

# Holme Valley Neighbourhood Development Plan Summary of Regulation 14 Consultation Responses

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## 1.0 Overview

### 1.1 Regulation 14 consultation

The Regulation 14 consultation was undertaken for 9 weeks from 15<sup>th</sup> July to 15<sup>th</sup> September 2019. It was widely publicised locally using posters, local newsletters, and on the Parish Council's website (this is all detailed in our Consultation Statement Appendix). Consultation bodies including Kirklees Council were contacted by email or letter. Respondents were able to complete an on-line questionnaire or complete a hard copy or submit their written comments to a dedicated email address (holmevalleyndp@gmail.com) or post a hard copy to the clerk to the Parish Council (Holmfirth Civic Hall, Huddersfield Road, Holmfirth, HD9 3AS). The questionnaire asked respondents to suggest any improvements to the policies and whether they supported the overall aims of the plan and its future progression to referendum. It also asked for any specific comments on the Statutory Environmental Assessment report which was out for consultation in parallel.

### 1.2 Previous informal Pre-Regulation 14 consultation

A summary of the draft NDP detailing all the proposed policies had already been distributed to all households and businesses in the valley in summer 2018 as an informal Pre-Regulation 14 consultation. It had also been shared informally with Kirklees Local Authority, Peak District National Park and Historic England for their comments.

Details of how various elements raised in this consultation were addressed is detailed on our website and provided as a separate Appendix to the Consultation Statement but a summary of the key changes is given below:

- All the important themes and key elements of the policies were retained but rationalised from 16 to 13 policies to avoid duplication and ensure that they were all mutually compatible.
- Wording of all policies was clarified to reduce ambiguity.
- Up to date references to the Kirklees Local Plan and its wider policies such as on biodiversity were added.
- A separate public realm policy was provided and brought the economic elements of the night time economy, tourism and businesses under one policy.
- Two policies were combined, recognising the relationships between transport, accessibility and local infrastructure.
- Shopfront and advertisements design guidance, which was previously provided as an appendix, was revised as a specific policy to strengthen its content.
- All the suggestions for local green spaces were reviewed and four sites short-listed which did not already benefit from other forms of protection. (Some of the proposals were already protected as a result of being in the Green Belt, identified by Kirklees as an Urban Green Space or covered by a wider Trees and Woodland Strategy or having some other status like Cliff Recreation Ground which is a 'Field in Trust'.)

Additionally, a Strategic Environmental Assessment (SEA) was commissioned to help improve how the plan supports the sustainability of our natural, historic and social environment in the Holme Valley.

## 2.0 Responses received

### 2.1 Number of responses

Responses were received from the following:

- 72 members of the public
- 2 community groups (Holmfirth Transition Town & Scholes Future Group)
- 1 developer (Gladman Developments Limited)
- 5 statutory consultees (Cawthorne Parish Council; Historic England; National Grid; Natural England; Sport England)
- Kirklees Council
- Peak District National Park Authority

Approximately 40 people attended the drop-in sessions held in Holmfirth and Honley to ask the Steering Group for further information about the NDP. Anecdotally, people who had previously responded in the informal consultation in 2018 commented that they did not need to reply again as the NDP still reflected their priorities despite being updated.

### 2.2 Analysis of responses

All the responses were collated into tables for analysis of each question and the detail of the plan as follows:

- Tables 1A & 1B Kirklees Council
- Table 2 Peak District National Park Authority
- Table 3 Consultation Bodies
- Table 4 Community Groups
- Table 5 Developers and Landowners
- Tables for residents' responses to each policy and general questions about the NDP and SEA as follows:

- 1) Policy 1: Protecting and enhancing the landscape character of the Holme Valley  
*Do you have any suggested improvements to this policy?*
- 2) Policy 2: Protecting and enhancing the built character and conservation areas of the Holme Valley and promoting high quality design  
*Do you have any suggested improvements to this policy?*
- 3) Policy 3: Conserving and enhancing local non-designated heritage assets  
*Do you have any suggested improvements to this policy?*
- 4) Policy 4: Promoting high quality shop fronts, and advertisements  
*Do you have any suggested improvements to this policy?*
- 5) Policy 5: Promoting high quality public realm  
*Do you have any suggested improvements to this policy?*
- 6) Policy 6: Building homes for the future  
*Do you have any suggested improvements to this policy?*
- 7) Policy 7: Supporting business generation  
*Do you have any suggested improvements to this policy?*
- 8) Policy 8: Facilitating development in Holmfirth, Honley and other local centres  
*Do you have any suggested improvements to this policy?*
- 9) Policy 9: Protecting and enhancing local community facilities  
*Do you have any suggested improvements to this policy?*
- 10) Policy 10: Protecting local green space

We have identified four sites: Scholes Well Garden (Marsh Road), Scholes Sandygate Fields (between Sandy Gate & Scholes Moor Road), Wooldale Chapel Field (between Bill Lane & Robert Lane) and Hade Edge Gateway Triangle (between Penistone Road & Dunford Road).

*Do you have any additional information to strengthen the cases for these sites to receive protection from development? Please indicate which site you are referring to.*

11) Policy 11: Improving transport, accessibility and local infrastructure

*Do you have any suggested improvements to this policy?*

12) Policy 12: Promoting sustainability

*Do you have any suggested improvements to this policy?*

13) Overall, do you support the aims of the plan and its future progression to referendum?

14) Do you have any other comments on the draft Neighbourhood Development Plan?

15) Strategic Environmental Assessment (SEA)

*Do you have any comments on this report?*

## 3.0 Main themes of responses

### 3.1 Kirklees Council

Kirklees Council considered the plan in detail, with officers providing comprehensive comments and clarifications. Their main concerns were regarding consistency of wording throughout the document, their effective interpretation of policies when considering planning applications and the provision of robust evidence and justification of all the policies. They also highlighted the relationship with the Local Plan and sought to reduce any duplication and contradictions whilst providing the locally specific detail that the NDP wished to reflect. Kirklees raised concerns over the justification for inclusion of the Local Green Spaces, Scholes Sandygate Fields and Hade Edge Gateway Triangle.

Members of the Steering Group met with officers from Kirklees Council on 20<sup>th</sup> December 2019 and 29<sup>th</sup> January 2020 to discuss their comments and proposed revisions to policies to address their concerns. An updated full draft of the plan was then shared with Kirklees Council in March 2020 for checking prior to Submission.

### 3.2 Peak District National Park Authority

The main feedback from the PDNPA was that the NDP was not sufficiently clear that part of the Holme Valley was within the Peak District and therefore there were some conformity issues in areas where the PDNPA planning policies applied. As a result, the relevant HVNDP policies were amended, to refer to the Kirklees Council area and PDNPA area. An updated full draft of the plan was then shared with the PDNPA in March 2020.

### 3.3 Consultation Bodies

Historic England was supportive of the plan and reflected on the inclusion of their previous feedback. Cawthorne Parish Council had no substantive comments but gave a positive endorsement of the NDP's presentation and content. National Grid advised that there was none of their apparatus within our area so had no substantive comments. Natural England confirmed that they had no specific comments on the plan whilst Sport England confirmed that it was important that the NDP referred to the role of open spaces and healthy lifestyles through walking and cycling. As these bodies all endorsed the plan and their considerations had already been included, no further changes were made.

### 3.4 Community Groups

Holmfirth Transition Town (HoTT) provided detailed comments on strengthening the sections on renewable energy, energy efficiency and the importance of community facilities. It also recommended including reference to community led housing and the Community Right to Build Order. Policy 6 was updated accordingly regarding housing. HoTT highlighted the need to include reference to the Climate Emergency Action Plan which has now been adopted by the Parish Council and this has now been reflected throughout the NDP.

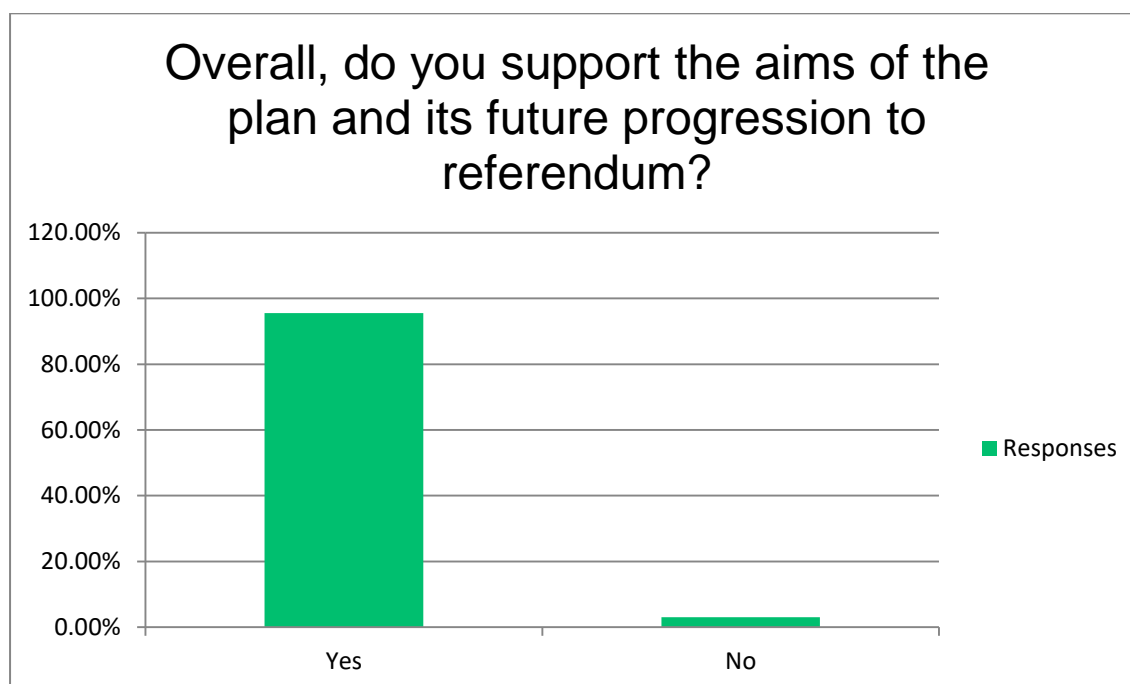
Scholes Future Group provided additional justification for the inclusion of the local green space at Scholes Sandygate Fields. This has been reflected in the updated NDP.

### 3.5 Developers & Landowners

One developer submitted comments: Gladman Development Limited. This set out concerns about consistency with national planning policy and whether the NDP was too prescriptive. It also objected to the inclusion of Local Green Space, Scholes Sandygate Fields, as it did not believe it had sufficient justification.

### 3.6 Residents

Overall, residents were supportive of the aims of the NDP with 95% respondents supporting its future progression to referendum.



The issues raised in the residents' feedback were generally supportive comments reiterating the importance of elements within the proposed policies. Quotes from respondents were included in the updated Plan to provide further justification of policies and clarity of local views.

Several clear issues were reflected in the comments which were:

- **Housing**

- ongoing concern about additional housing and associated infrastructure and what could be done to resist it
- the need for small, affordable housing and use of brownfield sites
- **Economic viability**
  - need for ongoing support for town / village centres in terms of independent shops and facilities such as libraries
  - resistance to more charity shops
- **Highways, transport & accessibility**
  - lack of sufficient consideration of improved accessibility to shops and services
  - highways concerns and the need for a higher priority for pedestrians & cyclists
  - reference to the Holmfirth Town Centre Access plan and concerns about its impact on the town
  - support for limiting HGV access and implementing 20mph zones.
- **Sustainability & climate emergency**
  - not enough focus on sustainability throughout the plan
  - lack of consideration of the climate emergency
  - importance of the environment and tree planting
- **Impact of the plan**
  - Whilst the plan was viewed as comprehensive, there was some scepticism over how much difference it would make
  - Concerns about the practical implementation by planning officers at Kirklees.
- **Local green spaces**
  - additional information refining the Hade Edge Gateway Triangle & Scholes Sandygate Fields boundaries

There were limited comments on the Strategic Environmental Assessment which reiterated concerns about housing and suggested that the NDP should be aiming for more positive environmental effects from the NDP.

## 4.0 Main updates made to the NDP as a result of the Regulation 14 consultation

### 4.1 Policies

All NDP policies were reviewed and refined to make wording clearer and easier to interpret. The sustainability policy was amended to form two policies with a separate policy focused on protecting wildlife and securing biodiversity net gain.

The policies in the Submission Plan are now therefore:

1. Protecting and enhancing the landscape character of the Holme Valley
2. Protecting and enhancing the built character and conservation areas of the Holme Valley and promoting high quality design
3. Conserving and enhancing local non-designated heritage assets
4. Design Codes for high quality shop fronts, and advertisements
5. Promoting high quality public realm and improvements to gateways and highways
6. Building homes for the future
7. Supporting economic activity
8. Facilitating development in Holmfirth, Honley and other local centres

9. Protecting and enhancing local community facilities
10. Protecting local green space
11. Improving transport, accessibility and local infrastructure
12. Promoting sustainability
13. Protecting Wildlife and Securing Biodiversity Net Gain
14. Focusing developer contributions on local priorities.

## **4.2 Justification & evidence**

The references to the technical evidence base and community consultations were revised, to include quotes from the public consultations and further detail about relevant Kirklees Local Plan and PDNPA policies. Some of the detail of the Landscape Character Assessment information in the AECOM report was moved to an Appendix and improved maps and references were provided throughout. Further clarification was provided about the Peak District National Park Authority part of the NDP area.

## **4.3 Detail within the NDP**

The wording was revised and explanations clarified, with more graphics or photographic images added to aid understanding. The Climate Change emergency was reflected throughout the document and up to date detail was provided on the Holmfirth Town Centre Access plan and current community activities. The Local Green Space maps for the Hade Edge Gateway Triangle & Scholes Sandygate Fields sites were amended to cover slightly smaller areas and the justifications for each site were reworded to align more clearly with the National Planning Policy Framework requirements.