, AD2628, AD2740, AD2646, AD2640, AD2557, AD2578, AD2309, AD2306, AD2199, AD2112, AD2126, AD2123, AD2105, AD2204, AD2336, AD2268, AD2263, AD2182, AD2143, AD2077, AD2160, AD2130, AD2095, AD2278, AD2186, AD2193, AD2156, AD2146, AD2092, AD2208, AD2138, AD2172, AD2167, AD2275, AD2196, AD2078, AD2289, AD2293, AD2286, AD2416, AD2398, AD2403, AD2382, AD2406, AD2370, AD2314, AD2594, AD2394, AD2417, AD2212, AD2191, AD2271, AD2296, AD2283, AD2302, AD2299, AD2376, AD2373, AD2386, AD2379, AD2409, AD2391, AD2260, AD2177, AD2327	
SL3396	AD3793	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 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.
TS1	AD3805	Support

Paragraph/Site	Representation IDs	Summary of Main Issues
TS10	AD440	No evidence that cycling is integrated into the major transport plans that are outlined Without cycling being specifically stated the opportunity for cycling to contribute to transport will be overlooked and will be seen as an extra
TS11	AD390, AD3578	TS11 needs to differentiate between committed RIS1 schemes and additional infrastructure requirements identified as part of the West Yorkshire Infrastructure Study
TS2	AD388, AD161	It should be made clear that this is a West Yorkshire Plus Transport Fund (WY+TF) scheme and not a Highways England scheme
TS3	AD1460, AD3806	Junction is adjacent to listed building. Support reference to para 7.1 of the need to have regard to heritage assets. The assessment of A629 needs extending further south as far as Highburton and Kirkburton to cope with existing traffic levels which will have a significant increase as a result of the many Accepted housing sites in Kirklees Rural South East.
TS4	AD389, AD3807	Route runs through a Conservation Area. Support reference to para 7.1 of the need to have regard to heritage assets. Highways England is working closely with Kirklees and Calderdale councils to understand and agree the scope of any proposals along this corridor in particular in relation to Ainley Top.
TS5	AD3808, AD3307	Junction is adjacent to listed building. Support reference to para 7.1 of the need to have regard to heritage assets. Objection to the non-inclusion of the Ravensthorpe Relief road within this allocation.
TS8	AD1462	The assessment of A629 needs extending further south as far as Highburton and Kirkburton to cope with existing traffic levels which will have a significant increase as a result of the many Accepted housing sites in Kirklees Rural South East.
TS9	AD900, AD1463, AD357	Should be a reference to provision of mobility impaired access at stations. This allocation should indicate improvements for Mirfield Station. The assessment of A629 needs extending further south as far as Highburton and Kirkburton to cope with existing traffic levels which will have a significant increase as a result of the many Accepted housing sites in Kirklees Rural South East.
Urban Green Space - UGS1016	AD1703	Support for the change to the boundary of UGS1016.

Paragraph/Site	Representation IDs	Summary of Main Issues
Urban Green Space - UGS1042, UGS2489, UGS1043, UGS1267, UGS1269, UGS1044, UGS1045, UGS1804, UGS1046, UGS1047, UGS1266, UGS964, UGS965, UGS1254, UGS967, UGS1477, UGS966, UGS1316, UGS968, UGS969, UGS970, UGS963.	AD2517	Support for the allocation of the following sites as urban green space: UGS1042, UGS2489, UGS1043, UGS1267, UGS1269, UGS1044, UGS1045, UGS1804, UGS1046, UGS1047, UGS1266, UGS964, UGS965, UGS1254, UGS967, UGS1477, UGS966, UGS1316, UGS968, UGS969, UGS970, UGS963.
Urban Green Space - UGS1068	AD1807, AD1820	<p>Objection to the allocation of the eastern part of UGS1068 as urban greenspace as site UGS1068 does not meet the definition of open space in para 74 of NPPF and it would also fail to meet definition of local greenspace.</p> <p>Objection to the allocation of part of UGS1068 off New Lane as urban greenspace. This site is not of high value in terms of physical , social, environmental or visual qualities. It is not publicly accessible and cannot perform a role in reducing health inequalities and enhancing physical activity. Its development would not lead to a qualitative or quantitative deficiency in urban greenspace within Cleckheaton. The New Lane site should be removed from the wider UGS for reasons relating to use and accessibility, purpose, character and visual quality, views, ecological value, other benefits and overall quality and value.</p>
Urban Green Space - UGS1168	AD2458	It is not justifiable to include land off Forest Road as urban greenspace. The site is a small unsightly area of land used for keeping of livestock and incorporating a number of unsightly livestock buildings with no public access. The site does not play a role in the overall functioning of UGS1168. The Open Space Assessment identifies sufficient greenspace in the area and the Open Space Assessment for the site has not been considered in context of NPPF.
Urban Green Space - UGS1214	AD670	Land west of Intake/Green Crescent is not justified as urban greenspace. It is semi-natural green space of poor quality and value and there is no public access. The proximity of the settlement edge and countryside calls into question the Council's calculations of the amount of green space available to the community. The Council has failed to consider uses other than Urban Green Space for the site. There are inconsistencies between the treatment of Green Belt and Urban Green Space in the allocation of housing sites.

Paragraph/Site	Representation IDs	Summary of Main Issues
Urban Green Space - UGS1240	AD1972	Land owned by Huddersfield University and adjacent land in private and council ownership should be removed from urban greenspace. The area of UGS1240 is 37.19 hectares which is too significant an area to identify for urban greenspace provision in this location. The University former playing fields are surplus to requirements and the adjacent land is vacant and unused. The land does not currently perform any recreation function or contain characteristics pertaining to urban green space designation and there is no public access.
Urban Green Space - UGS1251	AD795	It is not sound to extend UGS1251 to include land off Holmfirth Road. This will have a direct impact on the owner as does not take into account the owner's current plans or future aspirations for the site. It also fails to consider the use of the land that has taken place up to the present time, that being its use as a builders storage yard since 1978 and its current use as a tree surgery/forestry storage and processing site. Allocate plot 1 only as urban greenspace. This would be a minimal increase in urban greenspace in contrast to the amount of green belt and greenfield sites allocated for development.
Urban Green Space - UGS1281	AD1458	The inclusion of site UGS1281 as urban greenspace is sound.
Urban Green Space - UGS1804	AD337	UGS1804 is not valuable for sport, recreation, amenity or wildlife. It is a former football ground that has not been used for over 30 years and is cut off from urban green space to the north by residential development. The site is in private ownership and residential use, is landlocked, provides no public amenity and is not publicly accessible. A recent appeal for a single dwelling on the land was successful and the Inspector considered that the proposed development would not conflict with paragraphs 73 and 74 of the NPPF as they relate to the provision of high quality open spaces and sports and recreational land.
Urban Green Space - UGS2151	AD1991	Land at Rumble Road, Bywell is not appropriate for designation as urban green space. It is an agricultural field divorced from the main agricultural holding. It does not perform a greenspace function and apart for a footpath across the site there is not public access.
Urban Green Space - UGS2917	AD1359, AD988, AD1354, AD937, AD1041, AD869, AD1216, AD932, AD1046, AD977, AD1110, AD1471, AD1193, AD949, AD1818, AD1032, AD1111, AD1112, AD956, AD987, AD959, AD1819, AD872, AD913, AD1206, AD1028, AD943, AD917, AD938, AD1202, AD1054, AD870, AD920, AD1211, AD973, AD873, AD1102, AD919, AD991, AD942, AD1035, AD1072, AD1085, AD1093, AD1055, AD1071, AD1103, AD842, AD1095, AD922, AD908, AD944, AD882, AD866, AD940, AD876, AD934, AD921, AD1053, AD861, AD1050, AD1106, AD1031, AD995, AD1108, AD986, AD1109, AD1105, AD863, AD923, AD837, AD1023	Support for the allocation of site UGS2917 as urban green space.
Urban Green Space - UGS851	AD668	The UGS notation is not justified for land adjacent 26 Moor Close. The boundaries of UGS851 are not sound because this land does not fulfill an urban greenspace function. It does not provide opportunities for sport, recreation and play as the land has no public rights of access. The visual amenity of the site is considered low quality and development of the housing allocation immediately to the north negates any benefit from openness per se. The latest ecological databases show the site to have no significant wildlife or habitat value. The land should be included in housing allocation H1783.

Paragraph/Site	Representation IDs	Summary of Main Issues
Urban Green Space - UGS886	AD3703	Objection to the inclusion of land fronting Summervale within UGS886. The land forms part of the old railway sidings, the wooded hillside and a paddock. The land has developed over a period of time as individual plots and the paddock section of the land has been re-designated as open space. This has been done without due process being followed and without notifying the landowner. The land should be correctly designated as part of the domestic curtilage of the Summervale Development.
Urban Green Space - UGS928	AD1971	The inclusion of site UGS928 as urban greenspace is sound.
Urban Green Space - UGS936	AD109	The allocation of the whole of UGS936 as urban greenspace is unfounded. One third of the land is used as grazing farmland and a farm track and should be removed from the urban greenspace allocation.
Urban Green Space - UGS973	AD1821, AD1837	The White Lee Road, Batley site should be removed from the wider urban greenspace allocation. The land is not of high value in terms of physical, social, environmental or visual qualities. It is not publicly accessible and cannot perform a role in reducing health inequalities and enhancing physical activity. It is entirely separate from the wider UGS973 site and is different in character and context and performs no open space function. The land should be removed from the wider urban greenspace for reasons relating to use and accessibility, purpose, character and visual quality, views, ecological value, other benefits and overall quality and value. Allocation of the land is not consistent with NPPF as the urban greenspace is not considered to fulfil the function of a valued landscape in terms of paragraph 109 of NPPF. An additional objection relates to a more extensive area of land off White Lee Road on the basis it is not semi-natural greenspace and because it is not used for sport and recreation and is private land it cannot be defined as open space as per the NPPF definition. It would also fail to meet definition of local greenspace.

Summary of Main Issues - Rejected Sites Report

Paragraph/Site	Representation IDs	Summary of Main Issues
PDLP Rejected Site Options - E1850	RSO972	See summary in Main Report
PDLP Rejected Site Options - E1851	RSO974	See summary in Main Report
PDLP Rejected Site Options - E1881	RSO983	See summary in Main Report
PDLP Rejected Site Options - E1985b	RSO698	See summary in Main Report
PDLP Rejected Site Options -	RSO787	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
E1992		
PDLP Rejected Site Options - E2700	RSO1229	See summary in Main Report
PDLP Rejected Site Options - GTTS2064	RSO854	See summary in Main Report
PDLP Rejected Site Options - GTTS2065	RSO855	See summary in Main Report
PDLP Rejected Site Options - H111	RSO642	See summary in Main Report
PDLP Rejected Site Options - H113	RSO962	See summary in Main Report
PDLP Rejected Site Options - H136	RSO589, RSO415, RSO418, RSO431, RSO558, RSO461, RSO481, RSO482, RSO610, RSO648, RSO570, RSO550, RSO545, RSO673, RSO659, RSO636, RSO597, RSO630, RSO693, RSO941, RSO1123	See summary in Main Report
PDLP Rejected Site Options - H141	RSO948	See summary in Main Report
PDLP Rejected Site Options - H149	RSO466	See summary in Main Report
PDLP Rejected Site Options - H161	RSO774	See summary in Main Report
PDLP Rejected Site Options - H163	RSO951	See summary in Main Report
PDLP Rejected Site Options - H164	RSO969	See summary in Main Report
PDLP Rejected Site Options - H168	RSO805	See summary in Main Report
PDLP Rejected Site Options - H169	RSO699	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
PDLP Rejected Site Options - H1701	RSO295, RSO240, RSO243, RSO702, RSO701	See summary in Main Report
PDLP Rejected Site Options - H1713	RSO980	See summary in Main Report
PDLP Rejected Site Options - H1738	RSO1119	See summary in Main Report
PDLP Rejected Site Options - H1742	RSO1128	See summary in Main Report
PDLP Rejected Site Options - H177	RSO401, RSO467, RSO1172	See summary in Main Report
PDLP Rejected Site Options - H1792	RSO603, RSO751, RSO956	See summary in Main Report
PDLP Rejected Site Options - H1813	RSO982	See summary in Main Report
PDLP Rejected Site Options - H184	RSO706	See summary in Main Report
PDLP Rejected Site Options - H188	RSO591, RSO488, RSO408, RSO453, RSO474, RSO612, RSO520, RSO537, RSO655, RSO665, RSO631, RSO621, RSO1272	See summary in Main Report
PDLP Rejected Site Options - H189	RSO438, RSO592, RSO489, RSO409, RSO425, RSO565, RSO454, RSO613, RSO521, RSO571, RSO538, RSO656, RSO690, RSO666, RSO632, RSO622, RSO1114, RSO1273	See summary in Main Report
PDLP Rejected Site Options - H227	RSO572	See summary in Main Report
PDLP Rejected Site Options - H231	RSO681, RSO965	See summary in Main Report
PDLP Rejected Site Options - H247	RSO967	See summary in Main Report
PDLP Rejected Site Options - H250	RSO483, RSO414, RSO420, RSO433, RSO560, RSO460, RSO480, RSO587, RSO608, RSO646, RSO573, RSO551, RSO544, RSO674, RSO661, RSO637, RSO594, RSO629, RSO695, RSO942,	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
	RSO1109	
PDLP Rejected Site Options - H251	RSO484, RSO412, RSO421, RSO434, RSO561, RSO458, RSO586, RSO607, RSO645, RSO552, RSO542, RSO675, RSO662, RSO638, RSO595, RSO627, RSO696, RSO943, RSO1110	See summary in Main Report
PDLP Rejected Site Options - H252	RSO485, RSO939, RSO416, RSO429, RSO556, RSO457, RSO477, RSO465, RSO585, RSO606, RSO644, RSO522, RSO575, RSO553, RSO541, RSO676, RSO657, RSO639, RSO599, RSO626, RSO691, RSO741, RSO1111	See summary in Main Report
PDLP Rejected Site Options - H253	RSO486, RSO413, RSO419, RSO432, RSO559, RSO459, RSO479, RSO588, RSO609, RSO647, RSO554, RSO543, RSO677, RSO660, RSO640, RSO596, RSO628, RSO694, RSO944, RSO1112	See summary in Main Report
PDLP Rejected Site Options - H254	RSO605, RSO487, RSO411, RSO417, RSO430, RSO557, RSO456, RSO478, RSO464, RSO584, RSO643, RSO523, RSO555, RSO540, RSO678, RSO658, RSO576, RSO577, RSO641, RSO600, RSO625, RSO692, RSO745, RSO940, RSO1113	See summary in Main Report
PDLP Rejected Site Options - H255	RSO574	See summary in Main Report
PDLP Rejected Site Options - H256	RSO593, RSO490, RSO407, RSO422, RSO435, RSO562, RSO452, RSO475, RSO614, RSO653, RSO524, RSO536, RSO687, RSO663, RSO578, RSO633, RSO620, RSO1115, RSO1274	See summary in Main Report
PDLP Rejected Site Options - H256a	RSO634	See summary in Main Report
PDLP Rejected Site Options - H257	RSO491, RSO590, RSO410, RSO423, RSO436, RSO563, RSO455, RSO476, RSO611, RSO525, RSO539, RSO654, RSO688, RSO664, RSO579, RSO635, RSO623, RSO1116, RSO1120, RSO1275	See summary in Main Report
PDLP Rejected Site Options - H2590	RSO707	See summary in Main Report
PDLP Rejected Site Options - H26	RSO937	See summary in Main Report
PDLP Rejected Site Options - H260	RSO981	See summary in Main Report
PDLP Rejected Site Options - H2600	RSO703	See summary in Main Report
PDLP Rejected	RSO1242	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
Site Options - H2601		
PDLP Rejected Site Options - H262	RSO954	See summary in Main Report
PDLP Rejected Site Options - H263	RSO971	See summary in Main Report
PDLP Rejected Site Options - H2638	RSO1230	See summary in Main Report
PDLP Rejected Site Options - H264	RSO966	See summary in Main Report
PDLP Rejected Site Options - H265	RSO959	See summary in Main Report
PDLP Rejected Site Options - H27	RSO748	See summary in Main Report
PDLP Rejected Site Options - H2731	RSO700	See summary in Main Report
PDLP Rejected Site Options - H274	RSO1121	See summary in Main Report
PDLP Rejected Site Options - H275	RSO1122	See summary in Main Report
PDLP Rejected Site Options - H279	RSO973	See summary in Main Report
PDLP Rejected Site Options - H288	RSO437, RSO424, RSO564, RSO689, RSO1117	See summary in Main Report
PDLP Rejected Site Options - H291	RSO1124	See summary in Main Report
PDLP Rejected Site Options - H3	RSO979, RSO711	See summary in Main Report
PDLP Rejected Site Options -	RSO968	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
H311		
PDLP Rejected Site Options - H314	RSO857	See summary in Main Report
PDLP Rejected Site Options - H315	RSO963	See summary in Main Report
PDLP Rejected Site Options - H352	RSO978	See summary in Main Report
PDLP Rejected Site Options - H357	RSO683, RSO790, RSO1265	See summary in Main Report
PDLP Rejected Site Options - H362	RSO782	See summary in Main Report
PDLP Rejected Site Options - H37	RSO949	See summary in Main Report
PDLP Rejected Site Options - H450	RSO1125	See summary in Main Report
PDLP Rejected Site Options - H466	RSO975	See summary in Main Report
PDLP Rejected Site Options - H476	RSO680	See summary in Main Report
PDLP Rejected Site Options - H493	RSO781	See summary in Main Report
PDLP Rejected Site Options - H500	RSO785	See summary in Main Report
PDLP Rejected Site Options - H505	RSO784	See summary in Main Report
PDLP Rejected Site Options - H517	RSO786	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
PDLP Rejected Site Options - H522	RSO947	See summary in Main Report
PDLP Rejected Site Options - H523	RSO709	See summary in Main Report
PDLP Rejected Site Options - H557	RSO955	See summary in Main Report
PDLP Rejected Site Options - H558	RSO957	See summary in Main Report
PDLP Rejected Site Options - H564	RSO809	See summary in Main Report
PDLP Rejected Site Options - H575	RSO463, RSO750, RSO365, RSO316, RSO402, RSO368, RSO297, RSO346, RSO682, RSO231, RSO292, RSO296, RSO289, RSO288, RSO400, RSO391, RSO351, RSO347, RSO390, RSO442, RSO451, RSO679, RSO917, RSO1118	See summary in Main Report
PDLP Rejected Site Options - H586	RSO936	See summary in Main Report
PDLP Rejected Site Options - H594	RSO670	See summary in Main Report
PDLP Rejected Site Options - H596	RSO697	See summary in Main Report
PDLP Rejected Site Options - H6	RSO964	See summary in Main Report
PDLP Rejected Site Options - H602	RSO1127	See summary in Main Report
PDLP Rejected Site Options - H606	RSO1126	See summary in Main Report
PDLP Rejected Site Options - H644	RSO977	See summary in Main Report
PDLP Rejected Site Options - H65	RSO791	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
PDLP Rejected Site Options - H666	RSO938	See summary in Main Report
PDLP Rejected Site Options - H672	RSO960	See summary in Main Report
PDLP Rejected Site Options - H673	RSO970	See summary in Main Report
PDLP Rejected Site Options - H675	RSO958, RSO598, RSO752	See summary in Main Report
PDLP Rejected Site Options - H71	RSO803	See summary in Main Report
PDLP Rejected Site Options - H76	RSO779	See summary in Main Report
PDLP Rejected Site Options - H77	RSO783	See summary in Main Report
PDLP Rejected Site Options - H78	RSO950	See summary in Main Report
PDLP Rejected Site Options - H79	RSO1108	See summary in Main Report
PDLP Rejected Site Options - H8	RSO1243, RSO1237	See summary in Main Report
PDLP Rejected Site Options - H84	RSO953	See summary in Main Report
PDLP Rejected Site Options - H90	RSO807	See summary in Main Report
PDLP Rejected Site Options - H91	RSO800	See summary in Main Report
PDLP Rejected Site Options - H93	RSO808	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
PDLP Rejected Site Options - H97	RSO794	See summary in Main Report
PDLP Rejected Site Options - LocGS2721	RSO499, RSO516, RSO518, RSO501, RSO511, RSO504, RSO506, RSO509, RSO513, RSO1248, RSO1255, RSO1249, RSO1256, RSO1257	See summary in Main Report
PDLP Rejected Site Options - MX1902	RSO961	See summary in Main Report
PDLP Rejected Site Options - MX1908	RSO976	See summary in Main Report
PDLP Rejected Site Options - MX1914	RSO379, RSO382, RSO383	See summary in Main Report
PDLP Rejected Site Options - MX1924	RSO864	See summary in Main Report
PDLP Rejected Site Options - MX1925	RSO788	See summary in Main Report
PDLP Rejected Site Options - MX2681	RSO406, RSO449, RSO472, RSO651, RSO527, RSO546, RSO495, RSO534, RSO618	See summary in Main Report
PDLP Rejected Site Options - MX3371	RSO450, RSO473, RSO652, RSO529, RSO496, RSO535, RSO619	See summary in Main Report
PDLP Rejected Site Options - SGI2109	RSO492, RSO441, RSO445, RSO403, RSO446, RSO428, RSO468, RSO583, RSO568, RSO528, RSO549, RSO531, RSO686, RSO615, RSO669, RSO945, RSO1131, RSO1276, RSO1225	See summary in Main Report
PDLP Rejected Site Options - SGI2115	RSO439, RSO443, RSO404, RSO447, RSO426, RSO566, RSO470, RSO649, RSO519, RSO526, RSO547, RSO493, RSO532, RSO671, RSO684, RSO667, RSO580, RSO601, RSO616, RSO1129, RSO1277, RSO1224	See summary in Main Report
PDLP Rejected Site Options - SGI2115a	RSO440, RSO444, RSO405, RSO448, RSO427, RSO471, RSO650, RSO567, RSO530, RSO548, RSO494, RSO533, RSO672, RSO685, RSO581, RSO602, RSO617, RSO668, RSO946, RSO1130, RSO1223	See summary in Main Report
PDLP Rejected Site Options - SL2286	RSO769	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
PDLP Rejected Site Options - SL2293	RSO984	See summary in Main Report
PDLP Rejected Site Options - SL2300	RSO1244, RSO1238	See summary in Main Report
Rejected Site Options - E1840	RSO156	See summary in Main Report
Rejected Site Options - E1985	RSO1271	See summary in Main Report
Rejected Site Options - E1992	RSO97	See summary in Main Report
Rejected Site Options - E2333	RSO1270	See summary in Main Report
Rejected Site Options - GTTS1955	RSO105	See summary in Main Report
Rejected Site Options - GTTS1956	RSO106	See summary in Main Report
Rejected Site Options - GTTS1959	RSO107	See summary in Main Report
Rejected Site Options - GTTS1963	RSO76	See summary in Main Report
Rejected Site Options - GTTS2042	RSO108	See summary in Main Report
Rejected Site Options - GTTS2044	RSO104	See summary in Main Report
Rejected Site Options - GTTS2045	RSO109	See summary in Main Report
Rejected Site Options - GTTS2047	RSO110	See summary in Main Report
Rejected Site Options - GTTS2051	RSO111	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
Rejected Site Options - GTTS2055	RSO112	See summary in Main Report
Rejected Site Options - GTTS2057	RSO113	See summary in Main Report
Rejected Site Options - GTTS2060	RSO114	See summary in Main Report
Rejected Site Options - GTTS2061	RSO115	See summary in Main Report
Rejected Site Options - H111	RSO145	See summary in Main Report
Rejected Site Options - H115	RSO192, RSO853	See summary in Main Report
Rejected Site Options - H125	RSO1250	See summary in Main Report
Rejected Site Options - H136	RSO219, RSO203, RSO139, RSO329, RSO335, RSO387, RSO395	See summary in Main Report
Rejected Site Options - H137	RSO33	See summary in Main Report
Rejected Site Options - H143	RSO78	See summary in Main Report
Rejected Site Options - H149	RSO1251	See summary in Main Report
Rejected Site Options - H160	RSO175, RSO771, RSO806	See summary in Main Report
Rejected Site Options - H170	RSO924	See summary in Main Report
Rejected Site Options - H1701	RSO258, RSO303, RSO246, RSO273, RSO244, RSO278, RSO2, RSO6, RSO8, RSO7, RSO9, RSO10, RSO50, RSO49, RSO41, RSO42, RSO85, RSO87, RSO261, RSO301, RSO237, RSO298, RSO290, RSO286, RSO249, RSO247, RSO275, RSO272, RSO248, RSO265, RSO251, RSO241, RSO262, RSO299, RSO250, RSO239, RSO264, RSO300, RSO268, RSO294, RSO232, RSO291, RSO233, RSO242, RSO284, RSO285, RSO238, RSO267, RSO263, RSO255, RSO349, RSO236, RSO315, RSO314, RSO312, RSO311, RSO309, RSO308, RSO304, RSO277, RSO364, RSO366, RSO363, RSO360, RSO361, RSO362, RSO359, RSO358, RSO357, RSO356, RSO353, RSO354	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
Rejected Site Options - H177	RSO63, RSO116	See summary in Main Report
Rejected Site Options - H1796	RSO80, RSO60, RSO46, RSO120, RSO812	See summary in Main Report
Rejected Site Options - H1797	RSO765, RSO170, RSO798	See summary in Main Report
Rejected Site Options - H1798	RSO766, RSO171, RSO799	See summary in Main Report
Rejected Site Options - H1810	RSO757, RSO162, RSO777	See summary in Main Report
Rejected Site Options - H185	RSO39	See summary in Main Report
Rejected Site Options - H188	RSO225, RSO133, RSO340	See summary in Main Report
Rejected Site Options - H189	RSO223, RSO189, RSO135, RSO341	See summary in Main Report
Rejected Site Options - H226	RSO54, RSO61, RSO45, RSO47, RSO118, RSO83, RSO817	See summary in Main Report
Rejected Site Options - h226	RSO462	See summary in Main Report
Rejected Site Options - H226A	RSO57	See summary in Main Report
Rejected Site Options - H226a	RSO62, RSO48, RSO119, RSO815, RSO1239	See summary in Main Report
Rejected Site Options - H227	RSO1264	See summary in Main Report
Rejected Site Options - H240	RSO760, RSO165, RSO793	See summary in Main Report
Rejected Site Options - H243	RSO762, RSO167, RSO795	See summary in Main Report
Rejected Site Options - H249	RSO1240	See summary in Main Report
Rejected Site Options - H250	RSO218, RSO205, RSO140, RSO326, RSO332, RSO388, RSO396	See summary in Main Report
Rejected Site Options - H251	RSO217, RSO206, RSO141, RSO327, RSO333, RSO389, RSO397	See summary in Main Report
Rejected Site Options - H252	RSO215, RSO207, RSO142, RSO330, RSO336, RSO385, RSO393	See summary in Main Report
Rejected Site Options - H253	RSO216, RSO208, RSO143, RSO328, RSO334, RSO386, RSO394	See summary in Main Report
Rejected Site Options - H254	RSO214, RSO209, RSO144, RSO331, RSO337, RSO384, RSO392	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
Rejected Site Options - H2551	RSO888	See summary in Main Report
Rejected Site Options - H256	RSO221, RSO136, RSO338	See summary in Main Report
Rejected Site Options - H256a	RSO222, RSO190, RSO137, RSO342	See summary in Main Report
Rejected Site Options - H257	RSO220, RSO188, RSO138, RSO339	See summary in Main Report
Rejected Site Options - H2572	RSO159, RSO755, RSO775	See summary in Main Report
Rejected Site Options - H2590	RSO160, RSO756, RSO776	See summary in Main Report
Rejected Site Options - H2595	RSO1263	See summary in Main Report
Rejected Site Options - H2596	RSO1262	See summary in Main Report
Rejected Site Options - H2598	RSO469	See summary in Main Report
Rejected Site Options - H261	RSO158, RSO754, RSO773	See summary in Main Report
Rejected Site Options - H2639	RSO157, RSO753, RSO772	See summary in Main Report
Rejected Site Options - H2640	RSO764, RSO169, RSO797	See summary in Main Report
Rejected Site Options - H2684	RSO102, RSO1235	See summary in Main Report
Rejected Site Options - H2714	RSO1253	See summary in Main Report
Rejected Site Options - H2730	RSO103, RSO1236	See summary in Main Report
Rejected Site Options - H29	RSO226	See summary in Main Report
Rejected Site Options - H298	RSO183	See summary in Main Report
Rejected Site Options - H29a	RSO1245	See summary in Main Report
Rejected Site Options - H3	RSO1278	See summary in Main Report
Rejected Site Options - H309	RSO306	See summary in Main Report
Rejected Site Options - H315	RSO198	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
Rejected Site Options - H32	RSO98, RSO1231	See summary in Main Report
Rejected Site Options - H322	RSO195, RSO318	See summary in Main Report
Rejected Site Options - H322a	RSO229	See summary in Main Report
Rejected Site Options - H330	RSO305	See summary in Main Report
Rejected Site Options - H3325	RSO1254	See summary in Main Report
Rejected Site Options - H334	RSO99, RSO1232	See summary in Main Report
Rejected Site Options - H3387	RSO582	See summary in Main Report
Rejected Site Options - H352	RSO1279	See summary in Main Report
Rejected Site Options - H357	RSO892	See summary in Main Report
Rejected Site Options - H366	RSO705	See summary in Main Report
Rejected Site Options - H41	RSO77	See summary in Main Report
Rejected Site Options - H455	RSO100, RSO1233	See summary in Main Report
Rejected Site Options - H457	RSO281, RSO369, RSO874	See summary in Main Report
Rejected Site Options - H458	RSO280, RSO370, RSO876, RSO881	See summary in Main Report
Rejected Site Options - H459	RSO279, RSO877	See summary in Main Report
Rejected Site Options - H460	RSO804, RSO174, RSO770	See summary in Main Report
Rejected Site Options - H464	RSO759, RSO780, RSO164	See summary in Main Report
Rejected Site Options - H471	RSO257	See summary in Main Report
Rejected Site Options - H472	RSO79	See summary in Main Report
Rejected Site Options - H475	RSO320, RSO1267	See summary in Main Report
Rejected Site Options - H482	RSO763, RSO168, RSO796	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
Rejected Site Options - H493	RSO92	See summary in Main Report
Rejected Site Options - H497	RSO758, RSO163, RSO778	See summary in Main Report
Rejected Site Options - H500	RSO93	See summary in Main Report
Rejected Site Options - H505	RSO94	See summary in Main Report
Rejected Site Options - H510	RSO153	See summary in Main Report
Rejected Site Options - H517	RSO95	See summary in Main Report
Rejected Site Options - H520	RSO767, RSO172, RSO801	See summary in Main Report
Rejected Site Options - H524	RSO725	See summary in Main Report
Rejected Site Options - H525	RSO726	See summary in Main Report
Rejected Site Options - H530	RSO1269	See summary in Main Report
Rejected Site Options - H546	RSO761, RSO166, RSO792	See summary in Main Report
Rejected Site Options - H552	RSO1	See summary in Main Report
Rejected Site Options - H557	RSO371	See summary in Main Report
Rejected Site Options - H561	RSO1252	See summary in Main Report
Rejected Site Options - H564	RSO55, RSO56, RSO43, RSO40, RSO82, RSO182, RSO374, RSO377, RSO376, RSO380, RSO375, RSO302	See summary in Main Report
Rejected Site Options - H571	RSO194	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
Rejected Site Options - H575	RSO313, RSO254, RSO26, RSO27, RSO17, RSO28, RSO18, RSO19, RSO20, RSO21, RSO22, RSO25, RSO30, RSO11, RSO12, RSO13, RSO14, RSO15, RSO32, RSO35, RSO38, RSO185, RSO53, RSO37, RSO44, RSO52, RSO58, RSO64, RSO66, RSO67, RSO84, RSO117, RSO68, RSO69, RSO70, RSO71, RSO74, RSO72, RSO73, RSO75, RSO86, RSO88, RSO89, RSO90, RSO122, RSO121, RSO124, RSO125, RSO127, RSO128, RSO177, RSO186, RSO146, RSO181, RSO149, RSO148, RSO199, RSO184, RSO155, RSO176, RSO178, RSO179, RSO180, RSO204, RSO399, RSO234, RSO259, RSO293, RSO372, RSO245, RSO228, RSO230, RSO235, RSO253, RSO260, RSO367, RSO373, RSO352, RSO398, RSO1246	See summary in Main Report
Rejected Site Options - h575	RSO31, RSO227	See summary in Main Report
Rejected Site Options - H586	RSO96	See summary in Main Report
Rejected Site Options - H594	RSO196	See summary in Main Report
Rejected Site Options - H598	RSO307	See summary in Main Report
Rejected Site Options - H603	RSO283	See summary in Main Report
Rejected Site Options - H644	RSO624	See summary in Main Report
Rejected Site Options - H649	RSO193	See summary in Main Report
Rejected Site Options - H653	RSO1266, RSO1268	See summary in Main Report
Rejected Site Options - H659	RSO101, RSO1234	See summary in Main Report
Rejected Site Options - H672	RSO497	See summary in Main Report
Rejected Site Options - H674	RSO723	See summary in Main Report
Rejected Site Options - H692	RSO282	See summary in Main Report
Rejected Site Options - H745	RSO768, RSO173, RSO802	See summary in Main Report
Rejected Site Options - H76	RSO91	See summary in Main Report
Rejected Site Options - H78a	RSO886	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
Rejected Site Options - H8	RSO266, RSO885, RSO1027	See summary in Main Report
Rejected Site Options - LocGS2126	RSO1258	See summary in Main Report
Rejected Site Options - LocGS2129	RSO1259	See summary in Main Report
Rejected Site Options - LocGS2130	RSO1260	See summary in Main Report
Rejected Site Options - LocGS2721	RSO829, RSO828, RSO827, RSO825, RSO822, RSO735, RSO875, RSO835, RSO915, RSO879, RSO1031, RSO1045, RSO1046, RSO1020, RSO271, RSO498, RSO503, RSO502, RSO507, RSO508, RSO514, RSO510, RSO505, RSO515, RSO500, RSO512, RSO517, RSO737, RSO724, RSO716, RSO731, RSO718, RSO729, RSO712, RSO744, RSO746, RSO811, RSO826, RSO814, RSO816, RSO820, RSO830, RSO721, RSO722, RSO733, RSO717, RSO727, RSO713, RSO742, RSO739, RSO720, RSO708, RSO730, RSO710, RSO715, RSO728, RSO714, RSO732, RSO734, RSO736, RSO719, RSO738, RSO740, RSO920, RSO839, RSO869, RSO862, RSO919, RSO923, RSO891, RSO845, RSO870, RSO844, RSO906, RSO928, RSO929, RSO868, RSO846, RSO860, RSO743, RSO907, RSO914, RSO852, RSO856, RSO824, RSO831, RSO821, RSO810, RSO833, RSO832, RSO813, RSO747, RSO818, RSO749, RSO863, RSO847, RSO836, RSO900, RSO896, RSO912, RSO843, RSO910, RSO878, RSO1017, RSO1000, RSO1016, RSO880, RSO1002, RSO838, RSO903, RSO841, RSO890, RSO861, RSO848, RSO1014, RSO840, RSO935, RSO837, RSO851, RSO921, RSO926, RSO834, RSO895, RSO893, RSO925, RSO927, RSO913, RSO916, RSO897, RSO898, RSO899, RSO901, RSO902, RSO909, RSO908, RSO911, RSO842, RSO904, RSO905, RSO894, RSO867, RSO866, RSO865, RSO873, RSO872, RSO871, RSO849, RSO850, RSO858, RSO859, RSO1004, RSO985, RSO998, RSO992, RSO986, RSO991, RSO1048, RSO1038, RSO1019, RSO1022, RSO1059, RSO1005, RSO1012, RSO989, RSO993, RSO999, RSO1018, RSO933, RSO1006, RSO995, RSO1009, RSO1011, RSO1015, RSO930, RSO994, RSO934, RSO1001, RSO988, RSO1003, RSO1007, RSO1010, RSO996, RSO997, RSO931, RSO1013, RSO1008, RSO887, RSO1060, RSO1104, RSO1066, RSO1053, RSO1079, RSO1032, RSO1035, RSO1102, RSO1106, RSO1092, RSO1088, RSO1054, RSO1034, RSO1043, RSO1030, RSO1057, RSO1058, RSO1042, RSO1037, RSO1041, RSO1024, RSO1025, RSO1056,	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
	RSO1055, RSO1040, RSO1044, RSO1036, RSO1047, RSO1050, RSO1028, RSO1026, RSO1049, RSO1023, RSO1021, RSO1150, RSO1166, RSO1169, RSO1164, RSO1192, RSO1190, RSO1065, RSO1073, RSO1187, RSO1158, RSO1151, RSO1170, RSO1139, RSO1105, RSO1091, RSO1087, RSO1101, RSO1100, RSO1095, RSO1068, RSO1107, RSO1063, RSO1094, RSO1080, RSO1074, RSO1099, RSO1077, RSO1064, RSO1085, RSO1082, RSO1093, RSO1086, RSO1061, RSO1089, RSO1067, RSO1076, RSO1078, RSO1069, RSO1096, RSO1097, RSO1098, RSO1083, RSO1103, RSO1090, RSO1070, RSO1062, RSO1084, RSO1081, RSO1075, RSO1072, RSO1039, RSO1052, RSO1071, RSO1029, RSO1051, RSO1213, RSO1199, RSO1209, RSO1221, RSO1207, RSO1152, RSO1205, RSO1143, RSO1219, RSO1155, RSO1157, RSO1168, RSO1135, RSO1159, RSO1148, RSO1144, RSO1171, RSO1167, RSO1156, RSO1179, RSO1136, RSO1215, RSO1140, RSO1160, RSO1138, RSO1188, RSO1189, RSO1184, RSO1163, RSO1191, RSO1182, RSO1186, RSO1161, RSO1162, RSO1193, RSO1147, RSO1174, RSO1165, RSO1173, RSO1146, RSO1142, RSO1145, RSO1137, RSO1134, RSO1181, RSO1180, RSO1178, RSO1177, RSO1176, RSO1197, RSO1214, RSO1196, RSO1218, RSO1200, RSO1195, RSO1217, RSO1201, RSO1194, RSO1202, RSO1175, RSO1183, RSO1216, RSO1185, RSO1141, RSO1211, RSO1203, RSO1153, RSO1208, RSO1204, RSO1206, RSO1154, RSO1210, RSO1212, RSO1198, RSO1222, RSO1280	
Rejected Site Options - LocGS2723	RSO1261	See summary in Main Report
Rejected Site Options - LWS111	RSO65	See summary in Main Report
Rejected Site Options - ME1970	RSO319, RSO882	See summary in Main Report
Rejected Site Options - ME1971	RSO321, RSO883	See summary in Main Report
Rejected Site Options - ME1972	RSO322, RSO884	See summary in Main Report
Rejected Site Options - MX1904	RSO569	See summary in Main Report
Rejected Site Options -	RSO4	See summary in Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
MX1914		
Rejected Site Options - MX2681	RSO224, RSO134	See summary in Main Report
Rejected Site Options - MX3371	RSO132, RSO213, RSO343	See summary in Main Report
Rejected Site Options - SGI2109	RSO129, RSO210, RSO200, RSO344, RSO1228	See summary in Main Report
Rejected Site Options - SGI2115	RSO287, RSO130, RSO211, RSO191, RSO201, RSO270, RSO274, RSO325, RSO252, RSO310, RSO256, RSO345, RSO378, RSO381, RSO932, RSO1226	See summary in Main Report
Rejected Site Options - SGI2115a	RSO131, RSO212, RSO187, RSO202, RSO1227	See summary in Main Report
Rejected Site Options - SL2280	RSO29	See summary in Main Report
Rejected Site Options - SL2286	RSO59, RSO276, RSO1247	See summary in Main Report
Rejected Site Options - SL2300	RSO269, RSO1033	See summary in Main Report
Rejected Site Options - SL2732	RSO1241	See summary in Main Report
Rejected Site Options - SL2916	RSO889	See summary in Main Report
Rejected Site Options - Whole Document	RSO51	See summary in Main Report
Rejected Site Options -SGI2109	RSO604	See summary in Main Report

Summary of Main Issues - Green Belt Boundary Changes

Paragraph/Site	Representation IDs	Summary of Main Issues
Green Belt Boundary Changes - 0411_01	GBBC10	See Green Belt boundary changes report

Paragraph/Site	Representation IDs	Summary of Main Issues
Green Belt Boundary Changes - 1612_01	GBBC52	See Green Belt boundary changes report
Green Belt Boundary Changes - 1612-03	GBBC55, GBBC54, GBBC58, GBBC56, GBBC50, GBBC51	See Green Belt boundary changes report
Green Belt Boundary Changes - 1712-02	GBBC15	See Green Belt boundary changes report
Green Belt Boundary Changes - 1809_01	GBBC48	See Green Belt boundary changes report
Green Belt Boundary Changes - 2026_01	GBBC23	See Green Belt boundary changes report
Green Belt Boundary Changes - 2027_01	GBBC1	See Green Belt boundary changes report
Green Belt Boundary Changes - 2415_05	GBBC62	See Green Belt boundary changes report
Green Belt Boundary Changes - AGB2072	GBBC60	See Green Belt boundary changes report
Green Belt Boundary Changes - AGB2074	GBBC22	See Green Belt boundary changes report
Green Belt Boundary Changes - CCMX1905i	GBBC16	See Green Belt boundary changes report
Green Belt Boundary Changes - H233	GBBC13	See Green Belt boundary changes report

Paragraph/Site	Representation IDs	Summary of Main Issues
Green Belt Boundary Changes - H634	GBBC11	See Green Belt boundary changes report
Green Belt Boundary Changes - RGB2137	GBBC63	See Green Belt boundary changes report
Green Belt Boundary Changes - RGB2613	GBBC59	See Green Belt boundary changes report
Green Belt Boundary Changes - RGB2702	GBBC45	See Green Belt boundary changes report
Green Belt Boundary Changes - RSSGB102	GBBC64	See Green Belt boundary changes report
Green Belt Boundary Changes - RSSGB28	GBBC47	See Green Belt boundary changes report
Green Belt Boundary Changes - RSSGB39	GBBC61	See Green Belt boundary changes report
Green Belt Boundary Changes - RSSGB46	GBBC67	See Green Belt boundary changes report
Green Belt Boundary Changes - RSSGB91	GBBC49	See Green Belt boundary changes report
Green Belt Boundary Changes - RSSGB64	GBBC68	See Green Belt boundary changes report

Summary of Main Issues – Sustainability Appraisal

Paragraph/Site	Representation IDs	Summary of Main Issues
4.1	SA124	See Main Report
11.1	SA123	See Main Report
E1831	SA2	See Main Report
E1832c	SA112	See Main Report
GTTS2487	SA97	See Main Report
GTTS2487	SA98	See Main Report
H136	SA57	See Main Report
H138	SA76, SA78, SA90	See Main Report
H168	SA93	See Main Report
H1747	SA74	See Main Report
H228a	SA91	See Main Report
H2684a	SA133	See Main Report
H2730a	SA96, SA134	See Main Report
H288a	SA87, SA19, SA102, SA109, SA99, SA100, SA101, SA92, SA103	See Main Report
H288A	SA88	See Main Report
H31,H664, H616, H638, H2730, H2684a, H1679	SA8	See Main Report
H314	SA111	See Main Report
H358	SA12, SA82, SA13, SA83	See Main Report
H38	SA113	See Main Report
H442	SA122, SA89, SA86, SA105, SA104	See Main Report
H584	SA77	See Main Report
H69	SA106, SA84, SA81, SA79, SA95	See Main Report
H8	SA80	See Main Report
H91	SA94	See Main Report
ME2248a	SA7	See Main Report
ME2248b	SA114	See Main Report
ME2248c	SA115	See Main Report
ME2314	SA116	See Main Report
ME2568	SA107	See Main Report
ME3324	SA108	See Main Report
MX1924	SA110	See Main Report
Para. 2.31	SA132	See Main Report
Paragraph 12.137	SA130	See Main Report
Paragraph 12.57	SA131	See Main Report
Paragraph 4.68	SA125	See Main Report
Paragraph 5.50	SA126	See Main Report
Paragraph 6.62	SA127	See Main Report
Paragraph 9.42	SA128	See Main Report

Paragraph/Site	Representation IDs	Summary of Main Issues
PDLP Sustainability Appraisal	SA56	See Main Report
SGI2109	SA72	See Main Report
SGI2115a	SA73	See Main Report
SL2163	SA85	See Main Report
SL2170a	SA117, SA119	See Main Report
SL2170b	SA118, SA120	See Main Report
Table 12.4	SA129	See Main Report

Appendix 8 - Green Belt Strategy and Policies 19.5 and Green belt boundary changes

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942142

Agent ID 950095

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared Whether a site serves green belt purposes and provides sustainable development in line with the Local Plan strategy has not been the key driver in decision making, which has been whether it is possible or desirable to access land through any particular green belt edge.

Soundness - Justified The green belt review is unsupported by critical evidence. Test 1 is not supported by critical evidence on environmental constraints, how a slope would make a site undevelopable or how the presence of a listed building would preclude development of an entire site. There is no explanation of the weighting used in the Green Belt Review Assessment Matrix, such as how different combinations of colours lead to the final outcome. The approach taken to justify adding land to the green belt, removing land from the green belt and in the assessment of small sites is arguably unlawful as assessing whether past boundaries were incorrectly drawn is not an exceptional circumstance that justifies a change to the boundary and this is confirmed in case law.

Soundness - Effective

Soundness - Consistent with National Policy There is no direct justification for applying either three tests or for the "gateway" approach that rules out further consideration of the role and function of the green belt. Test 2 which rules out further consideration of green belt purposes if the site is deemed to be a strategic gap is inconsistent with the NPPF. This is not the fundamental purpose of the green belt and only appears second in the list of bullet points on green belt purposes in paragraph 80 of NPPF. The fundamental purpose of the green belt is to prevent sprawl which is given greater weighting than other green belt purposes in the assessment matrix. Test 2d has assessed green belt land for its ability to preserve the setting of historic assets. This is not consistent with the purposes of including land in the green belt set out in NPPF. Test 3 of the green belt review should not be applied to brownfield land in the green belt. Paragraph 80 of the NPPF identifies urban regeneration achieved through creating pressure to develop outside the green belt as the purpose green belt serves, not the purpose it may inhibit, which is the development of brownfield sites in the green belt. No additional test should therefore be applied. The review does not contain any assessment of a site's ability to meet the terms of paragraphs 84 and 85 of the NPPF or section 39 of the 2004 Planning and Compulsory Purchase Act. The NPPF requires authorities to promote sustainable patterns of development when reviewing green belt boundaries (paragraph 84) and ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (paragraph 85). Meeting objectively assessed need for housing and employment can constitute the exceptional circumstances required to amend the position of the green belt boundary. The Council should make it clear if this is not the circumstance being relied on to justify a review of the green belt. The green belt review methodology should not take as its starting point a consideration of how robust current boundaries are. This is not one of the purposes of the green belt, nor do physical changes to boundaries over time or forming a view over a position for a better boundary amount to the exceptional circumstances required to amend them. The Consequential Changes identified in the Green Belt Boundary Changes document are not sound as they have been identified based on an unsound green belt review methodology.

Proposed Change Requested The Council should specifically set out what exceptional circumstances exist that justify the review of the green belt.

Council Response No change. The Green Belt Review in Kirklees does not, in itself, identify parcels of land for removal from the green belt. It is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees and supports the overall assessment of specific development options in accordance with the site allocation methodology. It is through this comprehensive process that decisions on the acceptability or otherwise of sites is made, in accordance with the Kirklees Local Plan strategy for growth. The first part of the green belt review was to check for the presence of constraints along the green belt boundary or in land adjacent to the edge of the settlement that may inhibit the possibility of settlement extension. In terms of the topographical constraint, to be assessed as red (severe) the degree of slope must be >20% (1:5) and be on or very close to the edge of the settlement so that development impact would be immediate. Physical constraints to development can be either a physical constraint on the boundary, such as the M62 motorway, a railway line or river, or a physical constraint on land beyond the boundary, such as areas at high risk of flooding, sewage works, cemeteries etc. The presence of a listed building is a physical constraint to development and is correctly noted at test 1b but there are no green belt edges assessed as "red" at test 1b

Representations received at Publication Draft Local Plan on PDL - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942142

Agent ID 950095

solely for the presence of listed buildings or conservation areas. Environmental constraints can include for example areas of ancient woodland, a significant number of protected trees or buffer zones for example alongside high pressure gas pipelines. Land affected by these constraints to the extent that the assessment is "red" need not be assessed against green belt purposes as part of the Green Belt Review as these areas are unlikely to be able to accommodate settlement extension. In accordance with the site allocation methodology however, all sites undergo a site-specific green belt assessment, irrespective of the colour of the edge they abut, and may still be acceptable if it can be demonstrated that their release would not significantly harm any green belt purpose and that there would no other overriding constraint indicated by the technical site assessment. The Assessment Matrix (Appendix 1 of the Green Belt Review) is a tool that allows a combination of assessments to be translated into a single conclusion in a manner that is transparent and consistent. The matrix also allows weighting to be applied to land that is important in preventing the unrestricted sprawl of urban areas, recognising this as a fundamental purpose of the green belt. There is no prescribed method of undertaking a Green Belt Review set out in national planning policy or guidance. The method adopted by the council constitutes relevant and proportionate evidence consistent with its role in supporting the assessment of development options as part of the Local Plan site allocation methodology. The purpose of the Green Belt Review in Kirklees is to aid the assessment of development options. Where the needs for development cannot be accommodated in the non-green belt area new allocations will be considered firstly as an extension to an existing settlement. It is entirely consistent with this approach that an assessment should be made of the degree of constraint that may inhibit the extension of a settlement and where this is deemed to be severe that land need not progress through to be tested against green belt purposes. Land that progressed through at Test 1 was then tested firstly to determine whether it functioned as a strategic gap between settlements. The Council does not regard the bullet point list of purposes of the green belt in NPPF as a hierarchy of the importance of the issues and considers it reasonable to discount from further assessment land deemed to be serving an important green belt role such that any extension to the settlement could significantly undermine that role. It is accepted that Kirklees does not have any historic towns and this is stated in paragraph 3.20 of the Green Belt Review. Test 2d assesses the presence of historic assets and the degree to which development would be prejudicial to that asset or its setting. In terms of test 3, the Council states at paragraph 3.23 of the Green Belt Review that a purpose of the green belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land and it does this throughout its extent by channelling development into urban areas. The Council accepts that it cannot remove isolated brownfield sites from the green belt as this is contrary to the purposes of including land in the green belt, but could examine sites on the edges of the settlement to see if they are properly located within the green belt and this is the purpose of test 3. The Council accept that exceptional circumstances would still be required to adjust the green belt boundary to remove a site from the green belt, even if assessment demonstrated that the green belt was likely to inhibit its beneficial re-use. A sustainable pattern of development has been achieved through the Local Plan process as a whole. Each development option underwent a detailed sustainability appraisal against 19 sustainability appraisal objectives and the results of these have been published in the Sustainability Appraisal document. Exceptional circumstances are required to amend the position of the green belt boundary and in terms of the accepted development options it is the inability of the non-green belt areas to meet objectively assessed need for housing and employment land that conveys the exceptional circumstances necessary to remove sites from the green belt. The same exceptional circumstance applies to the removal of land that no longer performs a green belt role and function as a consequence of accepting development options (the "consequential changes"). As part of the preparation of the Local Plan the Council has carried out an exercise to transfer the existing green belt boundary (paper based at 1:10,000 scale) on to an up to date Ordnance Survey base so that the boundary is presented in electronic format. This is both necessary and appropriate. It is not an exercise to review the position of the boundary, nor does it consider how robust current boundaries are. For the vast majority of the extent of the boundary no change is proposed. As stated in the Green Belt Boundary Changes document it was not always possible to place the boundary on the modern map with a high degree of certainty, either because of the inadequacies of the original map base, in which case a "best fit" scenario was adopted, or because of changes that have occurred over time. The Council has been quite clear that exceptional circumstances are required to make a deliberate change to the position of the boundary and the Council has investigated in every case whether there is any material change in circumstances that would make it necessary to update the position of the boundary. All changes made to the position of the boundary have been published. The same is true of the small sites (sites of less than 0.4ha), the "add land to the green belt" options and the "remove land from the green belt" options that have been submitted to the Council for consideration. These sites are not required as development options therefore the need to meet OAN does not apply. In all cases the request to amend the boundary has been scrutinised to establish whether exceptional circumstances exist that justifies a change.

Representations recieved at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942144

Agent ID 941843

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

It would appear from para 3.2 the favoured approach of the Green Belt Review is to review the Green Belt edge and land immediately adjacent from it. From the associated plans, the focus is associated more with the Green Belt edge and it becomes unclear how much consideration has been given to associated land parcels. Green Belt edges provide a useful starting point but 'parcels' / 'general areas' and potential boundaries should be tested.

Soundness - Effective

Soundness - Consistent with National Policy

The test does not attempt to establish where new Green Belt boundaries could be defined.

Proposed Change Requested

Council Response

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942154

Agent ID 941891

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared While Savile Estate is supportive of the Council's review of the Green Belt to identify areas to be released for development, the Council should be more ambitious in delivering growth and meeting the objectively assessed needs of the District.

Soundness - Justified

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested Be more ambitious in meeting the objectively assessed needs of the district. A Government White Paper and accompanying changes to the guidance for development in Green Belts is anticipated in the New Year. Such changes should be taken on board.

Council Response

No change. Exceptional circumstances are required to amend the position of the green belt boundary and it is the inability of non-green belt areas to meet the objectively assessed need for housing and employment land that convey the exceptional circumstances required. While the Council is therefore supportive of the removal of land from the green belt to accommodate new development options to meet that need, the Council remains committed to the efficient use of previously developed land. The "Housing White Paper" was published by the Department for Communities and Local Government on 7 th February 2017. It sets out a range of proposals but does not introduce any new planning guidance or policy. It cannot therefore be used at the present time to formulate green belt policy or green belt review methodology.

Representations received at Publication Draft Local Plan on PDL - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942155

Agent ID 941779

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The green belt edge in this location is incorrectly assessed as having an important role in preventing merger (test 2a) as new development would be a modest extension of existing development south of Shillbank Lane and would not impact on the extent of the gap between Mirfield and Ravensthorpe any more than the existing development at Spring Place Court. It is also incorrectly assessed as having an important role in preventing sprawl (test 2b) as there are landscape features that could present new long term defensible boundaries. It also does not warrant a red assessment for encroachment (test 2c) as this area is not part of the wider countryside. It is an area of urban fringe which is not of high landscape quality. Topography and land use features also restrict views into the area.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Re-assess the green belt edge in this location.Â

Council Response

No change. The reason for the assessment of DW3 as an edge with a score of 5 is set out in the Green Belt Review document and is based on a comprehensive assessment of green belt purposes compatible with the Green Belt Review methodology. This area is considered to be a restricted gap separating Mirfield from Ravensthorpe but where some limited settlement extension could be achieved without fundamentally undermining that role. This is evidenced by the 'amber' assessment at Test 2a in terms of its role in preventing the merger of settlements. The green belt is then assessed as playing an important role in terms of checking sprawl and safeguarding the countryside from encroachment as the existing boundary is not a strong feature on the ground and that there is limited opportunity to contain new development. It is not accepted that this is an area of urban fringe as there is a clear distinction between land that is residential and land that is green belt and the treed areas and watercourse give the area a general countryside character. In accordance with the Assessment Matrix the green belt in this location is deemed to be performing strongly against green belt purposes and has been scored as 5. The assessment of the potential impact of the removal of site H594 from the green belt was carried out in line with the Council's Local Plan Site Allocation Methodology (November 2016). The red assessment for 'green belt edge' reinforced the green belt review and reflected the sprawl of the site to the west. The red assessment for the green belt overall reflected the extent and configuration of the site relative to the area of green belt in which it is located. Both the assessment of edge ref DW3 and the assessment of site H594 properly reflect the role and function of the green belt and the impact that the removal of site H594 would have on the green belt in this location.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942155

Agent ID 941779

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The green belt review is unsupported by critical evidence. There is little clarity of evidence to underpin the application of test 1, such as how a slope would make a site undevelopable or how mitigation may apply to a site. There is no clear evidence to underpin the categorisation of sites based on physical or environmental constraints. The Council should have taken into consideration detailed site specific evidence of how any such constraints could be overcome.

Soundness - Effective

Soundness - Consistent with National Policy

The Council's approach to the green belt review appears not to align with advice in NPPF. There is no justification for the three tests or for the gateway approach of ruling out further consideration in any national policy or legal requirements. Test 2a is a gateway test as only if this test is passed are the other purposes of the green belt assessed. Merger however only appears second in the list of green belt purposes in NPPF and it is sprawl, not merger that is the fundamental aim of green belt policy. This makes test 2a inconsistent with the NPPF. Kirklees does not have any historic towns so test 2d is also inconsistent with national guidance. The origin of test 3 is the fifth purpose of the green belt as defined by NPPF which is a strategic matter concerned with encouraging urban regeneration by channelling development towards urban areas. It should not be applied on a site by site basis for brownfield sites in the green belt. The Council's approach to the green belt review rules out further consideration of a site's ability to meet development needs in a sustainable manner and an overall judgement against all green belt purposes if a single severe constraint is identified in test 1 or if it fails test 2a. There has been no assessment of a site's ability to meet paragraph 84 and 85 of the NPPF or section 39 of the Act in terms of promoting sustainable patterns of development. These are factors relevant to the choices about where development should be accommodated alongside green belt purposes in a green belt review. The approach the Council is taking in assessing options to add land to the green belt, remove land from the green belt and in relation to small sites is arguably unlawful as it asks whether the original boundaries were incorrectly drawn. This has been shown by case law not to amount to exceptional circumstances.

Proposed Change Requested

The Council should define clearly what exceptional circumstances are being relied upon to justify amendments to the position of the green belt boundary.

Council Response

No change. The first part of the green belt review was to check for the presence of constraints along the green belt boundary or in land adjacent to the edge of the settlement that may inhibit the possibility of settlement extension. In terms of the topographical constraint, to be assessed as red (severe) the degree of slope must be >20% (1:5) and be on or very close to the edge of the settlement so that development impact would be immediate. Physical constraints to development can be either a physical constraint on the boundary, such as the M62 motorway, a railway line or river, or a physical constraint on land beyond the boundary, such as areas at high risk of flooding, sewage works, cemeteries etc. The presence of a listed building is a physical constraint to development and is correctly noted at test 1b but there are no green belt edges assessed as red at test 1b solely for the presence of listed buildings or conservation areas. Environmental constraints can include for example areas of ancient woodland, a significant number of protected trees or buffer zones for example alongside high pressure gas pipelines. Land affected by these constraints to the extent that the assessment is red need not be assessed against green belt purposes as part of the Green Belt Review as these areas are unlikely to be able to accommodate settlement extension. In accordance with the site allocation methodology however, all sites undergo a site-specific green belt assessment, irrespective of the colour of the edge they abut, and may still be acceptable if it can be demonstrated that their release would not significantly harm any green belt purpose and that there would no other overriding constraint indicated by the technical site assessment. There is no prescribed method of undertaking a Green Belt Review set out in national planning policy or guidance. The method adopted by the council constitutes relevant and proportionate evidence consistent with its role in supporting the assessment of development options as part of the Local Plan site allocation methodology. The purpose of the Green Belt Review in Kirklees is to aid the assessment of development options. Where the needs for development cannot be accommodated in the non-green belt area new allocations will be considered firstly as an extension to an existing settlement. It is entirely consistent with this approach that an assessment should be made of the degree of constraint that may inhibit the extension of a settlement and where this is deemed to be severe that land need not progress through to be tested against green belt purposes. Land that progressed through at Test 1 was then tested firstly to determine whether it functioned as a strategic gap between settlements. The Council does

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942155

Agent ID 941779

not regard the bullet point list of purposes of the green belt in NPPF as a hierarchy of the importance of the issues and considers it reasonable to discount from further assessment land deemed to be serving an important green belt role such that any extension to the settlement could significantly undermine that role. It is accepted that Kirklees does not have any historic towns and this is stated in paragraph 3.20 of the Green Belt Review. Test 2d assesses the presence of historic assets and the degree to which development would be prejudicial to that asset or its setting. In terms of test 3, the Council states at paragraph 3.23 of the Green Belt Review that a purpose of the green belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land and it does this throughout its extent by channelling development into urban areas. The Council accepts that it cannot remove isolated brownfield sites from the green belt as this is contrary to the purposes of including land in the green belt, but could examine sites on the edges of the settlement to see if they are properly located within the green belt and this is the purpose of test 3. The Council accept that exceptional circumstances would still be required to adjust the green belt boundary to remove a site from the green belt, even if assessment demonstrated that the green belt was likely to inhibit its beneficial re-use. A sustainable pattern of development has been achieved through the Local Plan process as a whole. Each development option underwent a detailed sustainability appraisal against 19 sustainability appraisal objectives and the results of these have been published in the Sustainability Appraisal document. Exceptional circumstances are required to amend the position of the green belt boundary and in terms of the accepted development options it is the inability of the non-green belt areas to meet objectively assessed need for housing and employment land that conveys the exceptional circumstances necessary to remove sites from the green belt. The same exceptional circumstance applies to the removal of land that no longer performs a green belt role and function as a consequence of accepting development options (the "consequential changes"). As part of the preparation of the Local Plan the Council has carried out an exercise to transfer the existing green belt boundary (paper based at 1:10,000 scale) on to an up to date Ordnance Survey base so that the boundary is presented in electronic format. This is both necessary and appropriate. It is not an exercise to review the position of the boundary, nor does it consider how robust current boundaries are. For the vast majority of the extent of the boundary no change is proposed. As stated in the Green Belt Boundary Changes document it was not always possible to place the boundary on the modern map with a high degree of certainty, either because of the inadequacies of the original map base, in which case a "best fit" scenario was adopted, or because of changes that have occurred over time. The Council has been quite clear that exceptional circumstances are required to make a deliberate change to the position of the boundary and the Council has investigated in every case whether there is any material change in circumstances that would make it necessary to update the position of the boundary. All changes made to the position of the boundary have been published. The same is true of the small sites (sites of less than 0.4ha), the "add land to the green belt" options and the "remove land from the green belt" options that have been submitted to the Council for consideration. These sites are not required as development options therefore the need to meet OAN does not apply. In all cases the request to amend the boundary has been scrutinised to establish whether exceptional circumstances exist that justifies a change.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942225

Agent ID 969464

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The red overall green belt assessment does not concur with the amber score from the green belt edge review. It is Windy Bank Lane and Hare Park Lane that prevent sprawl not the existing green belt boundary, which is ill-defined. It is agreed that the site does not preserve the setting of a historic town, that the presence of the listed building would not influence the result for the site, the site has no environmental or physical features best protected by a green belt designation and that the land does not serve a green belt purpose contained in NPPF. The land to the north east that would be severed from the remainder of the green belt could be designated as open space. Removal of the parcel of land would round off the settlement.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Allocate site H596 for housing in the Local Plan.

Council Response

No change. The Green Belt Review is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees. In this case the assessment has resulted in an "amber" (score 3) at edge HT7 which includes all the green belt land bounded by Hare Park Lane and Windy Bank Lane. The assessment concludes that the existing settlement pattern and land use features and characteristics of the green belt in this location could present opportunities for settlement extension without significant harm to the role and function of the green belt. This assessment is translated into a "RAG" rating for the purposes of the site allocation methodology and how this is achieved is set out in paragraphs 4.50 to 4.54 of the "Kirklees Local Plan Methodology Part 2: Site Allocation Methodology" document. Each site abutting the settlement edge had a two part green belt assessment, resulting in an edge assessment RAG rating with the reason for the assessment set out, and an overall site assessment RAG rating with the reason set out. The amber green belt edge RAG rating for the site reinforces the conclusions of the green belt review. The overall site assessment looked at the site's configuration and location relative to the settlement and the impact release of the site would have on the role and function of the green belt. It is clearly indicated in the site allocation methodology that a red RAG rating could apply to a site deemed to be poorly located in relation to the settlement edge. Site H596 has a very poor relationship with the existing settlement pattern and the red RAG rating is therefore entirely consistent with the site allocation methodology. H596 borders with accepted option H198 but this would still leave a large area of land to the north entirely severed from the wider green belt. The Green Belt Review is not an exercise in itself to amend the position of the green belt boundary, for which exceptional circumstances are required. A judgement that the existing boundary is ill-defined and that Windy Bank Lane would make a better or stronger green belt boundary than the existing boundary does not convey the exceptional circumstances required to amend it. Â

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942301

Agent ID 942076

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared Whether a site serves green belt purposes and provides sustainable development in line with the Local Plan strategy has not been the key driver in decision making, which has been whether it is possible or desirable to access land through any particular green belt edge.

Soundness - Justified The green belt review is unsupported by critical evidence. Test 1 is not supported by critical evidence on environmental constraints, how a slope would make a site undevelopable or how the presence of a listed building would preclude development of an entire site. There is no explanation of the weighting used in the Green Belt Review Assessment Matrix, such as how different combinations of colours lead to the final outcome. The approach taken to justify adding land to the green belt, removing land from the green belt and in the assessment of small sites is arguably unlawful as assessing whether past boundaries were incorrectly drawn is not an exceptional circumstance that justifies a change to the boundary and this is confirmed in case law.

Soundness - Effective

Soundness - Consistent with National Policy There is no direct justification for applying either three tests or for the "gateway" approach that rules out further consideration of the role and function of the green belt. Test 2 which rules out further consideration of green belt purposes if the site is deemed to be a strategic gap is inconsistent with the NPPF. This is not the fundamental purpose of the green belt and only appears second in the list of bullet points on green belt purposes in paragraph 80 of NPPF. The fundamental purpose of the green belt is to prevent sprawl which is given greater weighting than other green belt purposes in the assessment matrix. Test 2d has assessed green belt land for its ability to preserve the setting of historic assets. This is not consistent with the purposes of including land in the green belt set out in NPPF. Test 3 of the green belt review should not be applied to brownfield land in the green belt. Paragraph 80 of the NPPF identifies urban regeneration achieved through creating pressure to develop outside the green belt as the purpose green belt serves, not the purpose it may inhibit, which is the development of brownfield sites in the green belt. No additional test should therefore be applied. The review does not contain any assessment of a site's ability to meet the terms of paragraphs 84 and 85 of the NPPF or section 39 of the 2004 Planning and Compulsory Purchase Act. The NPPF requires authorities to promote sustainable patterns of development when reviewing green belt boundaries (paragraph 84) and ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (paragraph 85). Meeting objectively assessed need for housing and employment can constitute the exceptional circumstances required to amend the position of the green belt boundary. The Council should make it clear if this is not the circumstance being relied on to justify a review of the green belt. The green belt review methodology should not take as its starting point a consideration of how robust current boundaries are. This is not one of the purposes of the green belt, nor do physical changes to boundaries over time or forming a view over a position for a better boundary amount to the exceptional circumstances required to amend them. The Consequential Changes identified in the Green Belt Boundary Changes document are not sound as they have been identified based on an unsound green belt review methodology.

Proposed Change Requested The Council should specifically set out what exceptional circumstances exist that justify the review of the green belt.

Council Response No change. The Green Belt Review in Kirklees does not, in itself, identify parcels of land for removal from the green belt. It is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees and supports the overall assessment of specific development options in accordance with the site allocation methodology. It is through this comprehensive process that decisions on the acceptability or otherwise of sites is made, in accordance with the Kirklees Local Plan strategy for growth. The first part of the green belt review was to check for the presence of constraints along the green belt boundary or in land adjacent to the edge of the settlement that may inhibit the possibility of settlement extension. In terms of the topographical constraint, to be assessed as red (severe) the degree of slope must be >20% (1:5) and be on or very close to the edge of the settlement so that development impact would be immediate. Physical constraints to development can be either a physical constraint on the boundary, such as the M62 motorway, a railway line or river, or a physical constraint on land beyond the boundary, such as areas at high risk of flooding, sewage works, cemeteries etc. The presence of a listed building is a physical constraint to development and is correctly noted at test 1b but there are no green belt edges assessed as "red" at test 1b solely for the presence of listed buildings or conservation areas. Environmental constraints can include for example areas of ancient woodland, a significant number of protected trees or buffer zones for example alongside high pressure gas pipelines. Land affected by these constraints to the extent that the

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

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Consultee ID 942301

Agent ID 942076

assessment is not need not be assessed against green belt purposes as part of the Green Belt Review as these areas are unlikely to be able to accommodate settlement extension. In accordance with the site allocation methodology however, all sites undergo a site-specific green belt assessment, irrespective of the colour of the edge they abut, and may still be acceptable if it can be demonstrated that their release would not significantly harm any green belt purpose and that there would no other overriding constraint indicated by the technical site assessment. The Assessment Matrix (Appendix 1 of the Green Belt Review) is a tool that allows a combination of assessments to be translated into a single conclusion in a manner that is transparent and consistent. The matrix also allows weighting to be applied to land that is important in preventing the unrestricted sprawl of urban areas, recognising this as a fundamental purpose of the green belt. There is no prescribed method of undertaking a Green Belt Review set out in national planning policy or guidance. The method adopted by the council constitutes relevant and proportionate evidence consistent with its role in supporting the assessment of development options as part of the Local Plan site allocation methodology. The purpose of the Green Belt Review in Kirklees is to aid the assessment of development options. Where the needs for development cannot be accommodated in the non-green belt area new allocations will be considered firstly as an extension to an existing settlement. It is entirely consistent with this approach that an assessment should be made of the degree of constraint that may inhibit the extension of a settlement and where this is deemed to be severe that land need not progress through to be tested against green belt purposes. Land that progressed through at Test 1 was then tested firstly to determine whether it functioned as a strategic gap between settlements. The Council does not regard the bullet point list of purposes of the green belt in NPPF as a hierarchy of the importance of the issues and considers it reasonable to discount from further assessment land deemed to be serving an important green belt role such that any extension to the settlement could significantly undermine that role. It is accepted that Kirklees does not have any historic towns and this is stated in paragraph 3.20 of the Green Belt Review. Test 2d assesses the presence of historic assets and the degree to which development would be prejudicial to that asset or its setting. In terms of test 3, the Council states at paragraph 3.23 of the Green Belt Review that a purpose of the green belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land and it does this throughout its extent by channelling development into urban areas. The Council accepts that it cannot remove isolated brownfield sites from the green belt as this is contrary to the purposes of including land in the green belt, but could examine sites on the edges of the settlement to see if they are properly located within the green belt and this is the purpose of test 3. The Council accept that exceptional circumstances would still be required to adjust the green belt boundary to remove a site from the green belt, even if assessment demonstrated that the green belt was likely to inhibit its beneficial re-use. A sustainable pattern of development has been achieved through the Local Plan process as a whole. Each development option underwent a detailed sustainability appraisal against 19 sustainability appraisal objectives and the results of these have been published in the Sustainability Appraisal document. Exceptional circumstances are required to amend the position of the green belt boundary and in terms of the accepted development options it is the inability of the non-green belt areas to meet objectively assessed need for housing and employment land that conveys the exceptional circumstances necessary to remove sites from the green belt. The same exceptional circumstance applies to the removal of land that no longer performs a green belt role and function as a consequence of accepting development options (the 'consequential changes'). As part of the preparation of the Local Plan the Council has carried out an exercise to transfer the existing green belt boundary (paper based at 1:10,000 scale) on to an up to date Ordnance Survey base so that the boundary is presented in electronic format. This is both necessary and appropriate. It is not an exercise to review the position of the boundary, nor does it consider how robust current boundaries are. For the vast majority of the extent of the boundary no change is proposed. As stated in the Green Belt Boundary Changes document it was not always possible to place the boundary on the modern map with a high degree of certainty, either because of the inadequacies of the original map base, in which case a 'best fit' scenario was adopted, or because of changes that have occurred over time. The Council has been quite clear that exceptional circumstances are required to make a deliberate change to the position of the boundary and the Council has investigated in every case whether there is any material change in circumstances that would make it necessary to update the position of the boundary. All changes made to the position of the boundary have been published. The same is true of the small sites (sites of less than 0.4ha), the 'add land to the green belt' options and the 'remove land from the green belt' options that have been submitted to the Council for consideration. These sites are not required as development options therefore the need to meet OAN does not apply. In all cases the request to amend the boundary has been scrutinised to establish whether exceptional circumstances exist that justifies a change.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942301

Agent ID 942076

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The reference of the site in the green belt review is CK3. The site could be released without compromising the strategic extent of the Green Belt in this location. The main concern appears to relate to the area of land that would remain between Hightown Road and Quaker Lane which they consider would become vulnerable to development pressure. This concern does not therefore relate to the actual acceptability of removing the site itself from the Green Belt. Should the remaining land to the east remain in the Green Belt, national and local planning policy would still give the Council sufficient control over development in that area. The rejection of the site on this basis is clearly not justified when the Council has confirmed the site is well contained and would not compromise the strategic extent of the Green Belt.

Soundness - Effective

Soundness - Consistent with

National Policy

Proposed Change Requested

Council Response

No change. The Green Belt Review is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees. In this case the assessment has resulted in an "amber" (score 3) at edge CK3, which extends from the rear of properties at "The Highlands" to the green belt edge west of Pyenot Gardens, indicating that this area of green belt displays similar characteristics and that the existing settlement pattern and land use features within the green belt could accommodate some settlement extension without significant harm to green belt purposes. This assessment is translated into a "RAG" rating for the purposes of the site allocation methodology and how this is achieved is set out in paragraphs 4.50 to 4.54 of the "Kirklees Local Plan Methodology Part 2: Site Allocation Methodology" document. Each site abutting the settlement edge had a two part green belt assessment, resulting in an edge assessment RAG rating with the reason for the assessment set out, and an overall site assessment RAG rating with the reason set out. The edge assessment looked at the conclusion from the green belt review. In this case the "amber" RAG rating for the green belt edge for site H226 reinforced the conclusion of the green belt review in that H226 could be released from the green belt without undermining the strategic role of the green belt in this location. The overall site assessment looked at the site's configuration and location relative to the settlement and the impact release of the site would have on the role and function of the green belt. It is clearly indicated in the site allocation methodology that a red RAG rating could apply to a site deemed to be poorly located in relation to the settlement edge. In the case of H226 a significant area of land between the site and Quaker Lane would effectively be "cut off" from the wider green belt should the area of H226 be removed from the green belt and impact on the role and function of remaining green belt is a legitimate concern of a green belt assessment. This land would be vulnerable to development pressure contrary to the purposes of including land in the green belt.

Representations received at Publication Draft Local Plan on PDL - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942405

Agent ID 941908

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

Soundness - Consistent with National Policy

The Green Belt Review appears to take the form of an urban edge assessment and does not thoroughly consider the role and purpose of the Green Belt in all areas and locations. The review should have taken a three stage approach including identifying general areas within the green belt, technical site assessment and re-appraisal of resultant land parcels.

Proposed Change Requested

Undertake a full and robust and detailed Green Belt Assessment.

Council Response

No change. The Kirklees Green Belt Review is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees. The extent of assessed land around any particular settlement depends on its individual characteristics. The review methodology at paragraph 3.2 states "The extent of adjoining land taken into consideration depends on the features it contains and whether and how such features could form a new boundary". The initial assessment at test 1 indicates where the boundary, or land immediately beyond it, may be constrained such that new settlement extensions would be unlikely to be accommodated. While such land does not progress to a general assessment against green belt purposes, every site received for consideration as a development option in the green belt has been assessed in a manner consistent with the site assessment methodology contained in "Local Plan Methodology Statement Part 2: Site Allocation Methodology (November 2016)". This individual assessment was published in the technical assessment of sites, both for accepted and rejected options. The Kirklees Green Belt Review is not an exercise in itself to draw back the green belt boundary and it does not result in the removal of parcels of land from the green belt. It is an aid to the comprehensive assessment of sites in accordance with the site allocation methodology. The green belt is one part of this comprehensive assessment of the suitability of a site to form a new allocation in the Local Plan.

Representations recieved at Publication Draft Local Plan on PDL - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942405

Agent ID 941908

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Test 2b of edge SHL11 is incorrectly assessed as 'red' and should be re-assessed as 'green' as development would not lead to unrestricted sprawl. The site is well contained and would present stronger boundaries than the existing rear garden boundaries. Edge SHL11 is therefore incorrectly assessed as (4) and should be assessed as (1) or (2) i.e. 'green'. The site is well contained, does not lead to coalescence, and would not lead to unrestricted sprawl or encroachment. Test 2c of edge SHL11 is incorrectly assessed as 'amber' and should be re-assessed as 'green' as the site is well contained by development, is urban fringe and is not associated with wider countryside. Edge SHL11 is therefore incorrectly assessed as (4) and should be assessed as (1) or (2) i.e. 'green'. The site is well contained, does not lead to coalescence, and would not lead to unrestricted sprawl or encroachment.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Test 2b of edge SHL11 is incorrectly assessed as 'red' and should be re-assessed as 'green'. Test 2c of edge SHL11 is incorrectly assessed as 'amber' and should be re-assessed as 'green'.

Council Response

No change. Paragraph 3.16 of the Green Belt Review report states that an area's importance in checking the unrestricted sprawl of large built up areas will in part be judged on the presence of strong physical boundaries or landform which would contain an extension of development into the green belt. The existing green belt edge that delineates the western edge of Shelley is formed by the garden boundaries of properties on Park Avenue. The existing green belt boundary follows a strong, linear edge and there is a very clear distinction between land that is residential and land that is agricultural. It is not accepted that the existing boundary is weak, nor that the adjacent land does not fulfil a strong green belt role as it prevents the sprawl of Shelley to the west. Edge SHL11 is therefore correctly assessed as 'red' at test 2b and as '4' overall. Assessing the edge as 'green' would be inconsistent with assessment elsewhere in the district and fail to recognise the characteristics of different parts of the settlement edge. It is not accepted that the agricultural land to the west of Shelley is well contained by development or that it is an area of urban fringe. While there is some minor frontage development on Penistone Road the area consists entirely of open agricultural land, bounded by trees to the north. There is overlooking from properties on Park Avenue but this does not diminish the area's countryside character. The property at Healey Farm is considered to be sufficiently remote from the urban edge not to influence its appearance as countryside and farm access roads and tracks do not constitute urban fringe features. Landform restricts the relationship of the site to the countryside to the north, but the site is visible in long distance views from the south as open rising land very different in character from the strong urban edge of Shelley. Edge SHL11 is therefore correctly assessed as 'amber' at test 2c and as '4' overall. Assessing the edge as 'green' would be inconsistent with assessment elsewhere in the district and fail to recognise the characteristics of different parts of the settlement edge.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942410

Agent ID 950095

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared Whether a site serves green belt purposes and provides sustainable development in line with the Local Plan strategy has not been the key driver in decision making, which has been whether it is possible or desirable to access land through any particular green belt edge.

Soundness - Justified The green belt review is unsupported by critical evidence. Test 1 is not supported by critical evidence on environmental constraints, how a slope would make a site undevelopable or how the presence of a listed building would preclude development of an entire site. There is no explanation of the weighting used in the Green Belt Review Assessment Matrix, such as how different combinations of colours lead to the final outcome. The approach taken to justify adding land to the green belt, removing land from the green belt and in the assessment of small sites is arguably unlawful as assessing whether past boundaries were incorrectly drawn is not an exceptional circumstance that justifies a change to the boundary and this is confirmed in case law.

Soundness - Effective

Soundness - Consistent with National Policy There is no direct justification for applying either three tests or for the "gateway" approach that rules out further consideration of the role and function of the green belt. Test 2 which rules out further consideration of green belt purposes if the site is deemed to be a strategic gap is inconsistent with the NPPF. This is not the fundamental purpose of the green belt and only appears second in the list of bullet points on green belt purposes in paragraph 80 of NPPF. The fundamental purpose of the green belt is to prevent sprawl which is given greater weighting than other green belt purposes in the assessment matrix. Test 2d has assessed green belt land for its ability to preserve the setting of historic assets. This is not consistent with the purposes of including land in the green belt set out in NPPF. Test 3 of the green belt review should not be applied to brownfield land in the green belt. Paragraph 80 of the NPPF identifies urban regeneration achieved through creating pressure to develop outside the green belt as the purpose green belt serves, not the purpose it may inhibit, which is the development of brownfield sites in the green belt. No additional test should therefore be applied. The review does not contain any assessment of a site's ability to meet the terms of paragraphs 84 and 85 of the NPPF or section 39 of the 2004 Planning and Compulsory Purchase Act. The NPPF requires authorities to promote sustainable patterns of development when reviewing green belt boundaries (paragraph 84) and ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (paragraph 85). Meeting objectively assessed need for housing and employment can constitute the exceptional circumstances required to amend the position of the green belt boundary. The Council should make it clear if this is not the circumstance being relied on to justify a review of the green belt. The green belt review methodology should not take as its starting point a consideration of how robust current boundaries are. This is not one of the purposes of the green belt, nor do physical changes to boundaries over time or forming a view over a position for a better boundary amount to the exceptional circumstances required to amend them. The Consequential Changes identified in the Green Belt Boundary Changes document are not sound as they have been identified based on an unsound green belt review methodology.

Proposed Change Requested The Council should specifically set out what exceptional circumstances exist that justify the review of the green belt.

Council Response No change. The Green Belt Review in Kirklees does not, in itself, identify parcels of land for removal from the green belt. It is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees and supports the overall assessment of specific development options in accordance with the site allocation methodology. It is through this comprehensive process that decisions on the acceptability or otherwise of sites is made, in accordance with the Kirklees Local Plan strategy for growth. The first part of the green belt review was to check for the presence of constraints along the green belt boundary or in land adjacent to the edge of the settlement that may inhibit the possibility of settlement extension. In terms of the topographical constraint, to be assessed as red (severe) the degree of slope must be >20% (1:5) and be on or very close to the edge of the settlement so that development impact would be immediate. Physical constraints to development can be either a physical constraint on the boundary, such as the M62 motorway, a railway line or river, or a physical constraint on land beyond the boundary, such as areas at high risk of flooding, sewage works, cemeteries etc. The presence of a listed building is a physical constraint to development and is correctly noted at test 1b but there are no green belt edges assessed as "red" at test 1b solely for the presence of listed buildings or conservation areas. Environmental constraints can include for example areas of ancient woodland, a significant number of protected trees or buffer zones for example alongside high pressure gas pipelines. Land affected by these constraints to the extent that the

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942410

Agent ID 950095

assessment is "red" need not be assessed against green belt purposes as part of the Green Belt Review as these areas are unlikely to be able to accommodate settlement extension. In accordance with the site allocation methodology however, all sites undergo a site-specific green belt assessment, irrespective of the colour of the edge they abut, and may still be acceptable if it can be demonstrated that their release would not significantly harm any green belt purpose and that there would no other overriding constraint indicated by the technical site assessment. The Assessment Matrix (Appendix 1 of the Green Belt Review) is a tool that allows a combination of assessments to be translated into a single conclusion in a manner that is transparent and consistent. The matrix also allows weighting to be applied to land that is important in preventing the unrestricted sprawl of urban areas, recognising this as a fundamental purpose of the green belt. There is no prescribed method of undertaking a Green Belt Review set out in national planning policy or guidance. The method adopted by the council constitutes relevant and proportionate evidence consistent with its role in supporting the assessment of development options as part of the Local Plan site allocation methodology. The purpose of the Green Belt Review in Kirklees is to aid the assessment of development options. Where the needs for development cannot be accommodated in the non-green belt area new allocations will be considered firstly as an extension to an existing settlement. It is entirely consistent with this approach that an assessment should be made of the degree of constraint that may inhibit the extension of a settlement and where this is deemed to be severe that land need not progress through to be tested against green belt purposes. Land that progressed through at Test 1 was then tested firstly to determine whether it functioned as a strategic gap between settlements. The Council does not regard the bullet point list of purposes of the green belt in NPPF as a hierarchy of the importance of the issues and considers it reasonable to discount from further assessment land deemed to be serving an important green belt role such that any extension to the settlement could significantly undermine that role. It is accepted that Kirklees does not have any historic towns and this is stated in paragraph 3.20 of the Green Belt Review. Test 2d assesses the presence of historic assets and the degree to which development would be prejudicial to that asset or its setting. In terms of test 3, the Council states at paragraph 3.23 of the Green Belt Review that a purpose of the green belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land and it does this throughout its extent by channelling development into urban areas. The Council accepts that it cannot remove isolated brownfield sites from the green belt as this is contrary to the purposes of including land in the green belt, but could examine sites on the edges of the settlement to see if they are properly located within the green belt and this is the purpose of test 3. The Council accept that exceptional circumstances would still be required to adjust the green belt boundary to remove a site from the green belt, even if assessment demonstrated that the green belt was likely to inhibit its beneficial re-use. A sustainable pattern of development has been achieved through the Local Plan process as a whole. Each development option underwent a detailed sustainability appraisal against 19 sustainability appraisal objectives and the results of these have been published in the Sustainability Appraisal document. Exceptional circumstances are required to amend the position of the green belt boundary and in terms of the accepted development options it is the inability of the non-green belt areas to meet objectively assessed need for housing and employment land that conveys the exceptional circumstances necessary to remove sites from the green belt. The same exceptional circumstance applies to the removal of land that no longer performs a green belt role and function as a consequence of accepting development options (the "consequential changes"). As part of the preparation of the Local Plan the Council has carried out an exercise to transfer the existing green belt boundary (paper based at 1:10,000 scale) on to an up to date Ordnance Survey base so that the boundary is presented in electronic format. This is both necessary and appropriate. It is not an exercise to review the position of the boundary, nor does it consider how robust current boundaries are. For the vast majority of the extent of the boundary no change is proposed. As stated in the Green Belt Boundary Changes document it was not always possible to place the boundary on the modern map with a high degree of certainty, either because of the inadequacies of the original map base, in which case a "best fit" scenario was adopted, or because of changes that have occurred over time. The Council has been quite clear that exceptional circumstances are required to make a deliberate change to the position of the boundary and the Council has investigated in every case whether there is any material change in circumstances that would make it necessary to update the position of the boundary. All changes made to the position of the boundary have been published. The same is true of the small sites (sites of less than 0.4ha), the "add land to the green belt" options and the "remove land from the green belt" options that have been submitted to the Council for consideration. These sites are not required as development options therefore the need to meet OAN does not apply. In all cases the request to amend the boundary has been scrutinised to establish whether exceptional circumstances exist that justifies a change.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942410

Agent ID 950095

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Green belt boundary L1 is identified as a black boundary as it fails Test 1 in relation to physical and environmental constraints. In respect to L1, the Council consider that Grimescar Dyke, and open watercourse, streams and numerous listed buildings create physical features that would prevent development from happening and that protected trees form a strong linear edge in places. On this basis no further assessment of the green belt boundary has been carried out and the site has been discounted. The review disregards technical information submitted which show there are no constraints to development and this is evidenced by the site being a strategic location for development in the Core Strategy. Boundary L2 is assessed as amber (4) which is the second most important Green Belt boundary defined in the Council's review. The Council consider this boundary meets the Test 1 criteria relating to constraints and the site only scores one red against the Green Belt purposes, this being in relation to sprawl with the issue identified being that the developed area of Calderdale is immediately to the northwest of the site. This judgement seems to contradict the judgement in relation to merging where the Council consider that Brighouse Road prevents merger with Calderdale. In any event, the area to the northwest whilst in Calderdale, visually, physically and functionally relates to Huddersfield and there is no perceived gap between the Huddersfield and Calderdale urban areas in this location. In this context, the red criteria in relation to sprawl is considered unjustified and should be an amber/yellow.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Edges L1 and L2 should be assessed as green or amber (3) with no reds against the purposes of including land in the green belt.Â

Council Response

No change. Paragraph 3.5 and 3.6 of the Green Belt Review states that for tests 1b and 1c "physical and environmental constraints", the presence of features including watercourses, protected trees and listed buildings and the degree to which they would be considered to inhibit development is considered. The presence of numerous listed buildings and the length of the open watercourse running through areas of protected trees would clearly constrain new development from abutting the settlement edge and L1 is therefore correctly assessed as a "black" constrained edge. This approach is consistent with the assessment of edges elsewhere in the district and to change this approach would fail to recognise the constraints to development along the green belt edge in this location. In compliance with the site assessment methodology, each proposed development site option was assessed for the impact removing the site would have on the role and function of the green belt. This assessment consisted of two parts; an edge assessment and an overall site assessment. The edge assessment considers the site relative to the strategic role the green belt adjacent to the edge plays, as well the degree of constraint along that edge. The overall assessment considers the relationship of the site to the settlement and the degree to which removing the site would impact on the purposes of including land in the green belt, including safeguarding the countryside from encroachment and the prevention of sprawl.Â The assessment of site MX1904 has concluded that development would significantly impact on the purposes of including land in the green belt, and has been assessed as "red" for both the edge assessment and the overall assessment. This included the consideration that development that respected the watercourse and protected trees and their sensitive environmental habitats would be poorly related to the settlement it adjoins. Information relating to how constraints could be overcome that has been submitted in support of the site has been considered elsewhere as part of the technical assessment of the site, consistent with the site allocation methodology. The area was not proposed as a strategic location for housing or employment in the Core Strategy proposed Submission DPD September 2012: Submission date 2nd April 2013. In any case, the council has updated the evidence base to support the Local Plan since that date and the decisions made are based upon the most up to date evidence available. In respect to edge L2, the conclusions and assessments in relation to sprawl and encroachment were amended from the draft Plan to better reflect the role and function of the green belt in this location. This included a revised reason for the amber assessment at test 2a (merger) and a reversal from red to green between tests 2b (sprawl) and 2c (encroachment) resulting in green for test 2b and red for test 2c. The revision reflects the assessment in paragraph 2.23 of the Green Belt Review which states that development at Ainley Top has straddled the Kirklees and Calderdale boundaries and effectively the two authorities are already merged, but that the retention of open space in this location would retain long distance

Representations recieved at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942410

Agent ID 950095

views to the east and would help retain a sense of openness and separation. The revised assessment of edge L2 has been published in the Green Belt Review as an amber '3' edge, amended from amber '4' in the draft plan. The Council maintains that the red assessment for the role this area plays in safeguarding the countryside from encroachment is justified.

Representations recieved at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 942768

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The Green Belt Review does not adequately assess the role of the Green Belt as a whole, nor of specific sites, in contributing the urban regeneration by encouraging the re-use of brownfield land. Allocation of land near motorway junctions will shift emphasis of development activity away from the urban areas.

Soundness - Effective

Soundness - Consistent with

National Policy

Proposed Change Requested

Re-run the Green Belt review to take proper account of the Green Belt's purpose in encouraging urban regeneration.

Council Response

Representations received at Publication Draft Local Plan on PDL - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 943608

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

It is appalling that the Green Belt Review never even discusses merits of releasing individual parcels of land for development, considered against purposes of including land in the Green Belt.

Soundness - Effective

Soundness - Consistent with

National Policy

Proposed Change Requested

Council Response

No change. The Green Belt Review is a method of assessing land around settlements in Kirklees for the strength of its green belt role and function to aid the overall assessment of development options as part of the preparation of the Local Plan. The Green Belt Review informs the individual green belt assessment of development options in accordance with the site allocation methodology.

Representations received at Publication Draft Local Plan on PDL - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 968829

Agent ID 942125

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The assessment of green belt edge AL9 states it is topographically, physically and environmentally constrained but this ignores the fact that there is existing property on land immediately to the north with an identical physical profile. The site does not meet any green belt purpose, is bounded by existing development on three sides and by Penistone Road to the west, and has a limited visual relationship with open countryside.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Council Response

No change. Green belt edge AL9 assesses the green belt adjacent to the settlement edge from Fenay Lane to Jumble Wood. Where site H27 is located between the edge of the settlement and Penistone Road the topographical constraint is considered to be severe and in addition it contains an extensive area of protected trees. Fenay Beck and its floodplain lies immediately west of Penistone Road. The red assessment for the physical and environmental constraints identified at edge AL9 is therefore consistent with the Green Belt Review methodology paragraphs 3.3 to 3.8. In accordance with the Site Allocation Methodology site H27 underwent a two part green belt assessment. This individual site assessment reinforced the conclusion of the Green Belt Review that this is a steep and narrow area of land that appears as a wooded edge to the settlement. The Green Belt Review methodology adopted by Kirklees is a method of assessing the green belt around settlements in Kirklees to aid the overall assessment of development options as part of the preparation of the Local Plan. It does not, by itself, result in any amendment to the green belt boundary. This is done only through the acceptance of a development option in accordance with the site allocation methodology of which the green belt assessment is one part. A judgement that Penistone Road would make a better or stronger green belt boundary than the existing boundary does not convey the exceptional circumstances required to amend it.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 969350

Agent ID 969343

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The council has not demonstrated that there has been a material change in circumstances or exceptional justification for the Sites removal. The Green Belt review is therefore flawed and does not accord with the NPPF requirements

Soundness - Effective

Soundness - Consistent with

National Policy

Proposed Change Requested

Council Response

No change. The Green Belt Review is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees. It does not, by itself, result in any amendment to the green belt boundary. Exceptional circumstances are required to amend the position of the green belt boundary and it is the inability of non-green belt areas to meet the objectively assessed need for development that constitute the exceptional circumstances required to remove sites from the green belt and allocate them for development purposes. In addition to the need for new housing, whether a site is to be removed from the green belt is a decision that is taken through the comprehensive assessment of sites in accordance with the site allocation methodology, of which the green belt assessment is a part, and in accordance with the Local Plan strategy for growth.

Representations recieved at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 972565

Agent ID 1059531

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Green belt boundaries HB2 and adjoining boundary HB1 are identified as "pink" boundaries (significant conflict) and relate to the boundary between Bradshaw Road and Meltham Road. The boundaries fail tests 2b and 2c in relation to safeguarding against sprawl and encroachment into the countryside. Site H2598 therefore scores 5 in the green belt review so no further assessment is carried out and the site has been discounted. The red scores at Test 2 are unjustified and should be amber. The roads, wall features and Highfield Farm would create defensible new green belt boundaries and the topography, landscape and intervening features would significantly limit and control encroachment and sprawl.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Boundaries HB1 and HB2 should be altered to either light green or light yellow with no reds against the purposes of including land in the green belt.

Council Response

No change. The Green Belt Review is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees. In this case the assessment has resulted in a "pink" (score 5) at edges HB1 and HB2. This assessment is translated into a "RAG" rating for the purposes of the site allocation methodology and how this is achieved is set out in paragraphs 4.50 to 4.54 of the "Kirklees Local Plan Methodology Part 2: Site Allocation Methodology" document. Each site abutting the settlement edge had a two part green belt assessment, resulting in an edge assessment RAG rating with the reason for the assessment set out, and an overall site assessment RAG rating with the reason set out. The edge assessment looked at the conclusion from the green belt review. The overall site assessment looked at the site's configuration and location relative to the settlement and the impact release of the site would have on the role and function of the green belt. While it is accepted that there are roads, field boundaries and other land use features that could provide potential new green belt boundaries, the Green Belt Review methodology at paragraphs 3.16 and 3.17 in relation to Test 2b state that assessment should have regard to the presence of boundaries or landform and the degree of containment that could be achieved. This is an elevated area of rising land where the extension of the existing settlement pattern could result in an elongated and poorly related built form sprawling along Bradshaw Road. Test 2c considers an area's importance in safeguarding the countryside from encroachment which involves an assessment of the character of the land in relation to its surroundings. The more that an area appears to relate to an urban edge rather than open countryside or is screened from the wider countryside the less will be its importance in achieving this purpose. There is a very strong urban edge in this location and a clear distinction between land that is urban and land that is countryside. This is elevated and rising land very prominent both locally and in long distance views where development would significantly impact on the purposes of including land in the green belt.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 972565

Agent ID 1059531

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared Whether a site serves green belt purposes and provides sustainable development in line with the Local Plan strategy has not been the key driver in decision making, which has been whether it is possible or desirable to access land through any particular green belt edge.

Soundness - Justified The green belt review is unsupported by critical evidence. Test 1 is not supported by critical evidence on environmental constraints, how a slope would make a site undevelopable or how the presence of a listed building would preclude development of an entire site. There is no explanation of the weighting used in the Green Belt Review Assessment Matrix, such as how different combinations of colours lead to the final outcome. The approach taken to justify adding land to the green belt, removing land from the green belt and in the assessment of small sites is arguably unlawful as assessing whether past boundaries were incorrectly drawn is not an exceptional circumstance that justifies a change to the boundary and this is confirmed in case law.

Soundness - Effective

Soundness - Consistent with National Policy There is no direct justification for applying either three tests or for the "gateway" approach that rules out further consideration of the role and function of the green belt. Test 2 which rules out further consideration of green belt purposes if the site is deemed to be a strategic gap is inconsistent with the NPPF. This is not the fundamental purpose of the green belt and only appears second in the list of bullet points on green belt purposes in paragraph 80 of NPPF. The fundamental purpose of the green belt is to prevent sprawl which is given greater weighting than other green belt purposes in the assessment matrix. Test 2d has assessed green belt land for its ability to preserve the setting of historic assets. This is not consistent with the purposes of including land in the green belt set out in NPPF. Test 3 of the green belt review should not be applied to brownfield land in the green belt. Paragraph 80 of the NPPF identifies urban regeneration achieved through creating pressure to develop outside the green belt as the purpose green belt serves, not the purpose it may inhibit, which is the development of brownfield sites in the green belt. No additional test should therefore be applied. The review does not contain any assessment of a site's ability to meet the terms of paragraphs 84 and 85 of the NPPF or section 39 of the 2004 Planning and Compulsory Purchase Act. The NPPF requires authorities to promote sustainable patterns of development when reviewing green belt boundaries (paragraph 84) and ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (paragraph 85). Meeting objectively assessed need for housing and employment can constitute the exceptional circumstances required to amend the position of the green belt boundary. The Council should make it clear if this is not the circumstance being relied on to justify a review of the green belt. The green belt review methodology should not take as its starting point a consideration of how robust current boundaries are. This is not one of the purposes of the green belt, nor do physical changes to boundaries over time or forming a view over a position for a better boundary amount to the exceptional circumstances required to amend them. The Consequential Changes identified in the Green Belt Boundary Changes document are not sound as they have been identified based on an unsound green belt review methodology.

Proposed Change Requested The Council should specifically set out what exceptional circumstances exist that justify the review of the green belt.

Council Response No change. The Green Belt Review in Kirklees does not, in itself, identify parcels of land for removal from the green belt. It is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees and supports the overall assessment of specific development options in accordance with the site allocation methodology. It is through this comprehensive process that decisions on the acceptability or otherwise of sites is made, in accordance with the Kirklees Local Plan strategy for growth. The first part of the green belt review was to check for the presence of constraints along the green belt boundary or in land adjacent to the edge of the settlement that may inhibit the possibility of settlement extension. In terms of the topographical constraint, to be assessed as red (severe) the degree of slope must be >20% (1:5) and be on or very close to the edge of the settlement so that development impact would be immediate. Physical constraints to development can be either a physical constraint on the boundary, such as the M62 motorway, a railway line or river, or a physical constraint on land beyond the boundary, such as areas at high risk of flooding, sewage works, cemeteries etc. The presence of a listed building is a physical constraint to development and is correctly noted at test 1b but there are no green belt edges assessed as "red" at test 1b solely for the presence of listed buildings or conservation areas. Environmental constraints can include for example areas of ancient woodland, a significant number of protected trees or buffer zones for example alongside high pressure gas pipelines. Land affected by these constraints to the extent that the

Representations received at Publication Draft Local Plan on PDL - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 972565

Agent ID 1059531

assessment is "red" need not be assessed against green belt purposes as part of the Green Belt Review as these areas are unlikely to be able to accommodate settlement extension. In accordance with the site allocation methodology however, all sites undergo a site-specific green belt assessment, irrespective of the colour of the edge they abut, and may still be acceptable if it can be demonstrated that their release would not significantly harm any green belt purpose and that there would no other overriding constraint indicated by the technical site assessment. The Assessment Matrix (Appendix 1 of the Green Belt Review) is a tool that allows a combination of assessments to be translated into a single conclusion in a manner that is transparent and consistent. The matrix also allows weighting to be applied to land that is important in preventing the unrestricted sprawl of urban areas, recognising this as a fundamental purpose of the green belt. There is no prescribed method of undertaking a Green Belt Review set out in national planning policy or guidance. The method adopted by the council constitutes relevant and proportionate evidence consistent with its role in supporting the assessment of development options as part of the Local Plan site allocation methodology. The purpose of the Green Belt Review in Kirklees is to aid the assessment of development options. Where the needs for development cannot be accommodated in the non-green belt area new allocations will be considered firstly as an extension to an existing settlement. It is entirely consistent with this approach that an assessment should be made of the degree of constraint that may inhibit the extension of a settlement and where this is deemed to be severe that land need not progress through to be tested against green belt purposes. Land that progressed through at Test 1 was then tested firstly to determine whether it functioned as a strategic gap between settlements. The Council does not regard the bullet point list of purposes of the green belt in NPPF as a hierarchy of the importance of the issues and considers it reasonable to discount from further assessment land deemed to be serving an important green belt role such that any extension to the settlement could significantly undermine that role. It is accepted that Kirklees does not have any historic towns and this is stated in paragraph 3.20 of the Green Belt Review. Test 2d assesses the presence of historic assets and the degree to which development would be prejudicial to that asset or its setting. In terms of test 3, the Council states at paragraph 3.23 of the Green Belt Review that a purpose of the green belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land and it does this throughout its extent by channelling development into urban areas. The Council accepts that it cannot remove isolated brownfield sites from the green belt as this is contrary to the purposes of including land in the green belt, but could examine sites on the edges of the settlement to see if they are properly located within the green belt and this is the purpose of test 3. The Council accept that exceptional circumstances would still be required to adjust the green belt boundary to remove a site from the green belt, even if assessment demonstrated that the green belt was likely to inhibit its beneficial re-use. A sustainable pattern of development has been achieved through the Local Plan process as a whole. Each development option underwent a detailed sustainability appraisal against 19 sustainability appraisal objectives and the results of these have been published in the Sustainability Appraisal document. Exceptional circumstances are required to amend the position of the green belt boundary and in terms of the accepted development options it is the inability of the non-green belt areas to meet objectively assessed need for housing and employment land that conveys the exceptional circumstances necessary to remove sites from the green belt. The same exceptional circumstance applies to the removal of land that no longer performs a green belt role and function as a consequence of accepting development options (the "consequential changes"). As part of the preparation of the Local Plan the Council has carried out an exercise to transfer the existing green belt boundary (paper based at 1:10,000 scale) on to an up to date Ordnance Survey base so that the boundary is presented in electronic format. This is both necessary and appropriate. It is not an exercise to review the position of the boundary, nor does it consider how robust current boundaries are. For the vast majority of the extent of the boundary no change is proposed. As stated in the Green Belt Boundary Changes document it was not always possible to place the boundary on the modern map with a high degree of certainty, either because of the inadequacies of the original map base, in which case a "best fit" scenario was adopted, or because of changes that have occurred over time. The Council has been quite clear that exceptional circumstances are required to make a deliberate change to the position of the boundary and the Council has investigated in every case whether there is any material change in circumstances that would make it necessary to update the position of the boundary. All changes made to the position of the boundary have been published. The same is true of the small sites (sites of less than 0.4ha), the "add land to the green belt" options and the "remove land from the green belt" options that have been submitted to the Council for consideration. These sites are not required as development options therefore the need to meet OAN does not apply. In all cases the request to amend the boundary has been scrutinised to establish whether exceptional circumstances exist that justifies a change.

Representations recieved at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 973538

Agent ID 950095

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The Green Belt assessment of H672 is not sound. Drighlington was not assessed and as such there has been no formal assessment of this site in the Green Belt Review and this is a fundamental error in the process. Other boundaries with the adjoining Local Authority have been assessed, for instance, BS11 and B/EB1 so there is no justification for not considering a boundary review in this location particularly given the site's relationship to the built form of Drighlington, its local facilities and the A650. The Drighlington boundary bears a remarkable physical similarity and relationship to development as the Bradley Golf Course boundary and it is considered that if it were assessed against the same criteria, it would become a light yellow Green Belt boundary of medium importance with only three ambers in relation to the purpose of identifying land within Green Belt, these being merger, sprawl and encroachment. There are no topographical, physical or environmental constraints that would result in the site failing Test 1 and as such, it would be assessed against Test 2 with the conclusions as set out above.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Assess the green belt edge in this location as an amber boundary with an amber assessment for merger, sprawl and encroachment.Â

Council Response

No change. The Kirklees/Leeds administrative boundary runs along the edge of the A650, meaning that Drighlington as a settlement is within Leeds. The Kirklees green belt boundary abuts the road, which is in Leeds, so any development in this location would be wholly unrelated to any settlement in Kirklees. For comparison, edge ref BS11 delineates the boundary of the built up area of the West Yorkshire Retail Park, but the road it abuts, (the M62), is within Kirklees. Edge BS11 has also been assessed as 'black constrained', in that it is not physically possible to extend the settlement into the motorway. B/EB1 assesses the green belt edge where it meets properties at Toftshaw, Bradford. However, the properties on the south side of Toftshaw Lane are within the Kirklees administrative district. In this case, it would be possible to extend the settlement further into Kirklees if necessary.Â This is also the case at Bradley, where both the existing settlement and the adjoining green belt are within Kirklees. Â Map 4ii of the Green Belt Review shows the relationship of the Kirklees green belt with Leeds and states that in this location development could have a significant effect in undermining the key function of the green belt in this location, particularly where Drighlington in Leeds extends to the boundary. While the Kirklees Green Belt Review has assessed the settlement edge of Birkenshaw locally as amber, meaning that some settlement extension could be accommodated without significantly undermining the role and function of the green belt, this is for the potential to extend beyond the existing edge of Birkenshaw, not an extension to Drighlington.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 973538

Agent ID 950095

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared Whether a site serves green belt purposes and provides sustainable development in line with the Local Plan strategy has not been the key driver in decision making, which has been whether it is possible or desirable to access land through any particular green belt edge.

Soundness - Justified The green belt review is unsupported by critical evidence. Test 1 is not supported by critical evidence on environmental constraints, how a slope would make a site undevelopable or how the presence of a listed building would preclude development of an entire site. There is no explanation of the weighting used in the Green Belt Review Assessment Matrix, such as how different combinations of colours lead to the final outcome. The approach taken to justify adding land to the green belt, removing land from the green belt and in the assessment of small sites is arguably unlawful as assessing whether past boundaries were incorrectly drawn is not an exceptional circumstance that justifies a change to the boundary and this is confirmed in case law.

Soundness - Effective

Soundness - Consistent with National Policy There is no direct justification for applying either three tests or for the "gateway" approach that rules out further consideration of the role and function of the green belt. Test 2 which rules out further consideration of green belt purposes if the site is deemed to be a strategic gap is inconsistent with the NPPF. This is not the fundamental purpose of the green belt and only appears second in the list of bullet points on green belt purposes in paragraph 80 of NPPF. The fundamental purpose of the green belt is to prevent sprawl which is given greater weighting than other green belt purposes in the assessment matrix. Test 2d has assessed green belt land for its ability to preserve the setting of historic assets. This is not consistent with the purposes of including land in the green belt set out in NPPF. Test 3 of the green belt review should not be applied to brownfield land in the green belt. Paragraph 80 of the NPPF identifies urban regeneration achieved through creating pressure to develop outside the green belt as the purpose green belt serves, not the purpose it may inhibit, which is the development of brownfield sites in the green belt. No additional test should therefore be applied. The review does not contain any assessment of a site's ability to meet the terms of paragraphs 84 and 85 of the NPPF or section 39 of the 2004 Planning and Compulsory Purchase Act. The NPPF requires authorities to promote sustainable patterns of development when reviewing green belt boundaries (paragraph 84) and ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (paragraph 85). Meeting objectively assessed need for housing and employment can constitute the exceptional circumstances required to amend the position of the green belt boundary. The Council should make it clear if this is not the circumstance being relied on to justify a review of the green belt. The green belt review methodology should not take as its starting point a consideration of how robust current boundaries are. This is not one of the purposes of the green belt, nor do physical changes to boundaries over time or forming a view over a position for a better boundary amount to the exceptional circumstances required to amend them. The Consequential Changes identified in the Green Belt Boundary Changes document are not sound as they have been identified based on an unsound green belt review methodology.

Proposed Change Requested

The Council should specifically set out what exceptional circumstances exist that justify the review of the green belt.

Council Response

No change. The Green Belt Review in Kirklees does not, in itself, identify parcels of land for removal from the green belt. It is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees and supports the overall assessment of specific development options in accordance with the site allocation methodology. It is through this comprehensive process that decisions on the acceptability or otherwise of sites is made, in accordance with the Kirklees Local Plan strategy for growth. The first part of the green belt review was to check for the presence of constraints along the green belt boundary or in land adjacent to the edge of the settlement that may inhibit the possibility of settlement extension. In terms of the topographical constraint, to be assessed as red (severe) the degree of slope must be >20% (1:5) and be on or very close to the edge of the settlement so that development impact would be immediate. Physical constraints to development can be either a physical constraint on the boundary, such as the M62 motorway, a railway line or river, or a physical constraint on land beyond the boundary, such as areas at high risk of flooding, sewage works, cemeteries etc. The presence of a listed building is a physical constraint to development and is correctly noted at test 1b but there are no green belt edges assessed as "red" at test 1b solely for the presence of listed buildings or conservation areas. Environmental constraints can include for example areas of ancient woodland, a significant number of protected trees or buffer zones for example alongside high pressure gas pipelines. Land affected by these constraints to the extent that the

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Paragraph/Site 19.5

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assessment is "red" need not be assessed against green belt purposes as part of the Green Belt Review as these areas are unlikely to be able to accommodate settlement extension. In accordance with the site allocation methodology however, all sites undergo a site-specific green belt assessment, irrespective of the colour of the edge they abut, and may still be acceptable if it can be demonstrated that their release would not significantly harm any green belt purpose and that there would no other overriding constraint indicated by the technical site assessment. The Assessment Matrix (Appendix 1 of the Green Belt Review) is a tool that allows a combination of assessments to be translated into a single conclusion in a manner that is transparent and consistent. The matrix also allows weighting to be applied to land that is important in preventing the unrestricted sprawl of urban areas, recognising this as a fundamental purpose of the green belt. There is no prescribed method of undertaking a Green Belt Review set out in national planning policy or guidance. The method adopted by the council constitutes relevant and proportionate evidence consistent with its role in supporting the assessment of development options as part of the Local Plan site allocation methodology. The purpose of the Green Belt Review in Kirklees is to aid the assessment of development options. Where the needs for development cannot be accommodated in the non-green belt area new allocations will be considered firstly as an extension to an existing settlement. It is entirely consistent with this approach that an assessment should be made of the degree of constraint that may inhibit the extension of a settlement and where this is deemed to be severe that land need not progress through to be tested against green belt purposes. Land that progressed through at Test 1 was then tested firstly to determine whether it functioned as a strategic gap between settlements. The Council does not regard the bullet point list of purposes of the green belt in NPPF as a hierarchy of the importance of the issues and considers it reasonable to discount from further assessment land deemed to be serving an important green belt role such that any extension to the settlement could significantly undermine that role. It is accepted that Kirklees does not have any historic towns and this is stated in paragraph 3.20 of the Green Belt Review. Test 2d assesses the presence of historic assets and the degree to which development would be prejudicial to that asset or its setting. In terms of test 3, the Council states at paragraph 3.23 of the Green Belt Review that a purpose of the green belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land and it does this throughout its extent by channelling development into urban areas. The Council accepts that it cannot remove isolated brownfield sites from the green belt as this is contrary to the purposes of including land in the green belt, but could examine sites on the edges of the settlement to see if they are properly located within the green belt and this is the purpose of test 3. The Council accept that exceptional circumstances would still be required to adjust the green belt boundary to remove a site from the green belt, even if assessment demonstrated that the green belt was likely to inhibit its beneficial re-use. A sustainable pattern of development has been achieved through the Local Plan process as a whole. Each development option underwent a detailed sustainability appraisal against 19 sustainability appraisal objectives and the results of these have been published in the Sustainability Appraisal document. Exceptional circumstances are required to amend the position of the green belt boundary and in terms of the accepted development options it is the inability of the non-green belt areas to meet objectively assessed need for housing and employment land that conveys the exceptional circumstances necessary to remove sites from the green belt. The same exceptional circumstance applies to the removal of land that no longer performs a green belt role and function as a consequence of accepting development options (the "consequential changes"). As part of the preparation of the Local Plan the Council has carried out an exercise to transfer the existing green belt boundary (paper based at 1:10,000 scale) on to an up to date Ordnance Survey base so that the boundary is presented in electronic format. This is both necessary and appropriate. It is not an exercise to review the position of the boundary, nor does it consider how robust current boundaries are. For the vast majority of the extent of the boundary no change is proposed. As stated in the Green Belt Boundary Changes document it was not always possible to place the boundary on the modern map with a high degree of certainty, either because of the inadequacies of the original map base, in which case a "best fit" scenario was adopted, or because of changes that have occurred over time. The Council has been quite clear that exceptional circumstances are required to make a deliberate change to the position of the boundary and the Council has investigated in every case whether there is any material change in circumstances that would make it necessary to update the position of the boundary. All changes made to the position of the boundary have been published. The same is true of the small sites (sites of less than 0.4ha), the "add land to the green belt" options and the "remove land from the green belt" options that have been submitted to the Council for consideration. These sites are not required as development options therefore the need to meet OAN does not apply. In all cases the request to amend the boundary has been scrutinised to establish whether exceptional circumstances exist that justifies a change.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 974190

Agent ID 941908

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

MSL question the conclusions of green belt edges AS5 and AS6. A more robust green belt boundary for the long term would be the M62 motorway. The current green belt boundary is drawn along back gardens of properties but the distinctive feature is the motorway and along with adjacent woodland would form a long term robust and defensible boundary. The motorway would also be a more robust boundary than that proposed for accepted option H351. The Green Belt Review only considers green belt edges against the five purposes of the Green Belt and is therefore not a full consideration or strategic review. The assessment does not reflect the contained setting and strong physical features and boundaries surrounding the area.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Review the Green Belt boundary around sites H2600 and H2601 along Bradford Road and the proposed M62 Junction 24A (TS2).

Council Response

No change. The Green Belt Review methodology that resulted in an amber edge at AS5 (score 3) and an amber edge at AS6 (score 4) has been arrived at by an assessment of the green belt beyond the edge of the settlement against the green belt purposes set out in NPPF and in accordance with paragraphs 3.16 to 3.20 of the Green Belt Review methodology. The Assessment Matrix is then applied to combine the outcome of tests 2b to 2d into a conclusion "score" for the edge. The score of "3" for edge AS5 compared to the score of "4" for edge AS6 reflects the subtle differences in the role of the green belt in those locations. Land beyond edge AS5 is considered to be contained by hedgerows and landform and has a limited visual relationship with the wider countryside. Existing land use features and degree of containment mean that settlement extension could be possible with less potential harm to openness or the role and function of the green belt than on land beyond AS6 which is less contained and where development could be more prominent. The Green Belt Review methodology adopted by Kirklees is a method of assessing the green belt around settlements in Kirklees to aid the overall assessment of development options as part of the preparation of the Local Plan. It does not, by itself, result in any amendment to the green belt boundary. This is done only through the acceptance of a development option in accordance with the site allocation methodology of which the green belt assessment is one part. Exceptional circumstances are required to amend the green belt boundary and these are conveyed by the need to meet objectively assessed needs for development. The fact that an alternative boundary would represent a strong potential new green belt boundary does not convey the exceptional circumstances necessary to move the boundary. The new green belt boundary around accepted option H351 follows a field boundary which is discernible and complies with the requirements of NPPF.

Representations received at Publication Draft Local Plan on PDL - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 974190

Agent ID 941908

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

Soundness - Consistent with National Policy

The Green Belt Review appears to take the form of an urban edge assessment and does not thoroughly consider the role and purpose of the Green Belt in all areas and locations. The review should have taken a three stage approach including identifying general areas within the green belt, technical site assessment and re-appraisal of resultant land parcels.

Proposed Change Requested

Undertake a full and robust and detailed Green Belt Assessment.

Council Response

No change. The Kirklees Green Belt Review is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees. The extent of assessed land around any particular settlement depends on its individual characteristics. The review methodology at paragraph 3.2 states "The extent of adjoining land taken into consideration depends on the features it contains and whether and how such features could form a new boundary". The initial assessment at test 1 indicates where the boundary, or land immediately beyond it, may be constrained such that new settlement extensions would be unlikely to be accommodated. While such land does not progress to a general assessment against green belt purposes, every site received for consideration as a development option in the green belt has been assessed in a manner consistent with the site assessment methodology contained in "Local Plan Methodology Statement Part 2: Site Allocation Methodology (November 2016)". This individual assessment was published in the technical assessment of sites, both for accepted and rejected options. The Kirklees Green Belt Review is not an exercise in itself to draw back the green belt boundary and it does not result in the removal of parcels of land from the green belt. It is an aid to the comprehensive assessment of sites in accordance with the site allocation methodology. The green belt is one part of this comprehensive assessment of the suitability of a site to form a new allocation in the Local Plan.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 975291

Agent ID 969464

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The methodology for the green belt review is set out in the Green Belt Review and Outcomes report but it is not clear how this translates into a "red" overall score for the site in the Rejected Site Options Report. Explanation is limited to paragraph 4.48 of the Site Allocation Methodology. The red overall site assessment would seem to indicate that the site plays a more important green belt role than the green belt review would justify. The site is well contained with two boundaries adjacent to the existing settlement and two further boundaries formed by roads. Existing properties in the north eastern corner of the site also increase the perception of rounding off. The more elevated part of the site abuts existing property so would not be prominent. The site plays no role in preventing the merger of settlements. Strategically this is a rural fringe landscape and while it does have some characteristics associated with the wider pastoral landscape this is lessened by the horse grazing and stabling which marks the site as transitional between rural fringe and urban fringe. This is reinforced by the separation from the wider landscape by kerb lined and street-lit roads. The site plays no role in preserving the setting of historic towns.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Allocate site H575 for housing in the Local Plan.

Council Response

The Green Belt Review is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees. In this case the assessment has resulted in an "amber" (score 3) at edge KH4. This assessment is translated into a "RAG" rating for the purposes of the site allocation methodology and how this is achieved is set out in paragraphs 4.50 to 4.54 of the "Kirklees Local Plan Methodology Part 2: Site Allocation Methodology" document. Each site abutting the settlement edge had a two part green belt assessment, resulting in an edge assessment RAG rating with the reason for the assessment set out, and an overall site assessment RAG rating with the reason set out. In this case the "amber" RAG rating for the green belt edge for site H575 reinforced the conclusion of the green belt review. The overall site assessment looked at the site's configuration and location relative to the settlement and the impact release of the site would have on the role and function of the green belt. In this case it was concluded that the characteristic of this extensive site was not rural fringe but open countryside, visually linked to the wider countryside beyond. The site therefore plays an important role in safeguarding the countryside from encroachment.

Representations recieved at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 975291

Agent ID 969464

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The methodology for the green belt review is set out in the Green Belt Review and Outcomes report but it is not clear how this translates into a "red" overall score for the site in the Rejected Site Options Report. Explanation is limited to paragraph 4.48 of the Site Allocation Methodology. The red overall site assessment would seem to indicate that the site plays a more important green belt role than the green belt review would justify. The site has been incorrectly assessed as red overall as it is located adjacent to an edge that the Council considers not to play an important green belt role. A review of the green belt undertaken by Pegasus Group concurs with the Council's assessment that there is no risk of sprawl or merger to the north. It is agreed that the trees and watercourse are sensitive environmental features but these do not influence the perception or role of the green belt. Existing development at Wheatleys Farm and the hotel and car park are urbanising features which erode the role of the green belt and the boundary should be redrawn along Moor Lane thereby bringing this area into the settlement of Gomersal. This is an urban fringe landscape and while the site displays parkland characteristics and has a number of protected trees this is significantly disrupted by the M62. The site is not part of open countryside and plays no role in preserving the setting of historic towns. The M62 could form a strong new boundary to the north and the line of the drive to the hotel could be strengthened to form a new green belt boundary if necessary to the east. The protected trees could be sympathetically integrated into the scheme.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Allocate site H231 for housing in the Local Plan

Council Response

No change. The Green Belt Review is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees. In this case the assessment has resulted in a "green" (score 2) at edge GS8 indicating that the green belt role and function of adjacent land is relatively weak, and a "black" constrained edge at GS7 indicating that settlement extension would be constrained, in this case by the presence of a Tree Preservation Order area which protects trees in their parkland setting. This assessment is translated into a "RAG" rating for the purposes of the site allocation methodology and how this is achieved is set out in paragraphs 4.50 to 4.54 of the "Kirklees Local Plan Methodology Part 2: Site Allocation Methodology" document. Each site abutting the settlement edge had a two part green belt assessment, resulting in an edge assessment RAG rating with the reason for the assessment set out, and an overall site assessment RAG rating with the reason set out. Paragraph 4.6 of the Green Belt Review states that for tests 1b and 1c "physical and environmental constraints" the presence of features, including protected trees, and the degree to which they would be considered to inhibit development is considered. The red RAG rating is entirely consistent with both the Green Belt Review and the Site Allocation Methodology. The Green Belt Review is not an exercise in itself to amend the position of the green belt boundary, for which exceptional circumstances are required. A judgement that Moor Lane or the motorway would make a better or stronger green belt boundary than the existing boundary does not convey the exceptional circumstances required to amend it.

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 975291

Agent ID 969464

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The methodology for the green belt review is set out in the Green Belt Review and Outcomes report but it is not clear how this translates into a "red" overall score for the site in the Rejected Site Options Report. Explanation is limited to paragraph 4.48 of the Site Allocation Methodology. The red overall site assessment would seem to indicate that the site plays a more important green belt role than the green belt review would justify. The site is not currently contained by development but land to the south and south west is proposed as allocations. Leeds Road provides a strong boundary to the north. Removal of the whole pocket of land within which the site sits would allow Mirfield to expand while being contained by the strong boundary of Leeds Road. Development of the site would continue the strong urban development along Leeds Road and there is no risk of sprawl. Development would be rounding off of Mirfield and would not merge settlements. Strategically this is an urban fringe landscape and the site itself does not appear part of wider countryside beyond the A62. It has no role in preserving the setting of historic towns.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Allocate site H476 for housing in the Local Plan.

Council Response

No change. The Green Belt Review is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees. In this case the assessment has resulted in an "amber" (score 3) at edge MF20 which assesses the majority of this area of land as playing a similar green belt role and with similar land use characteristics. This assessment is translated into a "RAG" rating for the purposes of the site allocation methodology and how this is achieved is set out in paragraphs 4.50 to 4.54 of the "Kirklees Local Plan Methodology Part 2: Site Allocation Methodology" document. Each site abutting the settlement edge had a two part green belt assessment, resulting in an edge assessment RAG rating with the reason for the assessment set out, and an overall site assessment RAG rating with the reason set out. The edge assessment was informed by the conclusion from the green belt review. In this case the "amber" RAG rating for the green belt edge for site H476 reinforced the conclusion of the green belt review. The overall site assessment looked at the site's configuration and location relative to the settlement and the impact release of the site would have on the role and function of the green belt. It is clearly indicated in the site allocation methodology that a red RAG rating could apply to a site deemed to be poorly located in relation to the settlement edge. There are no accepted options in this area of green belt between Slipper Lane and Stocks Bank Road and the release of this site would significantly impact on the purposes of including the remaining land within the green belt, particularly that between the site and the settlement to the south. This land would be somewhat isolated from the wider green belt and therefore vulnerable to development pressure contrary to the purposes of including land in the green belt.

Representations recieved at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 1045883

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Green belt edge AL13 adjacent to sites H2684a and H2730a should have been assessed as moderate at test 1a and severe at test 1b and 1c. The inclines within the sites have not been tested and are therefore not known. A listed building to the north and Beldon Brook to the south both form physical constraints to development that should justify a severe assessment. The severe environmental constraints consist of both protected trees and Lepton Great Wood. This scoring of the edge would have resulted in the sites (H2684a and H2730a) being rejected. The green belt review methodology should be widened to include a realistic sustainable scale of development.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Amend the scoring of test 1a to moderate, 1b to severe and 1c to severe and reject H2684a and H2730a.

Council Response

No change. Test 1a of the Green Belt Review considers topography which in accordance with the methodology set out in paragraphs 3.3 and 3.4 is assessed as severe if the degree of slope is greater than 20% (1:5). The degree of slope adjacent to edge AL13 and in the land beyond the edge is in the main less than 15% which equates to a "green" assessment. There is no evidence to suggest therefore that the land adjacent to edge AL13 should be assessed as red or "severe" for the purposes of test 1a. There are a number of individually protected trees close to the green belt edge but no listed buildings or other heritage assets within the green belt adjacent to edge AL13. There is nothing to suggest therefore that the land adjacent to the edge of the settlement in this location is so constrained that it should not progress through to an assessment against green belt purposes in accordance with the green belt review methodology. In any case, all development options (even those which fail test 1) are subject to a full technical assessment on a site-specific basis including consideration of the green belt impacts. The Green Belt Review is used to inform the assessment of development options and does not attempt to establish any acceptable scale of development or where new boundaries could be found. The scale of development and whether an option presents a reasonable settlement extension is a matter for the Local Plan strategy for growth in accordance with the site allocation methodology.

Representations recieved at Publication Draft Local Plan on PDL - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 1049857

Agent ID 1049852

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The green belt edge in this location is incorrectly assessed as having an important role in preventing merger (test 2a) as new development would be a modest extension of existing development south of Shillbank Lane and would not impact on the extent of the gap between Mirfield and Ravensthorpe any more than the existing development at Spring Place Court. It is also incorrectly assessed as having an important role in preventing sprawl (test 2b) as there are landscape features that could present new long term defensible boundaries. It also does not warrant a red assessment for encroachment (test 2c) as this area is not part of the wider countryside. It is an area of urban fringe which is not of high landscape quality. Topography and land use features also restrict views into the area.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Re-assess the green belt edge in this location.Â

Council Response

No change. The reason for the assessment of DW3 as an edge with a score of 5 is set out in the Green Belt Review document and is based on a comprehensive assessment of green belt purposes compatible with the Green Belt Review methodology. This area is considered to be a restricted gap separating Mirfield from Ravensthorpe but where some limited settlement extension could be achieved without fundamentally undermining that role. This is evidenced by the amber assessment at Test 2a in terms of its role in preventing the merger of settlements. The green belt is then assessed as playing an important role in terms of checking sprawl and safeguarding the countryside from encroachment as the existing boundary is not a strong feature on the ground and that there is limited opportunity to contain new development. It is not accepted that this is an area of urban fringe as there is a clear distinction between land that is residential and land that is green belt and the treed areas and watercourse give the area a general countryside character. In accordance with the Assessment Matrix the green belt in this location is deemed to be performing strongly against green belt purposes and has been scored as 5. The assessment of the potential impact of the removal of site H594 from the green belt was carried out in line with the Council's Local Plan Site Allocation Methodology (November 2016). The red assessment for green belt edge reinforced the green belt review and reflected the sprawl of the site to the west. The red assessment for the green belt overall reflected the extent and configuration of the site relative to the area of green belt in which it is located. Both the assessment of edge ref DW3 and the assessment of site H594 properly reflect the role and function of the green belt and the impact that the removal of site H594 would have on the green belt in this location. Â

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 1049857

Agent ID 1049852

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The green belt review is unsupported by critical evidence. There is little clarity of evidence to underpin the application of test 1, such as how a slope would make a site undevelopable or how mitigation may apply to a site. There is no clear evidence to underpin the categorisation of sites based on physical or environmental constraints. The Council should have taken into consideration detailed site specific evidence of how any such constraints could be overcome.

Soundness - Effective

Soundness - Consistent with National Policy

The Council's approach to the green belt review appears not to align with advice in NPPF. There is no justification for the three tests or for the gateway approach of ruling out further consideration in any national policy or legal requirements. Test 2a is a gateway test as only if this test is passed are the other purposes of the green belt assessed. Merger however only appears second in the list of green belt purposes in NPPF and it is sprawl, not merger that is the fundamental aim of green belt policy. This makes test 2a inconsistent with the NPPF. Kirklees does not have any historic towns so test 2d is also inconsistent with national guidance. The origin of test 3 is the fifth purpose of the green belt as defined by NPPF which is a strategic matter concerned with encouraging urban regeneration by channelling development towards urban areas. It should not be applied on a site by site basis for brownfield sites in the green belt. The Council's approach to the green belt review rules out further consideration of a site's ability to meet development needs in a sustainable manner and an overall judgement against all green belt purposes if a single severe constraint is identified in test 1 or if it fails test 2a. There has been no assessment of a site's ability to meet paragraph 84 and 85 of the NPPF or section 39 of the Act in terms of promoting sustainable patterns of development. These are factors relevant to the choices about where development should be accommodated alongside green belt purposes in a green belt review. The approach the Council is taking in assessing options to add land to the green belt, remove land from the green belt and in relation to small sites is arguably unlawful as it asks whether the original boundaries were incorrectly drawn. This has been shown by case law not to amount to exceptional circumstances.

Proposed Change Requested

The Council should define clearly what exceptional circumstances are being relied upon to justify amendments to the position of the green belt boundary.

Council Response

No change. The first part of the green belt review was to check for the presence of constraints along the green belt boundary or in land adjacent to the edge of the settlement that may inhibit the possibility of settlement extension. In terms of the topographical constraint, to be assessed as red (severe) the degree of slope must be >20% (1:5) and be on or very close to the edge of the settlement so that development impact would be immediate. Physical constraints to development can be either a physical constraint on the boundary, such as the M62 motorway, a railway line or river, or a physical constraint on land beyond the boundary, such as areas at high risk of flooding, sewage works, cemeteries etc. The presence of a listed building is a physical constraint to development and is correctly noted at test 1b but there are no green belt edges assessed as red at test 1b solely for the presence of listed buildings or conservation areas. Environmental constraints can include for example areas of ancient woodland, a significant number of protected trees or buffer zones for example alongside high pressure gas pipelines. Land affected by these constraints to the extent that the assessment is red need not be assessed against green belt purposes as part of the Green Belt Review as these areas are unlikely to be able to accommodate settlement extension. In accordance with the site allocation methodology however, all sites undergo a site-specific green belt assessment, irrespective of the colour of the edge they abut, and may still be acceptable if it can be demonstrated that their release would not significantly harm any green belt purpose and that there would no other overriding constraint indicated by the technical site assessment. There is no prescribed method of undertaking a Green Belt Review set out in national planning policy or guidance. The method adopted by the council constitutes relevant and proportionate evidence consistent with its role in supporting the assessment of development options as part of the Local Plan site allocation methodology. The purpose of the Green Belt Review in Kirklees is to aid the assessment of development options. Where the needs for development cannot be accommodated in the non-green belt area new allocations will be considered firstly as an extension to an existing settlement. It is entirely consistent with this approach that an assessment should be made of the degree of constraint that may inhibit the extension of a settlement and where this is deemed to be severe that land need not progress through to be tested against green belt purposes. Land that progressed through at Test 1 was then tested firstly to determine whether it functioned as a strategic gap between settlements. The Council does

Representations recieved at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 1049857

Agent ID 1049852

not regard the bullet point list of purposes of the green belt in NPPF as a hierarchy of the importance of the issues and considers it reasonable to discount from further assessment land deemed to be serving an important green belt role such that any extension to the settlement could significantly undermine that role. It is accepted that Kirklees does not have any historic towns and this is stated in paragraph 3.20 of the Green Belt Review. Test 2d assesses the presence of historic assets and the degree to which development would be prejudicial to that asset or its setting. In terms of test 3, the Council states at paragraph 3.23 of the Green Belt Review that a purpose of the green belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land and it does this throughout its extent by channelling development into urban areas. The Council accepts that it cannot remove isolated brownfield sites from the green belt as this is contrary to the purposes of including land in the green belt, but could examine sites on the edges of the settlement to see if they are properly located within the green belt and this is the purpose of test 3. The Council accept that exceptional circumstances would still be required to adjust the green belt boundary to remove a site from the green belt, even if assessment demonstrated that the green belt was likely to inhibit its beneficial re-use. A sustainable pattern of development has been achieved through the Local Plan process as a whole. Each development option underwent a detailed sustainability appraisal against 19 sustainability appraisal objectives and the results of these have been published in the Sustainability Appraisal document. Exceptional circumstances are required to amend the position of the green belt boundary and in terms of the accepted development options it is the inability of the non-green belt areas to meet objectively assessed need for housing and employment land that conveys the exceptional circumstances necessary to remove sites from the green belt. The same exceptional circumstance applies to the removal of land that no longer performs a green belt role and function as a consequence of accepting development options (the "consequential changes"). As part of the preparation of the Local Plan the Council has carried out an exercise to transfer the existing green belt boundary (paper based at 1:10,000 scale) on to an up to date Ordnance Survey base so that the boundary is presented in electronic format. This is both necessary and appropriate. It is not an exercise to review the position of the boundary, nor does it consider how robust current boundaries are. For the vast majority of the extent of the boundary no change is proposed. As stated in the Green Belt Boundary Changes document it was not always possible to place the boundary on the modern map with a high degree of certainty, either because of the inadequacies of the original map base, in which case a "best fit" scenario was adopted, or because of changes that have occurred over time. The Council has been quite clear that exceptional circumstances are required to make a deliberate change to the position of the boundary and the Council has investigated in every case whether there is any material change in circumstances that would make it necessary to update the position of the boundary. All changes made to the position of the boundary have been published. The same is true of the small sites (sites of less than 0.4ha), the "add land to the green belt" options and the "remove land from the green belt" options that have been submitted to the Council for consideration. These sites are not required as development options therefore the need to meet OAN does not apply. In all cases the request to amend the boundary has been scrutinised to establish whether exceptional circumstances exist that justifies a change.

Representations recieved at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 1050041

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Green belt edge AL13 adjacent to sites H2684a and H2730a should have been assessed as moderate at test 1a and severe at test 1b and 1c. The inclines within the sites have not been tested and are therefore not known. A listed building to the north and Beldon Brook to the south both form physical constraints to development that should justify a severe assessment. The severe environmental constraints consist of both protected trees and Lepton Great Wood. This scoring of the edge would have resulted in the sites (H2684a and H2730a) being rejected. The green belt review methodology should be widened to include a realistic sustainable scale of development.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Â Amend the scoring of test 1a to moderate, 1b to severe and 1c to severe and reject H2684a and H2730a.

Council Response

No change. Test 1a of the Green Belt Review considers topography which in accordance with the methodology set out in paragraphs 3.3 and 3.4 is assessed as severe if the degree of slope is greater than 20% (1:5). The degree of slope adjacent to edge AL13 and in the land beyond the edge is in the main less than 15% which equates to a "green" assessment. There is no evidence to suggest therefore that the land adjacent to edge AL13 should be assessed as red or "severe" for the purposes of test 1a. There are a number of individually protected trees close to the green belt edge but no listed buildings or other heritage assets within the green belt adjacent to edge AL13. There is nothing to suggest therefore that the land adjacent to the edge of the settlement in this location is so constrained that it should not progress through to an assessment against green belt purposes in accordance with the green belt review methodology. In any case, all development options (even those which fail test 1) are subject to a full technical assessment on a site-specific basis including consideration of the green belt impacts. Â The Green Belt Review is used to inform the assessment of development options and does not attempt to establish any acceptable scale of development or where new boundaries could be found. The scale of development and whether an option presents a reasonable settlement extension is a matter for the Local Plan strategy for growth in accordance with the site allocation methodology.

Representations recieved at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 1053492

Agent ID 998185

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

No overall test score was afforded to CWS11 within the Green Belt Review. No assessment was therefore undertaken by the Council in respect of the 5 Green Belt purposes. Edge CWS11 is deemed to have severe physical constraints, but a moderate score would be more appropriate. The environmental constraints were afforded a severe score, due to the site's proximity to Flood Zone 3b. This would not represent a significantly constraining factor to development of the site and with appropriate mitigation and design development of the site is able to cone forward. A moderate score would be more appropriate.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Council Response

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 1059536

Agent ID 942076

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Red constraints are identified in relation to Green Belt although Green Belt Edge SCL5 is assessed as amber for the Whitechapel Road site. In relation to Green Belt it is suggested that there is an existing strong linear edge providing an immediate transition from urban area to open agricultural landscape.

Soundness - Effective

Soundness - Consistent with

National Policy

Proposed Change Requested

None given (they state their gb assessment is given at page 28 but that page contains only SA comments). Â

Council Response

No change. The Green Belt Review is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees. In this case the assessment has resulted in an "amber" (score 3) at edge SCL5 as the existing settlement pattern and land use features would allow for some limited infilling without fundamentally harming green belt purposes. This assessment is translated into a "RAG" rating for the purposes of the site allocation methodology and how this is achieved is set out in paragraphs 4.50 to 4.54 of the "Kirklees Local Plan Methodology Part 2: Site Allocation Methodology" document. Each site abutting the settlement edge had a two part green belt assessment, resulting in an edge assessment RAG rating with the reason for the assessment set out, and an overall site assessment RAG rating with the reason set out. The edge assessment looked at the conclusion from the green belt review. In this case the "amber" RAG rating for the green belt edge for site H115 reinforced the conclusion of the green belt review. The overall site assessment looked at the site's configuration and location relative to the settlement and the impact release of the site would have on the role and function of the green belt. It is clearly indicated in the site allocation methodology that a red RAG rating could apply to a site deemed to be poorly located in relation to the settlement edge. Site H115 is deemed to be very poorly configured in relation to the existing settlement pattern and its removal from the green belt would significantly impact on the role and function of the green belt in this location. Â

Representations received at Publication Draft Local Plan on PDL - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 1059536

Agent ID 942076

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared Whether a site serves green belt purposes and provides sustainable development in line with the Local Plan strategy has not been the key driver in decision making, which has been whether it is possible or desirable to access land through any particular green belt edge.

Soundness - Justified The green belt review is unsupported by critical evidence. Test 1 is not supported by critical evidence on environmental constraints, how a slope would make a site undevelopable or how the presence of a listed building would preclude development of an entire site. There is no explanation of the weighting used in the Green Belt Review Assessment Matrix, such as how different combinations of colours lead to the final outcome. The approach taken to justify adding land to the green belt, removing land from the green belt and in the assessment of small sites is arguably unlawful as assessing whether past boundaries were incorrectly drawn is not an exceptional circumstance that justifies a change to the boundary and this is confirmed in case law.

Soundness - Effective

Soundness - Consistent with National Policy There is no direct justification for applying either three tests or for the "gateway" approach that rules out further consideration of the role and function of the green belt. Test 2 which rules out further consideration of green belt purposes if the site is deemed to be a strategic gap is inconsistent with the NPPF. This is not the fundamental purpose of the green belt and only appears second in the list of bullet points on green belt purposes in paragraph 80 of NPPF. The fundamental purpose of the green belt is to prevent sprawl which is given greater weighting than other green belt purposes in the assessment matrix. Test 2d has assessed green belt land for its ability to preserve the setting of historic assets. This is not consistent with the purposes of including land in the green belt set out in NPPF. Test 3 of the green belt review should not be applied to brownfield land in the green belt. Paragraph 80 of the NPPF identifies urban regeneration achieved through creating pressure to develop outside the green belt as the purpose green belt serves, not the purpose it may inhibit, which is the development of brownfield sites in the green belt. No additional test should therefore be applied. The review does not contain any assessment of a site's ability to meet the terms of paragraphs 84 and 85 of the NPPF or section 39 of the 2004 Planning and Compulsory Purchase Act. The NPPF requires authorities to promote sustainable patterns of development when reviewing green belt boundaries (paragraph 84) and ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (paragraph 85). Meeting objectively assessed need for housing and employment can constitute the exceptional circumstances required to amend the position of the green belt boundary. The Council should make it clear if this is not the circumstance being relied on to justify a review of the green belt. The green belt review methodology should not take as its starting point a consideration of how robust current boundaries are. This is not one of the purposes of the green belt, nor do physical changes to boundaries over time or forming a view over a position for a better boundary amount to the exceptional circumstances required to amend them. The Consequential Changes identified in the Green Belt Boundary Changes document are not sound as they have been identified based on an unsound green belt review methodology.

Proposed Change Requested The Council should specifically set out what exceptional circumstances exist that justify the review of the green belt.

Council Response No change. The Green Belt Review in Kirklees does not, in itself, identify parcels of land for removal from the green belt. It is a method of assessing the relative strength of the green belt role and function of land around settlements in Kirklees and supports the overall assessment of specific development options in accordance with the site allocation methodology. It is through this comprehensive process that decisions on the acceptability or otherwise of sites is made, in accordance with the Kirklees Local Plan strategy for growth. The first part of the green belt review was to check for the presence of constraints along the green belt boundary or in land adjacent to the edge of the settlement that may inhibit the possibility of settlement extension. In terms of the topographical constraint, to be assessed as red (severe) the degree of slope must be >20% (1:5) and be on or very close to the edge of the settlement so that development impact would be immediate. Physical constraints to development can be either a physical constraint on the boundary, such as the M62 motorway, a railway line or river, or a physical constraint on land beyond the boundary, such as areas at high risk of flooding, sewage works, cemeteries etc. The presence of a listed building is a physical constraint to development and is correctly noted at test 1b but there are no green belt edges assessed as "red" at test 1b solely for the presence of listed buildings or conservation areas. Environmental constraints can include for example areas of ancient woodland, a significant number of protected trees or buffer zones for example alongside high pressure gas pipelines. Land affected by these constraints to the extent that the

Representations received at Publication Draft Local Plan on PDLP - Strategies and Policies

Paragraph/Site 19.5

Consultee ID 1059536

Agent ID 942076

assessment is "red" need not be assessed against green belt purposes as part of the Green Belt Review as these areas are unlikely to be able to accommodate settlement extension. In accordance with the site allocation methodology however, all sites undergo a site-specific green belt assessment, irrespective of the colour of the edge they abut, and may still be acceptable if it can be demonstrated that their release would not significantly harm any green belt purpose and that there would no other overriding constraint indicated by the technical site assessment. The Assessment Matrix (Appendix 1 of the Green Belt Review) is a tool that allows a combination of assessments to be translated into a single conclusion in a manner that is transparent and consistent. The matrix also allows weighting to be applied to land that is important in preventing the unrestricted sprawl of urban areas, recognising this as a fundamental purpose of the green belt. There is no prescribed method of undertaking a Green Belt Review set out in national planning policy or guidance. The method adopted by the council constitutes relevant and proportionate evidence consistent with its role in supporting the assessment of development options as part of the Local Plan site allocation methodology. The purpose of the Green Belt Review in Kirklees is to aid the assessment of development options. Where the needs for development cannot be accommodated in the non-green belt area new allocations will be considered firstly as an extension to an existing settlement. It is entirely consistent with this approach that an assessment should be made of the degree of constraint that may inhibit the extension of a settlement and where this is deemed to be severe that land need not progress through to be tested against green belt purposes. Land that progressed through at Test 1 was then tested firstly to determine whether it functioned as a strategic gap between settlements. The Council does not regard the bullet point list of purposes of the green belt in NPPF as a hierarchy of the importance of the issues and considers it reasonable to discount from further assessment land deemed to be serving an important green belt role such that any extension to the settlement could significantly undermine that role. It is accepted that Kirklees does not have any historic towns and this is stated in paragraph 3.20 of the Green Belt Review. Test 2d assesses the presence of historic assets and the degree to which development would be prejudicial to that asset or its setting. In terms of test 3, the Council states at paragraph 3.23 of the Green Belt Review that a purpose of the green belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land and it does this throughout its extent by channelling development into urban areas. The Council accepts that it cannot remove isolated brownfield sites from the green belt as this is contrary to the purposes of including land in the green belt, but could examine sites on the edges of the settlement to see if they are properly located within the green belt and this is the purpose of test 3. The Council accept that exceptional circumstances would still be required to adjust the green belt boundary to remove a site from the green belt, even if assessment demonstrated that the green belt was likely to inhibit its beneficial re-use. A sustainable pattern of development has been achieved through the Local Plan process as a whole. Each development option underwent a detailed sustainability appraisal against 19 sustainability appraisal objectives and the results of these have been published in the Sustainability Appraisal document. Exceptional circumstances are required to amend the position of the green belt boundary and in terms of the accepted development options it is the inability of the non-green belt areas to meet objectively assessed need for housing and employment land that conveys the exceptional circumstances necessary to remove sites from the green belt. The same exceptional circumstance applies to the removal of land that no longer performs a green belt role and function as a consequence of accepting development options (the "consequential changes"). As part of the preparation of the Local Plan the Council has carried out an exercise to transfer the existing green belt boundary (paper based at 1:10,000 scale) on to an up to date Ordnance Survey base so that the boundary is presented in electronic format. This is both necessary and appropriate. It is not an exercise to review the position of the boundary, nor does it consider how robust current boundaries are. For the vast majority of the extent of the boundary no change is proposed. As stated in the Green Belt Boundary Changes document it was not always possible to place the boundary on the modern map with a high degree of certainty, either because of the inadequacies of the original map base, in which case a "best fit" scenario was adopted, or because of changes that have occurred over time. The Council has been quite clear that exceptional circumstances are required to make a deliberate change to the position of the boundary and the Council has investigated in every case whether there is any material change in circumstances that would make it necessary to update the position of the boundary. All changes made to the position of the boundary have been published. The same is true of the small sites (sites of less than 0.4ha), the "add land to the green belt" options and the "remove land from the green belt" options that have been submitted to the Council for consideration. These sites are not required as development options therefore the need to meet OAN does not apply. In all cases the request to amend the boundary has been scrutinised to establish whether exceptional circumstances exist that justifies a change.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 0411_01

Consultee ID 1045907

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared Statements by both Members and Officers requesting that objections are made to the Planning Inspectorate rather than at this stage removes opportunities for co-operation.

Soundness - Justified

Soundness - Effective

Soundness - Consistent with National Policy Having discussed part of the plan with the DCLG they stated that at least one section did not comply with NPPF guidelines. Thus it neither legally compliant, sound or enforceable.

Proposed Change Requested

Follow legal guidelines, for example when altering greenbelt boundaries ensure that there is a fixed, identifiable and permanent boundary - not a broken, wavy line of trees some distance from the proposed new boundary.

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. Exceptional circumstances are required to amend the position of an existing green belt boundary and the exercise to transfer the existing green belt boundary to an electronic format for the purposes of the Local Plan does not by itself confer any exceptional circumstances justifying a change. The Green Belt Boundary Changes document at paragraph 2.3 clearly states that there are instances where the existing boundary follows the back of houses leaving the gardens in the green belt. Moving the boundary simply to follow a garden boundary would result in a significant change for which there is no justification. As part of the process of preparing the Local Plan all requests to amend the position of the green belt boundary were scrutinised to determine whether any exceptional circumstances existed that would justify a change. A material change in circumstances since the position of the green belt boundary was adopted is capable of amounting to the exceptional circumstances required to amend the boundary. The requested amendment to the green belt boundary at no. 58 Mount Road (RSSGB122) has been rejected on the basis that no material change in circumstances has occurred since the position of the boundary was adopted and that the re-positioning of the boundary in the position requested would remove a significant amount of land from the green belt for which there is no justification.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 1612_01

Consultee ID 975861

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

There is an inconsistency in the approach to green belt boundaries in Farnley Tyas. Advertised change 1612/01 has been retained from the draft plan, but 1612/02, 1612/03, 1712/01 and 1712/02 have been rejected. How does this approach relate to the proposed extension into green belt land on site H120?

Soundness - Effective

Soundness - Consistent with

National Policy

Proposed Change Requested

Council Response

No change Exceptional circumstances are required to amend the position of an existing green belt boundary and the exercise to transfer the existing green belt boundary to an electronic format for the purposes of the Local Plan does not by itself confer any exceptional circumstances justifying a change. A material change in circumstances since the original boundary position was established is capable of amounting to the exceptional circumstances required provided that the change is necessary. Following representations received on the Draft Plan the Council scrutinised all the advertised changes to ensure that exceptional circumstances justifying the change could be demonstrated. In the case of draft advertised change 1612_03 scrutiny revealed that no change was actually intended to the position of the boundary from the UDP to the Local Plan so the advertised change was deleted. In all other cases exceptional circumstances cannot be demonstrated because nothing has occurred subsequent to the establishment of the boundary that would make a change in the position of the boundary necessary.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 1612-03

Consultee ID 961870

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

**Soundness - Consistent with
National Policy**

Proposed Change Requested

Council Response

No change. Support noted.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 1612-03

Consultee ID 961889

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

**Soundness - Consistent with
National Policy**

Proposed Change Requested

Council Response

No change. Support noted.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 1612-03

Consultee ID 961904

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

**Soundness - Consistent with
National Policy**

Proposed Change Requested

Council Response

No change. Support noted.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 1612-03

Consultee ID 962957

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

**Soundness - Consistent with
National Policy**

Proposed Change Requested

Council Response

No change. Support noted.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 1612-03

Consultee ID 1059533

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

**Soundness - Consistent with
National Policy**

Proposed Change Requested

Council Response

No change. Support noted.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 1612-03

Consultee ID 1059549

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

**Soundness - Consistent with
National Policy**

Proposed Change Requested

Council Response

No change. Support noted

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 1712-02

Consultee ID 1044018

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

Soundness - Consistent with National Policy

Exceptional circumstances exist that warrant a change to the position of the green belt boundary, as was proposed by draft Local Plan advertised change ref 1712-02. The green belt boundary no longer follows a feature on the ground following conditions imposed when the dwelling 'Ash Croft' was built. The green belt boundary should therefore be repositioned to follow the new curtilage boundary which is a recognisable and permanent feature. This would result in a position for the green belt boundary consistent with paragraph 85 of NPPF.

Proposed Change Requested

Move the position of the green belt boundary to that proposed by draft Local Plan advertised change 1712-02.

Council Response

No change Exceptional circumstances are required to amend the position of an existing green belt boundary and the exercise to transfer the existing green belt boundary to an electronic format for the purposes of the Local Plan does not by itself confer any exceptional circumstances justifying a change. A material change in circumstances since the original boundary position was established is capable of amounting to the exceptional circumstances required provided that the change is necessary. It is understood that certain earth mounding and landscaping works have taken place in order to safeguard the route of a sewer and a fence erected to protect the area from plough damage. However, the area of land involved was not included in the application site boundary when the dwelling was approved and such off site works are not deemed to constitute a material change of circumstances such that the original decision to place the land within the green belt has been permanently falsified. As such exceptional circumstances do not exist to amend the position of the boundary. In the case of advertised change 1612_01 at St Lucius's Close referred to in this representation the area of land to be removed from the green belt formed part of the application site where permission was granted for residential development. As such a material change in circumstances since the original position of the boundary was established has been demonstrated sufficient to amount to the exceptional circumstances necessary to amend the boundary.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 1809_01

Consultee ID 976851

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The site is within the built up area of Shepley on the Unitary Development Plan and is capable of development. Exceptional circumstances do not exist to amend the position of the green belt boundary and place this site within the green belt.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Retain the green belt boundary in its existing position so this site remains unallocated.

Council Response

No change. The Council reviewed all the advertised changes to the position of the green belt boundary from the Draft Plan to the Publication Draft Plan. Advertised change reference 1809/01 was a change proposed at draft stage but which was deleted from the publication plan because following re-examination the Council consider that exceptional circumstances do not exist to warrant a change to the position of the green belt boundary in this location. The modification requested has therefore already been actioned.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 2026_01

Consultee ID 1033839

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

Soundness - Consistent with

National Policy

Proposed Change Requested

Council Response

No change. Support noted

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 2027_01

Consultee ID 1033839

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

**Soundness - Consistent with
National Policy**

Proposed Change Requested

Council Response

No change. Support noted.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site 2415_05

Consultee ID 1061758

Agent ID 941949

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

**Soundness - Consistent with
National Policy**

Proposed Change Requested

Council Response

No change. Support noted.

Representations received at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site AGB2072

Consultee ID 1034329

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared This land should be returned to the green belt.

Soundness - Justified

Soundness - Effective

**Soundness - Consistent with
National Policy**

Proposed Change Requested Return this land to the green belt.

Council Response No change. This area of land has been assessed for inclusion in the green belt and is rejected option AGB2072. There is no need to include this land within the green belt in order to strengthen the role and function of the green belt, nor is the purpose of including land in the green belt weakened by its exclusion. There has been no change in circumstances since the green belt boundary was established and no exceptional circumstances to justify a change to the green belt boundary in this location.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site AGB2074

Consultee ID 943910

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

**Soundness - Consistent with
National Policy**

Proposed Change Requested

Council Response

No change. Support for AGB2074 noted.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site CCMX1905i

Consultee ID 1047427

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared Proposed development not necessary given that retail and industrial units in nearby Batley, Dewsbury and at Shaw Cross Business Park are currently empty and there are other 'brown field sites' available.

Soundness - Justified Proposals will destroy the area which is the only designated Green Belt land left on the borders between Leeds, Wakefield and Kirklees. It will have a detrimental effect on plants and wildlife in the fields and around Dogloitch Wood, a favourite area with walkers. Proposal will bring much more traffic to the area, cause gridlock along the main Leeds Road, despite proposals to upgrade the road. There will be an increase in air and noise pollution and this will have a detrimental effect on the environment and on the health and well-being of local residents.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Council Response No change These comments have been responded to in PDLP_AD1068.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site H233

Consultee ID 1046287

Agent ID

Legal Compliance

Duty to Co-operate

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

Soundness - Justified

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested Retain the site as green belt.

Council Response No change These comments have been reponded to in PDLP_AD197.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site H634

Consultee ID 1046287

Agent ID

Legal Compliance

Duty to Co-operate

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

Soundness - Justified

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested Retain the site as green belt.

Council Response No change These comments have been reponded to in PDLP_AD285.

Representations received at Publication Draft Local Plan on PDL Green Belt Boundary Changes

Paragraph/Site RGB2137

Consultee ID 1061788

Agent ID 942058

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared Including this land in the Green Belt means that the Council are not supporting the rural economy.

Soundness - Justified The site forms an existing commercial / industrial business park which differs in nature to countryside surrounding it. Site has no role to play in the functioning of Green Belt and should be removed from the Green Belt.

Soundness - Effective

Soundness - Consistent with National Policy The site does not fulfil the role and function of including land within the Green Belt as set out in NPPF

Proposed Change Requested Remove from Green Belt and allocate as Priority Employment Area

Council Response No change Support for the rural economy forms part of the vision for Kirklees and this is reinforced by Publication Draft Local Plan policy PLP10 which sets out ways in which the economic performance of the rural economy will be improved. For development in the green belt to be considered acceptable it must be in line with green belt policy and this is entirely consistent with national planning policy. The site is stated to be wholly different in character to the surrounding countryside and it does not perform a green belt role. It is accepted that this is a brownfield site which is already heavily developed and therefore is not "open" land. However, national planning guidance now provides for the redevelopment of existing brownfield sites in the green belt, subject to consideration of openness. As this site is already covered by buildings it should be possible to design a successful scheme for redevelopment without impacting on openness. National policy also allows for extension and replacement of buildings subject to certain controls. It is not considered that in this case the green belt constitutes a constraint to the successful functioning of the business park. Removing this site on its own could harm green belt purposes as it would create a small pocket of non-green belt land surrounded by green belt which is contrary to the purposes of including land in the green belt.

Representations received at Publication Draft Local Plan on PDL Green Belt Boundary Changes

Paragraph/Site RGB2613

Consultee ID 973991

Agent ID 1060797

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

Soundness - Consistent with National Policy

The plan's approach in respect to the green belt boundary in this location is not consistent with national policy. Test 1b (environmental constraint) and 1c (physical constraint) of the green belt review identified the constraint to development in this location as being severe (red) and therefore no further assessment of the green belt was undertaken. The Almondbury Conservation Area and its listed buildings are at such a distance from the site that the assessment should have been none/minor (green). Impact on protected trees could be managed through the application process so the assessment should have been moderate (amber). This assessment would have resulted in the site being carried forward into test 2. This would show that the site was not necessary to prevent towns merging, the site is not important in checking sprawl, it is not countryside and there are no historic towns within Kirklees. Infill development would however respect the adjacent Conservation Area. There is a defensible boundary formed by Dark Lane. An assessment of the site against green belt purposes should therefore have resulted in a score of 2. This parcel of land has an urban land use and should therefore also have been assessed against test 3. Amending the boundary to allow infill development is compliant with test 3 as it is re-using land. All existing development south of Fenay Lane, along St Helen's Gate and Arkenley Lane and King James' School are in the green belt which means that the green belt in this location is not fulfilling its role because it has failed to check the unrestricted sprawl of Almondbury. It should be amended to take account of infill development that has occurred over time.

Proposed Change Requested

Remove site RGB2613 from the green belt and amend the boundary in this location to take account of infill development that has occurred over time.

Council Response

No change Exceptional circumstances are required to amend the position of the green belt boundary and it is the inability of non-green belt areas to meet the objectively assessed need (OAN) for development that constitute the exceptional circumstances required to remove sites from the green belt and allocate them for development purposes. As it is clearly stated in support of site RGB2613 that removal from the green belt is being sought in order to facilitate small scale infill housing, the site is not being considered as a housing allocation and therefore exceptional circumstances based on meeting OAN cannot be shown. In order to justify an amendment to the green belt boundary therefore other exceptional circumstances must be demonstrated. These could be either that there was a clear error in the placing of the original position of the boundary, or that something has occurred subsequent to the establishment of the boundary that permanently falsifies the original decision to include this land in the green belt. Neither of these is considered to apply to site RGB2613. In terms of the assessment of the site in the green belt review, the tests applied at test 1 indicate the presence of constraints where new settlement extensions would be unlikely to be found. The 'red' assessment against 1b and 1c does not mean that no further assessment of the site was undertaken as along with all other green belt sites and consistent with the Kirklees Local Plan Site Allocation Methodology it underwent a green belt assessment which was published in the Rejected Site Options report. This concluded that the constraints noted in test 1b; the Almondbury conservation area, listed buildings and existing residential development also applied to site RGB2163. The site is not at a distance from the conservation area. It both borders it at its western extent and includes a small part within it. It is also in very close proximity to numerous listed buildings. This would not by itself justify a 'red' assessment at test 1b but the presence of the existing residential development which fronts the length of Fenay Lane would. There are a significant number of protected trees bordering and within the site. This site sits within an area overwashed by green belt with an existing strong boundary along Fenay Lane and whose role is to prevent the intensification of developed form that could harm the setting of the Conservation Area. The site is an integral part of that landscape. In terms of test 3 which considered whether brownfield sites on the edges of the urban area were properly located within the green belt, the Green Belt Review states at paragraph 3.25 that sporadic residential development on the edges of settlements are not included in the test. In any case a substantial part of site RGB2613 is garden and is therefore considered to be greenfield. The built form in the green belt in this location, including King James' School was already present when the green belt boundary was established. Any development that has occurred in the area subsequently must have been either in conformity with green

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site RGB2613

Consultee ID 973991

Agent ID 1060797

belt policy or where very special circumstances could be shown to justify the development.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site RGB2702

Consultee ID 1049896

Agent ID 1049890

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

Soundness - Effective

Soundness - Consistent with National Policy

The site (RGB2702) should be removed from the green belt as it does not perform a green belt role. The green belt boundary should be moved to follow the garden boundaries and the edge of Kittle Point Wood, thereby including residential properties within the built up area. The woodland could represent a strong new defensible green belt boundary.

Proposed Change Requested

Council Response

No change These four properties front Whitehall Road East as do the properties they abut to the west, which are within the settlement. While there is little to differentiate the character of nos. 137 to 141 from properties in the settlement, 143 is detached and set back from the road and retains a significant treed frontage. This appears contiguous with the tree cover alongside Kittle Point beck and has a very close relationship with the continuation of the narrow wooded valley to the south of the road. Nothing has occurred subsequent to the establishment of the green belt boundary in this location that would constitute a material change in circumstances and therefore exceptional circumstances do not exist to amend its position. In addition, the removal of the site from the green belt would result in pressure for development which could result in the loss of the trees. This would have a significant impact on the character of this part of the green belt and result in the encroachment of urban land uses into this wooded valley setting.

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site RSSGB102

Consultee ID 1047995

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The property boundary was created in 1974 when the garden was separated from an adjacent piece of land. The garden boundary is shown on the OS map. There is no boundary feature on the ground where the Local Plan proposes the green belt boundary to be so the existing green belt boundary is less defensible than the proposed new boundary.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Amend the position of the green belt boundary to remove the garden from the green belt.

Council Response

No change Exceptional circumstances are required to amend the position of the green belt boundary. The act of transferring the existing green belt boundary on to an up to date ordnance survey base is necessary and appropriate but does not by itself confer the exceptional circumstances required to alter its position. In order to be exceptional in this case something must have occurred subsequent to the establishment of the boundary that has permanently falsified the reasons for originally including the land in the green belt. The statutory green belt boundary in this location was established in 1999 and included the garden area of no. 10 in the green belt. This is not unusual and there are many such examples in the district. While it is accepted that there is a garden boundary feature where the amended position is proposed, the position of the existing boundary should be readily identifiable as it follows the gable end of the property. As such it complies with national guidance in that it is following a physical feature that is readily recognisable and likely to be permanent. The establishment of the garden pre-dates the establishment of the green belt boundary and therefore there does not appear to be any change subsequent to the establishment of the boundary that would justify a change. Exceptional circumstances do not exist to amend the position of the green belt boundary in this location.

Representations received at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site RSSGB28

Consultee ID 960560

Agent ID 1058070

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The site lies on the settlement boundary and was previously occupied by a terrace of housing. A defensible green belt boundary would remain. The rejection of H1752 does not preclude considering release of this site.

Soundness - Effective

Soundness - Consistent with

National Policy

Proposed Change Requested

Remove RSSGB28 from the green belt.

Council Response

No change. Exceptional circumstances are required to amend the position of the green belt boundary. There is nothing to suggest that the original decision on the placing of the boundary was incorrect or that anything has happened on the site subsequent to that decision that constitutes a material change in circumstances. As such exceptional circumstances do not exist to amend the position of the green belt boundary. The site has been correctly assessed on its own merits as RSSGB28. The fact that the site abuts rejected housing option H1752 plays no part in its assessment but is given for information, consistent with other instances where small sites abut development options. This is so that the relationship between abutting sites can be assessed if necessary and also so that RSSGB28 could be reconsidered should the decision on the adjoining option be reversed.

Representations received at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site RSSGB39

Consultee ID 951517

Agent ID 942058

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The document states that the reason the site is not removed from the Green Belt is that it is an isolated site. This is wholly erroneous. The site constitutes a small gap in the frontage along Shillbank Lane, however despite this in reality the land does not stop the merging Mirfield with Ravensthorpe. There is already no discernible gap.

Soundness - Effective

Soundness - Consistent with National Policy

Proposed Change Requested

Council Response

No change RSSGB39 is detached from the settlement edge by the access road that runs along the back garden boundaries of properties south of Shillbank View. It is therefore an isolated site for the purposes of the consideration of such sites in the Green Belt Boundary Changes document. The site extends over the frontage part of an undeveloped field south of Shillbank Lane and as the only undeveloped open frontage it plays an important role in maintaining at least an appearance of separation between Mirfield and Ravensthorpe in this location. It is properly considered as a small site of 0.15ha because it was submitted to the Council for consideration independent of any other development option. Exceptional circumstances do not exist to amend the boundary to remove RSSGB39 from the green belt. Â

Representations recieved at Publication Draft Local Plan on PDLP Green Belt Boundary Changes

Paragraph/Site RSSGB46

Consultee ID 1075132

Agent ID

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

The land should be allocated as it could meet local housing needs and is within the settlement.

Soundness - Effective

Soundness - Consistent with

National Policy

Proposed Change Requested

Allocate the site.

Council Response

Representations received at Publication Draft Local Plan on PDL Green Belt Boundary Changes

Paragraph/Site RSSGB64

Consultee ID 945266

Agent ID 961268

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared The plan has not been prepared having regard to meeting objectively assessed development needs as there is no reason why the land should not be removed from the green belt. The plan should encourage the effective use of land by re-using land which has been previously developed where it is not of high environmental value.

Soundness - Justified The site does not currently have a green belt use and has no prospect of having a green belt use in the future. It is effectively landlocked from the wider green belt by a steeply sloping bank which creates a topographical physical boundary and the presence of the cricket ground would prevent encroachment. The land is not visible from the wider green belt. The site is urban fringe and should be considered to be brownfield as it contains 3 detached domestic garages and is therefore partly previously developed. As such the green belt could be considered to be preventing its beneficial re-use. The site is bordered on three sides by existing residential development, would have no impact on openness and should be regarded as an infill site. The green belt boundary to the rear of 1 Lower Common Lane does not follow any feature on the ground and projects unallocated land further into the green belt than the subject site. There is an area of land that has been removed from the green belt as an advertised change (ref 2510/01) as part of the exercise to create the digitised green belt boundary for the Local Plan and the reason for the amendment is to reflect land lines around properties on Lower Common Lane.

Soundness - Effective

Soundness - Consistent with National Policy The plan does not appear consistent with the presumption in favour of sustainable development as it should meet objectively assessed needs with sufficient flexibility to adapt to rapid change unless any adverse effects of doing would significantly and demonstrably outweigh the benefits when assessed against the policies. The Local Plan should follow the approach of presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.

Proposed Change Requested Amend the position of the green belt boundary to remove site RSSGB64 from the green belt.

Council Response The Local Plan has a site size threshold for new allocations of 0.4ha and this site falls below that threshold. In accordance with the Site Allocation Methodology it cannot therefore be considered as a new housing allocation in the Local Plan. An allowance has been made for windfall sites to come forward over the plan period and this is included at Table 5 of the Strategy and Policies document. For the Kirklees Local Plan, meeting objectively assessed need for new development land constitutes the exceptional circumstances necessary to justify removing land from the green belt but as this site cannot be considered as a new allocation that exceptional circumstance cannot apply. It is agreed that the proposed new boundary would in this location follow a landline and this has been included in the revised assessment of site RSSGB64 in the Publication Draft Local Plan Green Belt Boundary Changes document (November 2016). It is also agreed that the existing boundary to the south west no longer follows a physical feature. However, exceptional circumstances are required to make an amendment to the position of the green belt boundary and there is nothing to suggest that any exist for site RSSGB64. There does not appear to have been an error in the placing of the original boundary, nor has anything occurred subsequent to that decision that would make a change necessary. The Council reviewed all the proposed advertised changes in the Draft Local Plan and advertised change 2510/01 was deleted as the exceptional circumstances required to justify an amendment to the boundary in that location could not be shown, even though the green belt boundary does not appear to be following anything on the ground. This site is considered to be predominantly greenfield, despite the presence of the three detached garages. Sustainable economic growth is delivered in Kirklees through the provision of new employment and housing land to meet objectively assessed needs. Applications for development will continue to be considered against the relevant policies, including green belt policy.

Representations received at Publication Draft Local Plan on PDL Green Belt Boundary Changes

Paragraph/Site RSSGB91

Consultee ID 968438

Agent ID 942058

Legal Compliance

Duty to Co-operate

Soundness - Positively Prepared

Soundness - Justified

- It is clear that the site is better related to the settlement than the green belt and is considered to reinforce the current green belt boundary. The Council's decision not to remove the land from the green belt just because the site was previously in t

Soundness - Effective

The site performs no green belt function.

Soundness - Consistent with National Policy

- It is considered that the current green belt as show in the Local Plan and the UDP's policies map, conflict with the purposes of including land in the green belt as set out in the NPPF and the Councils own published documents.

Proposed Change Requested

Redrawing of the green belt boundary to exclude the site would strengthen the defined green belt boundary in this location (as previously recognised by the Council) which will endure beyond the timescale of the plan (following physical features).

Council Response

No change The Council initially proposed to remove RSSGB91 from the green belt as part of the Draft Local Plan. However, subsequent scrutiny has indicated that exceptional circumstances do not exist to remove the site from the green belt. There does not appear to have been an error in the placing of the original boundary, nor has anything occurred subsequent to that decision that would make a change necessary. Â There are very many examples of dwellings on the edge of settlements being placed within the green belt and the mere fact that they are there does not undermine the overall role and function of the wider green belt. Whether any particular site is considered to be an anomaly in the green belt does not amount to the exceptional circumstances required to amend a boundary. Â The exercise to transfer the existing green belt boundary to an electronic format for the purposes of the Local Plan does not by itself confer any exceptional circumstances justifying a change. The NPPF states at paragraph 85 that local planning authorities should define green belt boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The existing boundary in this location is therefore properly placed under the terms of NPPF as it follows readily identifiable features, in this case the southern garden boundary and the edge of the disused railway. Whether the boundary would be better placed elsewhere is not a matter capable of amounting to exceptional circumstances.
