

# **Kirklees Local Plan Submission Documents SD8**

Kirklees Local Plan:  
Publication Draft Sustainability  
Appraisal Report –  
Schedule of Responses  
(April 2017)



## Consultation Comments on SA of Kirklees Publication Draft Local Plan

### Introductory notes

This report sets out the consultation comments received on the Sustainability Appraisal (SA) undertaken by LUC of the Kirklees Publication Draft Local Plan. It provides a record of the consultee, the comments raised, and LUC's response to the consultation comments including any action arising.

Many comments received relate to the allocation of sites and/or the 'scores' assigned to the SA objectives for a particular site. The following points relate to all comments and demonstrate how the SA has ensured robustness and consistency throughout the process:

- The allocation of specific sites is outside of the scope of the SA Report which LUC has produced. The decision making process has been undertaken by the Council and reasons for selections are presented in Appendix 5 of the SA Report. The Council has also provided more information about the decision making process in the Rejected Site Options Report (November 2016).
- The SA appraisals of policies, sites and their reasonable alternatives have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted upon at previous iterations of the SA Report. They reflect the key sustainability issues which have been identified for Kirklees in Table 3.1 of the SA Report. The methodology used for the SA Report has been set out in Chapter 2. This presents the stages of consultation involved in the previous iterations of the SA Report. This approach has been taken to ensure consistency between the SA findings in relation to sites and policies which have been subject to appraisal.
- The SA Report has been undertaken as a statutory requirement of the Planning and Compulsory Purchase Act 2004. In line with the National Planning Practice Guidance the document has been prepared as a joint SA/SEA process. It is therefore required to address the SEA Regulations (Art. 5 and Annex I) which are detailed in Table 1.1 of the SA Report. The table shows where these regulations have been met in the SA Report.
- The findings of the SA report in relation to access to various services and facilities in Kirklees have been informed by 'heat mapping' work undertaken on behalf of the Council (SA objectives 1, 3, 4 and 6). A description of how this work has informed findings as well as the assumptions and limitations which relate to the use of this data have been presented in paragraph 2.37 of the SA Report.

**Table 1 Publication Draft Local Plan SA Report Consultation Comments and Responses**

Consultee	Comment	Action
<p>Calderdale Friends of the Earth (Anthony Rae)</p>	<p>Sites E1832c (p.78) and H1747 (p.207) have both been given a Green ++ score in relation to SA objective 19: Reduce the contribution that the District makes to climate change. It is highly likely that their deliberate location alongside the M62, and existing J25 and planned J24a, will result in modal splits sharply weighted towards road traffic and extended travel to work journeys. This will result in increased carbon emissions rather than the radically reduced ones that NPPF paragraph 93 requires the Plan and this SA to achieve.</p>	<p>It relation to site E1832c; it has been identified through assessment work undertaken on behalf of the Council that 26,609 residents of working age are within 0-20 minutes travel time of this employment site.</p> <p>It relation to site H1747; it has been identified through assessment work from the Council that the site is located within 11-15 minutes of a secondary school (it is mapped as green in terms of access to only one feature).</p> <p>Based on the agreed assumptions which have previously undergone consultation (SA objective 19 in Appendix 4 Assumptions used in the SA of Site Options Tables A4.1 (residential) and A4.2 (employment)) where an employment site is located within 20 minutes of more than 25,000 people a significant positive (++) effect is likely. Similarly where a residential site is mapped as green for at least four of the eight features (relating to connections by sustainable transport links to primary schools, secondary schools, further education, GPs, hospitals, employment nodes, local centres and town/district centres) a significant positive (++) effect is likely. Where a residential site is mapped as green for between one and three of the eight features a minor positive (+) effect is likely. This positive effect is likely given that good accessibility to services is likely to reduce per capita emissions of carbon dioxide from transport.</p> <p>As such site E1832c is assessed as likely to have a significant positive effect on SA objective 19: climate change. Site H1747 has been assessed as likely to have a minor positive (+) effect (please see page 2609 of Annex 1 - H1747 (allocated in the Publication Draft Local Plan)) on this SA objective (not a significant positive effect as Calderdale Friend of the Earth has stated). The effects recorded are therefore in line with the SA framework.</p>

Consultee	Comment	Action
<p>Farnley Tyas Community Group (Jane Faulkner)</p>	<p>Group supports the rejection of sites SGI2115a and SGI2109 (which have been considered in the SA Report for allocation as a Strategic Green Infrastructure Site in the Local Plan but rejected) and wants the changes to reject this site to remain to keep the Plan 'sound'. Group agrees with the conclusions now expressed in the Rejected Site Options Report and the Sustainability Appraisal Report that the provision of a country park cannot be justified or delivered and that the visitor and leisure facilities would breach the strong green belt boundary of Penistone Road.</p> <p>Group supports the rejection of site H136 (which has been considered in the SA Report for allocation as a Residential Site in the Local Plan but rejected). The group identifies that an existing bowling club is at this location giving it high amenity, recreation and open space value; they state that it is unsuitable for residential development.</p>	<p>Noted.</p> <p>The SA Report has identified that site H136 would have a combined (significant positive/significant negative effect) in terms of SA objective 8: recreation as its development may result in the loss of a semi-natural and natural greenspace as well as an outdoor sports facility, but acknowledging that the site is located in close proximity to a number of existing open spaces and other recreational facilities.</p>
<p>Tristan Wooller</p>	<p>Consultee disagrees with the Council's reasoning for allocating site H442 in the Local Plan. The consultee also disagrees with the amendment to the Green Belt boundary to accommodate this allocation and contests that the site is located within the Green Belt performing the Green Belt function of preventing unrestricted sprawl of large built-up areas and preventing the settlements of Roberttown and Liversedge from merging. The Council has stated that these settlements already "merge to some extent" in relation to the site's value as part of the Green Belt. The consultee also states that the site is within an Urban Fringe Character Area and is identified as a green area and, as such, should remain undeveloped. It is also suggested that the change in allocation of the site will result in it having a more urban character, will diminish the openness and harm the visual amenities of the Green Belt, and conflict with the purposes of including land within it. In addition the site is considered an unsustainable location where future residents of the proposed development would have to rely on private motorised forms of transport.</p> <p>In relation to the SA Report the consultee objects with the findings for SA objective 13: historic environment. The allocation of the site</p>	<p>The scoring of SA objective 13 in the SA Report has incorporated the following input from Historic England. Historic England has scored this site as "Orange" in terms of the potential for impacts on the historic environment, meaning that effects are uncertain. Historic England identified that impacts on the Old Hall Farmhouse Grade II* Listed Building relate to the development of the site which could harm elements which contribute to the significance of this asset. Sites which have been identified as 'Orange' in Historic England's assessment will have an uncertain effect on the historic environment as per the SA agreed SA Assumptions which have previously been consulted upon at previous iterations of the SA Report. The assumptions are presented in Appendix 4 Assumptions used in the SA of Site Options Tables A4.1 (residential). The methodology used for the SA Report has been set out in Chapter 2. This presents the stages of consultation involved in the previous iterations of the SA Report.</p>

Consultee	Comment	Action
	<p>for development would impact upon its character given that it is currently undeveloped and part of the Green Belt. The setting of Lowfold Hall, a Grade 2* Listed Building has been identified as potentially being affected and therefore the consultee believes the effect on SA objective 13 should be negative.</p>	
<p>Carol Martin</p>	<p>Consultee contests that the Local Plan is not legally compliant and unsound. They have stated that the SA Report is unclear in terms of how it has been undertaken and how consistently judgements have been made across the sites. The SA Report is considered to “lack rigour and clear explanations”.</p> <p>The consultee has stated that the SA objectives should be presented clearly consistently across all sites. A full review of the SA should also be presented with measured outcomes that provide the public with information that shows a fair and transparent process has been undertaken. An explanation stating how the decisions to reject or accept have come about is also required.</p>	<p>See Introductory Notes.</p> <p>Chapter 2 of the SA report describes the methodology of the SA process highlighting how previous iterations of the Local Plan and SA have fed into the most recent draft of both documents. As highlighted above, consistency across the SA Report has been maintained by using an agreed set of assumptions for each SA objective against which the sites and policies of the Local Plan and reasonable alternatives have been considered. These assumptions have been consulted upon at previous iterations of the SA Report.</p>
<p>David Pursehouse</p>	<p>The response consists mainly of an extract from MAGIC software and an HRA document. The consultee has suggested that the sites H288a, SL2170a and SL2170b should be re-designated as Green Belt.</p> <p>In relation to comments on the SA Report the consultee feels that the findings are flawed and inconsistent particularly in relation to site H288a. Issues of sustainability in relation particularly to accessibility (specifically services and facilities and healthcare) have been raised. However, the response has not brought specific findings of the SA Report in relation to the SA objectives against which each site has been appraised into question.</p>	<p>Site H288a is identified as having a potential minor positive effect on health and well-being (SA objective 4) as it is mostly located within 21-25 minutes travel time of GP and over 60 minutes travel time from a hospital.</p> <p>The site is also located within 16-20 minutes travel time of a local and town / district centre (although it is recognised that a small portion of the site is within 21-25 minutes travel time of such centres) and therefore a minor negative effect has been recorded for SA objective 6 in relation to access to services and facilities.</p> <p>Site 288a has been assessed as likely to have minor positive effect in relation to objective 10 (sustainable transport) given that it has been assessed as being easily accessible to primary school facilities (one of the eight features considered) as per the heat mapping work undertaken on behalf of the Council. A similar minor positive effect is also expected in relation to SA objective 19 (climate change) as the site has been assessed as having a good level of access to one of the eight features considered meaning the use of private cars might be limited due to the relatively good level accessibility at this</p>

Consultee	Comment	Action
		location.
Adam Godbold	<p>The consultee contests the allocation of site H138 and the findings of the SA Report in relation to this. There is disagreement with the score for this site in relation to SA objective 8: recreation. The SA Report has recorded the score as significant positive effect however the consultee states that the development of the site would result in the loss of the use of a "well-used football pitch". The consultee also states that there is currently a recreational building on Site H138 which would need to be replaced if development proceeded.</p> <p>The consultee also disagrees with the recorded score for SA objective 14: biodiversity and geodiversity stating that the assessment of the site is not sufficient as development would result in the loss of nearly eight hectares of mature, diverse and well connected flora and fauna. The consultee has stated that allocation of the site would result in the potential removal of this substantial and diverse network of ecology and would not consider TPOs along the A62 as well as TPOs within the site itself. The site has been recorded as having an uncertain negligible effect on this SA objective.</p>	<p>The assessment of all sites considered has been informed by GIS information provided by the Council. This GIS information received by LUC omitted the location of the football pitch that the consultee has highlighted. As such, no negative effect has previously been recorded for this SA objective and a positive score was recorded as the site is close to a number of recreational centres and open spaces. Upon further investigation, LUC has concluded that the development of the site may result in the loss of the football pitch between Mill Street and Park Street. This would be dependent upon the design of the development. A query to the Council has also revealed that mitigation measures would be required to provide a replacement playing pitch if the site is to be developed. The SA Addendum will therefore include a reassessment of the site in relation to SA objective 8 to consider the potential loss of this open space.</p> <p>Similarly the score in terms of SA objective 14 has been based upon the agreed SA Assumptions. As the site is not located within close proximity of any designated biodiversity or geodiversity sites a negligible effect has been recorded for this SA objective. Detailed biodiversity assessments are outside the scope of the SA, as SA is required to conduct a strategic assessment of all site options in the same level of detail, and a level of detail that is proportionate to the plan.</p> <p>The appraisal does not relate to TPOs in the District given that this is a statutory protection afforded to trees in planning law (Town and Country Planning (Tree Preservation) (England) Regulations 2012) and will therefore be considered at the planning application stage, rather than SA, which is a strategic process. This considered, TPOs may relate to the value of trees beyond biodiversity, potentially protecting for example related character and amenity, which again will be considered at the planning application stage. Policy PLP 30 will ensure that biodiversity is taken into consideration at the planning application stage.</p>

Consultee	Comment	Action
Joanna Terry	<p>The consultee contests the allocation of site H138 for what she considers to be a high level of housing due to issues of potential pollution from the PPG factory; traffic and pollution issues at the A62 Huddersfield Road; existing school and healthcare capacity; flooding relating to the drainage system; and use of the site which is greenfield when other brownfield sites exist in Birstall.</p>	<p>Given its high level nature the SA has not addressed pollution from specific industrial sources in the District. Pollution for such sources have not been identified as a key sustainability issue in Kirklees and it is considered that these issues would be more appropriately addressed at the planning application stage if any proposals were to come forward for this site. Amenity (in terms of light pollution and noise pollution) has been considered through SA objective 5, however as the site is not adjacent to any industrial buildings no significant negative effects have been identified. With regard to traffic issues the SA Report through SA objective 5 has however recorded that there is potential for the site to be adversely impacted upon by noise pollution from the nearby A62 and therefore a significant negative effect has been recorded for this SA objective.</p> <p>SA objective 10 has addressed public transport and work undertaken on behalf of the Council in relation to access suggests that residents would be encouraged to make use of modes of sustainable transport from this site, therefore a significant positive effect has been recorded for this SA objective.</p> <p>The site has also identified as likely to have a significant positive effect in terms of SA objective 4 which addresses health and wellbeing in Kirklees as it is in close proximity of both a GP and a hospital. The SA Report has not considered potential for specific sites to overburden existing services and facilities of this type, due to the high level nature of the SA. The need to assess a large number of reasonable alternative site options requires a desk-based assessment, and such issues will be part of the assessment of sites at the planning application stage. In line with the PPG, the level of detail in the SA is proportionate to the level of detail in the plan.</p> <p>The site is not in an area of high flood risk as identified through SA objective 16, for which a minor negative effect has been recorded. As the site is greenfield, development would increase the area of impermeable surfaces in the District which might increase local flood risk. Flooding due to drainage is not considered as data on this is not available for all sites, meaning that to include this information for this site only would result in an inconsistent approach, which could bias the SA results. This would be inconsistent with the PPG, which</p>

Consultee	Comment	Action
		<p>requires all sites should be assessed to the same level of detail. In addition, drainage issues can usually be resolved through appropriate design.</p> <p>The loss of greenfield land at this site has also meant that a significant negative effect has been recorded for SA objective 11 in relation to efficient use of land. The negative effect was recorded as significant given its relatively large (over 5ha) size.</p>
Carl Bagley	<p>The consultee contests the SA Report findings in relation to site H69. He has provided the following points:</p> <ul style="list-style-type: none"> <li>• Employment recorded as significant positive - will only apply to construction workers as no plans for business development on the site</li> <li>• Education uncertain - the local schools clearly are oversubscribed with no plans for the situation to change in the future with 350 homes to be added</li> <li>• Health mix of positive and negative - air pollution arising from CO2 adding to the problems of the area with the vast air quality issues in Kirklees particularly in relation to the M62</li> <li>• Sustainable Transport positive – disagree; minimal public transport currently available</li> <li>• Flooding minor negative - no major issue has been identified but consultee disagrees</li> <li>• Amenities negative - agree</li> <li>• Landscape negative uncertain- agree</li> </ul>	<p>In relation to employment at this site it is not contested that the site would only be used for residential development and would not include any new businesses. SA objective 1 however addresses access to existing employment sites in the District. It has been highlighted that this site would be in close proximity to at least one employment site and therefore a significant positive effect has been recorded.</p> <p>The score recorded for SA objective 3: education addresses proximity to schools. Given that only part of the site is in close proximity to education facilities a mixed overall effect is expected. The uncertainty attached to the overall score acknowledges that issues relating to capacity may exist at the identified nearby schools.</p> <p>In relation to health at this site, potential for noise and light pollution impacts on residential amenity are addressed by SA objective 5 for which a significant negative effect has been recorded. This effect is expected given the close proximity of industrial buildings to the west of the site. Specifically in relation air pollution a negligible effect has been recorded as the site is not within an AQMA and the M62 is not within an AQMA. SA objective 4 addresses health and wellbeing in the District. An overall mixed effect (minor positive/significant negative) has been recorded given that only part of the site is located within close proximity of a GP. This assessment has been made making use of accessibility work undertaken on behalf of the Council.</p> <p>SA objective 10 addresses sustainable transport at this site. A minor positive effect has been recorded for this SA objective given that accessibility work undertaken on behalf of the Council has</p>



Consultee	Comment	Action
		<p>demonstrated that the site is considered to be highly accessible to one of the eight features against which it has been assessed.</p> <p>SA objective 16 addresses flood risk at this site. The site is not located within flood zone 2 or 3 but is located on greenfield land. As such its development might result in limited increased flood risk in the District and therefore a minor negative effect has been recorded for this SA objective.</p>
Alan Oldfield	<p>The consultee disagrees with the findings of the SA Report with regards to site H69 for the following reasons:</p> <ul style="list-style-type: none"> <li>• SA objective 1 – no long term jobs would be created at this site</li> <li>• SA objective 3 – no new education opportunities would be created only increased pressures on existing facilities</li> <li>• SA objective 4 – further pressures would be placed on existing health care facilities</li> <li>• SA objective 6 – existing services are likely to become oversubscribed</li> <li>• SA objective 7 – the consultee contests evidence to support findings</li> <li>• SA objective 8 – PRoW will be lost</li> <li>• SA objective 9 – the consultee agrees that additional housing is need but feels loss of 'greenbelt' site is not required</li> <li>• SA objective 10 – disagrees with the findings of the SA Report in relation to improved use of public transport</li> <li>• SA objective 19 – contests the findings of the SA Report in relation to climate change</li> </ul>	<p>In relation to employment at this site it is not contested that the site would only be used for residential development and would not include any new businesses. SA objective 1 however addresses access to existing employment sites in the District. It has been highlighted that this site would be in close proximity to at least one employment site and therefore a significant positive effect has been recorded. This is in line with the findings of the accessibility work undertaken on behalf of the Council.</p> <p>The score recorded for SA objective 3: education addresses only proximity to schools. The findings in relation to this SA objective have been based upon the accessibility work undertaken on behalf of the Council. Given that only part of the site is in close proximity to education facilities a mixed overall effect is expected.</p> <p>An overall mixed effect (minor positive/significant negative) has been recorded for SA objective 4: health, given that only part of the site is located within close proximity of a GP. These findings have been based on the accessibility work which has been undertaken on behalf of the Council. The SA does not consider the potential capacity of healthcare facilities in the District due to the high level nature of the SA.</p> <p>SA objective 7 addresses crime and making the District safer. It is considered that the specific siting of new housing would not affect this SA objective, based on the assumptions presented in the SA framework.</p> <p>The consultee has stated that a PRoW would be lost through the development of site H69 however based on the GIS supplied by the Council this is not evident. This has been checked against OS map</p>

Consultee	Comment	Action
		<p>data and although a footpath forms at the south western and eastern boundaries of the site, these are not expected to be lost to development.</p> <p>The site is not located within the Green Belt boundary, which is to the east of the site. The impact of the loss of greenfield land has been recognised in the SA Report through SA objective 11: efficient use of land, for which a significant negative effect has been recorded. This negative effect has been recorded as significant as the site is 5ha in size and is therefore considered to be relatively large. The high number of new houses which might be provided at this location given its large size means that a significant positive effect has been recorded in relation to SA objective 9: housing.</p> <p>SA objective 10 addresses sustainable transport at this site. A minor positive effect has been recorded for this SA objective given that accessibility work undertaken on behalf of the Council indicates that the site is located as to be highly accessible to one of the eight features against which it has been assessed. As such new residents may be encouraged to make use of sustainable or more active modes of transport (for example walking or cycling) to access these facilities given their relative proximity.</p> <p>SA objective 19 has been based on the findings of the accessibility work undertaken on behalf of the Council. This site has been identified as being easily accessible to one of these eight features and therefore a minor positive effect is expected as the number of journeys by private car which new residents might be required to take may be reduced which would help to limit the emission of greenhouse gases in Kirklees.</p>
Catherine Walker	<p>The consultee contests the allocation of site H69 using the findings of the SA Report to support this stance. The comments state "that the SA is detailed as likely to have a significant negative effect ... on the following; Amenity, Efficient Land Use and Landscape. It also states site H69 is 'likely to have a minor negative effect on the SA objectives' with regards to the following; Biodiversity &amp; Geodiversity and Flooding. The only 'positives' of the development of site H69 are an increase in housing and an increase in people available for</p>	<p>The SA Report has highlighted significant negative effects in relation to SA objectives 3: education, 4: health, 5: amenity, 6: access to local services, 8: leisure and recreation, 11: land use and 12: landscape and townscape with the significant negative effect expected in relation to SA objectives 3, 4, 6 and 8 as part of an overall mixed effect.</p> <p>Minor negative effects are likely in respect of SA objectives 14:</p>

Consultee	Comment	Action
	employment, there are no benefits for the existing local community of Hunsworth."	biodiversity and geodiversity, 16: flooding and 17: waste. Significant positive effects are likely in relation to SA objectives 1: employment, 3: education and 8: recreation the positive effects identified in relation to the last two SA objectives both likely as part of an overall mixed effect. Further minor positive effects are expected for this site in relation to SA objectives 4: health, 6: access to services and facilities, 10: transport and 19: climate change. The minor positive effects likely for SA objectives 4 and 6 are expected as part of an overall mixed effect.
Scholes Future Group (Michael Reader)	The consultee has specifically questioned the findings of the SA Report in relation to sites H8 and H38 for SA objective 6. There is disagreement about the findings that the sites are within 11-15 minutes travel time of local centre and how this travel might be undertaken. The response also addressed access to the local medical practice.	<p>In relation to the scoring of sites H8 and H38 for SA objective 6 access to services and facilities site H8 has been identified as being located within 11-15 minutes travel time of both a local centre and town/district centre and thereby is expected to have minor positive effect on this SA objective. The majority of Site H38 is located within 11-15 minutes travel time of a local centre and within 16-20 minutes travel time of a town/district centre meaning a negligible effect is expected on this SA objective.</p> <p>Both of the sites have been identified as being located mostly within 16-20 minutes travel time of a GP surgery and more than 60 minutes travel time from a hospital. A minor negative effect has therefore been recorded for SA objective 4 (health and well-being) for both sites. All findings for the individual sites considered for allocation in the Local Plan are in line with the agreed SA Assumptions.</p>
Emley Millennium Green (Frank Spivey)	<p>The consultee considers that the SA Report methodology is "too broad-brush and crude, and lacks evidence of even the most cursory technical appraisal having been undertaken, and as a consequence lacks objectivity". It is highlighted that Paragraph 2.30 of the Report states "(it) ... inevitably relies on an element of subjective judgement".</p> <p>Also Para 2.35 of the SA report states "it is a requirement of the SEA Regulations that consideration is given to any data limitations ..."</p> <p>The consultee has stated that there is no evidence that this has</p>	<p>See Introductory Notes. Details of the difficulties encountered in the SA process have been presented from paragraphs 2.36 to 2.39.</p> <p>Further details about reasons for the rejection of relevant sites based on the Council's assessment are presented in the Rejected Site Options Report (November 2016) with site H685 presented on pages 467 and 468. The two sites in question are very similar given that they cover much of the same land with H685 being slightly bigger.</p>

Consultee	Comment	Action
	<p>taken place.</p> <p>The consultee also contends that site H358 should be not be allocated comparing it to site H685.</p>	
Karnesh Patel	<p>The consultee contends that the site H288a is rural and is known to have poor access to essential services. There should be a plan for improving transport links, access to services and employment at the location before development should proceed with requirements for developers to take at least part responsibility for improving these services/transport links.</p>	<p>The SA Report has found for site H288a that in terms of the score for access to existing employment (SA objective 1) a significant negative effect is likely. A minor positive effect has been identified in relation to access to existing education facilities as the site is located within 6-10 minutes travel time of a primary school and is mostly within 26-30 minutes travel time of a secondary school. In terms of access to healthcare facilities a minor negative effect has been identified given that the site is mostly located within 21-25 minutes travel time of a GP and over 60 minutes travel time from a hospital.</p> <p>The site was previously assessed incorrectly as being in close proximity of a local centre and town centre, however this was corrected in the Publication Draft Kirklees Local Plan: Sustainability Appraisal Report Erratum Notice given that the site is within 16-20 minutes travel time of a local and town/district centre. A minor negative effect is therefore likely with regards to this SA objective.</p>
Hade Edge Fight for the Fields (Kevin Macmillan)	<p>The consultee has described the SA methodology for the assessment of the allocated sites as "not easy to understand and difficult to interpret".</p> <p>The consultee has also provided issues which they believe have resulted in incorrect findings in the SA Report. These concerns relate mainly to site H288a and accessibility of the site.</p>	<p>A more concise version of the whole SA Report and its relevant findings are presented in the Non-Technical Summary document which has been presented alongside the full report.</p> <p>As noted in Chapter 2 of the SA Report, assumptions regarding the distance which residents would be willing to walk to the first connection involved in their journey (e.g. a bus stop) and the speed of walking have been made.</p> <p>Publication Draft Kirklees Local Plan: Sustainability Appraisal Report Erratum Notice presents the final updated findings for the sites in question. This should be read in conjunction with the full SA Report. The scoring has been decided upon based on the agreed SA Assumptions presented in Appendix 4 of the SA Report. These relate to SA Framework which is based on the key sustainability issues for the District, which are presented Table 3.1 of the SA Report.</p>

Consultee	Comment	Action
		<p>Site 288a has been identified as having a potential minor positive effect on health and well-being (SA objective 4) as it is mostly located within 21-25 minutes travel time of GP and over 60 minutes travel time from a hospital.</p> <p>The site is also located within 16-20 minutes travel time of a local and town / district centre (although it is recognised that a small portion of the site is within 21-25 minutes travel time of such centres) and therefore a minor negative effect has been recorded for SA objective 6 in relation to access to services and facilities.</p> <p>Site 288a has been assessed as likely to have minor positive effect in relation to objective 10 (sustainable transport) given that it has been assessed as being easily accessible to primary school facilities (one of the eight features considered) as per the heat mapping work undertaken on behalf of the Council. A similar minor positive effect is also expected in relation to SA objective 19 as the site has been assessed as having a good level of access to one of the eight features considered.</p> <p>In relation to SA objective 9 (housing), not all sites have been attributed the same score in relation to this issue as has been alluded to in the consultee's response. The allocation of sites over 5ha could potentially deliver higher numbers of new homes and therefore a significant positive effect has been recorded. The SA objectives are consistent with the SEA Regulations which require that relevant plans are assessed in terms of a number of factors including population, human health and material assets all of which will be influenced by the appropriate delivery of new homes in the District. The key sustainability issues (see Table 3.1 of the SA Report) of Kirklees have also been considered and given that one of these is "Housing Provision (Supply)" it is deemed appropriate to consider the contribution each site can make in relation to meeting housing need in Kirklees.</p> <p>The significant negative effect expected in relation to site H68 for SA objective 12 (landscape) is because it is a large site (sites over 5ha are considered to be large in line with the agreed SA Assumptions) and would result in a loss of significant area of greenfield land. It is expected that losses of large areas of previously undeveloped</p>

Consultee	Comment	Action
		<p>greenfield may have detrimental impacts in terms of character. While site H288a would also result in the loss of greenfield land it is only 2.5ha in size and therefore the negative effect on landscape (SA objective 12) is expected to be minor.</p>
David Simmons	<p>The consultee considers that the SA Report methodology is “too broad-brush and crude, and lacks evidence of even the most cursory technical appraisal having been undertaken, and as a consequence lacks objectivity”. It is highlighted that Paragraph 2.30 of the Report states “(it) ... inevitably relies on an element of subjective judgement”.</p> <p>Also Para 2.35 of the SA report states "it is a requirement of the SEA Regulations that consideration is given to any data limitations ..."</p> <p>The consultee has stated that there is no evidence that this has taken place.</p> <p>The consultee proposes that “a transparent and qualified assessment methodology (is developed) against which each site, can properly receive a level of technical appraisal and then scored (from 1 to 10) against compliance with each of the Council's SA Objectives; these Objectives themselves having being weighted in turn against Council's Policy Objectives for the District concerned.”</p> <p>The consultee also contests the allocation of site H358.</p>	<p>See Introductory Notes. Details of the difficulties encountered in the SA process have been presented from paragraphs 2.36 to 2.39.</p> <p>Whilst there is no statutory methodology for SA, LUC has taken a standard approach, which was subject to consultation at previous stages. Therefore the methodology is considered appropriate.</p>
Bellway Homes (Yorkshire)	<p>The consultee contests the significant negative effect which has been recorded for site H125 in relation to SA objective 5: amenity stating that this score is incorrect given that “most housing allocations should adjoin the existing urban area” meaning that all sites would have a negative effect on this SA objective. It is also noted that any adverse impacts would be temporary (confined to only the construction phase) and would be mitigated or controlled by a construction management plan.</p> <p>The respondent also disputes the assessment of the site in relation to having a mixed overall effect in relation to education (SA objective 3), believing that the score should be a significant positive overall.</p> <p>The response of the consultee also contends that where the SA</p>	<p>As per the assumptions residential sites which are adjacent to existing residential properties on all sides would have a significant negative effect on this SA objective in relation to potential for existing properties to be affected by noise and/or light pollution. This assumption allows for differentiation between those sites which are adjacent to existing development on one side and those which are adjacent to such development on multiple sides. It has also been noted in the justification text of individual site appraisals that this negative effect would extend beyond the construction phase of the development.</p> <p>Given the larger size of the site it has extended across two distinct areas of accessibility to education facilities as informed by work</p>

Consultee	Comment	Action
	<p>Report concludes that “negative impacts will need to be considered further in terms of mitigation and/or enhancement” it is evident that the significant negative impact identified can be easily mitigated.</p>	<p>undertaken on behalf of the Council in relation to accessibility to services and facilities. The most accessible part of the site is located within 5 minutes travel time of a primary school and within 6-10 minutes travel time of a secondary school while the least accessible portion of the site is located within 6-10 minutes travel time of a primary school and within 21-25 minutes travel time of a secondary school. Based on the SA Assumptions the mixed score of minor positive/significant positive has been recorded.</p> <p>The conclusion text for site H125 states that “<u>these issues</u> (relating to the potential significant positive effects and potential significant negative effects identified) will need to be considered further in terms of mitigation and/or enhancement”. As such the potential for enhancement relates to significant positive effects identified while mitigation relates to significant negative effects identified. As mitigation measures are not detailed at this stage, the SA represents a ‘pre-mitigation’ assessment, but recognises where mitigation could be implemented.</p>
Michael Hall	<p>The consultee contests the allocation of site H358. It has been highlighted that the SA Report does not consider the potential for new school places which might be required to be accommodated or issues of local drainage and water pressure. Access to the site and to the two major 'green spaces' in the village, namely the Sportsfield and the Millennium Green have also been raised as potential issues.</p>	<p>The SA Report has only considered the accessibility of sites to schools in Kirklees through SA objective 3 and uncertainty has been attached to each of these scores (minor positive for site H358) given that it is unknown if new school places would be supported as part of new development or if current capacity exists. The SA has addressed flooding concerns through SA objective 16. A minor negative effect has been identified for site H358 as it is not located within a flood zone as identified through Environment Agency data but would result in an increase in impermeable surfaces which could increase overall local flood risk. Issues of drainage and water pressure are not considered in the SA Report given its high level nature and considering that this information is not available for all sites. Inclusion of this information in assessing some sites but not others would be contrary to the PPG, which states that all options should be considered in the same level of detail. These issues are more appropriate for consideration if/when any proposals were to come forward to a planning application stage. They are also often resolvable at this later stage.</p>

Consultee	Comment	Action
		<p>SA objective 10 has considered the potential impact of development of the site in relation to accessibility and transport. Work undertaken for the Council has identified that four out of eight features assessed are relatively accessible from the site, meaning an overall significant positive effect is expected given that new residents might be encouraged to travel by more sustainable and active modes of transport as travel distances are reduced. A mixed (significant positive/significant negative) effect is expected overall for SA objective 8 which addresses access to open space and recreation facilities as the site would be in close proximity to a number of existing open spaces.</p>
Gerald Newsome	<p>The consultee contests the findings of the SA Report in relation to sites H31, H664, H616, H638, H2730, H2684a and H1679 and queries, in particular, whether the cumulative effects of these sites and plan have been considered.</p>	<p>The cumulative effects of the plan (including sites allocated and policies to guide development) are presented by SA objective from paragraph 12.80 onwards of the SA Report. The cumulative effects of allocated sites at specific villages have not been separated out as the effects of allocating sites at any specific settlement will not be entirely separate from other allocations in the plan. The SEA Regulations require the cumulative effects of implementing the plan to be assessed and reported upon. As such the approach of considering the cumulative effects of the plan in its entirety is considered to be appropriate.</p> <p>In response to issues raised which relate to the findings of the SA Report for individual SA objectives:</p> <p>Employment: This issue has been addressed by SA objective 1. The site findings have been based upon work undertaken on behalf of the Council which has provided details of the accessibility of the site to existing employment sites. The Council has identified that over the period 2013-2031 23,000 jobs are expected to be delivered which would meet the proposed growth over the plan period.</p> <p>Education: This issue has been addressed by SA objective 3. In relation to the appraisal of residential sites considered for allocation in the plan the SA considered only access to nearby schools in terms of proximity. It has been accepted in the SA that capacity issues may result and this has been acknowledged by adding uncertainty to the scores recorded. The cumulative effects section of the SA Report</p>



Consultee	Comment	Action
		<p>has identified (paragraph 12.91) that the delivery of 1,730 new homes over the plan period may result in capacity issues. It is also clarified that:</p> <p><i>"The Publication Draft Local Plan makes provision for the development of new schools and additional school places to meet increased demand through PLP49: Education and Healthcare Needs. In addition, PLP4: Providing Infrastructure requires such essential infrastructure to be in place before the associated development comes forward."</i></p> <p>Transport: This issue has been addressed through SA objective 10. The findings have been based upon the work undertaken on behalf of the Council in relation to the ease of access to eight essential features. Sites which provide ease of access to one of eight features may help to encourage the use of more sustainable or active modes of transport (meaning a minor positive effect was scored) given that the journeys to such features are likely to be shorter. Sites which provide ease of access to four out of eight features were recorded as likely to have a significant positive effect on this SA objective. The consultee has referenced a number of sources of data relating to traffic generation from individual sites. These are not considered relevant to the SA, which is a strategic study that uses consistent data across the local authority area in order to give like-for-like assessments for each site.</p> <p>In relation to cumulative effects of the plan (paragraph 1.122) it has been highlighted that:</p> <p><i>"The Publication Draft Local Plan includes a number of policies seeking to improve sustainable transport links in Kirklees. While some policies would improve the highway network (in particular PLP19: Strategic Transport Infrastructure), which could be seen to encourage and facilitate car use, they are underpinned by the wider aim to encourage sustainable transport use."</i></p>
Toby Capstick	The consultee contests the findings of the SA Report in relation to minerals sites ME2248 a, b, c and ME2314. The minor negative effect which has been scored in relation to health and well-being has	The SA Assumptions used to appraise the mineral sites in question have considered the potential for impacts on health and wellbeing in line with national planning policy. As explained in the SA

Consultee	Comment	Action
	<p>been queried due to the proximity of the site to residential properties, a school and playing fields.</p> <p>The findings of the SA Report in relation to residential amenity have been also been queried due to the proximity of the site to residential properties.</p> <p>The consultee has highlighted the findings in relation to access to open space and recreation facilities. It has been suggested that the sites ME2248a and ME2314 both contain a PRoW which might be lost and that further adverse impacts may result on surrounding open spaces as a result of these sites.</p> <p>The consultee has queried the findings of the SA Report in relation to SA objective 9: housing as it does not address potential exposure to dust and noise pollution.</p> <p>It has also been suggested in the consultee's response that loss of farming land has not been considered in the SA findings.</p> <p>The consultee has also suggested that the sites would result in adverse impacts on the character of the Upper Cumberworth Conservation Area. It is also stated that as the Conservation Area Appraisal notes that the site is in a conservation area to 'help preserve and enhance quality of life for its residents and visitors' it "cannot be described as a 'poor landscape'".</p> <p>The response of the consultee suggests that as quarrying activities may have an extended lifetime the argument which the SA Report makes in relation to the "restoration of sites in poor landscape characters areas" with potential to ensure the "long term enhance(ment of) the landscape" is flawed. It is argued that the effects should be assessed in short, medium and long term in this instance. It is also contested that the tradition for mineral extraction in the area sits in contention with the advice of the SA Report to require for screening and buffers, and sympathetic site restoration.</p>	<p>Assumptions used to address mineral sites in Kirklees (Table A4.6).</p> <p><i>"The NPPF is clear that minerals planning authorities should ensure that unavoidable dust emissions are controlled and mitigated or removed at source. Therefore it is assumed that mineral extraction at any of the potential sites will be well operated and that mitigation measures implemented should be sufficient to avoid any potential health effects. Minerals sites within 100m of sensitive receptors could have minor negative effects on health as a result of dust; however this is uncertain (-?) depending on factors such as topography, the nature of the landscape, the respective location of the site and the nearest residential property or other sensitive use in relation to the prevailing wind direction and visibility."</i></p> <p>As such it is considered reasonable to assess the sites as likely to have a minor negative effect in relation to health and well-being in Kirklees.</p> <p>Issues in relation to amenity have been addressed through SA objective 5. Where information has been provided about the type of minerals extraction which might occur at this location this has been used to inform the judgement. All sites have been identified as having a minor negative in terms of impacts on residential amenity in line with the agreed SA Assumptions.</p> <p>The SA report was undertaken making use of GIS data which has been supplied by the Council. This has shown there is at least one PRoW within sites ME2248, ME2248a, ME2248c and ME2314. The sites have been appraised as having a significant negative effect in terms of access to open spaces and recreation facilities given the potential impact of mineral extraction on accessibility and attractiveness of nearby open spaces. The remaining sites have been appraised as having a minor negative effect on this SA objective given that open spaces or PRoWs which have been identified as being in close proximity to the sites in question may be less attractive or accessible due to mineral extraction. This negative effect has been recorded in combination with an uncertain minor positive effect in line with the SA Assumptions as the restoration of mineral sites may allow for the provision of recreation opportunities</p>

Consultee	Comment	Action
		<p>in the future.</p> <p>In relation to SA objective 9: housing - residential amenity relating to potential for exposure to noise pollution and dust has been not been considered through this SA objective but has instead been considered through SA objective 5: pollution. SA objective 9 relates to the provision of new homes in the District to meet local needs and it is not considered appropriate to relate this SA objective to residential amenity. Impacts on this issue have already been considered elsewhere in line with the agreed SA Assumptions and as such the approach suggested by the consultee would lead to a "double counting" of sustainability effects.</p> <p>The SA Report considers the use of agricultural land for mineral extraction and potential loss of this finite resource (at least temporarily given the potential for restoration in line with NPPF guidance) through SA objective 11. It has been identified that the sites in question lie on Grade 4 Agricultural Land and in line with the agreed SA Assumptions a minor negative effect has been recorded for this SA objective.</p> <p>In relation to potential for impacts on the setting of the Upper Cumberworth Conservation Area the potential for effects on the landscape and historic environment has been appraisal separately through SA objectives 12 and 13 of the SA Report. The setting of the Conservation Area is relevant to the scoring of SA objective 13: historic environment. The potential effects of the allocation for mineral extraction on SA objective 13 are uncertain with the exception of site ME2248. An extant planning permission exists for this site and therefore heritage issues have already been considered during the planning application stage. The remaining sites have been scored based on information provided by English Heritage. These sites having been recorded as having an uncertain impact on the local heritage environment as they have been scored as 'amber' by English Heritage.</p> <p>All sites in question have been scored as having a potential minor negative effect on SA objective 12 given that through the agreed SA Assumptions it is accepted that "areas of high landscape quality and the setting of settlements may be affected by the development of</p>

Consultee	Comment	Action
		<p>minerals sites.” It is also identified through the SA Assumptions that the exact value of the landscape “will not be able to be determined until the planning application stage, and will depend upon factors such as: how prominent sites are in the landscape; the level of screening; and the character of the surrounding landscape.”</p>
<p>Matthew Ingram</p>	<p>The consultee contests the allocation of site H584. He suggests that a large number of objections to the site have been received and that other sites which have not been allocated did not receive any objections. He has stated that this demonstrates that the consultation process is flawed.</p> <p>The consultee has also suggested a number of disagreements with the SA findings for this site:</p> <ul style="list-style-type: none"> <li>• SA objectives 1, 3, 4 and 6– have been suggested as having been assessed based on “factually incorrect” information.</li> <li>• SA objective 5 – the consultee contends that the site is located in close proximity to residential properties to the south which have not been considered in terms of potential impacts on amenity.</li> <li>• SA objective 8 – the consultee disagrees with the assessment that the site should be scored as significant positive in relation to SA objective 8. They have suggested that there is no footpath at the southern boundary of the site.</li> <li>• SA objective 11 – there is disagreement about the minor negative effect scored in relation to use of greenfield land (which the consultee identifies as high quality agricultural land). The respondent states that this should be a significant negative effect.</li> <li>• Based on these perceived mistakes in the SA and the other negative conclusions of the SA Report in relation to this site the consultee views that the site should not be allocated for development.</li> </ul>	<p>While it is noted that the justification text does not acknowledge the presence of one residential property to the south of the site, SA objective 5 has already been scored as a significant negative. This is the most adverse recorded effect possible for this SA objective and as such recognition of this property would not result in a change of score.</p> <p>The score for SA objective 8 has been based upon supplied GIS data for Kirklees District. This information has been used to identify that a footpath runs along Marsh Platt Lane and then parallel to the site within 5m and 20m to the south. A significant positive effect has been scored as the development of the site would provide new residents with a good level of access to existing open spaces and PRowS, which might encourage increasingly active lifestyles.</p> <p>The scoring for SA objective 11 considers not only the type of land which would be lost to new development but also the amount of land which would be lost. The threshold for a larger site has been set at 5ha and as this site is 2.61ha it is considered that this loss of greenfield land would be of a lesser amount and therefore a minor negative effect has been recorded. This is in line with the Assumptions used for the SA as presented in Appendix 4 of the SA Report.</p>
<p>Janet Spivey</p>	<p>The consultee considers that the SA Report methodology is “too broad-brush and crude, and lacks evidence of even the most cursory technical appraisal having been undertaken, and as a consequence</p>	<p>See Introductory Notes. Details of the difficulties encountered in the SA process have been presented from paragraphs 2.36 to 2.39.</p> <p>In relation to the findings of the SA which the consultee has queried</p>

Consultee	Comment	Action
	<p>lacks objectivity". It is highlighted that Paragraph 2.30 of the Report states "(it) ... inevitably relies on an element of subjective judgement".</p> <p>Also Para 2.35 of the SA report states "it is a requirement of the SEA Regulations that consideration is given to any data limitations ..."</p> <p>The consultee has stated that there is no evidence that this has taken place.</p> <p>The consultee also contends that site H358 should not be allocated. She has stated that the access to Wentworth from Beaumont Street is inadequate and dangerous. The consultee has also suggested that there are issues relating to the potential for mine shafts being present underground near the site meaning it may be susceptible to collapse. It has been stated that the site was previously allotments which would allow for home food production. The consultee is also concerned with the findings of the SA Report in relation to education stating that the report contends that requirement for education will be reduced by this allocation and that in actuality the local school is oversubscribed. Issues of poor local public transport and lack of nearby employment opportunities have also been alluded to by the consultee.</p>	<p>access to the site has only been assessed in terms of encouraging journeys to be made my non car-based modes of transport day to day as per the agreed SA Framework. The assessment of SA objective 10 has made use of work undertaken on behalf of the Council to identify that four of the eight features against which the site has been assessed are considered to be accessible from the site. As such the site is considered to promote the use of more sustainable modes of transport and therefore a significant positive effect has been recorded for this SA objective. The assessment of the site in terms of access to and from specific routes is beyond the scope of the SA and this would be considered by the Council in terms of assessing whether the site is a reasonable alternative to be subject to SA.</p> <p>Access to education from the site has been addressed through SA objective 3. This has considered the nearby education facilities and which indicate that the site is located within 6-10 minutes travel time of a primary school and within 21-25 minutes travel time of a secondary school. As such it is expected that a minor positive effect in relation to access to education would occur. As the current capacity of the school is unknown and it is unknown if new school places might be provided as development proceeded uncertainty is associated with the score.</p> <p>The SA addresses employment at residential sites in terms of providing access to existing employment sites. Work undertaken on behalf of the Council has identified that the site is located within 11-15 minutes travel time of the nearest employment site and therefore a significant positive effect has been recovered for this SA objective.</p> <p>The scope of the SA Report does not extend to issues of safety related to potential for collapse at specific sites in relation to mine shafts. It has been assumed that none of the sites considered to be reasonable by the Council are associated with such hazards. Further information about the constraints of the site would be required at the planning application stage with information such as a <a href="#">Coal Mining Risk Assessment</a> potentially being required.</p> <p>It is noted that the site is not currently used for allotments, therefore this is not part of the baseline against which SA</p>

Consultee	Comment	Action
		assessments were undertaken.
Ian Abbot	<p>The consultee contests the allocation of site E1831. It is stated in the response that the site is located on Green Belt land. The response states that the assessment quotes that the main access would be from the A58 and as such it may not be suitable in terms of accessibility to allow for development and associated higher levels of traffic. Issues relating to the safety of the access point to the school playing fields and the increased traffic flow this development would bring in terms of increased air pollution have also been raised.</p>	<p>The site is greenfield land but is not within the current boundaries of the Green Belt which are to the north, north east, west and south of the site. It is unclear where the consultee believes that the SA states that the access to the site is to be located at the A58.</p> <p>In relation to accessibility the site has scored as a minor positive effect in relation to SA objective 10 as it is located within 20 minutes travel time of 10,424 people of working age taking non-car based modes of transport into consideration. As such the location of the site may encourage people to access the site by more sustainable modes of transport.</p> <p>Issues of air pollution have been addressed through the SA Report by SA objective 15. As the site is not within an AQMA, a negligible effect is expected on local air quality.</p> <p>The issue of safety in relation to access of the school playing fields is outside the scope of the SA, as details of this are dependent on the design of any development proposal and will thus be addressed at the planning application stage.</p>
Savile Estates	<p>The consultee has inferred a number of issues with the SA Report in relation to specific selection of sites for allocation. The consultee has suggested that site H357 should be allocated for housing development in the Local Plan. The consultee has queried the findings of the SA in relation to the negative effects on leisure and recreation (in combination with a positive effect) and also on biodiversity. It is stated in the comment that the site is on an agricultural field meaning recreation and leisure and biodiversity would be less likely to be affected.</p>	<p>The appraisal of the site has been undertaken based upon GIS information provided by the Council. The site in question has been identified as an area of semi-natural greenspace and therefore provides a recreational resource in the area. Although the site is located in close proximity to a high number of open spaces, sports facilities or PRowWs which might be made use of by new residents at this location the overall effect recorded for SA objective 8 is mixed considering the potential loss of use of this open space. The negative effect is uncertain dependent upon the design of the new scheme.</p> <p>With regards to biodiversity and geodiversity a minor negative effect has been recorded for SA objective 14. As the site is located within 595m of Caulms Wood Quarry, Dewsbury a Local Geological Site a minor negative effect is expected on this SA objective in line with the SA Assumptions. The delivery of new homes may result in habitat</p>

Consultee	Comment	Action
		<p>damage, disturbance to species, air pollution, trampling etc. Conversely, there may be opportunities to promote habitat connectivity if housing developments include green infrastructure and therefore uncertainty is attached to the minor negative effect.</p>
Savile Estates	<p>The consultee states that site H65 should be allocated to address the current shortfall in housing. It is stated that the site has no significant negative effects, albeit this is not clear in respect of leisure and recreation for which both positive and negative effects have been recorded.</p>	<p>The negative effect identified for H65 in respect of SA objective 8 (recreation and leisure) is expected given that the site lies on an area of semi-natural greenspace which provides a recreational resource. This is expected as part of an overall mixed effect given that the site is located in close proximity to a number of open spaces, sports facilities or PRowS which might be used by new residents at this location.</p>
Savile Estates	<p>The consultee also states that site H97 should be allocated to address the current shortfall in housing. They suggest that this is supported by the findings of the SA Report, which the consultee highlights as finding no significant adverse effects. The consultee states that it is unclear how these findings can differ so greatly from those of the Rejected Site Options Report specifically in relation to Environmental Protection Assessment.</p>	<p>The Rejected Site Options Report has been produced by the Council using different criteria from those presented in the SA Report. It also assesses different issues for example including a specific consideration for impacts on the Green Belt in Kirklees. In relation to Environmental Protection Assessment which has been considered in the Rejected Site Options Report this has been considered with regards to land contamination. Consideration for land contamination issues has not been addressed through the SA Report, as this is a high level document, which considers a level of detail that is proportionate to the plan.</p>
Savile Estates	<p>The consultee also states that site H71 should be allocated to address the current shortfall in housing. It is stated that for this site significant positive effects and potential significant adverse effects on recreation and leisure have been identified. The consultee has also stated that the SA appears flawed given that limited consideration appears to be given to the proximity to existing employment sites.</p>	<p>The negative effect identified for H71 in respect of SA objective 8 (recreation and leisure) is expected given that the site contains a PRow which provides a recreational resource. This is expected as part of an overall mixed effect given that the site is located in close proximity to a number of open spaces, sports facilities and other PRowS which might be used by new residents at this location. The negative effect is uncertain dependent upon the design of any scheme which might come forward and might allow for the continued use of the PRow.</p> <p>. As the site is located within between 5 minutes and 15 minutes (differing levels of access to employment sites are present at different parts of the site) of employment sites a significant positive</p>

Consultee	Comment	Action
		effect is expected on this SA objective.
Savile Estates	The consultee also states that site H90 should be allocated to address the current shortfall in housing. It is stated that for this site significant positive effects on recreation and leisure have been identified. The consultee has also stated that the SA appears flawed given that the proximity to education facilities as the appraisal appears to be "cut and paste" and fails to acknowledge the presence of a Primary School in the village, within 100m of the site.	The site has been identified as being within 6-10 minutes of a primary school, and within 21-25 minutes of a secondary school meaning an overall minor positive effect is expected on SA objective 3 for this site. These findings are in line with the SA Assumptions which have been set out in Appendix 4 of the SA Report.
Savile Estates	The consultee also states that site H93 should be allocated to address the current shortfall in housing. The comment states that the SA Report suggests the site would have significant positive effects but no significant adverse effects on recreation and leisure.	See introductory text regarding allocation of sites.
Savile Estates	The consultee has stated that the findings of the SA Report should be questioned as it suggests that the northern part of the site (H168) does not have access to secondary and primary schooling, whilst the southern part of the site does. The consultee has stated that a primary school and secondary school are within 50m of the site thereby concluding that the findings of the SA are inaccurate.	<p>The consultee incorrectly states that there is a primary and secondary school within 50m of the site – this is likely meant to be 500m. The consultee has measured accessibility by distances as the crow flies (which is not a true representation of the journey to school), whereas the method used in the Council’s accessibility mapping takes into account the likely transport routes pupils and parents will travel.</p> <p>Site H168 has been identified as being located between areas of accessibility with the southern part of the site being assessed as being more accessible than the northern part of the site. The northern part of the site is located more than 60 minutes from a primary school, secondary school or further education centre. The southern part of the site is located within 11-15 minutes travel time of a primary school, within 16-20 minutes travel time of a secondary school and within 16-20 minutes travel time of a further education centre. As such the mixed (significant positive/significant negative) is recorded for SA objective 3. These findings are in line with the SA Assumptions which have been set out in Appendix 4 of the SA Report.</p>
Savile Estates	The consultee contests the findings of the SA Report in relation to site H91. It is stated that the SA suggests the site would have	The Rejected Site Options Report was undertaken by the Council, using a separate methodology from the SA Report and it relates to



Consultee	Comment	Action
	<p>significant positive effects and no significant adverse effects but that this is conflict with the major negative on the Transport findings which are presented in the Rejected Site Options Report.</p>	<p>different aspects of transport in the District. As highlighted in Appendix A of the Report transport constraints in relation to the SRN or local highway network have been considered. The assessment of site H91 in the Report relates to more technical issues of access and improvements required to allow for access.</p> <p>The only significant positive effect expected is in relation to SA objective 8: leisure and recreation given that the close proximity of the site to open spaces and/or PRowWs may ensure the use of such facilities.</p> <p>The findings of the SA Report in relation to transport (SA objective 10) are based on accessibility assessment work undertaken on behalf of the Council. A description of how this work has informed findings as well as the assumptions and limitations which relate to the use of this data have been presented in paragraph 2.37 of the SA Report. The accessibility of eight different features from each site option on the basis of sustainable modes of transport, and mapping the sites on a scale of green to red was conducted to inform the SA. This site was appraised as being 'green' in relation to three of the eight features assessed and therefore a minor positive effect was recorded.</p>
<p>Smithies Community Group (Adam Godbold)</p>	<p>The consultee has raised a number of issues in relation to allocation of site H138. Many of the issues relate to objectives of other plans and policy documents (for example the NPPF and Sport England Sustainability Objectives). Those concerns which relate to the findings of the SA Report are as follow:</p> <ul style="list-style-type: none"> <li>SA objective 8: in the SA Report a significant positive effect has been recorded on this SA objective. The positive effect has been recorded given that, as the consultee recognises there are a number of nearby open spaces and recreational facilities. The consultee disputes the positive score as they have stated that use of a football pitch at this location would be lost as a result of the allocation of this site.</li> <li>SA objective 10: has been recorded as having a significant positive effect on this SA objective. The consultee has stated that they disagree with this score as "not all elements of the</li> </ul>	<p>The assessment of all sites considered has been informed by GIS information provided by the Council. This GIS information omitted the location of the football pitch which the consultee has highlighted. As such no negative effect has previously been recorded for this SA objective as per the agreed SA Assumptions. As the site is close to a number of recreational centres and open spaces (for example an amenity greenspace is located within 230m to the north east and further outdoor sports facilities is located within 110m to the south) it is expected that new residents would be provided with a good level of access to such facilities and a significant positive effect has been recorded overall. Upon further investigation the development of the site may result in the loss of the football pitch between Mill Street and Park Street. This would be dependent upon the design of the development. A query to the Council has also revealed that mitigation measures would be required to provide a replacement</p>

Consultee	Comment	Action
	<p>sustainability objective have been achieved". They have also suggested that issues of access related to safety at the site (particularly in relation to the A62) should be considered.</p> <ul style="list-style-type: none"> <li>SA objective 14: the SA Report has recorded this SA objective as likely to have a negligible effect. The consultee has stated that the consideration of proximity to biodiversity sites is not sufficient for this SA objective and has also suggested that "eight hectares of mature, diverse and well connected flora and fauna would be lost as a result of the development".</li> </ul>	<p>playing pitch if the site was developed. The SA Addendum will therefore include a reassessment of the site in relation to SA objective 8 to consider the potential loss of this open space.</p> <p>This site is scored as mostly 'green' for six out of eight features considered through the 'heatmapping work' meaning that in keeping with the SA Assumptions a significant positive effect has been recorded for this SA objective. The methodology of the SA does not require every element of this SA objective to be met for a positive effect to be expected. Road safety is outside the scope of the SA and would be more appropriately addressed at application stage when further and more detailed information relating to safe and access will be required to support any proposal which might come forward. The SA is required to produce a strategic assessment of all site options in the same level of detail, incorporating a level of detail that is proportionate to the plan.</p> <p>Similarly the score in terms of SA objective 14 has been based upon the agreed SA Assumptions. As the site is not located within close proximity of any designated biodiversity or geodiversity sites a negligible effect has been recorded for this SA objective. Detailed biodiversity assessments are outside the scope of the SA, as SA is required to conduct a strategic assessment of all site options in the same level of detail, and a level of detail that is proportionate to the plan. Policy PLP 30 will ensure that biodiversity is taken into consideration at the planning application stage.</p>
Gaynor Palfrey	Comment states that it relates to H288a, SL2170a and SL2170b and that they wish to be represented by Hade Edge Fight the Fields Group (HEFF) during the oral examination of the plan. It also states that the comment relates to the SA Report however it does not specify any issue of concern in relation to the Report.	Noted.
Dick Palfrey	Comment states that it relates to H288a, SL2170a and SL2170b. It also states that the comment relates to the SA Report however it does not specify any issue of concern in relation to the Report.	Noted.
Craig McIntosh	The consultee does not agree with the allocation of site H442. He	The findings of the SA report in relation to access to various services

Consultee	Comment	Action
	<p>has stated that the site should remain as part of the Green Belt. A number of concerns relating to the findings of the SA Report have also been presented in this comment. It is stated that it is unrealistic to expect any individual to have detailed knowledge or devote sufficient resource into researching thoroughly each objective as it applies on each site.</p> <p>The consultee presented comments specific to a number of SA objectives as follows:</p> <ul style="list-style-type: none"> <li>• SA objective 1: the consultee disputes the scoring of a significant positive which has been based on the site lying within 11-15 minutes travel time of an employment node. The consultee states that there are issues of congestion on routes surrounding from the site.</li> <li>• SA objective 3: education: the consultee relates the issue of congestion to this SA objective (education) and also believes that capacity of schools to accept new pupils should be considered for this SA objective.</li> <li>• SA objective 4: the consultee states that issues of congestion and capacity will also impact upon the scoring for this SA objective (health).</li> <li>• SA objective 6: the consultee has stated that there is limited opportunity to increase local services and facilities by the site and cites the shared use of the community centre as an example. Issues of congestion also previously raised have also been related to access to town/district centres from the site.</li> <li>• SA objective 8: the comment also states that, although there is agreement with the findings of the SA Report in relation to potential loss of access to PRowS, people who might otherwise have made use of the PRowS would not be able to make use of the other amenities mentioned as suitable alternatives, e.g. sports clubs and playgrounds.</li> <li>• SA objective 10: the consultee has stated that the features against which the heatmapping information has been provided are not detailed. It is also stated that public transport may be adversely impacted upon by congestion issues and that access to the train station is not of a good</li> </ul>	<p>and facilities in Kirklees have been informed by 'heatmapping' work undertaken on behalf of the Council. A description of how this work has informed findings as well as the assumptions and limitations which relate to the use of this data have been presented in paragraph 2.37 of the SA Report. As such the site has been identified as being within 11-15 minute travel time of the nearest employment node and significant positive effect has been recorded for SA objective 1.</p> <p>The site has been identified as being within 6-10 minute travel of a primary school and mostly within 6-10 minutes travel time of a secondary school. As such a significant positive effect has been recorded on this SA objective in line with the agreed SA Assumptions. This effect is recorded as uncertain given that capacity issues may influence access to education facilities in the District. The SA Report further recognises potential capacity issues at schools in Kirklees stating in paragraph 4.23 that "the effects of the allocations on this objective (3) will depend largely on whether nearby schools have capacity and whether new schools and school places are provided as part of the development proposals".</p> <p>As the site has been identified as being within 11-15 minutes travel time of a GP and 36-40 minutes travel time of a hospital a minor positive effect has been recorded on this SA objective in line with the SA Assumptions. Road congestion is beyond the scope of the SA and is a matter for the Council when considering the site's suitability for development. The SA is required by the PPG to produce a strategic assessment of all site options in the same level of detail, incorporating a level of detail that is proportionate to the plan.</p> <p>With regards to SA objective 6, the site has been identified as being mostly within 5 minutes travel time of a local centre and within 16-20 minutes travel time of a town/district centre, therefore a minor positive effect has been recorded on this SA objective. This objective assesses the potential for new residents to access existing services and facilities in Kirklees and not the potential provision of new services and facilities as part of the development.</p> <p>The appraisal of site H442 for SA objective 8 considers the accessibility of the site to existing open space, recreation facilities</p>

Consultee	Comment	Action
	<p>standard from this location with additional issues of parking problems at this sustainable transport node.</p> <ul style="list-style-type: none"> <li>• SA objective 12: while the consultee supports the SA report's findings that "Some areas still retain a relative sense of tranquillity and rural character, however increasing urbanisation creates a landscape of transition" he has stated that it is not clear what conclusion is being made about the site for this SA objective. The consultee also suggests that the development of the site (which has previously been part of the Green Belt) would remove the separate identity of Roberttown from Liversedge.</li> <li>• SA objective 13: the consultee suggests that the development of the site would have the potential to impact upon the setting of Lowfold Hall, a grade II* listed building on Roberttown Lane. It is suggested that the score should be recorded as negative.</li> <li>• SA objective 14: the comment states that no firm conclusions have been made for this SA objective and that the site contains a large area of grassland and is criss-crossed and bordered by hedgerows. As such it is suggested that a negative effect should be recorded for this SA objective.</li> <li>• SA objective 15: the consultee disagrees with the negligible effect recorded for this SA objective stating that as the site would result in the construction of "250 houses" a negative effect should be recorded. This suggested negative effect has been related to the loss of green fields containing trees and hedgerows which are currently in place at the site.</li> <li>• SA objective 16: it is considered by the consultee that the site should be scored 'more negatively' (it is currently scored as a minor negative effect) for this SA objective as the site holds a significant amount of surface water.</li> <li>• SA objective 19: the consultee believes this SA objective should also be reappraised in light of potential congestion issues on surrounding roads. It is noted however in the consultee's comment that, as stated in the SA Report, irrespective of location, the contribution houses make to climate change is a design issue which is not exclusive to site</li> </ul>	<p>and PRowS. As the site could result in the loss of a number of a number of PRowS if developed, dependent upon the design of new development which might occur, an uncertain significant effect is expected on this SA objective. The site would however provide a high level of access to surrounding open spaces and recreation facilities which are within 600m for new residents. A significant positive effect has therefore also been identified on this SA objective. The consultee has not explained why other nearby facilities would not be available for use.</p> <p>Road congestion is outside the scope of the SA and is a matter for the Council when considering the site's suitability for development. The SA is required to produce a strategic assessment of all site options in the same level of detail, incorporating a level of detail that is proportionate to the plan.</p> <p>SA objective 12 has considered the loss of greenfield land in the District and the potential impact this loss is likely to have on local character. As site H442 is over 5ha in size it is considered to be relatively large and therefore the negative effect on this SA objective is considered to be significant. The justification text provides context for this SA objective, containing information about which landscape character area the site lies within as per the 2015 Landscape Character Assessment.</p> <p>SA objective 13 has, in line with the agreed SA Assumptions, been scored as an uncertain effect. The findings in relation to SA objective 13 have been informed by assessment work undertaken by Historic England. As the site has been scored as 'orange' following this assessment work the effect of allocation on the historic environment is uncertain. As stated in the appraisal matrix for this site the development of the site could harm elements which contribute to the significance of Old Hall Farmhouse Grade II* Listed Building.</p> <p>The scoring of the sites considered for allocation in the Local Plan in relation to SA objective 14 relates to the proximity of a given site to designated biodiversity sites in the District. Given the high level nature of the SA it is not considered appropriate to appraise the site in terms of more detailed biodiversity features. Detailed biodiversity</p>

Consultee	Comment	Action
	H442.	<p>assessments are outside the scope of the SA, as SA is required to conduct a strategic assessment of all site options in the same level of detail, and a level of detail that is proportionate to the plan. Policy PLP 30 will ensure that biodiversity is taken into consideration at the planning application stage.</p> <p>SA objective 15 has been scored considering that impacts on pollution will be most evident from increases in vehicular traffic. It is expected that where AQMAs have been identified in the District impacts on air pollution would be most significant. Given that the site is not located within an area where an AQMA has been declared impacts on air pollution in Kirklees are expected to be less significant and therefore negligible effect has been recorded on this SA objective. The consultee has related this issue to loss of greenfield land, however this issue has been addressed separately under SA objective 11 (land use).</p> <p>In relation to flooding (SA objective 16) the site has been assessed based on Environment Agency flood zone data. The development of the site would result in loss of greenfield land and increase the area of impermeable surfaces in the District. As the site is not within a flood zone the overall effect on this SA objective is likely to be minor negative. It is unclear from GIS information and satellite imagery if the site contains any waterbodies considering the consultee's comment that the site contains a "significant amount of surface water". Inclusion of more detail about potential drainage constraints for this site only would be inappropriate in the SA Report considering that it is required that a strategic appraisal is undertaken making use of the same level of detail for each site. Inclusion of additional information in assessing some sites but not others would be contrary to the PPG. Issues of drainage are more appropriate for consideration if/when any proposals were to come forward to a planning application stage. They are also often resolvable at this later stage.</p> <p>In relation to SA objective 19 the Report explains that the eight features considered are: primary schools, secondary schools, further education, GPs, hospitals, employment nodes, local centres and town/district centres. Road congestion is beyond the scope of the</p>

Consultee	Comment	Action
		<p>SA and is a matter for the Council when considering its suitability for development. The SA is required by the PPG to produce a strategic assessment of all site options in the same level of detail, incorporating a level of detail that is proportionate to the plan.</p>
<p>Elizabeth Jane Bagley</p>	<p>The consultee believes the language used and involvement with the local community has been inappropriate.</p> <p>The consultee has also raised a number of issues in relation to the SA Report particularly in reference to sites MX1914 and H69 which are located on the same land.</p> <p>Issues raised with regards to the SA Report have also been related to specific SA objectives as follows:</p> <ul style="list-style-type: none"> <li>• SA objective 1: the consultee states that any significant positive effect which has been identified for this objective in relation to employment would be in relation to those employed in the construction sector as there are no longer plans for business development at the site.</li> <li>• SA objective 3: the consultee questions the positive findings in relation to education stating that additional 380 houses would have an adverse impact on local schools which are already oversubscribed.</li> <li>• SA objective 4: the consultee questions the positive findings in relation to health describing the location as being subject to the worst air quality in Kirklees and stating that the local doctors, dentists and hospitals are oversubscribed. The consultee has also stated that there is potential for local anxiety levels to rise given the potential for increased congestion in the area as a result of new development.</li> <li>• SA objective 5: the consultee has questioned the findings of the SA Report in terms of amenity stating that if the score for this SA objective is negative that the scores for education, health and services and facilities should also be negative.</li> <li>• SA objective 6: the consultee has stated that the mixed overall effect recorded for this SA objective in relation to services and facilities is incorrect as new schools and GP surgeries have not been planned for.</li> </ul>	<p>A more concise version of the whole SA Report and its relevant findings are presented in the Non-Technical Summary document which has been presented alongside the full report. The SA Report has been based upon the agreed SA Framework and associated Assumptions which have been set out in Appendix 4. The Framework and Assumptions have been agreed to ensure a consistent approach to assessing the high number of sites considered for allocation in the District. These are in keeping with the SEA Regulations and have been consulted upon at previous iterations of the SA Report. They reflect the key sustainability issues which have been identified for Kirklees in Table 3.1 of the SA Report. The methodology used for the SA Report has been set out in Chapter 2. This presents the stages of consultation involved in the previous iterations of the SA Report</p> <p>In relation use of the site for mixed use (MX1914) as this site was considered as containing employment land the effect on SA objective 1: employment is expected to be significantly positive. The score recorded with regard to consideration for only housing (H69) is also significantly positive. This is because the site is located within 0-20 minutes travel time of an employment site (via non-car based modes of transport) as identified by heatmapping accessibility work undertaken on behalf of the Council.</p> <p>Both options (MX1914 and H69) include an element of housing. The sites have been appraised in relation to education in terms of access to existing schools. Accessibility heatmapping work undertaken on behalf of the Council identified the sites to be located at variable distances from the nearest primary and secondary schools given its size. In line with the SA Assumptions an overall mixed effect (significant positive/significant negative) has been identified for this SA objective. The SA has attached uncertainty to the score for each</p>

Consultee	Comment	Action
	<ul style="list-style-type: none"> <li>SA objective 8: the consultee questions the SA findings in relation to recreation stating that there are no plans for increased numbers of facilities and that the facilities at Whitcliffe Mount School may close.</li> <li>SA objective 10: the consultee has stated that there are minimal sustainable transport provisions at the site.</li> <li>SA objective 12: the consultee has agreed with the significant negative effect which has been recorded in relation to landscape for the site options, but questions what 'exceptional circumstances' there are to extend development of Hunsworth.</li> <li>SA objective 13: the consultee questions the "negligible or no effect" recorded in relation to the historic environment. It is stated in the comment that historically the area was a small hamlet which would be detrimentally impacted upon in terms of its character by "almost doubling the population".</li> <li>SA objective 14: the consultee has questioned the uncertainty which has been attached to the negative effect recorded in relation to biodiversity and geodiversity. They state it has been recorded that adverse impacts would occur on bats, pond life and a multitude of birds as well as the Spen heritage trail.</li> <li>SA objective 15: the consultee has stated that the increase in pollution at the site would likely result in an increase in waste, 'car pollution' and CO<sub>2</sub> levels. The negligible findings recorded against this SA objective in the SA Report have therefore been queried.</li> <li>SA objective 16: the consultee questions the findings of the SA in relation to flood risk. It is stated that the site floods on a yearly basis and therefore the minor negative effect is questioned.</li> <li>SA objection 17: the consultee disagrees with the minor negative score recorded with regards to waste for this land. They state that the site would almost double the local population meaning the negative effect would be significant.</li> </ul>	<p>site for this SA objective considering that the existing availability of school places and potential provision of new school infrastructure and places to support growth are unknown at this stage.</p> <p>Sites MX1914 and H69 have been appraised in terms of the access from the sites to existing healthcare facilities (GPs and hospitals). This appraisal makes use of accessibility heatmapping work undertaken on behalf of the Council. In line with the SA Assumptions the sites have been assessed as having an overall mixed effect (minor positive/significant negative) in terms of access to existing facilities. The SA Report has considered the potential for air quality to impact upon health through the proximity of the site to declared AQMAs in Kirklees. These sites are not in close proximity to an AQMA and as such are less likely to be adversely impacted upon by air quality issues. Congestion-related anxiety is a detailed matter with a varied evidence base and is outside the scope of SA, which deals with strategic sustainability issues.</p> <p>SA objective 5: . Amenity relates to protection of residential amenity (i.e. the potential for light and noise pollution etc. to impact upon the enjoyment of residential properties), rather than local amenities such as shops and GP services. Education, health and services and facilities have been considered separately by SA objectives 3, 4 and 6 respectively.</p> <p>The SA Assumptions for SA objective 6 consider the access new residents would have to existing local centres and town/district centres, which are likely to have more services and facilities. The score for this SA objective is mixed given the large size of the site meaning that the part of the site would provide a better level of access to the nearest local centre and town/district centre than the other.</p> <p>A mixed effect has been identified for SA objective 8 (recreation) as the development of the land in question would have access to a number of nearby open spaces, which could be used by new residents, but may also result in the loss of use of a PRoW, depending upon the design of any development which might come forward. This appraisal has been made in line with the SA Assumptions. The facilities at Whitcliff Mount School did not</p>

Consultee	Comment	Action
		<p>influence this assessment.</p> <p>In line with the SA Assumptions access to and potential use of sustainable transport options have been informed by accessibility heatmapping work undertaken on behalf of the Council. As a site option that would provide employment and residential uses, MX1914 has been considered in relation to the accessibility of the site for potential employees (approximately 10,373 people aged 16-64 would be able to access this site via sustainable transport within 20 minutes) and the accessibility of the eight features against which the site has been assessed in terms of non-car modes of transport (the site was classed as 'green' in relation to one out of eight of features considered). H69 would only provide for housing delivery and the accessibility of the eight features against which the site has been assessed in terms of non-car based modes of transport will be the same as for MX1914. In line with the SA Assumptions, it is expected that both options would have a minor positive effect on SA objective 10.</p> <p>With regards to SA objective 12, agreement with the SA is noted.</p> <p>The findings of the SA Report in relation to SA objective 13 have been informed by the work of Historic England. This site has been recorded as being "green" meaning Historic England believe that "development of the site is unlikely to result in harm to any designated heritage asset" in line with the SA Assumptions. As such a negligible effect has been recorded for this SA objective. Uncertainty is attached to this score given that the design of any development which might take place at this location could potentially impact upon local character and is unknown at this stage.</p> <p>SA objective 14 has addressed the potential of development to have adverse impacts on identified biodiversity and geodiversity designations. As the site is located within 535m of Hunsworth Great Wood and Little Wood Local Wildlife Site and approximately 775m of Hanging Wood Local Wildlife Site it is expected to have a minor negative effect on this SA objective in line with the SA Assumptions. The uncertainty attached to this SA objective has been recorded given that development of the site may include mitigation and may allow for improved green infrastructure which may encourage habitat</p>



Consultee	Comment	Action
		<p>connectivity in the area. Mitigation and potential habitat connectivity improvements would be dependent upon the design of the development which is unknown at this stage.</p> <p>SA objective 15 has been scored considering that the primary impacts on pollution will be due to increases in vehicular traffic and considering the specific location of new development is likely to have the greatest effect on pollution in terms of requiring a lesser or greater number of car journeys in Kirklees. It is expected that where AQMAs have been identified in the District, impacts on air pollution would be most significant. Given that the site is not located within proximity of an AQMA, significant impacts on air pollution are not expected and therefore negligible effect has been recorded on this SA objective.</p> <p>The site lies on land which is outside of Flood Zones 2 and 3 as per Environment Agency mapping. An area of Flood Zone 2 and Flood Zone 3 lies to the south and west of the site. In line with the SA Assumptions the site has been recorded as having a potential minor negative effect on SA objective 16 given that its development would result in a reduction in greenfield land and therefore an increase in impermeable surfaces in Kirklees which could increase local flood risk. Anecdotal evidence cannot be considered through the SA process, as this would not be consistently available or reliable for all sites.</p> <p>SA objective 17 has been scored in line with SA Assumptions. These state that <i>"all new housing development is likely to involve an increase in waste generation, but may also offer good opportunities for incorporating sustainable waste management practices (e.g. through sustainable construction practices but also design of new developments to incorporate space for storage and collection of recyclables), regardless of the <u>location</u> of the potential residential sites. Kirklees has District-wide kerbside recycling; therefore proximity to household recycling centres is not a key indicator of the effects of development on recycling rates."</i> As such it not expected that the allocation of this specific site would affect the rate of recycling in Kirklees. In addition, the site is mostly located on greenfield land, therefore a minor negative effect is expected on this</p>

Consultee	Comment	Action
<p>Roberttown Residents' Association (David Hall)</p>	<p>The consultee has stated that site H442 should not be removed from the green belt. The consultee notes that the site was rejected for housing development in the draft local plan and also states that the decision received over 300 comments in support thereby demonstrating the strength of local feeling. The comment has stated that the sustainability analysis in the local plan does not stand up to scrutiny, and that the site should receive a significantly lower sustainability rating.</p> <p>A number of queries have been raised in relation to the specific scores recorded for a number of the SA objectives which are detailed as follows:</p> <ul style="list-style-type: none"> <li>SA objective 1: as the site would deliver new housing the consultee has stated that it would not affect employment opportunities.</li> <li>SA objective 3: the comment states that all children in Kirklees have access to education facilities and the location of new development would not affect this. It is also stated that schools close to the site are over-subscribed meaning a neutral score is more appropriate.</li> <li>SA objective 4: The consultee has stated that health in Kirklees would not be affected by accessibility to healthcare services and that all sites would have good access to healthcare facilities. It is also stated that the development of the site would result in the loss of green space which is important for mental and physical well-being and that an overall 'neutral' effect should be scored.</li> <li>SA objective 5: the consultee agrees with the overall significant negative effect recorded, however states that the reasoning for the scoring is incorrect, which would therefore call into question the quality of the assessment. The consultee has stated that the A62 is some distance from the site and is screened by existing housing, which is in contrast to the findings of the SA.</li> <li>SA objective 8: the consultee has stated that no score has</li> </ul>	<p>SA objective.</p> <p>The SA Report has been based upon the agreed SA Framework and associated Assumptions which have been set out in Appendix 4. The Framework and Assumptions have been agreed to ensure a consistent approach to assessing the high number of sites considered for allocation in the District. These are in keeping with the SEA Regulations and have been consulted upon at previous iterations of the SA Report. They reflect the key sustainability issues which have been identified for Kirklees in Table 3.1 of the SA Report. The methodology used for the SA Report has been set out in Chapter 2. This presents the stages of consultation involved in the previous iterations of the SA Report</p> <p>As the site would provide a good level of access to employment land by non-car modes of transport a significant positive effect has been recorded for SA objective 1.</p> <p>This site has been identified as being located in close proximity to both a primary and secondary school meaning a significant positive effect on SA objective 3 is likely. The uncertainty attached to the overall score acknowledges that issues relating to capacity may exist at the identified nearby schools.</p> <p>Through the heatmapping work it has been identified that site options in Kirklees have variable levels of accessibility to healthcare facilities. This site has a good level of access to a GP surgery but a lesser level of access to a hospital meaning an overall minor positive effect on SA objective 4 is likely. Access to and potential loss of open space has been considered separately through SA objective 8: recreation.</p> <p>The score for SA objective 5 has been based on both the potential for existing residential amenity to be adversely impacted upon and the potential for the residential amenity of new development to be subject to negative effects. The site is located within approximately 5m of the A62 at its closest point where a small number of houses may provide sparse screening. As such there is potential for issues relating to noise pollution from this A-road. Regardless of this</p>

Consultee	Comment	Action
	<p>been recorded in relation to recreation for the site. A negative effect is thought to be appropriate by the consultee as the footpaths currently on the site are used for recreation purposes.</p> <ul style="list-style-type: none"> <li>• SA objective 10: the consultee disagrees with the significant positive effect for sustainable transport. It is stated that the site will not be close enough to the main employment areas for most people to walk to work and that the hilly terrain, high traffic density and lack of segregated infrastructure will deter cycling to many destinations. The comment also states that the roads nearby are already at or over capacity and that a 'neutral' score should be recorded overall.</li> <li>• SA objective 13: the comment states that the site used to be part of the estate of the Grade II Listed Building Low Fold Hall meaning that there is potential for adverse impacts in terms of setting and a negative effect for this SA objective is more appropriate.</li> <li>• SA objective 14: the consultee has stated that the score for this site should be negative and not 'neutral' due to the potential loss of tree and hedgerow habitat onsite.</li> <li>• SA objective 19: the comment contests the positive score which has been given in relation to climate change stating that it cannot be justified that new residents at this location would drive significantly fewer miles than they would if they lived elsewhere. It is stated that the close proximity of the site to the motorway would encourage long distance commuting by car.</li> </ul>	<p>judgement the residential developments which surround the site have the potential to be adversely impacted upon by noise and light pollution etc. which would result during the construction period meaning the significant negative effect would still remain.</p> <p>The site has been recorded as having an overall mixed effect (significant positive/significant negative) in terms of recreation. The positive score has been recorded as the site would allow new residents to have access to a number of existing open spaces within 600m. This is combined with a significant negative score as the appraisal recognises that the use of footpaths currently onsite may be lost as a result of development. The negative effect is uncertain as the loss of these footpaths would be dependent upon the design of any development proposal which comes forward which is unknown at this stage.</p> <p>The site was classed as 'green' in relation to six out of eight 'heatmapping' features considered meaning an overall significant positive effect is expected in relation to sustainable transport. The potential requirement for improved road and cycle infrastructure (through S106 or CIL for example) are detailed matters to be considered at the development proposal stage. The SA Report is a higher level and more strategic appraisal of development site options.</p> <p>Historic England has scored this site as "Orange" in terms of the potential for impacts on the historic environment, meaning that effects are uncertain. Historic England identified that development of the site could harm elements which contribute to the significance of the Old Hall Farmhouse Grade II* Listed Building. Sites which have been identified as 'Orange' in Historic England's assessment will have an uncertain effect on the historic environment as per the SA agreed SA Assumptions.</p> <p>As the site is not located within close proximity of any designated biodiversity or geodiversity sites a negligible effect has been recorded for this SA objective, in line with the SA Assumptions. Uncertainty has been attached to the neutral effect recorded given that the design of the scheme is unknown at this stage which could have potential effects on local habitats. Detailed biodiversity</p>

Consultee	Comment	Action
		<p>assessments are outside the scope of the SA, as a strategic assessment of all site options in the same level of detail, and a level of detail that is proportionate to the plan.</p> <p>The site has been identified as being 'green' in relation to access to six of the heatmapping features. In line with the SA Assumptions a significant positive effect is considered likely, given that the close proximity of the site to these features may help to encourage new residents to take journeys by more sustainable and active modes of transport.</p>
Redrow Homes and Portman Land Ltd	<p>The consultee has raised a number of issues in relation to site H2730a. The issues raised relate to the following SA objectives:</p> <ul style="list-style-type: none"> <li>SA objective 5: the consultee disagrees with the significant negative scoring for the site in relation to amenity. It is stated that there is an error in the description of the site being surrounded by residential development to the north and east when it is actually adjacent to existing development to the north west.</li> <li>SA objective 8: the comment also states that for recreation has been recorded as uncertain and as either a significant positive or significant negative effect. The consultee refers to the initial concept masterplan for the site stating that there will be a retention of existing public footpaths within the site as well as potential to create new public footpaths.</li> <li>SA objective 12: the consultee does not agree with the significant negative effect recorded against this SA objective but welcomes the recognition of uncertainty given that the impact will depend upon the design of the scheme. The consultee states that an initial landscape and visual appraisal has been carried out which informed the initial concept masterplan for the site and that a full landscape and visual impact appraisal will inform the progress towards a full planning application. It is stated that detailed design measures including landscaping and public open space will mitigate any landscape and visual impact that the development of the site might have.</li> </ul>	<p>The appraisal of each site has been made in line the agreed SA Assumptions presented in Appendix 4 of the SA Report. These assumptions have been consulted upon at previous iterations of the SA Report. The methodology used for the SA Report has been set out in Chapter 2. This presents the stages of consultation involved in the previous iterations of the SA Report. The assumptions relate to SA Framework which is based on the key sustainability issues for the District, as presented Table 3.1 of the SA Report.</p> <p>In relation to the scoring of the site in terms of amenity (SA objective 5), it is acknowledged that there is an error in the description of the site in relation to surrounding development. An updated assessment of this site in relation to SA objective 5 will be presented in the SA Addendum.</p> <p>The referenced proposed masterplan for the site has not been considered in the SA Report, as site allocation options relate to the principle of development at a particular site, not schemes put forward by potential developers. The score recorded for recreation is an overall combined significant positive and uncertain significant negative effect. This is because the site is both close to existing facilities, open spaces and/or PRoWs, which might be used by new residents, but also contains a PRoW, access to which might be affected dependent on the exact design of the scheme.</p> <p>The landscape and visual impact appraisal relates to a specific development scheme, whereas site allocation options relate to the principle of development at a particular site. In addition,</p>

Consultee	Comment	Action
	<ul style="list-style-type: none"> <li>SA objective 13: the consultee is in agreement with the uncertain score given in relation to the historic environment also stating that there may be opportunities to enhance the setting of heritage features.</li> <li>SA objective 14: the consultee does not agree with the significant negative effect recorded in relation to biodiversity. They feel that this score is overly negative as the development of the site would involve the retention of Lepton Great Wood which is a Local Wildlife Site and in part a Local Geological Site. The consultee has also stated that any proposal would include a buffer between the wood and residential development.</li> <li>SA objective 16: it is stated that flood risk should be recorded as a 'neutral' effect. The consultee has stated that the site is within flood zone 1 and that drainage impacts of the site could be dealt with within the site.</li> </ul>	<p>consideration of the landscape and visual impact appraisal would not be in line with the PPG, which states that all options should be considered in the same level of detail. In line with the SA Assumptions SA objective 12 has been scored in relation to the potential loss of a large area of greenfield land in Kirklees which currently contributes to local landscape character and the rural nature of the District.</p> <p>The SA has not considered the specific potential design of any proposal which might proceed at this location. Impacts on biodiversity and geodiversity features has been considered in relation to the proximity to biodiversity and geodiversity designations. A significant negative effect is appropriate as Lepton Great Wood, which is a Local Wildlife Site and in part a Local Geological Site, is adjacent to the site.</p> <p>Although site H2730a is not within flood zones 2 or 3 it consists of a large area of greenfield land. The development of this land would increase the area of impermeable surfaces in Kirklees which might increase local flood risk and therefore a minor negative effect has been recorded for SA objective 16. The SA assessments do not consider any potential mitigation which might be provided as part of the design of any scheme which may proceed at this location.</p>
IKEA Properties Investments Limited	The consultee does not believe that the site GTTS2487 should be allocated for gypsy and traveller accommodation. In terms of the SA Report, it is stated that the minor positive effect in relation to education (SA objective 3) is incorrect. The consultee states that the assessment of the site being 0-15 minute journey time of a primary school or a 0-20 minute journey time of a secondary school is incorrect due to the distances from the nearest facilities and the low frequency of public transport.	The accessibility of eight different features (including education facilities) from each site option on the basis of sustainable modes of transport, and mapping the sites on a scale of green to red was conducted to inform the SA. In line with the SA Assumptions the site has been scored as being likely to have a minor positive effect on SA objective 3.
Harron Homes (Yorkshire)	The consultee supports the allocation of site H69. It is however noted that there is disagreement of the scoring of a number of SA objectives which have been recorded as significant negative effects as follows:	The scoring of SA objective 5 has been made in line with the SA Assumptions. As this land is surrounded by existing residential properties there is potential for residents to be adversely impacted upon during the construction phase. In addition the site is in close proximity to industrial buildings which have the potential to

Consultee	Comment	Action
	<ul style="list-style-type: none"> <li>SA objective 5: the consultee disagrees with the significant negative effect stating that short term disruption would be caused during construction regardless of the location of the site. All sites in proximity to residential properties are likely to result in adverse impacts on residential amenity. The comment also states that the site has been assessed in terms of potential impacts on housing at this location in relation to the existing adjacent industrial uses. This assessment has identified that the noise levels are not significant and that mitigation could further limit any effects.</li> <li>SA objective 11: the consultee has stated that the significant negative effect in relation to efficient land use is inappropriate. It is unclear why this scoring is deemed to be inappropriate however; the comment seems to address the proximity of the site to facilities, employment, shops and leisure.</li> <li>SA objective 12: the consultee disagrees with the significant negative scored in relation to landscape. The comment refers to a Landscape Assessment and Landscape and Visual Impact Assessment which have been undertaken for the site and which have detailed that although there is potential for adverse impacts mitigation is possible. The consultee has stated that the score for this SA objective should be minor negative.</li> <li>SA objective 14: the consultee disagrees with the minor negative effect which has been recorded for the site in relation to biodiversity and geodiversity stating that a negligible effect is more appropriate. This is as a result of consideration of an ecological appraisal of the site.</li> </ul>	<p>adversely impact upon the amenity of residents in new homes to be delivered on site in the longer term. A significant negative effect has been recorded for this SA objective for these reasons. SA assessments are carried out against the baseline and do not take account of any potential mitigation measures.</p> <p>The site has been assessed in relation to land use through SA objective 11. This specifically relates to the promotion of re-use of brownfield land in the District. As this site would result in the loss of a large area of greenfield land in Kirklees a significant negative effect has been recorded. The SA has considered proximity to employment sites, facilities, and recreation and leisure facilities separately through SA objectives 1, 3 and 8 respectively.</p> <p>In line with the SA Assumptions the site has been scored as a significant negative effect for SA objective 12. The loss of this larger area of greenfield land is likely to have a greater negative impact on the landscape in terms of detrimental impacts on rural character. Detailed assessment of specific schemes are outside the scope of the SA, and SA is required to conduct a strategic assessment of all site options in the same level of detail.</p> <p>The site has been identified as being within 1km of a number of biodiversity sites (Hunsworth Great Wood and Little Wood Candidate Local Wildlife Site and Hanging Wood Local Wildlife/ Candidate Local Wildlife Site). In line with the SA Assumptions, a minor negative effect has been recorded given the proximity of these features. It is recognised that mitigation and potential improvements (such as habitat connectivity) may be part of any development which occurs at this location and therefore the minor negative effect is uncertain. As previously noted, detailed site-specific assessments cannot be considered through the SA process, as this would be against the PPG, which states that all options must be considered in the same level of detail.</p>
Hade Edge Fight for the Fields (Mr John Dalton)	The consultee has stated that they believe that the allocation of site H288a for residential development is unsound. It is stated that the Sustainability Assessment " <i>legend is too simplistic a scale of refinement to produce sufficiently accurate data</i> " and also difficult to	The appraisal of each site has been made in line with the agreed SA Assumptions presented in Appendix 4 of the SA Report. These

Consultee	Comment	Action
	<p>navigate as the phrases positive and minor positive etc. carry little meaning.</p> <p>The consultee has stated that there are errors in the scoring of the sites H68 H288, H288a, SL2170A and SL2170B which are all in close proximity of each other. The issues which the consultee has referred to relate to SA objectives 11, 12, 13 and 14 for these sites. The consultee has stated that these errors are also present in the Erratum Notice produced.</p> <p>Further commentary is provided in the consultee's response in relation to landscape and the historic environment, which has been linked to strategic objectives and policies of the Local Plan but the consultee does not seem to dispute the findings or content of the SA Report in relation to this.</p>	<p>assumptions have been consulted upon at previous iterations of the SA Report. The methodology used for the SA Report has been set out in Chapter 2. This presents the stages of consultation involved in the previous iterations of the SA Report. The assumptions relate to SA Framework which is based on the key sustainability issues for the District, as presented Table 3.1 of the SA Report. SA is a high-level strategic process and in line with the PPG, focuses on effects that are likely to be significant and is not done <i>'in any more detail or using more resources than is... appropriate'</i>.</p> <p>With regards to SA objectives 11 and 12 all sites apart from H68 have been assessed as having a minor negative effect given that they are located on greenfield land and are under 5ha in size. As H68 is on greenfield land and is over 5ha in size a significant negative effect is expected for this SA objective.</p> <p>SA objective 13 has been assessed with input from Historic England. The sites have been scored as green, yellow, orange or red in relation to the potential for development at these locations to impact upon the historic environment. All sites in question have been recorded as "orange" apart from H288 which has been recorded as "yellow". As per the SA Assumptions all sites have been scored as uncertain in relation to potential impacts on the historic environment apart from H288 which has been scored as an uncertain minor negative effect due to its "yellow" score.</p> <p>The scoring for SA objective 14 relates to the proximity of the development sites to internationally, nationally or locally designated biodiversity or geodiversity sites. Those sites which are within 250m and 1km of one or more designated sites biodiversity or geodiversity sites may have a minor negative effect on this SA objective. As all sites are within this proximity of one of these features a minor negative effect has been recorded on this SA objective for each site. The scoring on this SA objective will not be affected by the number or type of designation within close proximity of each site but only the distance between the site and any designation identified. The naming of individual biodiversity and/geodiversity sites in the justification text relating to each site is only to provide context to the score provided.</p>

Consultee	Comment	Action
Dr and Mrs Andrew Smith	<ul style="list-style-type: none"> <li>The content of this comment is the same as that from Roberttown Residents' Association, submitted by David Hall, as addressed above.</li> </ul>	See response to Roberttown Residents' Association (David Hall) comment above.
Alison Armstrong	<p>The consultee disagrees with the allocation of site H288a and also states that sites H288a, SL2170A and SL2170b should be returned to the Green Belt.</p> <p>The SA Report has also been described as being flawed and inconsistent in relation to the assessment of site H288a. In general the comment refers to the SA Report as not being compliant with a number of the policies of the NPPF and the Local Plan.</p> <p>The comment has also stated that a number of specific effects have not been addressed through the SA process. These relate to Supporting a Prosperous &amp; Rural Economy, Promoting Healthy Communities, Meeting the Challenge of Climate Change, Flooding &amp; Coastal Change, Conserving &amp; Enhancing the Natural Environment and Conserving &amp; Enhancing the Historic Environment. It is also stated that effects on agricultural land have not been considered. It is questioned whether cumulative effects have been considered in the SA Report.</p>	<p>To ensure a consistent approach to the appraisal process a SA Framework containing SA objectives addressing the Key sustainability issues in the District was established. This framework and the assumptions upon which the appraisal process has been based are presented in Appendix 4 of the SA Report.</p> <p>Chapter 2 of the SA report describes the methodology of the SA process highlighting how previous iterations of the Local Plan and SA have fed into the most recent draft of both documents. As highlighted above, consistency across the SA Report has been maintained by using an agreed set of assumptions for each SA objective against which the sites and policies of the Local Plan and reasonable alternatives have been considered. These assumptions have been consulted upon at previous iterations of the SA Report.</p> <p>Specifically the following SA objectives relate to the issues raised by the consultee:</p> <ul style="list-style-type: none"> <li>Prosperous &amp; Rural Economy - SA objectives 1 (employment) and 2 (economy)</li> <li>Promoting Healthy Communities - SA objective 4 (health)</li> <li>Meeting the Challenge of Climate Change - SA objective 19 (climate change)</li> <li>Flooding &amp; Coastal Change - SA objective 16 (flooding)</li> <li>Conserving &amp; Enhancing the Natural Environment - SA objective 14 (biodiversity and geodiversity)</li> <li>Conserving &amp; Enhancing the Historic Environment - SA objective 13 (historic environment)</li> </ul> <p>The SA Report has also considered the potential for cumulative effects in relation to the sites allocated through the Local Plan and those policies it contains. The cumulative effects of the plan are presented by SA objective from paragraph 12.80 onwards of the SA Report.</p>



Consultee	Comment	Action
Michael Armstrong	The content of this comment is the same as that submitted by Alison Armstrong, as addressed above.	See response to Alison Armstrong's comment above.
Alexander Armstrong	The content of this comment is the same as that submitted by Alison Armstrong, as addressed above.	See response to Alison Armstrong's comment above.
Chris Giles	<p>The first part of this comment is the same as that submitted by Alison Armstrong, as addressed above.</p> <p>Specifically in relation to site H288a the consultee has stated that although he agrees with a number of points in the SA Report he disagrees with some of the broad assumptions made to classify the site as a sustainable area. Issues have raised by the consultee in relation to the following SA objectives:</p> <ul style="list-style-type: none"> <li>• SA objective 1: the consultee has stated that this is correctly classified as significantly negative.</li> <li>• SA objective 4: it is stated that this score should be recorded as a significant effect due to the volume of traffic on local roads in relation to accessing the local hospital, given that the consultee believes there will be further increases in local housing numbers which would adversely affect journey times and considering that the consultee believes a local healthcare facility (Huddersfield A&amp;E) is expected to close.</li> <li>• SA objective 9: the consultee has questioned the provision of affordable housing within the site.</li> <li>• SA objective 10: the comment has questioned the use of heatmapping data to reflect the accessibility of the site in relation to more sustainable modes of transport. It has been stated that the site is located on a hill which may impact upon the use of cycles to access it.</li> <li>• SA objective 11: the consultee has stated that the site should be scored as a significant negative effect similar to site H288 as they site on much of the same land.</li> <li>• SA objective 12: it is stated in the comment that the score for this site should be significant negative similarly to site H288 as they take up much of the same land. The consultee refers to the proposed plans for the site.</li> </ul>	<p>See response to Alison Armstrong's comment above.</p> <p>In relation to the consultee's comments specific to site H288a as has been highlighted above the appraisal has been undertaken in line with the SA Assumptions set out in the Report. The scope of the Report requires that a strategic assessment of all site options is undertaken in the same level of detail, and a level of detail that is proportionate to the plan.</p> <p>The scoring for the site in relation to SA objective 4 (health) has been made using accessibility heatmapping work undertaken on behalf of the Council. This identified how access to the site is of the nearest GP surgery and hospital by public transport. As the site has been identified as being mostly within 21-25 minutes travel time of a GP and more than 60 minutes travel time of a hospital an overall minor negative effect has been recorded for this SA objective.</p> <p>SA objective 9 addressed the potential for a level of housing to help meet requirements in the District to be provided at this site. As the site is relatively small (under 5ha) it is expected to provide a lower level of housing. Requirements for the provision of affordable homes as part of development schemes in the District are set out in Policy PLP11 (Housing Mix and Affordable Housing) in the Publication Draft Local Plan and a definition of affordable housing is provided in the glossary of the document. The enforcement of this policy and determining who would qualify for such housing is however outside of the scope of the SA Report.</p> <p>The site has been recorded as having a minor positive in relation to accessibility given that it is scored as "green" (making use of accessibility heatmapping work undertaken on behalf of the Council) for access to one (primary schools) of the six features which have been considered. The heatmapping work relates to accessibility to</p>

Consultee	Comment	Action
	<ul style="list-style-type: none"> <li>SA objective 14: the consultee has stated that the site should be scored as a significant negative given that there is potential for increased fly tipping and four by four recreational use. The proximity of the site to the SSSI has also been noted in the response.</li> <li>SA objective 16: it is stated that the site should be scored as a significant negative effect in relation to flood risk. The comment relates to proposals for the site which might have an adverse impact on a nearby football pitch.</li> </ul>	<p>the site by public transport and this is not expected to be affected by topography. Additionally the SA assesses all sites at a strategic, proportionate and consistent level.</p> <p>Both SA objectives 11 and 12 as per the SA Assumptions are influenced by the size of the site being assessed. As the site lies on greenfield land it is expected to have a negative effect in terms of efficient land use and the landscape. The site is considered to be relatively small however (it is under 5ha), resulting in a minor negative effect for these two SA objectives. This is the same as for site H288, as presented in the SA Erratum Notice (November 2016).</p> <p>SA objective 14 has been determined in line with the SA Assumptions, which consider proximity of designated sites as a proxy for effects, such as urban edge effects and recreational effects.. As such this site has been scored as a minor negative to reflect its relative proximity (between 250m and 1km) to local biodiversity features (including Wild Boar Clough a candidate local wildlife site).</p> <p>The scoring of the site for SA objective 16 reflects the Environment Agency's flood risk map. As the site is located outside of flood zones 2 and 3, a significant negative effect is not expected on this SA objective. As the site would result in the loss of greenfield land and therefore its development would increase the area of impermeable surfaces in the District and a minor negative effect has been recorded.</p>
John Griffiths and Fiona Hartley	<p>The comment states that sites ME2568 and ME3324 should be deleted from the Local Plan and should be returned to the Green Belt. The consultee has made a number of comments in relation to the audit trail of site options and the Council's reasons for decision making which is presented in Appendix 5 of the SA Report. These comments mostly relate to consultation on sites ME2568 and ME3324.</p> <p>In relation to the findings of the SA Report the consultee has stated that impacts have been referred to but that these have been scored as 'neutral' or minor negative. The comment does not refer to any</p>	<p>Appendix 5 (Council's reasons for selection and rejection of sites) has been informed by input from the Council, as LUC is not involved in the decision-making process.</p> <p>To ensure a consistent approach to the appraisal process a SA Framework containing SA objectives which will address the Key Sustainability Issues in the District was established. This framework and the assumptions upon which the appraisal process has been based are presented in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted upon at previous iterations of the SA Report. They reflect the key</p>

Consultee	Comment	Action
	<p>specific findings of the SA Report but states that sufficient weight has not been given to the significance of the scores as an aggregate impact of the totality of both sites. It is also stated that the cumulative effects of both sites should be considered and that factors should not be for left consideration until the planning application stage.</p> <p>It is stated in relation to noise and dust that residential properties within the village and within proximity of the site will be adversely affected. The consultee has also stated that the extension of the site across Intake Road would give rise to issues which have not been adequately considered in the Local Plan or the SA Report. The remainder of the comments in this response relate mainly to assessment which has been presented in the Council's Accepted Site Options – Technical Appraisals document including issues of need to improve access to the site.</p> <p>There are further comments relating to potential impacts on Dean Wood Local Wildlife Site, the Conservation Area at the village and those heritage assets contained and loss of access to the countryside. These comments are not directly related to the SA Report.</p>	<p>sustainability issues which have been identified for Kirklees in Table 3.1 of the SA Report. The methodology used for the SA Report has been set out in Chapter 2. This presents the stages of consultation involved in the previous iterations of the SA Report. As such the weight attached to the significance of the scores recorded for each of the SA objectives is consistent and appropriate for the sites in question.</p> <p>The cumulative effects of the plan (including sites allocated and policies to guide development) are presented by SA objective from paragraph 12.80 onwards of the SA Report. The cumulative effects of specific allocations have not been separated out as the effects of allocating sites at any specific settlement will not be entirely separate from other allocations in the plan and to assess every different combination of site allocations within the plan would be disproportionate.</p> <p>Similarly the high level and strategic approach of the SA Report is in line with the PPG<sup>1</sup>. Issues such as potential site access are outside of the scope of the SA Report and will be addressed through the detailed planning proposal and application stage.</p> <p>The SA Report has considered the potential for adverse impact occurring as a result of noise and dust through SA objective 5: amenity. As both sites have been identified as being within close proximity of sensitive receptors minor negative effects have been identified. The effect is uncertain for both sites as it will be dependent upon the exact nature and scale of the operations on site as well as topography and the nature of the surrounding landscape which have not been considered as part of the assessment.</p> <p>The consultee has raised issues relating to Dean Wood Local Wildlife Site, the Conservation Area at the village and heritage assets within and loss of access to the countryside but has not related these issued specifically to the SA Report. These are discussed further below.</p> <p>The proximity and subsequent potential adverse impacts of mineral</p>

<sup>1</sup> Paragraph: 001 Reference ID: 11-001-20140306 of Planning Practice Guidance Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Consultee	Comment	Action
		<p>sites on biodiversity sites have been considered through SA objective 14 (biodiversity and geodiversity). Both of the sites are between 250m and 1km of Dean Wood Local Wildlife Site meaning a minor negative effect has been recorded for this SA objective. This is combined with an uncertain minor positive effect given that there is the potential for all sites to deliver biodiversity benefits in the long term. Site ME2568 is also located within 250m of Bank Wood Candidate Local Wildlife Site and therefore the negative effect has been increased for minor to significant for this site.</p> <p>Impacts on heritage assets including Conservation Areas are addressed through SA objective 13. This objective has been informed by assessment provided by Historic England who have scored each site red, orange, yellow or green in relation for potential development to impact on the significance or/setting of heritage assets nearby. As both sites have been assessed as "orange" the impact on the surrounding historic environment is uncertain.</p> <p>Development on greenfield land has been addressed through SA objective 11. As both sites would result in the development of minerals workings on Grade 4 agricultural land the negative effect expected on this SA objective is likely to be minor. The loss of greenfield land to minerals sites is also likely to have an impact on the rural character of Kirklees and local landscape character and as such minor negative effects have also been recorded for SA objective 12 for both sites. The development of minerals sites is expected to have an impact on access to open spaces and PRow's in the surrounding area given that this type of development may adversely affect amenity in terms of dust and/or noise pollution. As such minor negative effects have been identified for both sites. Given that restoration of minerals sites increasingly allows for recreational opportunities due to the adoption of innovative practices an uncertain minor positive effect is also expected in combination for both sites.</p>
Colliers International (Anthony Aitken)	The consultee states that the allocation of site GTTS2487 is not adequately justified nor soundly based and therefore it should not be included in the Local plan.	To ensure a consistent approach to the appraisal process an SA Framework containing SA objectives which address the Key Sustainability Issues in the District was established. This framework

Consultee	Comment	Action
	<p>With regards to the SA Report the comment states that assessment considered <i>"the likely impact of the proposed development on existing situations as opposed to considering the merits of the site for the intended use. As a result, several scores in the appraisal are comparable for many sites and do not therefore offer a basis for which to distinguish between the sites."</i></p> <p>The comment contains reference to scores for site GTTS2487 contained in the Council's Accepted Site Options – Technical Appraisals document (November 2016).</p> <p>Turning back to the SA Report the comment states that <i>"with regard to flooding and drainage, the Sustainability Appraisal indicates potential negative impacts which could increase overall flood risk in Kirklees. Therefore, mitigation would be required"</i>.</p> <p>It is also highlighted that the SA Report has included that <i>"residents (at site GTTS2487) would be affected by noise over the longer term, a significant effect on this SA objective is therefore likely."</i></p>	<p>and the assumptions upon which the appraisal process has been based are presented in Appendix 4 of the SA Report. In line with the PPG, the SA has assessed alternatives <i>'against the baseline environmental, economic and social characteristics of the area and the likely situation if the Local Plan were not to be adopted'</i>. The SA has considered both positive and negative effects and assesses the effects of the site as presented in the plan, rather than speculating about design and details of individual development proposals.</p> <p>The Technical Appraisals document and the SA Report and the respective findings of each document should not be confused. The findings of the Technical Appraisal have not influenced the findings of the SA Report and represent the Council's findings in relation to specifics of the sites.</p> <p>The minor negative effect has been identified in relation to flood risk (SA objective 16) given that the site lies on greenfield land outside of an area of high flood risk. As the development of the site would increase the area of impermeable surfaces in Kirklees it may increase local flood risk. The potential need for mitigation is noted.</p> <p>The site has been assessed in relation to amenity (including noise and light pollution) through SA objective 5. As the site is located in close proximity to an existing industrial area to the west and north there may be potential for adverse impacts on this SA objective and a significant negative effect has been recorded.</p>
Janet Armitage	<p>The consultee queries the findings of the SA Report in relation to sites H314 and H47. It is commented that site H314 is equally as sustainable as site H47. The sites are adjacent to each other with H47 immediate to the north. H47 has been allocated in the Local Plan.</p> <p>The SA Report has scored the sites equally for all SA objectives other than SA objective 6 (access to services and facilities) and SA objective 13 (historic environment). The consultee states that the scores for these sites should be equal for these SA objectives.</p>	<p>The scoring of SA objective 6 (access to services and facilities) has been informed by accessibility "heatmapping" work undertaken on behalf of the Council. A description of how this work has informed findings as well as the assumptions and limitations which relate to the use of this data have been presented in paragraph 2.37 of the SA Report. This work has shown that site H47 is located within 16-20 minutes travel time of a local centre and within 21-25 minutes travel time of a town/district centre. Site H314 is located within 11-15 minutes travel time of a local centre and within 21-25 minutes travel time of a town/district centre. Therefore in line with the SA Assumptions site H47 has been recorded as having a minor negative effect on this SA objective while site H314 has been recorded as</p>

Consultee	Comment	Action
		<p>having a negligible effect on this SA objective.</p> <p>The scoring of site options considered in the SA Report in relation to the historic environment (SA objective 13) has been based on Historic England input with regards the potential impact development may have on character and surrounding heritage assets and their setting. Historic England has rated sites as green, yellow, orange or red in relation to potential impacts on the historic environment. Site H47 has been identified as being "green" meaning a negligible effect is expected given that the development of this site is unlikely to result in harm to any designated asset. Site H314 has been identified as being "orange" and therefore the effect on historic environment is uncertain. The Historic England commentary states that <i>"this site adjoins the boundary of the Underbank Conservation Area. The loss of this currently open area and its subsequent development could harm elements which contribute to the significance of this area."</i></p>
Michael Smith	<p>The consultee states that site MX1924 should be allocated for mixed use development, and not left unallocated, to make the Local Plan sound. It is also stated that the Sustainability Appraisal has been "proven". The comment also states that the site has been rejected due to the potential for noise and disruption during the construction phase at this location.</p>	<p>Further details of those sites which have been rejected for allocation are provided in the Council's Publication Draft Local Plan Rejected Site Options Report (November 2017).</p> <p>A significant negative effect (red) has been recorded for the site in relation to SA objective 5 (amenity) given that residential properties surround the site on most sides meaning that noise and light pollution might affect these existing properties during any construction phase required. This effect has not resulted in the ultimate rejection of the site however which considered a variety of factors.</p>
John Dalton	<p>The first part of this comment is the same as that submitted by Alison Armstrong, as addressed above</p> <p>The SA Report has also been described as being flawed and inconsistent in relation to the assessment of site H288a. In general the comment refers to the SA Report as not being compliant with a number of the policies of the NPPF and the Local Plan.</p> <p>Comments have also been attributed to the findings presented in the</p>	<p>See response to Alison Armstrong's comment above.</p> <p>With regards to access to schools the score for this SA objective has been recorded as uncertain given that as the justification text explains <i>"availability of school and college places to serve the growing population will depend in part on whether new places are provided as part of new housing developments, which is unknown at this stage"</i>. The justification text also explains that <i>"there are uncertainties as the effects will depend on there being capacity at</i></p>

Consultee	Comment	Action
	<p>SA Erratum Notice (November 2016) for site H288a. Comments have been made in relation to the specific scorings for each SA objectives below:</p> <ul style="list-style-type: none"> <li>SA objective 1: the consultee has stated that the significant negative effect recorded for SA objective (employment) is correct as the site is only effective way to access employment is by private car.</li> <li>SA objective 3: it is stated that the primary school which is located within 6-10 minutes travel time of the site is both small and currently at full capacity. There are no other local primary schools which are easily accessible of the site. The consultee has also stated that the topography of the site also makes it inaccessible by walking or cycling. It has also been stated that those attending secondary school from the site would be outside of the 3 mile radius which would entitle those students to a free bus pass thereby increase the cost of schools upkeep in the District.</li> <li>SA objective 4: the consultee states that the findings of the SA Report in respect of access to healthcare facilities are not factual. It is stated that the nearest GP surgery is located more than the 25 minutes away which has been detailed in the SA Report. The consultee agrees with the SA Report in relation to access to the nearest hospital. It is stated in the comment that the overall score for this SA objective should be a significant negative.</li> <li>SA objective 5: the consultee states that the closeness of agricultural land should be addressed within this SA objective in terms of potential impacts on residential properties at this location as well as potential impacts on agricultural practices.</li> <li>SA objective 6: the consultee states that this SA objective should be scored more negatively as local centres and district/town centres can only be reached by car.</li> <li>SA objective 7: it is stated in the comment that increased crime, fly tipping and trampling has already and will continue to result from new local developments.</li> <li>SA objective 8: the consultee has stated that the churchyard should not be included within the assessment of open space</li> </ul>	<p><i>those schools and colleges to accommodate new pupils</i>". Issues of topography are not expected to have a significant impact upon the accessibility scores recorded for this SA objective given that the heatmapping information as explained "<i>travel time indicators are based on the travel time to reach each destination type by public transport</i>". A description of how this work has informed findings as well as the assumptions and limitations which relate to the use of this data have been presented in paragraph 2.37 of the SA Report.</p> <p>The heatmapping work provides information on the accessibility of the site to existing healthcare facilities (the nearest GP surgery and hospital) by public transport and provides a consistent basis for assessment across all sites.</p> <p>Impacts on agricultural land have been considered through SA objective 11: land use, which addressed the loss of greenfield land in Kirklees. SA objective 5 addresses amenity in terms of potential for light and noise pollution from sources which are likely to have adverse impacts on residential properties (e.g. motorways, A-roads and industrial units as well as construction sites). The impacts of development on neighbouring agricultural uses is outside of the scope of the SA, as this is not considered a key issue in the district and there is little data that can be used to draw such conclusions.. These issues are likely to be addressed through the detailed development proposal and application process on a case-by-case basis.</p> <p>The heatmapping work has shown that the nearest local centre is located mostly within 16-20 minutes of the site and the nearest town/district centre is mostly located within 16-20 minutes of the site by public transport. The minor negative effect recorded for this SA objective is in line with the SA Assumptions and reflects the limited ability of new residents at the site to access services and facilities.</p> <p>In relation to SA objective 7 (crime), the specific siting of development in a given area is considered unlikely to affect the rate of crime. In order for the SA to be consistent and robust, it cannot account for anecdotal evidence.</p>

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	<p>accessible from the site. It is also stated that the sports facility detailed in the assessment is privately owned and oversubscribed and that the park to the west of the site while being a "huge positive" should not "be used as a make weight in trying to justify a residential development". The consultee has also stated that the development of the site would result in the loss of green space for current nearby residents and there will be a detrimental impact upon the landscape quality of Hade Edge.</p> <ul style="list-style-type: none"> <li>• SA objective 10: the comment states that the score in relation to sustainable transport should be recorded as a significant negative and not a minor positive. It is stated that Hade Edge has poor public transport and the topography of the area will also affect this score.</li> <li>• SA objective 11: the consultee has stated that they agree with the negative effect recorded in relation to land use.</li> <li>• SA objective 12: the consultee states that the site is located within 900m of the National Park and that it thereby forms part of its fringe. There is potential for negative impact on character and the "feel" of the village. It is also stated that the group (Hade Edge Fight for the Fields) has supplied a Landscape Character assessment as part of their full representation.</li> <li>• SA objective 13: It is stated that the uncertain scope which has been recorded in relation to the historic environment should result in further investigation and appropriate assessment.</li> <li>• SA objective 14: the consultee has stated that further investigations into all of the biodiversity elements should be undertaken. It is stated that uncertainty which is attached to the score should be investigated so that more clarity can be provided in relation to potential effects.</li> <li>• SA objective 16: it is stated that Hade Edge was flooded on the 28th November 2016 and that the water was passed down the valley and was a major contributing factor to the flooding of lower lying areas. The consultee believes that the loss of greenfield land would reduce the natural soak away areas which would lead to increased lower level flooding.</li> </ul>	<p>SA objective 8 has been scored making use of GIS information provided by the Council. This shows mapping for all identified open spaces which can be used in the District. The site itself is not an area of publically accessible open space which has been identified by the Council. The SA Assumptions for this site identify that sites that are within 600m of three or more areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleway would have significant positive effect on this SA objective. If the access to the churchyard (which might provide walking space or areas for community interactions) is disregarded the site would still provide access to a number of areas of open space (including publically accessible features such as the park to the north west which includes an area of outdoor sports facilities and children's play space, and further areas of private outdoor sports facilities at Hade Edge AFC, the sailing club and by Holme Styes Reservoir). A PRoW is also located in close proximity to the site along Long Ing Road. It is expected that the close proximity of these features might encourage new residents to make use of them as partake of more activity and healthier lifestyles. Landscape quality is considered as part of SA objective 11.</p> <p>The SA report has found through the accessibility heatmapping information undertaken on behalf of the Council that the site is classed as "green" in relation to one (access to primary schools) of the eight features against which is has been assessed. As such the site may encourage residents to make use of more sustainable modes of transport when accessing the local primary school and therefore a positive effect is recorded for SA objective 10. The positive effect is expected to be minor given that other features are unlikely to be as accessible by sustainable modes of transport.</p> <p>SA Objective 12 has considered the Kirklees Landscape Character Assessment and the landscape character area into which each site falls. Impact on local rural character is recognised, given that a minor negative effect has been recorded. The SA Assumptions consider development within a 500m buffer around the Peak District National Park to have potential significant negative effects on this designated landscape. The SA is a strategic level assessment and it is necessary to apply an indicative buffer distance that can be used</p>



Consultee	Comment	Action
	<ul style="list-style-type: none"> <li>SA objective 19: the consultee disagrees with the minor positive effect recorded in relation to climate change highlighting that in the SA Report the site has been scored as a significant negative in relation to access to employment opportunities and stating that the buses are being cut in the area and that topography makes car the only form of transportation suitable in the area.</li> </ul> <p>The consultee also has a number of comments on the heatmapping work which has informed much of the assessment work of the SA Report. It is stated the heatmapping work has not factored in topography which is particularly important to travel around Hade Edge. It is also stated that the bus service is limited in the area and that cuts to existing services (the main 25 bus service) are due to occur. The consultee believes that private car or taxi is the only viable way to travel to the site. The individual findings of each of the heatmaps which relate to the eight features in terms of the assessment of accessibility of site options in the Local Plan have also been contested in the representation.</p>	<p>consistently in the SA of numerous site options, for which 500m is considered appropriate. As explained in the assumptions table in Appendix 4 of the SA Report, all of the scores against SA objective 12 are currently uncertain, recognising that effects cannot be assessed in detail until the specific proposals for sites come forward. The landscape work provided by HEFF cannot be considered through the SA process, as SA is a strategic process and comparable assessments are not available for all sites.</p> <p>The scoring of SA objective 13 in the SA Report has incorporated the following input from Historic England. Historic England has scored this site as "Orange" in terms of the potential for impacts on the historic environment, meaning that effects are uncertain. The high level nature of the SA Report means that this stage further investigation is outside of its scope. However, the Council has commissioned further work on the basis of this uncertainty, the results of which will inform a review of the SA to be presented in an Addendum. Similarly, it is outside the scope of the SA to collect further data with regards to biodiversity, rather its role is to flag up where uncertainty exists.</p> <p>The site is not located within an area of high flood risk as per mapping provided by the Environment Agency (it does not lie within Flood Zones 2 or 3). The SA Report has recognised that the development of this greenfield land would increase the area of impermeable surfaces in Kirklees which may increase local flood and therefore a minor negative effect has been recorded on SA objective 16.</p> <p>Given the influence greenhouse gas emissions from vehicle traffic has on the District's contribution to climate change it is thought to be appropriate for the scoring of SA objective 19 to reflect the accessibility of various features from the site, through the 'heatmapping' work. Given that the site has been scored as "green" in relation to one (access to primary schools) of the eight features assessed in terms of access by public transport a positive effect is expected on this SA objective. The positive effect is minor given that access to the remaining features is not expected to be of a high level.</p>

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		<p>The production of heatmaps which have been used to provide an assessment of the accessibility of the sites considered in the SA Report has not taken place as part of the production of the SA Report. As detailed previous the assumptions and limitations which relate to the use of this data have been presented in paragraph 2.37 of the SA Report. Further details on the methodology of the heatmapping work are available from the Council on request. The SA has taken this work as read.</p>
<p>Liberal Democrats (Alison Munro)</p>	<p>The consultee has included a number of comments which relate to the overall soundness of the Local Plan. The comments address land which would be allocated at the Lepton and Fenay Bridge area. It is stated that the totality of the development which might result as a result of the land allocated at this location would create “unsustainable pressure on the local community”.</p> <p>In relation to the SA Report specifically it has been stated that appraisal of sites H2684a and H2730a is unsound and as such these sites should be removed from the Local Plan. The following issues have been raised in the detail of the consultee response and relate to sites H31, H616, H638, H664, H1679, H2684a and H2730a:</p> <ul style="list-style-type: none"> <li>Public transport and employment: the comment has been made in relation to the sustainable transport accessible in the area of Lepton in general. This relates to the heatmapping approach used in the SA Report. It is stated that the local population rarely makes use of public transport to access employment opportunities and that this would continue to be the case for future developments in the area. The comment also states that the failure to address local sustainable transport capacity as opposed to its relative proximity to sites allocated is also an issue. The comment therefore questions the findings of the SA in relation to objectives 1 (employment), 10 (sustainable transport) and 19 (climate change) stating that “maximum dark green score(s)” have been recorded for these objectives for all sites apart from H2730a.</li> <li>Traffic: the consultee has stated that the surrounding roads</li> </ul>	<p>Of the sites in question (H31, H616, H638, H664, H1679, H2684a and H2730a) all have been recorded as likely to have a significant positive effect (dark green) on SA objective 1 (employment) apart from sites H664 and H1679. The majority of these sites (H31, H616, H638, H2684a and H2730a) have been identified as being within 20 minutes journey time (via non-car based modes of transport) of an employment node as part of the accessibility heatmapping work undertaken on behalf of the Council. Sites H664 and H1679 have been identified as being located across areas of differing accessibility to employment nodes meaning that mixed overall effects have been recorded in relation to SA objective 1. These scores have been recorded in line with the SA Assumptions.</p> <p>Part of site H664 is located within 21-25 minutes travel time of the nearest employment node while another portion of the site is located more than 60 minutes from an employment node. As such an overall mixed effect (minor positive/significant negative) as denoted by a blue colour has been recorded. Part of the site H1679 is within 11-15 minutes travel time of the nearest employment node while another portion of the site is located within 21-25 minutes from an employment node. An overall mixed effect (significant positive/minor positive) has therefore been recorded for SA objective and this is identified through the blue colour. These scores have been recorded in line with the SA Assumptions.</p> <p>Significant positive effects (as shown by the dark green colour) have been recorded for SA objectives 10 (sustainable transport) and 19 (climate change) for all of the sites in question apart from sites H638 and H664. These significant positive scores have been recorded in</p>

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	<p>would be adversely impacted upon by increased levels of development and that this has not been considered in the SA Report. This issue is related to health and pollution in particular.</p> <ul style="list-style-type: none"> <li>• School places: the comment contains concerns that issues relating to school infrastructure have not been considered. This relates to a potential oversubscription to local schools and a resultant overburdening. This comment has been made in general and not in relation to any one specific site.</li> <li>• Health, amenity, services and facilities and recreation: the consultee also states that there are issues in relation to the scores recorded for these SA objectives. These issues relate to the response of residents to a recent survey on current provisions, facilities within Lepton and the future closure of Huddersfield Royal Infirmary.</li> <li>• Green Belt: the consultee has stated that while five of the seven sites at Lepton and Fenay Bridge are within the Green Belt SA objectives other than 5, 11, 12 and 14 have been "overscored" for many of the these sites "in order to overcome the presumption against development in the Green Belt".</li> <li>• In relation to sites H2684a and H2730a which the consultee believes should not be allocated in the Local Plan, it has been stated that the only "dark green" (significant positive effect) which should be given should be in relation to housing.</li> </ul>	<p>line with the SA Assumptions given that these sites would provide a good level of access to at least four out of eight of the features against which they have been assessed. It is expected that this high level of access to the features in question (which include employment opportunities, education infrastructure, healthcare services and other services and facilities which are likely to be provided at local or town/district centres) would encourage residents to make use of more sustainable transport links to access them. Given the high contribution private car use makes to greenhouse gas emissions in the District the encouragement of sustainable transport use in Kirklees is expected to help reduce local contribution to climate change meaning a significant positive effect has also been recorded for SA objective 19 for these sites. It is noted that while the correct score (significant positive i.e. ++ ) has been recorded for SA objective 10 for site H2730a, it has been incorrectly coloured blue and should be dark green.</p> <p>Where a residential site is mapped as green for between one and three of the eight features a minor positive effect is likely for SA objective 10. This is the case for sites H638 and H664. A minor positive effect is also likely for SA objective 19 for these sites given that good accessibility to services is likely to reduce per capita emissions of carbon dioxide from transport.</p> <p>It is not considered appropriate to include the capacity of the local sustainable transport infrastructure in the SA. The SA is required to conduct a strategic assessment of all site options in the same level of detail, and a level of detail that is proportionate to the plan. The potential requirement for improved sustainable transport (through S106 or CIL for example) are detailed matters to be considered at the development proposal stage.</p> <p>Similarly, potential requirements for improvements to road infrastructure (through S106 or CIL for example) may also result as part of individual applications.</p> <p>Health and (in terms of access to healthcare facilities) pollution (in terms of both air pollution and noise/light pollution relating to amenity) have been addressed through SA objectives 4 and 5</p>

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		<p>respectively.</p> <p>A range of scores have been recorded for the sites which are highlighted in the earlier part of the consultation comment. These relate to the accessibility of each site to education facilities (primary, secondary and further education centres). This is considered proportionate to the plan and the capacity at existing facilities would be considered at the planning application stage for any proposal which might come forward at these locations. The SA Assumptions require that uncertainty is attached to all scores in relation to education given that "the effects will depend on there being capacity at those schools and colleges to accommodate new pupils".</p> <p>Health and services and facilities have been addressed through SA objectives 4 and 6 respectively. These SA objectives relate to the current accessibility of the sites to existing healthcare facilities and identified local and district/town centres where a large range of services and facilities are likely to be found based upon accessibility heatmapping work undertaken on behalf of the Council. As such a range of likely effects have been identified for these two SA objectives. SA objective 5 relates to the protection of amenity in Kirklees. This addresses the potential for new development to have adverse impacts on existing properties in relation to noise/light pollution or for new residents to be affected by such issues. Significant negative effects have been identified for sites H31, H616, H2684a and H2730a given that these sites are located in close proximity to a high number of existing sensitive receptors or a main transport route or industrial site which is likely to result in increased noise or light pollution.</p> <p>All SA objectives have been scored in accordance with the SA Assumptions which relate to the Key Sustainability Issues for Kirklees. This approach has been taken to ensure objectivity and consistency is achieved to the approach of the appraisal of all sites. The SA objectives do not relate to protection of the Green Belt in Kirklees. Development within the Green Belt will be influenced by assessment of the current Green Belt boundary and any revision which is subsequently supported as well as proposals which come forward with the Green Belt to be assessed at planning application</p>

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		stage. As such the scope of the SA Report is considered to be appropriate.
Strata Homes	<p>The consultee's comments relate to site H442 which is being promoted and has been allocated in the Local Plan. Section 3.0 of the response relates to the findings of the SA Report for the site. The response seeks to clarify and provide more certainty in relation to these findings with many of the findings of the original SA Report being agreed with and some being upgraded to "more positive" effects. The scores for the following SA objectives have been challenged in the consultee's response:</p> <ul style="list-style-type: none"> <li>SA objective 3 (education): the comment states that the site should be scored as a significant positive instead of the uncertain significant positive effect that has been recorded for this site in the SA Report. The comment states that "provision of school places will be delivered through the CIL infrastructure mechanism" which would thereby remove uncertainty currently attached to the score.</li> <li>SA objective 5 (amenity): in relation to the SA Report the consultee has stated that the site should be scored as negligible for potential impacts on amenity. The comment states that a buffer (of existing properties) is present between the site and the A62 and that these existing properties would not be influenced adversely by noise and light pollution during the construction phase as appropriate conditions would be imposed. It is also stated that any effect resulting from construction required would be for a temporary period.</li> <li>SA objective 6 (services and facilities): the consultee disagrees with the scoring of SA objective 6 for the site as minor positive stating that as the site is located within 5 minutes travel time of a local centre a significant positive effect should be recorded for this SA objective.</li> <li>SA objective 7 (crime): the comment clarifies that the consultee believes that this SA objective should be scored as a minor positive and not the negligible effect currently recorded. It is stated in the commentary that the masterplan</li> </ul>	<p>All SA objectives have been scored in accordance with the SA Assumptions which relate to the Key Sustainability Issues for Kirklees. This approach has been taken to ensure objectivity and consistency is achieved to the approach of the appraisal of all sites. The SA is required to conduct a strategic assessment of all site options in the same level of detail, and a level of detail that is proportionate to the plan. As such the potential provision of school places (through CIL or S106 for example) as part of any new development should not be considered as part of the assessment given that this information is not available for all sites. This would mean that in line with the SA Assumptions an element of uncertainty is attached for this SA objective given that issues of capacity have not been considered in detail.</p> <p>The score for SA objective 5 has been based on both the potential for existing residential amenity to be adversely impacted upon and the potential for the residential amenity of new development to be subject to negative effects. The site is located within approximately 5m of the A62 at its closest point where a small number of houses may provide sparse screening. As such there is potential for issues relating to noise pollution from the A-road. Regardless of this judgement the residential developments which surround the site have the potential to be adversely impacted upon by noise and light pollution etc. which would result during the construction period meaning the significant negative effect would still remain. These findings are in line with the SA Assumptions.</p> <p>While the scoring of SA objective 6 relates to the location of the site with regards to the nearest local centre it also considers the location of the site in relation to its proximity to the nearest district/town centre. This is in line with the SA Assumptions which have guided the findings of the SA Report. The site is located mainly within 5 minutes travel time of the nearest local centre and mainly within 16-20 minutes travel time of the nearest district/town centre and therefore the overall effect on this SA objective is expected to be a</p>

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	<p>proposed for the site has "regard to incorporation of greenspace which would have a high level of surveillance to increase the perception of personal safety."</p> <ul style="list-style-type: none"> <li>SA objective 8 (recreation): the consultee states that the mixed effect (significant positive/significant negative) recorded in relation to access to recreational facilities should be adjusted to an overall significant positive effect. It is stated that the proposed layout of the site would allow for the accommodation of the existing PRoWs within the site boundaries.</li> <li>SA objective 11 (efficient land use): it has been stated in the consultee's comment that the significant negative effect recorded in relation to the loss of greenfield land which the development of this site would result in should be reduced from a significant negative effect to a minor negative effect. The comment contends that the Council would need to release greenfield sites to meet the housing need and that the site is in an accessible location and the majority of the site is not within an area of quality agricultural land meaning that it should "be seen as the first priority to direct development."</li> <li>SA objective 12 (landscape): the consultee has stated that the score for this SA objective should be changed from a significant negative to a minor negative based on assessment contained within its Planning Statement. This concluded that in relation to landscape character "there is a moderate landscape structure, however, rural features are few."</li> <li>SA objective 13 (historic environment): the comment states that site should be scored as a negligible effect and not as an uncertain effect which was originally recorded in the SA Report. This change to the score has been stated to be appropriate as the consultee believes that the site does not form part of the Old Hall Farmhouse Grade II* Listed Building's immediate setting. Furthermore the masterplan layout would include a strip of landscape planting along Roberttown Lane to screen views of the site from the north.</li> <li>SA objective 16 (flood risk): the consultee disagrees with the minor negative effect which has been recorded for this SA</li> </ul>	<p>minor positive.</p> <p>The SA Assumptions, which have guided the appraisal of all site options, identify that a negligible effect should be recorded for all sites in relation to SA objective 7. It has been detailed within the text of the SA Assumptions that the <u>location</u> of housing sites would not impact upon the potential for influencing levels of crime or perceptions of personal safety. While the masterplan of proposal which the consultee references might in fact lead to a positive impact on the level of crime within the District, this level of detail is not available for all site options and as such it is not proportionate to that which is available for other site options considered. This information therefore would be more appropriate to be considered at the planning application stage of any proposal which might come forward.</p> <p>SA objective 8 has been scored in line with SA Assumptions. The site is located within close proximity of a number of existing recreational facilities meaning a significant positive effect is expected on this SA objective. As two PRoWs have been identified within the boundaries of the site any development may result in loss of use of these features. A significant negative effect has therefore also been recorded for this SA objective. The proposed layout of the site is considered to be more appropriate for consideration during the planning application stage of any scheme which might be submitted. The SA Report is required to base its appraisal upon consistent and proportionate information and this level of detail is not available for all sites.</p> <p>As has been clarified above the scoring of all sites has been made in line with the SA Assumptions to ensure a consistent approach has been taken to the appraisal process. The site has therefore been scored as a significant negative effect for SA objective 11 as it has been identified as being over the 5ha threshold (it is 7.79ha) and therefore would result in a relatively large area of greenfield land being developed. It is recognised within the appraisal justification that most of the site is not high quality agricultural land.</p> <p>The scoring of the site in relation to landscape character (SA objective 12) has been made with consideration for the impact of</p>

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	<p>objective due to the potential for the development of greenfield land to increase the area of impermeable surfaces in the District. The consultee has stated that "masterplanning work has confirmed that both surface water and foul water can be drained in a suitable manner" from the site. The comment therefore states that a negligible effect should be recorded for this SA objective.</p> <ul style="list-style-type: none"> <li>SA objective 17 (waste): the consultee has stated that this SA objective should be recorded as a negligible effect and therefore that the minor negative effect recorded in the SA Report is incorrect. The text of the consultee's comment states that "we are of the opinion that the site would ensure the recycling of waste close to source".</li> </ul>	<p>development with regards to use of greenfield land which is likely to have an adverse impact on the rural character of the District. Information from the 2015 Landscape Character Assessment for Kirklees has also informed the scoring of this SA objective. As the development of the site would be on a relatively large (7.79ha) area of greenfield land a significant negative effect has been recorded for this SA objective.</p> <p>SA objective 13 has been scored to include input from Historic England. Historic England has identified that the site currently contributes to the significance of the Old Hall Farmhouse Grade II* Listed Building which is opposite the site and as such its development could harm elements which contribute to this significance. Adopting a precautionary approach, it is therefore not considered appropriate to score this site as negligible in terms of potential impacts on the historic environment. It has not been considered appropriate to consider the masterplan layout proposed for the site given that the appraisal of sites included in the SA Report should be proportionate and this level of detail is not for all sites.</p> <p>The site has been scored a minor negative effect in relation to SA objective 16 (flood risk) as its development would reduce the area of greenfield land which currently facilitates surface water infiltration in Kirklees. It is not possible to consider masterplanning work in the SA if consistency is to be achieved across all sites appraised.</p> <p>A minor negative effect has been recorded for SA objective 17 in line with the SA Assumptions given that the use of this greenfield land would presented reduced opportunities to make use of existing buildings and materials which are more likely to be present at brownfield sites. The consultee's comment has not provided further evidence as to why the score should be adjusted to a negligible effect beyond the reference to the consultee's own opinion.</p>
Historic England (Ian Smith)	In relation to the Local Plan's strategies and policies Historic England broadly agrees with the conclusions in the SA Report regarding the likely significant effects which its contents would be likely to have upon the historic environment. Where there is likely to be an adverse effect, there is also concurrence with the mitigation	Noted

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	measures which have been suggested.	
Historic England (Ian Smith)	<p>In relation to the Local Plan's allocations and designations Historic England has reservations about the approach which this SA has used to evaluate the likely significant effects which the Plan's proposals might have upon the historic environment and, as a result, would question whether or not the mitigation measures suggested (i.e. relying on the Policy framework of the plan) would actually reduce any harm to an acceptable level.</p> <p>Under the provisions of Article 5(1) of The SEA Directive there is a requirement to assess the likely significant effects which the Policies and proposals of a Plan might have upon "cultural heritage including architectural and archaeological heritage". However, neither the Plan nor the Sustainability Appraisal has undertaken any meaningful evaluation, at all, of what potential impact the sites that are being put forward for development might have upon the heritage assets of the area.</p> <p>Other than identifying which sites which might have an impact upon the historic environment, the SA had gone no further. It has concluded that the development of these sites would, for the most part, have an "uncertain" impact upon the SA Objective relating to the historic environment. In terms of mitigation, the SA states that the Local Plan's policies for the historic environment should assist in avoiding or reducing harm. Historic England raises concerns about this approach.</p> <p>By allocating a site in this Plan, Historic England states that the Council is, in effect, saying that the principle of development in that particular location (including the loss of any open spaces in the vicinity of those heritage assets) is acceptable. However, in the case of this Local Plan, there has been no evaluation, in either the Evidence Base underpinning the plan, or in this SA, of what impact the loss of these currently-open areas and their subsequent development might have upon those heritage assets. Moreover, in the absence of any assessment of the degree of harm which the proposed allocations might cause to the historic environment, it is impossible for this SA to identify what mitigation measures might be</p>	<p>In response to the concerns raised by Historic England, Kirklees Council have engaged with Historic England, firstly to clarify and agree the robustness of the work undertaken to date, and secondly to agree what further work is required.</p> <p>As a result of these discussions, Historic England sought clarify its position as follows, in a letter dated 24th February 2017:</p> <p><i>"We [i.e. Historic England] can accept your concerns that those reading our letter of 25 November, 2016 may misconstrue that we considered that there had been no evaluation, at all, of the impact of any of the sites upon the historic environment as part of the preparation of this Local Plan. In order to avoid any doubt, I can confirm that we do not consider this to be the case. In fact we fully acknowledge that the selection of sites which have been put forward as allocations in the Publication Draft have been arrived at following a series of evaluations by the Council of the potential impacts that of all the sites which had been put forward as allocations might have upon the historic environment. Indeed, the process undertaken to arrive at the selection of sites included in the latest iteration of the Plan is one which we would not only endorse but which has involved full consultation with, and considerable input from, Historic England. We also confirm that the Publication Draft did not include any of the sites whose development we considered to be likely to result in substantial harm to a designated heritage asset (and whose allocation, therefore, would be likely to conflict with national policy guidance).</i></p> <p><i>Of the sites allocated in the Publication Draft, we accept that the Sustainability Appraisal has correctly identified those sites whose development are likely to have some impact upon the significance of heritage assets in their vicinity. Our concern, therefore, was simply that neither the Plan nor the Sustainability Appraisal had assessed what that impact might be. Whilst for many sites it may well be the case that this impact will be minimal, in others the harm might be such that the identification of that particular area for development</i></p>



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	<p>needed in order to ensure that any harm is minimised. Historic England expects to see a recommendation for each of these sites that a more detailed evaluation of the potential impact which the development of the sites which have been identified as being uncertain in relation to SA objective 13 might have upon the historic environment.</p> <p>As such in relation to advice given to the Council by Historic England regarding the appropriateness of the "orange" sites as allocations additional work needs to be undertaken by the Council to evaluate the potential impact which their development might have upon heritage assets in their vicinity. This work should be undertaken before identifying any of these sites as Allocations.</p> <p>Historic England has also stated that as the Local Plan would establish the acceptability of the principle of development in particular locations and there has been little evaluation of the impact of loss of these currently-open areas the Plan cannot demonstrate (and the SA cannot presume) that, where harm is likely, the Policies of the Plan are actually capable of mitigating that harm. As such Historic England has stated that the SA Report should put forward the following recommendations for "orange" sites which are currently assessed as having an uncertain impact on the historic environment:</p> <ol style="list-style-type: none"> <li>1. An assessment should be undertaken of the contribution which these sites make to the significance of the heritage assets in their vicinity and what impact their development might have upon the significance of these assets.</li> <li>2. If it is considered that the development of any site would harm elements which contribute to the significance of a nearby heritage asset, then the Plan needs to set out the measures by which that harm might be removed or reduced.</li> <li>3. If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of a heritage asset, then that site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</li> </ol> <p>Historic England do not agree that Policy PLP6 is unlikely to have a</p>	<p><i>may well be questionable.</i></p> <p><i>Whilst we can accept that the Sustainability Appraisal is a high-level evaluation of the Plan's Policies and proposals, having over 60 sites whose development is considered to have an "uncertain" impact seems to us to accept a very high degree of uncertainty about the likely significant effects which the plan, as a whole, might have upon the historic environment. Whilst it is recognised that Policy PLP35 might well provide appropriate mitigation for some of those sites (as is suggested in the Sustainability Appraisal), in the absence of any assessment of the likely impact of the development of the sites we identified upon the historic environment, there is insufficient evidence to have the confidence that the Plan's Policies, as currently drafted, will actually mitigate any harm to an acceptable level.</i></p> <p><i>Having said this, however, we are fairly confident that the work being undertaken by Farrell &amp; Clarke will render much of this debate largely academic. Certainly, the Heritage Impact Assessments which we discussed seem likely to provide the necessary degree of evaluation to inform both the Plan itself and the Sustainability Appraisal about the likely effects which each of the allocations might have upon Kirklees' heritage assets. Obviously, there may well be a need to publish an addendum to the Publication Draft Sustainability Appraisal tying the output of the Heritage Impact Assessments into the appraisal process. Although not wishing to prejudge the conclusions and recommendations of these Appraisals or any addendum to the Sustainability Appraisal, nevertheless, this work currently being undertaken by the Council seems likely to address all our previously-stated concerns regarding the Sustainability Appraisal."</i></p> <p>An Addendum to the SA Report has now been produced. This includes the findings of the new Heritage Impact Assessments which (prepared by Farrell &amp; Clark), which Historic England advised needed to be undertaken and seeks to remove uncertainty which previously remained in relation to the historic environment and those sites which were proposed for allocation in the Local Plan.</p> <p>With respect to Policy PLP 6 Safeguarded Land, no development is proposed during the plan period for these sites as a result of the</p>

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	<p>negligible or no effect upon SA Objective 13 (historic environment). A large number of the sites identified in the Plan as Safeguarded Land if developed could harm heritage assets in their vicinity. Since there has been no evaluation of the extent of the harm or whether or not it is capable of mitigation, this Policy should be scored as "uncertain".</p>	<p>Publication Draft Local Plan, and therefore significant effects are unlikely to occur.</p>