

Consultation Statement

Appendix 11

Holme Valley Draft Neighbourhood Development Plan – Regulation 14 Consultation

15th July to 15th September 2019

Response Tables Combined

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Table 1A General Comments from Kirklees Council

Page No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NP
All	Comment	The council recognises the work involved to date in producing the HVNDP and the work that has been undertaken to address the council's previous comments on the First Draft Plan 2016-2031.	Noted.	No change.
All	Comment	We also note your excellent website which is clear, straight forward to use and provides easy access to all relevant documents.	Noted.	No change.
All	Comment	The council still has concerns however, particularly relating to general non-conformity with both the National Planning Policy Framework and the Kirklees Local Plan and the lack of supporting evidence and policy justification. The imprecise nature of some policies means it is difficult to understand how they are intended to be interpreted and implemented.	Accepted - see detailed changes below.	No further change to detailed amendments set out below.
All	Comment	It must also be noted that the comments provided by Kirklees Council are in relation to the use of the HVNDP in determining planning applications where Kirklees Council is the relevant	Accepted. Detailed comments have also been submitted by the Peak District National Park	No further change to detailed amendments set out below.

Page No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NP
		planning authority. The HVNDP makes no distinction between areas within and outside the Peak District National Park where the Peak District National Park Authority is the relevant planning authority. Both authorities will need to be involved in the process of submitting the HVNDP for examination.	Authority and these will also be addressed in amendments to the NDP.	
All	Comment	These comments should also be read alongside the Council's comments on the Holme Valley Neighbourhood Development Plan 'Comments on First Draft for Public Consultation 2018' provided to the Holme Valley Parish Council on 17 th August 2018 and alongside the minutes of the meeting held on 19 th December 2018 between the Council and members of the Holme Valley Neighbourhood Plan Steering Group.	Noted.	No change.
115 124	Comment	Non-planning matters - Non-planning matters are still contained in some policy areas, including (but not limited to) the use of single-use plastics (HVNDP Draft Policy 12), the introduction of 20mph speed limits and the introduction of weight limits (HVNDP Draft Policy 11). An example of a Neighbourhood Plan which has an emphasis on HGV weight limits but	Accepted - see responses to detailed points below.	No further change to detailed amendments set out below.

Page No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NP
		<p>recognises that it is not a planning matter is Little Mitton Neighbourhood Plan</p> <p>http://www.southoxon.gov.uk/sites/default/files/Little%20Milton%20Neighbourhood%20Plan%20Referendum%20Version.pdf</p>		
102 124	Comment	<p>Consistency with national policy -</p> <p>Inconsistencies are still contained in some policy areas, including (but not limited to) the designation of Local Green Space (HVNDP Draft Policy 10) and support for wind turbines (HVNDP Draft Policy 12).</p>	Noted.	No further change to detailed amendments set out below.
82 91	Comment	<p>General conformity with the Local Plan</p> <p>- While many of the policies appear to be in general conformity with the Local Plan, the wording of some is so imprecise that judgement of the degree of conformity is difficult. Actual non-conformity with the Local Plan is evident, including (but not limited to) Draft Policy 6 which appears to contradict LP6 Safeguarded Land and LP61 Urban Green Space, and Draft Policy 8 which appears to contradict LP13 Town Centres Uses. There is a lack of general understanding of green belt</p>	Noted.	No further change to detailed amendments set out below.

Page No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NP
		policy. There is frequent reference to 'rural areas' which has not been defined in the context of the HVNDP. The Council recommends that regard be had to Local Plan paragraph 19.31 to avoid any confusion in terms of infilling in villages.		
40 61 91 82 124	Comment	Evidence justification – Policy areas that lack sufficient evidence include (but is not limited to) Draft Policies 1 and 2 and Draft Policy 8. There is a lack of evidence underpinning Draft Policy 6 relating to housing need and Draft Policy 12 relating to support for wind turbines. The council is also concerned that some of the supporting evidence justifies Parish Council actions rather than the policies. An example of a Neighbourhood Plan which distinguishes between planning policies and community actions is Morpeth Neighbourhood Plan https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Morpeth-Neighbourhood-Plan-Made-May-2016.pdf Neighbourhood Plans do not have to separate community/town/parish council actions	Noted.	No further change to detailed amendments set out below.

Page No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NP
		into a separate section as they can be referenced through the plan but a review of Examiner Reports demonstrates that they should be clearly distinguished e.g. Ripon Neighbourhood Plan Examiners Report.		
All	Comment	<p>Using the Holme Valley Neighbourhood Plan - The Holme Valley Neighbourhood Development Plan cannot be interpreted with certainty and is therefore considered to be contrary to NPPF paragraph 16 criterion d) and NPPG paragraph 041. The Plan lacks clarity of meaning and is in places inconsistent, repetitive, contradictory, unreasonable, overly prescriptive and unenforceable. The HVNDP appears to have been written in large parts as a Local Plan, rather than a plan helpful to the objective of retaining an area's identity. This has resulted in a significant degree of overlap with the Kirklees Local Plan and risks confusion for both applicants and officers. The format of the policies varies with the use of numbers, headings and sub headings which makes referencing parts of policies difficult. Issues are dispersed among different policies and reasoned</p>	Noted.	No further change to detailed amendments set out below.

Page No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NP
		justification is mixed in with policy wording.		
All	Comment	The HVNDP needs to be updated to reflect the new Local Plan policy numbers and to remove reference to the 'emerging' plan and policies;	Noted.	Find all references to Local Plan and update to refer to policies in adopted version.
General	Comment	The Holme Valley Parish Council is not the local planning authority and does not have the powers to control, enforce or implement highway infrastructure or other infrastructure projects;	Noted.	Find references to highway and infrastructure projects and improve clarity in relation to of PC and Highways Authority. Insert at 4.10.2 'Holme Valley Parish Council is not the local planning authority and does not have the powers to control, enforce or implement highway infrastructure or other infrastructure projects.'
General	Comment	The new boxes containing reference to Local Plan policies are a useful addition. These boxes could be used to direct applicants/developers to the relevant Local Plan policy but need to be comprehensive.	Noted.	Check all Local Plan policy boxes and ensure that they are comprehensive.
General	Comment	Development briefs: Given the emphasis in the HVNDP on character the plan could take the opportunity to provide design guidance to inform the development of the remaining allocated development sites.	Noted. The Parish Council does not intend to prepare design guidance to inform the development of the remaining site allocations. This is	No change.

Page No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NP
			considered to be a matter for Kirklees Council. The policies in the NDP provide design policies for development proposals across the NDP area.	
General	Comment - additional policy proposed.	Specific Biodiversity Policy: The HVNDP could consider a specific biodiversity policy requiring a measurable biodiversity net gain as a result of development in line with the National Planning Policy Framework and National Planning Practise Guidance and the government's ambitions as set out in https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirement .	Noted. It is important not to duplicate national Kirklees planning policies. It is accepted that the neighbourhood area has significant wildlife and habitat assets however so it may be necessary to review the biodiversity related criteria in Policy 12.	Review Policy 12 biodiversity criteria and consider rewording or provide a new policy - see below.
General	Comment	Landscape Character Areas would be better in an Appendix with the Parish Council picking out the distinctive characteristics that apply to the consideration of applications in each area.	Accepted.	Move Landscape Character Areas information to an appendix - see 6. Below.

Table 1B Detailed General Comments from Kirklees Council

Text in blue in the following table is considered by Kirklees Council to be reasoned justification that should be removed from the policy.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	2.0 Planning Context for Holme Valley NDP				
1.	Page Number	Paragraph/ Policy Number	Comments, including whether the policy and supporting text conform to National Planning Policy Framework and National Planning Practice Guidance, the Kirklees Local Plan and EU obligations (if relevant), whether there is sufficient supporting evidence, inconsistencies between policies and whether the policy can be implemented.		
2.	Page 19	2.7/2.8 and others	It may not be advisable to embed web links into the document as they may not be available for the life of the plan.	Accepted. The Examiner may require links to all referenced documents but these could be provided by Kirklees Council prior to od during the examination. The HVNDP webpages will be updated to include all referenced documents at submission.	Remove all Kirklees Council weblinks in NDP.
3.	Page 23	Objective B	Clarification is needed that the views to be protected are public views rather than private views.	Accepted.	<u>Amend NDP</u> Insert "public" before "views" in Objective B.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
4.	Page 23	Objective C	It may add clarity if the objectives of housing provision and general building design are in separate objectives.	<p>Not accepted.</p> <p>The Steering Group and Parish Council consider that it is preferable to retain this as a single objective.</p>	No change.
	4.1 Protecting Local Character				
5.	Page 29	Para 4.1.15	The maps associated with Appendix 7 are not OS based so cannot be used with certainty to locate a proposal within any particular area.	<p>The map was reproduced from the AECOM Holme Valley Heritage and Character Assessment report.</p> <p>The Steering Group has revised and improved Map 2 to improve clarity.</p>	Insert new map with improved clarity.
	4.2 Landscape Character Areas				
6.		Draft Policies 1 and 2: General comment	<p>The Council consider that Draft Policy 1 and Draft Policy 2 contravene NPPG paragraph 041 and NPPF paragraph 16 criterion d). Additionally, NPPF Chapter 12 paragraph 125 states that plans should “<i>set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable</i>” and that “<i>neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development</i>”. Draft policies 1 and 2 are imprecise, unclear and difficult to apply. The length and complexity of both these policies make them</p>	<p>Noted.</p> <p>(NPPG paragraph 041 states: How should the policies in a neighbourhood plan be drafted?</p> <p><i>A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can</i></p>	No further change to detailed changes discussed with Kirklees' Council prior to Submission.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
		<p>more akin to design codes.</p> <p>The Heritage and Character Assessment (HCA) contained in Appendix 7 is a description of the landscape of the valley and the dispersal of settlement and how they relate to local topography. This information has been summarised in the HVNDP at pages 31 to 38 as key characteristics of each landscape character area, but Draft Policy 1 points directly to the HCA itself. This means that applicants must refer to the stand alone document in order to assess how their application complies with the information contained within it. This brings into question the usefulness of the summaries contained in the HVNDP, unless those summaries could be used more effectively to help both applicants and officers by picking out those elements the Parish Council would like to promote in each particular area. As it stands it is confusing. For example, the HCA contains reference to key views to Castle Hill, Emley Moor mast, Holme Moss transmitting station and others, while the summaries refer only to views to Castle Hill.</p>	<p><i>apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.</i></p> <p>Paragraph: 041 Reference ID: 41-041-20140306 Revision date: 06 03 2014)</p>		
7.	Policy 2	<p>The purpose of Draft Policy 2 would appear to be to control the more detailed character of built form within the HVNDP area, yet directs applicants only to look at the Landscape Character Areas without specifying whether this is the summaries or the stand alone HCA. However, neither the summaries nor the HCA are sufficiently detailed to allow an assessment for the purposes of criteria a, b and c of Draft Policy 2 point 1. In addition, criteria c refers to 'historic landscape character', which refers to a policy area that</p>	<p>Noted - see detailed response below.</p>	No further change.	

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			would sit more comfortably in Draft Policy 1, but also refers to 'historic' landscape character, as separate from 'landscape character', and for which no background information or guidance has been provided.		
8.		Policies 1 and 2	Both Draft Policy 1 and Draft Policy 2 contain a mix of elements relating to landscape character and to the built form, which would be better separated into distinct policies.	Noted - see detailed response below.	No change.
9.		Policies 1 and 2	Policies 1 and 2 could clarify that views from <i>public</i> vantage points should be protected, whereas private views, over land not in the ownership of the viewer, cannot be protected by the planning system.	Noted - see detailed response below.	No change.
10.	Page 30	Map 2	The map cannot be used with any certainty to determine which LCA a site falls within. The more detailed maps contained in Appendix 7 are not OS based and are also not suitable for the purpose stated.	Noted. See 5. Above.	No further change.
11.	Page 31	Landscape Character Areas	<p>The descriptions used in section 4.2 are inconsistent and as they are silent on some issues it is not clear how an applicant would comply with this policy. For example: the same headings are not used within each LCA. LCA1 refers to 'land use and cover' and 'settlement pattern and built form' only, but LCA2 also includes 'views'. LCA3 refers to the same 2, but includes 'greenspace and public realm' and omits 'views'. Appendix 7 includes more headings, including 'movement and connectivity' and 'heritage assets', while the policy is silent on these even though the policy refers the applicant to the full document at Appendix 7.</p> <p>The LCA descriptions in section 4.2 are silent on the key characteristics of transport corridors, but having regard to</p>	Noted. See 13. below.	No further change.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			them is a requirement of Draft Policy 11 criteria 3.		
12.	Page 37-38		Hepworth is included in LCA7 and LCA8.	Noted. Hepworth is on the boundary of 2 LCAs.	No change.
	Draft Policy 1: Protecting and Enhancing the Landscape Character of Holme Valley				
13.		Draft Policy 1: General Comments	<p>This policy is in general conformity with national policy. However, its use as a Development Management policy is considered to contravene NPPG (paragraph 041) and NPPF paragraph 16 criterion d). Points are imprecise, unclear and difficult to apply.</p> <p>It would be helpful if this policy could be worded to refer to the positive and characteristic attributes of a place. Suggested change: "New development in Holme Valley should protect and enhance the local landscape character of each Landscape Character Area as identified and described in the Heritage and Character Assessment (2016). Where possible proposals should retain and positively respond to those elements of the relevant Landscape Character Area which contribute to the distinct identity of the area as described in the Holme Valley Heritage and Character Assessment report."</p>	Accepted. The Policy wording has been discussed with officers at Kirklees Council and amended.	Amend Policy 1. Change first paragraph to: 'Where possible proposals should retain and positively respond to those elements of the relevant Landscape Character Area which contribute to the distinct identity of the area as described in the Holme Valley Heritage and Character Assessment report.'
14.	Page 40	Draft Policy 1 1st & 2nd Paragraphs	The policy states that all applications should have regard to the LCAs but then goes on to give 12 additional criteria that all applications must also have regard to. It is unclear if the	Accepted. Refer to p22 of the HCA	See above.

	KIRKLEES COMMENTS		PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>12 individually numbered points are intended to add clarity to the paragraphs or if they are in addition to the considerations required by the first and second paragraphs.</p> <p>Draft Policy 1 could clarify that there are features highlighted within the summaries of the LCAs that applicants wouldn't be expected to replicate. Would new post and wire fencing or geometric blocks of coniferous plantation be acceptable in LCA2 for example?</p>		<p>report. This sets out the characteristics which have been considered in the identification of the various LCAs and the second paragraph of Policy 1 could be deleted and replaced with more precise wording reflecting the characteristics identified and described in the HCA.</p>	
15.	Draft Policy 1	<p>It is unclear whether applicants must have regard to the summary provided at pages 31-38 or to the Heritage and Character Assessment provided at Appendix 7. There is imprecision in terms of how development proposals will be required to 'demonstrate' consideration of the matters referred to.</p>	<p>Accepted.</p> <p>See 14 above for changes to the Policy wording. This now refers to the full descriptions under key headings of each of the LCAs.</p> <p>The supporting text of the NDP should be amended as suggested. Delete para 4.1.15 and provide new wording referring to the key characteristics in the relevant appendix.</p> <p>Delete paras 4.2.1 - 4.2.8 and insert new appendix with</p>	<p><u>Amend NDP.</u></p> <p>Delete: 4.1.15 Each of these areas is described in Section 4.2, where their particular landscape and built heritage characteristics are described separately.</p> <p>Insert new text: "The Key Characteristics of each of these Landscape Character Areas are provided in Appendix 7"</p> <p>Delete 4.2: "The following extracts are taken directly from the Holme Valley Heritage and</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
				only Key Characteristics of each Character Area.	<p>Character Assessment produced by AECOM."</p> <p>Delete the extracts from the Heritage and Character Assessment (paras 4.2.1 to 4.2.8).</p> <p>In the Appendix copy from the Heritage and Character Assessment the Key Characteristics (bullet points) only from each of the 8 Character Areas.</p>
16.		Draft Policy 1	Correction required in paragraph 2: 'Local <u>Landscape</u> Character Area.	Accepted.	<p><u>Amend NDP</u></p> <p>Insert 'landscape'</p>
17.		Draft Policy 1	Some of the numbered points are not concerned with design and siting issues, especially points 1 and 2.	Accepted. See below. Points 1 and 2 should be deleted.	No further change.
18.	Page 40	Draft Policy 1	Point 1: Should be removed. This is an objective not a policy. Relates to the principle of development while the policy is concerned with addressing design issues. In addition it is not in conformity with the NPPF or the adopted Kirklees Local Plan as it suggests through footnote 10 that development in the green belt is a priority. It could also have the unintended consequence of prioritising development in overwashed settlements in the green belt.	Accepted.	<p><u>Amend NDP</u></p> <p>Delete point 1.</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
19.		Draft Policy 1	Point 2: Unnecessary as repeats national and local policy. If retained the list of Local Plan policies should be removed.		
20.		Draft Policy 1	<p>Point 3: This point is unnecessary given that matters relating to views should already have been taken into account under paragraphs one and two of Draft Policy 1.</p> <p>It is unclear how point 3 should be used in determining a planning application. Is the view that has to be respected from the site outwards or from any part of the built-up area outwards? At what point does a view become significant? How should an applicant determine whether an area is moorland or moorland fringe? Is it only areas of moorland or moorland fringe that have to be protected (consistency issue with paragraphs 1 and 2).</p> <p>At present it reads that any proposal that enhances or promotes views will be supported so requires the addition of the words; 'subject to other policies'. This point also refers to the need to take into account Conservation Area Appraisals. However, this is more appropriate to be considered under Draft Policy 2. If retained the Council suggests that all the text after 'Conservation Area Appraisals' should be deleted.</p>		

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
21.		Draft Policy 1	<p>Point 4: It is unclear if this policy is intended to apply only to agricultural buildings in the green belt as LP54 only applies in the green belt.</p> <p>Duplicates point 2 in respect of LP54. Unclear in relation to what would be 'appropriate' screening and landscaping as this is not explained in the justification. Unnecessary detail in relation to colours and 'tones'. Unclear as to what is meant by 'roof spans having a variation in heights'.</p>	Accepted. Amend Criterion 4 as suggested.	impacts on the wider landscape setting of the development. <u>Amend NDP.</u> Provide further explanatory text to explain screening and colours in supporting text. Replace final sentence in 4.2.11 with: 'There are already agricultural permitted development rights for functional buildings such as barns, but where planning permission is required, proposals need to be sensitive in terms of the siting, design and external appearance to minimise adverse visual impacts. Suitable screening should be provided by using locally appropriate native species of trees and shrubs in planting and landscaping schemes and development should make use of local topography to minimise the prominence of large new buildings in the landscape. Use of natural materials such as'

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					wood, and neutral colours such as earth browns and soft greens can reduce visual impacts and are encouraged.'
22.		Draft Policy 1	Point 5: Unclear whether the protection of dry stone walls is intended to apply everywhere even if the Heritage and Character Assessment is silent.	Accepted. Revise criterion 5 to improve clarity.	<p><u>Amend NDP.</u></p> <p>This now reads:</p> <p>'3. Boundary treatments should be sensitive to the relevant Landscape Character Area. Schemes should protect existing dry-stone walls wherever practicable and incorporate new dry-stone walls using natural stone in areas where these are a characteristic feature of the Landscape Character Area. Cast iron railings should be used in areas where these are a characteristic feature. Hedges should be retained and repaired.'</p>
23.		Draft Policy 1	Point 6: It is suggested this point is not necessary as it exactly repeats part of Local Plan policy LP33 Trees (paragraph 2). Also repeated at HVNDP Draft Policy 12 'Green Infrastructure and Biodiversity' section (point 2).	Accepted. Amend 6.	<p><u>Amend NDP.</u></p> <p>This now reads:</p> <p>'5. A full hard and soft landscaping scheme is to be submitted with all planning applications where</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>appropriate. Landscaping schemes and planted boundary treatments should enhance Green Infrastructure in accordance with Kirklees Local Plan Policy LP31 Strategic Green Infrastructure Network. They should also use native plant species, or other species where appropriate, in tree planting and hedgerows to support and enhance biodiversity in line with the council's Biodiversity Action Plan and the relevant Biodiversity Opportunity Zones. Regard should be had to the location, setting, species height, planting density and need for on-going maintenance and management, particularly in relation to future resilience linked to climate change.'</p>
24.		<p>Point 7: Should this read 'New residential development should include pedestrian linkages to existing tracks and routes'. Not necessary to specify packhorse routes and long distance footpaths. Unclear as to whether this will apply to all residential development whatever the size. May not be relevant to all schemes.</p>	<p>Accepted. Amend criterion 7 as suggested. This should refer to "major" development which is defined in the NPPF. This</p>	<p><u>Amend NDP.</u> This now reads: '4. New major development should include pedestrian linkages to existing tracks and routes'</p>	

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
				should be amended to refer to all major development - not just residential.	
25.			<p>Point 8: This point is unnecessary as it repeats the general intentions of Local Plan policies LP30 Biodiversity and Geodiversity, LP33 Trees and LP23 Core Walking and Cycling Network. It does not add any specific local detail. It is unclear what is meant by 'green corridors' in the context of the Holme Valley and these are not identified in the HVNDP. Green Corridors were identified in the Kirklees UDP but these have since been replaced in the Local Plan by the Core Walking and Cycling Network and the Wildlife Habitat Network. The strategies referenced in this point have now been superseded by the Local Plan with the exception of the Biodiversity Strategy which is not directly relevant to planning but sets out the council's approach to biodiversity in delivering its services.</p> <p>Suggested change: Delete point 8.</p>	Accepted. Delete criterion 8.	<u>Amend NDP.</u> Deleted. Now addressed in 5.
26.		Draft Policy 1	<p>Point 9: It is unclear what is meant by 'traditional and appropriate' species within landscaping schemes. This term could be interpreted in a number of different ways.</p> <p>Suggested change: "Landscaping schemes and planted boundary treatments should use <u>traditional and appropriate native plant species or other species where appropriate</u> to</p>	Accepted. Amend criterion 9 as suggested.	<u>Amend NDP.</u> See new wording for 5 above.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			support and enhance biodiversity as outlined in Kirklees <u>Biodiversity Policy, in line with the council's Biodiversity Action Plan and the relevant Biodiversity Opportunity Zones.</u> The species should take account of <u>Regard should be had to</u> the location, <u>setting, species height, planting</u> density and need for on-going <u>maintenance and</u> management.		
27.		Draft Policy 1	Point 10: Multiple criteria deal with boundary treatments which is confusing. This point may not be enforceable.	<p>Noted.</p> <p>Delete criterion 10. This is covered in the revised criterion 9 as above.</p> <p>(Criterion 5 refers to dry stone walls.)</p>	<u>Amend NDP.</u> See new 3. Above.
28.		Draft Policy 1	Point 11: The first sentence of point 11 is covered by Local Plan policy LP31 Strategic Green Infrastructure. It is unclear what is meant by the second sentence of point 11 and it is not supported by justification text. Suggested change: Delete point 11.	Accepted. Delete criterion 11.	<u>Amend NDP.</u> See new 5. above.
29.		Draft Policy 1	Point 12: It is unclear what is meant by 'rural areas' as the wording clearly makes these distinct from 'in the green belt'. Duplicates considerations set out in the first and second paragraphs of the policy.	Partially accepted. 12 has been deleted following objections from the PDNPA.	No further change.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
30.	Page 43	4.3.2	Consider changing to include that conservation areas are designated under the Planning (Listed Buildings and Conservation Areas Act) 1990 by the local planning authority to give more weight to the paragraph.	Accepted. Amend text as suggested.	<u>Amend NDP.</u> Insert to beginning of 4.3.2: "Conservation areas are designated under the Planning (Listed Buildings and Conservation Areas Act) 1990 by the local planning authority."
31.	Page 46	4.3.15	Mention is made throughout of a management plan following on from the appraisal. None of these are adopted and whilst some points are well supported by the council, the suggestions are somewhat premature and may well be omitted from any council document.	Noted. Insert additional explanatory text after first sentence of 4.3.15.	Amend NDP. Insert additional text after 4.3.15: " However it should be noted that the Conservation Area Appraisal and proposed Management Plan are not, as yet, adopted by Kirklees Council, and proposed actions and other content may be subject to change."
32.	Pages 48 and 49	Maps 5 and 7	Maps 5 and 7 could cause confusion because part of different conservation areas are visible in the map window.	Refer to Kirklees. These maps are reproduced from information on Kirklees Council's website. Request new replacement maps for the NDP.	<u>Amend NDP.</u> Request replacement Maps 5 and 7 from Kirklees Council. (Note a number of other new maps for conservation areas were also provided by Kirklees Council and inserted into the NDP)

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	Draft Policy 2: Protecting and Enhancing the Built Character and Conservation Areas of the Holme Valley and Promoting High Quality Design				
33.	Page 60	Draft policy 2 General Comments	<p>This policy is in general conformity with national policy. However, its use as a Development Management policy is considered to contravene NPPG paragraph 041, NPPF paragraph 16 criterion d) Points are imprecise, unclear and difficult to apply.</p> <p>There is particular concern regarding:</p> <ul style="list-style-type: none"> • The relationship between Draft Policy 1 part 1 and criteria 3 and Draft Policy 2 criteria 1; • Distinction between areas within and outside the conservation areas. The Council considers that the Holmfirth Conservation Area Appraisal, used to inform Draft Policy 2, is not adoptable in its current form and requires a significant amount of further work to make it so. Note: The second paragraph of Draft Policy 8 seems to imply that draft policy 2 relates only to conservation areas. • Criteria 2 ‘sense of place’ unfathomable; • There are elements that are contradictory and repetitious and there is a mix of policy and reasoned 	<p>Noted. See detailed responses below. The Policy has been revised following further discussions with Kirklees Council.</p>	No further changes - see detailed changes below.

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			<p>justification.</p> <p>If the Holme Valley has an above average older population and above average levels of mobility impairment and dementia in both residents and visitors, Draft Policy 2 could refer to 'inclusive design', so that there are no barriers that would prevent or restrict the use of development both for occupiers and visitors.</p>		
34.	Page 60	Point 1 Local Character	<p>As currently worded this paragraph could be misinterpreted as meaning that the LCAs have context (perhaps the land surrounding each LCA) and that it is this context that must be responded to. Suggested change:</p> <p>"Proposals for new development and alterations to existing buildings should <u>respect respond to the context</u> of the Landscape Character Area in which they are located and seek to protect and enhance."</p> <p>This paragraph reflects the intentions of Local Plan policy LP35 but the Local Plan policy contains much more detailed information regarding development affecting designated or non-designated heritage assets. The HVNDP is advised to rely on LP35 or risk undermining the level of protection afforded by the Local Plan policy.</p>	<p>Accepted.</p> <p>Amend first sentence of Local Character as suggested.</p>	<p><u>Amend NDP.</u></p> <p>Policy 2 part 1. now reads:</p> <p>1) Local Character Proposals for new development and alterations to existing buildings should respect the Landscape Character Area in which they are located and seek to protect and enhance:</p> <ul style="list-style-type: none"> • Local built character and distinctiveness and in particular the character of conservation areas; and • Historic landscape character. <p>Suitable measures should be put in place to avoid any adverse impacts on heritage assets, and where infeasible, to minimise or</p>

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25.	Page 60	Point 2 Sense of Place	<p>It is unclear how or why an applicant would be expected to comply with the first sentence in providing visual references to past industrial and agricultural heritage.</p> <p>Use of local millstone grit and stone flags is more relevant to point 7 'Built Form and Materials'.</p>	Accepted. Amend Policy as suggested.	<u>mitigate damage.'</u> <u>Amend NDP</u> 2. Now reads: 2) Sense of Place New developments should strengthen the local sense of place through use of local materials and detailing. Where historic features such as mill chimneys function as key focal points, they should be retained and restored as an integral part of new development schemes.
26.	Page 60	Point 3 Visual Impact and Key Views	<p>How does this criteria relate to the first part of Draft Policy 1 and point 3 of Draft Policy 1? All matters concerning views should be contained in one policy.</p> <p>'Gateways' are referenced as a separate heading under Draft Policy 5.</p> <p>It is unclear how an applicant would be expected to comply with the first and last sentences.</p>	Accepted. Amend Policy as suggested.	<u>Amend NDP</u> Views are now addressed in Policy 1 and Gateways are covered in Policy 5.
27.	Page 60	Point 4 Utilising Existing Assets	First sentence: Unreasonable and unnecessary to expect all existing structures to be incorporated into a new scheme. It is unclear what is meant by 'other features'.	Accepted. Amend Policy 2 as suggested.	<u>Amend NDP.</u> This now reads:

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	<p>Second sentence: This is not policy. What is meant by 'remaining features'? It would appear that the remaining features are those likely to produce areas of 'extensive shade or shelter'.</p> <p>Last sentence: Delete as this consideration is covered in Draft Policy 12 Promoting Sustainability.</p> <p>If retained suggest change to "Development of individual <u>buildings</u> and groups of buildings."</p>				<p>'3) Utilising Existing Assets Wherever possible, significant trees, internal boundaries and water courses on the site should be retained and incorporated in the new design. Proposals should consider the aspect of the site and the ways in which the site contours and vegetation can be used to provide areas of extensive shade or shelter. Advantage should be taken of sunny slopes in orientation of gardens and / or main elevations. Development of individual buildings and groups of buildings should utilise site characteristics to improve energy efficiency and maximise use of renewable technologies.'</p>
28.	Page 61	<p>Point 5 Innovation and Responding to Local Context</p> <p>In general conformity with NPPF. However, the policy is imprecise and unclear on the objective and cannot be used in determining a planning application. There is no supporting evidence to justify and implement this part of the policy. What is meant by modern materials and design? Suggest change to 'contemporary' design and materials. In any case, the use of contemporary design and materials may be preferred. Text explaining what is meant by 'grain of</p>	<p>Accepted.</p> <p>Amend Policy and provide supporting text as suggested. Refer to new Promoting Sustainability Policy (12) for updates and changes.</p>	<p><u>Amend NDP.</u></p> <p>This now reads:</p> <p>4) Innovation and Responding to Local Context</p> <p>The use of traditional materials</p>	

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	<p>development' would also be helpful.</p> <p>Suggested change: "The use of traditional materials and design will be <u>supported</u> promoted. However, where appropriate <u>contemporary modern materials and design and materials</u> will be supported where the special character of the area is enhanced.</p> <p>Up-to-date or contemporary details, for example in window and door designs, or the use of robust, modern materials are supported in new buildings where they do not conflict with sensitive historic settings. Site layout should respect the existing grain of development of the surrounding area.</p> <p>Move the following to the justification text: "High quality design should not only be visually attractive but should incorporate flexibility to allow future adaptation to meet the changing needs of occupiers over time, including meeting the needs of older residents and / or those with changing care needs.</p> <p>Commercial, industrial, community, sports and leisure proposals as well as residential development present an opportunity for innovative design, using modern materials and building techniques that will achieve flexibly planned, sustainable and energy efficient buildings."</p> <p>It is recommended that the following is moved to draft policy 12 Promoting Sustainability if the point has not already been covered in that policy: "Proposals will be encouraged to demonstrate thermal efficiency, use of renewable and sustainable energy sources and reduction of</p>		<p>and design will be supported. However, contemporary design and materials will be supported where the special character of the area is enhanced or opportunities are identified for greater energy efficiency. Site layout should respect the existing grain of development in the surrounding area. Gated communities which restrict permeability are not characteristic of the Holme Valley area and will be resisted.'</p> <p>Insert footnote after "grain": "Urban grain is the pattern of the arrangement and size of buildings and their plots in a settlement; and the degree to which an area's pattern of street-blocks and street junctions is respectively small and frequent, or large and infrequent (reference By Design, Urban design in the planning system: towards better practice, CABE for DETR,</p>

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		carbon emissions."			<p>2000)"</p> <p>Move the following to after 4.4.5:</p> <p>" High quality design should not only be visually attractive but should incorporate flexibility to allow future adaptation to meet the changing needs of occupiers over time, including meeting the needs of older residents and / or those with changing care needs.</p> <p>Commercial, industrial, community, sports and leisure proposals as well as residential development present an opportunity for innovative design, using modern materials and building techniques that will achieve flexibly planned, sustainable and energy efficient buildings."</p>
29.	Page 61	Point 6 Public Spaces	It is unclear how this policy should be considered and applied. What is meant by 'new major development' and why only 'new major development' as single dwelling	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> This now reads:

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	<p>developments can have an impact on the landscape character or visual setting of a development and even minor schemes can have an impact on the landscape.</p> <p>It is unclear what is mean by a 'positive contribution' and how this intended to be applied. For example, the Local Plan requires new open space to be provided as part of new housing developments (policy LP63 New Open Space). Is the intention that point 6 should be implemented through the provision of new open space as part of a development or is it suggesting development should help improve existing public spaces nearby? Either of these would in any case be sought under the provisions of LP63.</p> <p>Suggest change:-</p> <p>"(d) a full hard and soft landscaping scheme is to be submitted with all planning applications <u>where appropriate</u>." Open spaces should be designed <u>to meet the needs of the development</u> and located to satisfy their intended, specific function, such as toddler's play, older children's activities, sitting out, or visual amenity."</p>		<p>' 5) Public Spaces New development should make a positive contribution to the public realm. In particular, this should include:</p> <ul style="list-style-type: none"> • A clear distinction between streets and other publicly accessible spaces and areas that are intended for private use • A designed sequence of spaces that connects with and relates to the pattern of spaces already present in the area • Where appropriate, the "greening" of public spaces by using trees and other suitable planting • Open spaces should be designed to meet the needs of the development and located to satisfy their intended, specific function, such as

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					toddler's play, older children's activities, sitting out, or visual amenity.'
30.	Page 61	Point 7 Built Form and Materials	<p>This point is in general conformity with NPPF.</p> <p>However, it is too precise in some respects and unclear why there should be a "consistent design approach in the use of materials, windows and other openings and the building's roofline." This is not easy to implement and it is unclear whether this relates to all new buildings in a scheme or to existing buildings in the vicinity.</p> <p>There is insufficient robust evidence to support this policy.</p> <p>In order to enable development to be contextually appropriate and subordinate where necessary the following change is suggested:-</p> <p>"Designs should reflect <u>respect</u> the scale..."</p>	Accepted. Amend Policy as suggested.	Amend NDP. This now reads: '6) Built Form and Materials Designs should respect the scale, mass, height and form of existing locally characteristic buildings. Materials must be chosen to complement the design of the development and add to the quality or character of the surrounding environment. Local millstone grit and stone flags should be used wherever possible.'
31.	Page 61	Point 8 Boundaries	<p>This point is in general conformity with NPPF and there is some evidence to support it contained within the character studies. However, there are inconsistencies with other policy points relating to boundary treatment, including Draft policy 1 paragraph 1, draft policy 1 points 5, 9 and 10 and Draft policy 2 points 4 and 11. As point 8 is headed 'boundaries' it would not be unreasonable if an applicant assumed that this contained all the information about boundaries that they would need.</p>	Accepted. As boundaries are addressed in more detail in Policy 1 (see 22 above) delete criterion 8 in Policy 2. Amend wording in Policy 1 to refer to natural stone or cast	<u>Amend NDP.</u> See Policy 1 above.

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			<p>Justification is required to support the requirement for “openings in existing boundaries should be kept to a minimum”.</p> <p>Suggested change: “Site boundaries should be of local <u>natural</u> stone or cast iron railings and hedge planting should be retained and repaired”.</p>	iron railings.	
32.	Page 61	Point 9 Scale and Proportion	<p>Suggested change:</p> <p>“Scale, height and massing of development should not be an “off the shelf” solution but should be demonstrably purpose designed to reflect the setting and location of each individual site. In doing this, Development should fit in and neither dominate nor have a detrimental impact on its surroundings and neighbouring properties.”</p>	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> This now reads: 7) Scale and Proportion Scale, height and massing of development should be designed to reflect the setting and location of each individual site. Development should fit in and neither dominate nor have a detrimental impact on its surroundings and neighbouring properties.'
33.	Page 62	Point 10 Amenity, Privacy and Space Standards	This policy is unclear and imprecise. There is no definition of ‘dimensions’. It also appears to relate to new dwellings rather than distance to existing buildings. The general intention of the policy repeats Local Plan policy LP24.	Amend 10.	<u>Amend NDP.</u> This now reads: 10) Protecting Amenity Proposals should minimise

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			There is no flexibility in the last sentence and no evidence or information to support this policy.		impacts on general amenity and give careful consideration to noise, odour and light. Light pollution should be minimised, and security lighting must be appropriate, unobtrusive and energy efficient.
34.	Page 62	Point 11 Planting	<p>First sentence: It is not always appropriate to use native species.</p> <p>Second sentence: May be unreasonable.</p> <p>Third sentence: The list of indicated planting implies that applicants will have to choose from these suggestions, however the list is not exhaustive and schemes should not be limited to those itemised. Each site will require a bespoke landscape treatment with varieties and combinations of planting for landscaping boundaries.</p> <p>Suggested change:</p> <p><i>"Planting proposals <u>on or close to site boundaries</u> should <u>where appropriate</u> be designed to be an integral part of all new development and use <u>include a suitable mix of primarily</u> native species <u>where appropriate</u>. Proposals will only be supported when it is clear that Careful consideration has been <u>should be</u> given to the creation of <u>a</u> strong landscape structure throughout the site and <u>be appropriate to the setting</u>. Planting around the external boundaries should include an appropriate mix of native tree, hedgerows and new woodland areas (although not in Pennine Fringes), wildflower rich grasslands. Wildlife corridors should be linked to the existing green infrastructure resource. <u>Proposed planting should consider and complement and</u></i></p>	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> This now reads: 8) Planting Planting proposals on or close to site boundaries should where appropriate include a suitable mix of primarily native species. Careful consideration should be given to the creation of a strong landscape structure throughout the site and be appropriate to the setting. Proposed planting should consider and complement and where possible enhance existing wildlife and habitats within the site and on adjacent land. Once all changes made cross check planting in NDP for duplication and include in a

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	<p><u>where possible enhance existing wildlife and habitats within the site and on adjacent land.</u></p> <p>Criteria (d) of Local Plan policy LP28 relates to the provision of open space/green infrastructure and sustainable drainage systems. Move the following to justification text:</p> <p><i>"Sustainable urban drainage schemes using porous materials should could be integrated incorporated within the planting scheme where appropriate.</i> The planting scheme should not be used simply to fill space which is not occupied by the proposed buildings. Planting should be seen as an integral part of the overall master plan, used to define spaces, frame views, and provide screening and shelter. Native species should be used to enrich the natural habitat and increase biodiversity. Corridors for wildlife movement should be provided on sites next to or in green fields, hedgerows and tree belts these are particularly valuable when they incorporate existing natural features such as ponds and watercourses."</p> <p>It would be helpful if all the required information relating to planting could be contained in one place.</p>				single policy if possible.
35.	Page 62	Point 12 Mixed Uses	This point is unclear, unreasonable and no supporting evidence is provided. In respect of proposals being visible from public routes, as long as the proposal for a shop or service meets the town centres sequential test where required, there is no requirement for the development to be 'seen'. That is a choice for the end user. Suggested change:	Accepted. Amend Policy as suggested.	Amend NDP. Accepted. This now reads: '9) Mixed Uses If a shop or service is proposed as a part of a

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	<p>"Mixed uses should be considered. Provision of small workspaces can be both in association with some house types and/or grouped in courts. New shops and services will need to be visible from public routes, beyond the proposed development, if they are to be viable." <u>If a shop or service is proposed as a part of a development scheme applicants will be encouraged to locate the facility where it is accessible to the wider community.</u></p>				development scheme applicants will be encouraged to locate the facility where it is accessible to the wider community.
36.	Page 62	Point 13 Designing Out Crime	<p>It is unclear how and by whom 'locations at risk of crime should be identified'. If it can be shown that the location is not at risk of crime, this policy would not apply as currently worded.</p> <p>The intention that 'design solutions should be incorporated to reduce opportunities for anti-social behaviour' repeats Local Plan policies LP24 Design (e); LP16 Food and Drink Uses and the Evening Economy and LP47 Healthy, Active and Safe Lifestyles.</p>	Accepted. The Policy duplicates policies in the Local Plan and should be deleted.	<u>Amend NDP.</u> Delete criterion 13.
	4.5 Conserving and Enhancing Local Heritage Assets				
37.	Page 64	Section 4.5 Title	<p>It is suggested that the title should be amended to omit 'Local' or follow the title of the Local Plan.</p> <p>Suggested change to section title: "Conserving and Enhancing Local Heritage Assets"</p>	Accepted. Amend Policy title as suggested.	<u>Amend NDP.</u> Change title to " Conserving and Enhancing Heritage Assets."

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38.	Page 64	4.5.1	The last sentence should be up-dated to reflect the adopted Local Plan.	Accepted.	<u>Amend NDP</u> Update 4.5.1 to refer to adopted Local Plan.
39.	Page 64	4.5.2	<p>This is not in conformity with NPPF or the Kirklees Local Plan. There is no requirement for a formally adopted list of local heritage assets. Suggest change 'local heritage assets' to '<u>non-designated assets</u>'.</p> <p>There is insufficient robust supporting evidence.</p>	Accepted. Amend to "non designated" heritage assets.	<u>Amend NDP.</u> Amend 4.5.2 to " non-designated assets ". Add further text to end of final sentence "and there is no requirement for a formally adopted list of non-designated heritage assets."
40.	Page 64	4.5.4	The NPPF does differentiate between designated and non-designated heritage assets in paragraphs 195-197 but in a footnote states 'Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.'	Accepted. Add further text to 4.5.4 as suggested.	Amend NDP. Insert additional sentence after first sentence of 4.5.4: "In addition the NPPF sets out that non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets." Delete "However"

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41.	Page 64	4.5.5	First sentence is not necessarily correct as whether a building is a non-designated asset would become a material consideration in the determination of any application.	Accepted. Delete first sentence and replace with more appropriate wording.	Amend NDP. In 4.5.5 delete paragraph and replace with: "Where a building is a non-designated asset, this would become a material consideration in the determination of any planning application."
42.	Page 64	4.5.6	This is not in conformity with NPPF or the Kirklees Local Plan. In addition, there is no robust supporting evidence. The list of assets has not been agreed by the council and as such needs further assistance. The list would need to be supported by clear criteria for including buildings which has not been provided. Historic England guidance is generic and any local list would need to demonstrate why an asset is locally important. The assets should be referred to as 'non-designated heritage assets'.	Accepted. The local list of non-designated heritage assets is at an early stage of preparation and the volunteers hope to continue working with Kirklees Council to provide robust evidence supporting the assets' local importance.	Refer to Holmfirth Conservation Group and Kirklees to revise and update para 4.5.6. Delete " local lists of heritage assets" and replace with " non-designated heritage assets ".
	Draft Policy 3: Conserving and enhancing local non-designated heritage assets				
43.	Page 65	Draft Policy 3 Conserving and Enhancing Local Non- Designated	Point 3 is not in conformity with NPPF (paragraphs 197 & 198) or the Kirklees Local Plan policy LP35 (Historic Environment). There is not sufficient and robust evidence to justify this part of the policy.	Refer to Holmfirth Conservation Group. The NDP could include a list of non designated heritage	Amend NDP. The Policy now reads: A list of proposed non-

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	Heritage Assets	<p>Suggested change (subject to having an agreed list):</p> <ol style="list-style-type: none"> 1. Where a non-designated heritage asset is affected by development proposals, there will be a presumption in favour of its retention. Any loss of the whole or part of such an asset will require clear and convincing justification. 2. Any extensions which require planning permission should be designed sympathetically, without detracting from or competing with the heritage asset. 3. Proposals within the setting of a non-designated heritage asset will be required to give due consideration to its significance and ensure that this is protected or enhanced. <p><i><u>The following non-designated heritage assets have been identified in the Holme Valley Neighbourhood Plan.</u></i></p> <p><i><u>Development affecting a non-designated heritage asset should be considered against Local Plan Policy LP35 Historic Environment :- (list the sites)</u></i></p>	<p>assets if the list is at an advanced stage and well evidenced.</p> <p>If the work is ongoing in other areas this could be referred to in the supporting text as an update.</p>	<p>designated heritage assets is identified in the Holme Valley Neighbourhood Plan and further non-designated heritage assets may be identified during the plan period.</p> <p>The emerging list of non-designated heritage assets is provided in Appendix 2.</p> <p>Once the proposed list of local non-designated heritage assets has been adopted, development proposals will be required to assess any impacts on these assets and to conserve their significance in accordance with Kirklees Local Plan Policy LP35 Historic Environment, in particular Parts 2 and 3a, or, where proposals are in the Peak District National Park, Development Management Policy DMC5 Assessing the impact of development on designated and non-designated heritage assets and their settings, in particular</p>

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					Parts D and F(i) and (ii).'
	Draft Policy 4: Design Codes for High Quality Shopfronts and Advertisements				
	Design Principles for Shopfronts				
44.	Page 67	4.6.4	It might help to give examples of where a corporate image has been adapted.	<p>Noted.</p> <p>The Steering Group could not find a good example locally.</p>	No change. <p>(However other photographs have been added to the NDP to illustrate shopfronts.)</p>
45.	Page 68	4.6.6	The first sentence makes clear that 'historic areas' are not confined just to conservation areas for the purposes of paragraph 4.6.6 and this introduces uncertainty at the beginning of the paragraph. A clearer paragraph or definition would be beneficial.	<p>Accepted.</p> <p>Amend paragraph to improve clarity and reduce uncertainty.</p>	Amend NDP. <p>Amend paragraph 4.6.6 to:</p> <p>" Developers are advised to discuss proposals for new shopfronts and advertisements in historic areas (such as conservation areas) in</p>

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					<u>conservation areas or where proposals impact on listed buildings or other heritage assets with the Kirklees Council's Conservation Team at an early stage. Historic areas will include premises within Conservation Areas or that are either designated or non-designated heritage assets.</u>
46.	Page 68	4.6.8	If each local centre has a distinctive style it would be useful if the HVNDP could set out what characteristics are distinctive to each centre so that applicants have a much clearer understanding of the type of designs that would be expected.	<p>Partially accepted.</p> <p>The Heritage and Character Assessment describes the local character of centres within the various Landscape Character Areas. Refer to this in the text.</p>	<u>Amend NDP.</u> <p>Insert additional text to 4.6.8: "The Heritage and Character Assessment report describes local character in more detail in each of the identified Landscape Character Areas."</p>
47.	Pages 68-72	Draft Policy 4 General Comments	<p>This policy is in general conformity with NPPF. However, its use as a Development Management policy is considered to contravene NPPG paragraph 041 and NPPF paragraph 16 criterion d). Points are imprecise, unclear and difficult to apply. It would be difficult for example to reconcile the competing demands of full accessibility but retention of traditional shop fronts. Its length and complexity makes it more applicable as a design code than a policy.</p> <p>Many of the principles of Draft Policy 4 are covered by Local Plan policy LP25 (Advertisements and Shop Fronts).</p>	<p>Noted.</p> <p>See further detailed responses below.</p>	No further change to detailed responses set out below.

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48.	Page 68	Point 1 General Principles	<p>This is a mix of policy and reasoned justification. The policy points duplicate Local Plan policy LP25 (Advertisements and Shop Fronts).</p> <p>Suggested change:</p> <ul style="list-style-type: none"> • Simplify point 1 to the key aim that "<i>Shopfronts should be designed to integrate into the existing building by respecting the period, scale and architectural style of the building and reflect the characteristics of the wider streetscene.</i>" • Insert remainder of the draft policy wording into the main body of the justification text. 	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP</u></p> <p>Amend text under General Principles.</p> <p>The Policy now reads:</p> <p>Design Principles for Shopfronts</p> <p>1) General Principles</p> <p>Shopfronts should be designed to integrate into the existing building by respecting the period, scale and architectural style of the building and reflect the characteristics of the wider street scene.</p> <p>Proposals for new shopfronts, or alterations to existing shopfronts should consider the following design concepts to ensure that the proposal is sympathetic to the character and amenity of the locality.</p> <p>Designs should:</p> <p>a) Enclose and frame shop windows and entrances with</p>

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			<p>essential visual and functional elements such as pilasters, fascias and stallrisers. Accurate and authentic detailing is essential;</p> <ul style="list-style-type: none"> b) Use shopfronts that do not dominate the architecture of the main building; c) Avoid linking two or more buildings with one fascia unless historically already established by continuous architectural pattern or shop use; d) Make sure that shopfronts have individual distinctive identities with different stallriser heights, window designs and fascias that positively contribute to the character and integrity of the building and the complexity and diversity of the street scene; e) Make use of energy-efficient measures with regard to any illumination arising from the shopfront, particularly through the use of LED lighting where appropriate; and f) Make use of recessed

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					<p>doorways, single and double to give more three-dimensional quality.</p> <p>g) Avoid use of uPVC windows in historic areas.</p> <p>Insert into supporting text:</p> <p>"Many of the Holme Valley's buildings date from the 18th and 19th centuries. During this period shopfront design sought to achieve a successful relationship between the shopfront itself and the building as a whole. Some adaption may be necessary to take account of technological change, but such original features should be retained where possible. "</p>
49.	Page 69	Point 2 Retention of Existing Shopfronts	<p>Point 2 duplicates Local Plan policy LP25.</p> <p>Suggested change:-</p> <ul style="list-style-type: none"> • Simplify point 2 to the key aim that "<u>The retention of existing shopfronts, which contribute to the character of the building or area, will be encouraged and special care should be given to the preservation and sensitive restoration of original features where</u> 	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP</u></p> <p>The Policy now reads:</p> <p>2) Retention of Existing Shopfronts</p> <p>The retention of existing</p>

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			<i>possible."</i>		<p>shopfronts, which contribute to the character of the building or area, will be encouraged and special care should be given to the preservation and sensitive restoration of original features where possible.</p> <p>Move the following to the supporting text to after 4.6.2:</p> <p>"Very few early shopfronts survive. Special care is needed to ensure that these are preserved and restored in a sensitive manner. Sometimes original features such as pilasters and fascias have been hidden by later work and where this is the case such features should be revealed and restored."</p>
50.	Page 69	Point 3 Replacement of Shopfronts	<p>This point repeats the intentions of Local Plan Policy LP25 and duplicates the general principle in point 1 of draft policy 4 that shopfronts should respect the existing building through appropriate design and use of materials.</p> <p>First sentence is not policy but justification text.</p> <p>It is unclear about what is meant by the terms 'traditional</p>	<p>Accepted.</p> <p>Delete point 3.</p> <p>Parts of the policy may be moved to the supporting text as part of the justification.</p>	<p><u>Amend NDP</u></p> <p>Delete 3.</p> <p>Insert the following text after 4.6.4:</p> <p>"The replacement of modern shopfronts with traditional</p>

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			<p>features' and 'crude joinery', how this would be assessed and by whom.</p> <p>Suggested change:-</p> <ul style="list-style-type: none"> • Delete point 3 as this is already covered by point 1. 		<p>designs can have positive benefits. Traditional style shop fronts can enhance the street scene and add to the visual interest of the local shopping area, helping to make it more attractive to shoppers and visitors. Large plate glass windows, excessively deep fascias and unsuitable materials such as unpainted tropical hardwood or aluminium should be replaced with more appropriate and sensitive design and materials wherever possible."</p>
51.	Page 69	Point 4 Accessibility	<p>Stepped entrances and narrow doorways are characteristic of traditional shop fronts. The requirement to be fully compliant with the Equality Act 2010 and part M of the Building Regulations is likely to mean that many existing shop fronts will not be able to be retained or new shops fronts designed in accordance with this policy. The policy needs to allow for the normal planning balance to be applied.</p> <p>It is unclear what is meant by 'the provision of alternative means of access should be a last resort'.</p> <p>It may help to quote or paraphrase the Historic England document cited in the footnote as this links with altering historic buildings for access and specific guidance could be</p>	<p>Accepted.</p> <p>Delete point 4 and replace with new wording, taking into consideration the Historic England document, <i>Easy Access to Historic Buildings, 2004</i>.</p> <p>The reference to Part M of the Building Regulations can be deleted from the Policy but would still apply through the building control framework.</p>	<p><u>Amend NDP.</u></p> <p>The Policy now reads:</p> <p>3) Accessibility</p> <p>The sensitive alteration of existing traditional shops and town centre buildings to improve accessibility for all is supported. Accessibility should be improved wherever practically possible, provided the special interest of any historic building or buildings is</p>

	KIRKLEES COMMENTS		PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>given in the supporting text. This issue is relevant given the demographics of the neighbourhood plan area. It may also be useful to reference the government's Good Practice Guide on access for disabled people.</p>			<p>not compromised. Overall proposals should not prejudice the character of the building or buildings and should have due regard for any features which make a particular building or buildings special or significant.</p> <p>Add new wording to supporting text after 4.6.5.</p> <p>"Whilst protecting the historic and distinctive character of town and village centres in Holme Valley is a priority for the NDP, there is also a need to ensure shops and services are as accessible as possible for all groups. The NDP aims to take a balanced approach by promoting sensitive alterations which support improved accessibility for all groups whilst protecting the historic character. Historic England's document "Easy Access to Historic Buildings, 2004" and the Department for Communities and Local Government's "Planning and</p>

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p><i>access for disabled people: a good practice guide, 2003"</i> provide more detailed information.</p> <p>Barriers to access include:</p> <ul style="list-style-type: none"> - external physical elements of the building and its setting, including landscape features, kerbs, exterior surfaces, paving, parking areas, building entrances and exits as well as emergency escape routes - any feature arising from the design or construction of a building itself, including architectural details (such as plinths, column bases, staircases, ironwork and door openings), fixtures, fittings, furnishings, furniture, equipment and other materials. <p>The Historic England document notes that easy physical access involves people being able to circulate freely and cope with changes in level. Horizontal movement is most likely to be constrained by floor surfaces,</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>corridors, doorways, thresholds and small changes in level. Improvements to vertical circulation may require alterations to steps, stairs and handrails or involve the introduction of ramps or lifts. All of these can affect the appearance and significance of the building and the advice of conservation officers should be sought at the earliest opportunity."</p>
52.	Page 69	Point 5 Historic Areas	<p>It is confusing to have point 5, which only applies in conservation areas, (or to designated or non-designated heritage assets subject to the definition in paragraph 4.6.6) mixed in with policy that applies everywhere. If the design principles for shopfronts has separate considerations for proposals in historic areas, it would be useful if the same distinction could be used with regard to advertisements.</p> <p>There is overlap with Local Plan policy LP25.</p> <p>Shouldn't these design principles apply to all shopfronts? If so it may be worth making this point 1 of the policy. There does not seem to be any reason why the use of energy efficient illumination should not apply throughout the</p>	Accepted. Delete the title "5. Historic Areas" and move the content to "1. General Principles"	<u>Amend NDP</u> Delete the title "5. Historic Areas" and move the content to "1. General Principles"

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			HVNPD area for example. It is unclear what is meant by 'unconvincing or clumsy results' in criteria a).		
53.	Page 70	Point 6 Fascias	<p>The intention of the first sentence is covered by Local Plan Policy LP25.</p> <p>There is more information about fascias in other points. It should be all in one place or risks being missed.</p> <p>Reasoned justification should be removed from the policy wording.</p>	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> The Policy now reads: 4) Fascias Proposals for shopfronts should seek to incorporate moulded cornices weathered with a properly detailed lead flashing above the fascia. Add to the supporting text after 4.6.8: " Consideration should also be given to future maintenance and weather proofing. Shopfronts should be designed to throw water clear of the shopfront to help prevent rot and avoid long-term maintenance issues."
54.	Page 70	Point 7 Doors and Windows	This point is overly prescriptive.	Accepted. Amend 7 Doors and	<u>Amend NDP.</u> The Policy now reads:

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
				Windows as suggested to increase flexibility.	<p>'5) Doors and Windows</p> <p>Stallrisers are encouraged to protect shop windows and provide a visual break between the window and the street surface. Designs for shopfronts should include part-glazed door panels that reflect the height of the stallriser and the sub-division of large areas of glass wherever possible.'</p>
55.	Page 70	Point 8 Materials & Colour	Point 8 is prescriptive and unreasonable. Who will make the judgement and on what basis that a colour is strong and strident?	Accepted. Delete Point 8.	<p><u>Amend NDP</u></p> <p>Point 8 has been deleted.</p>
56.	Page 70	Point 9 Blinds and Canopies	This point is not supported by justification text and it is unclear what are 'appropriate circumstances' in which roller blinds can be incorporated within cornices.	Accepted. Delete Point 9.	<p><u>Amend NDP</u></p> <p>Point 9 has been deleted.</p>
57.	Page 70	Point 10 Shutters & Grilles	There is no flexibility within point 10. It is unclear what is meant by 'historic building'. Is it a building that is listed and/or one that is in a conservation area?	Accepted. Revise wording of point 10 to improve flexibility and remove references to historic buildings.	<p><u>Amend NDP</u></p> <p>The Policy now reads:</p> <p>' 6) Shutters and Grilles</p> <p>Solid roller shutters and the introduction of shutter boxes to the exterior of buildings have an adverse visual impact and will be resisted in the</p>

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>Kirklees Council part of the neighbourhood area. Any shopfronts in the Peak District National Park Authority part of Neighbourhood Area will not be permitted to have external security roller shutters.</p> <p>The following suitable alternatives will be supported:</p> <ul style="list-style-type: none"> a) Security glass with alarm or internal cameras; b) A reduction in the size of window glass; c) Internal see-through shutters; or d) In the Kirklees Council part of the Neighbourhood Area only, external shutters that are removed during working hours - decorative options may be applicable, themed on shop trade e) In the Kirklees Council part of the Neighbourhood Area only, externally mounted open mesh roller shutters provided that the box housing is concealed behind the fascia or the extent to which it projects from the face of the building,

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					does not result in increasing its depth or the creation of a sub-fascia.'
	Design Principles for Advertisements				
58.	Page 71	Point 11 General principles	Much of point 11 is imprecise. Additional information in terms of how 'proliferation' and clutter' should be judged is required. It is not reasonable to expect an illuminated sign to be 'substantially hidden from view'.	Accepted. Amend Policy as suggested to improve clarity.	<u>Amend NDP.</u> The Policy now reads: ' 1) General Principles Any shopfronts within the Peak District National Park Authority part of Neighbourhood Area will not be permitted illuminated signs except in accordance with DMP DMS 5. In the Kirklees Council part of the Neighbourhood Area, where planning consent is required, proposals for fascia, hanging and projecting advertisement signs should complement the design of the building and shopfront. Cumulative impacts of advertisements should be considered in relation to street scene and visual clutter.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>Advertisements should not overly dominate the public realm or have an adverse impact on local character.</p> <p>Consideration should be given to an advertisement's impact on highway safety.</p> <p>Advertisements which are distracting to road users, by the virtue of their scale, design or positioning should be avoided.</p> <p>Illuminated signs should be treated as an integral part of the overall design, and should be discreet, and energy efficient.</p>
59.	Page 72	Point 13 Projecting Signs	Unclear what is meant by 'clearly appropriate'.	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> The Policy now reads: 2) Projecting Signs Projecting signs will be supported where they are sensitive to the design of the existing building and are a

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>characteristic feature of the surrounding area.</p> <p>The use of internally illuminated projecting box signs that form a projecting part of a fascia should be avoided.</p> <p>Where a projecting sign is appropriate, proposals should make use of a traditional hanging sign, which is hung from a metal bracket that can add interest to the street without unobtrusive external illumination. Consideration should be given to the use of hanging symbols denoting the trade being carried on in the premises as an interesting and eye-catching alternative to a hanging board.</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>Projecting signs should be of a high quality and relate to the size and scale of the existing building façade and do not appear either overly intrusive or inappropriately small.</p> <p>Projecting signs should be carefully positioned to take into account the design and architectural detailing of the existing building – normally below the first-floor windows.</p> <p>Projecting signs will be restricted to one sign per building and should relate only to the business which occupies the premises.</p>
58.	Page 72	Point 14 Stand-alone advertising	A-boards on the highway do not require planning permission or advertisement consent but would require a licence from Highways. It is suggested that this point would be better as a Holme Valley Parish Council action to work with traders and shop keepers to discourage the use of A-boards and clutter to keep routes clear for people who may have mobility or visual issues, or for parents with children in buggies.	Accepted. Delete Point 14 and add a further action to Parish Council Actions 3.	<u>Amend NDP.</u> Delete Point 14 and add a further action to Parish Council Actions 3.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	Public Realm				
59.	Page 74	4.6.17	<p>It is not clear if Draft Policy 5 is intended to apply only to development along these routes (and how much of the route?). This paragraph is inadequate to support or justify Draft Policy 5.</p>	<p>Noted.</p> <p>Draft Policy 5 is intended to apply to areas of public realm generally, not just to the routes identified.</p> <p>The preceding paragraphs 4.6.10 - 4.6.16 also provide part of the justification to Policy 5.</p>	<p><u>Amend NDP.</u></p> <p>Amend 4.6.17 to:</p> <p><u>"The public realm is not limited to highways, but road networks in the valley form a significant part of the public realm of settlements, particularly along the valley floors.</u> There are several specific gateways to the valley as four key roads enter the Holme Valley from different directions: A635 Greenfield Road and A6024 Woodhead Road from the West; B6106 Dunford Road and A616 Sheffield Road from the South; A635 Holmfirth Road from the East and A616 Huddersfield Road from the North. These routes converge in specific centres: Holmfirth town centre, New Mill square and Honley bridge.</p> <p><u>Without careful management, these locations can become</u></p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					dominated by highways and as a respondent to Pre-Regulation 14 consultation commented 'traffic and infrastructure will always be problematic around Holmfirth due to the geography'. However, we believe that applying the principles outlined in the policy below will help ensure that the importance of public realm is recognised not only in these specific 'hotspots' but also in the smaller village centres which have more localised highways challenges."
	Draft Policy 5: Promoting High Quality Public Realm				
60.	Page 74	Draft policy 5 General Comments	The section relating to public realm enhancements may be more appropriate as Parish Council actions. It is unclear what types of development this policy intended to apply to and how it will be applied to planning applications. This policy contains a mix of issues which are not related to public realm. A Design Guide is needed for the level of detail set out in this policy.	Noted. See more detailed responses below.	No further change to detailed amendments set out below.
61.	Page 74	First section	Second paragraph: consider adding 'subject to other policies' to make it clear that proposals cannot always be supported if they comply with a) and b).	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> <u>The Policy now reads:</u>

	KIRKLEES COMMENTS		PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>Second paragraph criteria b) should refer to 'where appropriate' as it would not always be appropriate to create gaps in order to create a view.</p> <p>Third paragraph relating to refuse collection is already covered in Local Plan Policy LP24 Design criteria d (vi).</p>			<p>' Policy 5: Promoting High Quality Public Realm and Improvements to Gateways and Highways</p> <p>Public Realm</p> <p>Proposals for public realm improvements should enhance the quality of life for residents and visitors alike and should be an integral part of transport links through towns, settlements and villages.</p> <p>Proposals for public realm enhancements will be supported subject to other policies where they:</p> <ul style="list-style-type: none"> a) Are of a high-quality design and sensitive to the visual appearance of surrounding buildings and street scene, especially in the case of a Heritage Asset or within a Conservation Area; b) Where possible, enhance or open up views towards existing locations of interest, such as the river or public spaces within the town and local

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>centres, so that new developments improve rather than hide existing points of interest.</p> <p>c) Prioritise pedestrians and then cyclists, providing seating and safe, accessible routes for all.</p> <p>Where public realm enhancements are proposed as part of development schemes, proposals should include, where possible, cycle and car parking with electric charging points, clear and useful signage to local public transport facilities, and low energy street lighting.</p> <p>Adequate public recycling and waste bins should be provided and large commercial bin storage areas should be suitably screened as part of proposals to enhance the public realm and improve waste management.</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
62.	Page 75	Draft Policy 5 Gateways and Highways General comments	<p>It would be helpful if the supporting text could make reference to physical measures to protect all road users, such as tree and shrub planting as physical landscape barriers.</p> <p>It is unclear how the policy relating to 'Gateways and Highways' can be applied to a planning application as:-</p> <ul style="list-style-type: none"> • the types of development it intend to relate to are not specified; • gateway locations are not identified and it would be helpful to show these on a map for this policy to be clear and effective; • a description of what 'gateway improvements' are needed; and • what is meant by a 'sense of arrival' should be clarified. <p>It is unclear whether the policy under 'Gateways and Highways' is relevant only to public realm works given the title of the policy which is 'Promoting High Quality Public Realm'.</p>	Accepted. Insert further supporting text as suggested.	<u>Amend NDP.</u> The Policy now reads: ' Gateways and Highways Where new residential or commercial development is close to gateways into the Holme Valley, for example at entry points along the main transport routes including roads along valley floors and at rail stations including as identified on Map 17 Key Gateways, consideration should be given to gateway improvements. Such improvements could include for instance, welcome signage, landscaping and planting and relevant information about visitor facilities. To ensure a balance is achieved between highway safety and highway dominance, and to ensure that the character of a place is maintained whilst still enabling a safe and sustainable highway, the following principles should be applied:

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>a) Design and materials in public realm improvements and highways schemes should be sensitive to local character.</p> <p>b) Traffic dominance should be minimised through surface treatment and layout;</p> <p>c) Visual clutter should be limited;</p> <p>d) Provision of shared public space should be maximised whilst accommodating vehicular movement where necessary;</p> <p>e) Consideration should be given to accessibility for everyone;</p> <p>f) Consideration of Green Infrastructure should be built into the public realm where appropriate;</p> <p>g) Street furniture should not act as a hazard to pedestrians or distract motorists unnecessarily.</p> <p>h) Signage and interpretation should be clear and visually unobtrusive;</p> <p>i) Lighting should limit light pollution and the use of columns.'</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>Insert further supporting text to end of 4.6.17:</p> <p>"Improvements to the public realm offer opportunities to provide physical measures to protect all road users, such as tree and shrub planting as physical landscape barriers. "</p> <p>Insert a new map identifying above locations.</p>
63.	Page 75	Draft Policy 5 Gateways and Highways	<p>It is not clear when points 1 to 11 should be applied:</p> <p>Point 1: It is unclear what the design and material relate to: should this relate to a development proposal or a highway scheme? It is unclear what is meant by the 'origin' of a place and how this should be taken into account. Is this as well as the considerations set out in Draft Policy 1 and Draft Policy 2?</p> <p>Point 4: Should this be shared public space? This needs to be made clearer. Also consider whether vehicular access to all public areas is really necessary.</p> <p>Point 5: Must evidence or justify use of 'shared surfaces' – not always suitable for all users such as the visually impaired.</p>	Accepted. Amend Policy as suggested.	<p><u>Amend NDP.</u></p> <p>See above.</p> <p>Insert additional supporting text:</p> <p>'Green infrastructure</p> <p>What can green infrastructure include?</p> <p>Green infrastructure can embrace a range of spaces and assets that provide environmental and wider</p>

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>Point 6: Suggested change:-Accessibility for everyone particularly those with mobility impairments should be introduced <u>Consideration should be given to accessibility for everyone;</u></p> <p>Point 7: There is the opportunity to update the definition of Green Infrastructure to reflect recent changes to the definition of Green Infrastructure in National Planning Policy Guidance (see Natural Environment section Green Infrastructure paragraphs 004-008).</p>		<p>benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies. References to green infrastructure in this guidance also apply to different types of blue infrastructure where appropriate.</p> <p>Paragraph: 004 Reference ID: 8-004-20190721 Revision date: 21 07 2019"</p> <p>Add to supporting text before 4.6.14:</p> <p>" Street furniture such as interpretation panels, bollards, cycle racks, free-standing signs, lamp-posts and waste bins can all have a significant impact on the public realm. Careful consideration is needed to ensure designs are sensitive and locations are suitable and support improved accessibility</p>

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>Point 8: views as identified locally – by whom? ‘Protecting’ a view contradicts Draft Policy 1 which refers to ‘respecting’ a significant view and Draft Policy 2 which refers to ‘considering’ views. How does this criteria relate to other policies concerning views, namely Draft Policy 1 paragraph 1, Draft Policy 1 point 3, Draft Policy 2 point 3, Draft Policy 2 point 4, Draft Policy 5 criteria b) and Draft Policy 12 ‘flooding and extreme weather’ point 8.</p> <p>Point 9: It is unclear as to why street furniture should always be a secondary feature. Evidence is required to support the wording as it stands and could consider ensuring street furniture does not act as a hazard to pedestrians (including wheelchair and buggy users).</p>		<p>for all. Street furniture should not form obstacles when set on pedestrian routes. Grouping items together can make them more easily visible and thus less of a hazard. Benches and internal seating should offer a range of heights and a choice between those with and without backs and armrests. There should also be space for a wheelchair user to pull up next to a seated companion. Tables, where they are provided, should be wheelchair accessible.”</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
64.	Page 80	4.7.12 & 4.7.13	These paragraphs need to be updated to reflect the adoption of the Local Plan.	Noted.	Update 4.7.12 and 4.7.13 to refer to adopted Local Plan.
	Draft Policy 6: Building Homes for the Future in Areas Not Protected by Green Belt				
65.	Page 77	4.7.1	This paragraph lacks evidence. If these findings are from the Neighbourhood Plan engagement, it would be helpful to reference this.	Noted. Refer to NDP consultations in paragraph.	<u>Amend NDP.</u> Insert before second sentence: "Public consultations for the NDP (see the Consultation Statement, consultation on Issues and Options and emerging First Draft Plan) have shown that .."
66.	Page 78	4.7.5	Reference to Local Plan modifications is no longer relevant following adoption of the Local Plan. Instead the HVNDP could reference the Local Plan Strategy and Policies document paragraph 8.6 (page 59). Suggest change: Delete " (Modification SD1-MM33, 2018) ".	Accepted. Amend text as suggested.	<u>Amend NDP.</u> Amend 4.7.5: Delete first five lines. Insert relevant text from Local Plan Strategy and Policies document paragraph 8.6 (page 59). "Paragraph 8.6 in the Local Plan sets out that "the Local Plan housing requirement has used the most up to date national household projections (2014-based) as a starting

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP												
					<p>point. Following analysis of this information and consideration of economic assumptions, the Local Plan housing requirement is a minimum of 31,140 homes over the plan period from 2013-31 which will meet identified needs. This equates to an annual housing requirement of 1,730 new homes per annum. As this is based on up-to-date demographic evidence it takes account of any need arising from shortfalls in delivery against previous targets."</p>												
67.	Page 78	Table 2	<p>Suggest change: Amend the table title to "Local Plan Housing <u>and Mixed Use</u> Site Allocations".</p> <p>The allocated housing and mixed use sites have been renumbered in the adopted Local Plan. It is suggested these should be amended as shown below:</p> <table border="1"> <thead> <tr> <th>Previous site number</th> <th>New site number</th> </tr> </thead> <tbody> <tr> <td>H48</td> <td>HS159</td> </tr> <tr> <td>H129</td> <td>HS161</td> </tr> <tr> <td>H178</td> <td>HS162</td> </tr> <tr> <td>H2586</td> <td>HS164</td> </tr> <tr> <td>H584</td> <td>HS167</td> </tr> </tbody> </table>	Previous site number	New site number	H48	HS159	H129	HS161	H178	HS162	H2586	HS164	H584	HS167	<p>Accepted.</p> <p>Amend title as suggested.</p>	<p><u>Amend NDP.</u></p> <p>Amend the table title to "Local Plan Housing <u>and Mixed Use</u> Site Allocations".</p> <p>Insert new figures in table as provided.</p>
Previous site number	New site number																
H48	HS159																
H129	HS161																
H178	HS162																
H2586	HS164																
H584	HS167																

KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	H664 HS168 H786 HS171 H47 HS174 H50 HS175 H130 HS176 H214 HS177 H284 HS178 H288a HS179 H294 HS180 H297 HS181 H597 HS182 H626 HS183 H715 HS184 H727a HS185 H728 HS186 H729 HS187 H730 HS188 H787 HS189 H2585 HS190 H2587 HS191 MX1912a MXS12 H331 HS173	
68. Page 79	4.7.8	This paragraph lacks evidence, particularly in relation to 'considerable concern locally'. If these findings are from the Neighbourhood Plan engagement, it would be helpful to reference this.
69. Page 80	4.7.10	LP11 refers to latest evidence of housing need. Any other evidence used to inform the type of housing provided on the sites would need to be referenced.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
70.	Page 80	4.7.11	If proposing a certain type of design (multi-storey houses) this could be set out in a design policy supported by justified evidence.	Noted. The revised NDP policies make reference to the need to consider context and character.	4.7.10 and update. No change.
71.	Page 80	4.7.12	Delete - no longer relevant now the Local Plan is adopted.	Accepted.	<u>Amend NDP.</u> Delete 4.7.12
72.	Page 80	4.7.13	Delete - no longer relevant now the Local Plan is adopted.	Accepted.	<u>Amend NDP.</u> Delete 4.7.13
73.	Page 81	4.7.15	This needs both to be clarified in terms of what circumstances would make it applicable and what would not and information provided as to how an applicant would comply with this.	Accepted.	<u>Amend NDP.</u> Amend 4.7.15 to: "All developers of medium to large schemes of over 5 properties (but depending upon the local context and impact of the development on local character) are recommended to undertake a public consultation with local residents." " The Parish Council therefore encourages developers of all housing schemes of 5 or more

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
74.	Page 81	Draft Policy 6 Title	<p>The policy title implies that building homes on land protected by other designations (e.g. employment or urban greenspace) is acceptable.</p> <p>Suggested change: Building Homes for the Future in Areas Not Protected by Green Belt</p>	Accepted. Amend title as suggested.	properties to undertake public consultation with local residents and stakeholders." <u>Amend NDP.</u> Provide new title for Policy 6: " Building Homes for the Future in Areas Not Protected by Green Belt"
75.	Page 81	Draft Policy 6 General comments	<p>This policy contradicts policies in the Local Plan which seek to protect some land within existing settlements, including LP6 Safeguarded Land and LP61 Urban Green Space.</p> <p>Many of the matters in this policy are already set out in the Local Plan, particularly LP7 Efficient and effective use of land and buildings, LP11 Housing Mix and Affordable Housing and LP24 Design. However, it is suggested that possible changes to this policy could include the following:-</p> <p>In addition to the sites allocated by Kirklees Council in the Allocations and Designations DPD for housing in the Kirklees Local Plan, New housing development which accords with the Local Plan will be supported within existing settlements where the proposal:</p> <p>Proposals are required to address the following additional considerations.</p> <p>1. <i>involves</i> redevelopment of a brownfield sites and <i>or</i> the conversion of other <i>a</i> suitable buildings for residential use is strongly encouraged within existing</p>	Accepted. Amend Policy 6 as suggested.	<u>Amend NDP.</u> The Policy now reads: ' Draft Policy 6: Building Homes for the Future General Principles In the Peak District National Park Authority part of the Neighbourhood Area, in line with Core Strategy Policy Development Strategy DS1, only new affordable (ie not open market) housing will be permitted in or on the edge of Holme village. In the Kirklees Council part of the Holme Valley NDP area, in addition to the sites allocated

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>settlements.</p> <p>2. <i>Is</i> Housing should be suitable in terms of design, house size and tenure and development should <u>does</u> not lead to ribbon development which impacts adversely on the distinctive character of individual existing settlements.</p> <p>3. <u>includes</u> conversion of an <u>existing</u> mill buildings for low cost housing and apartments rather than demolition is preferred, <u>especially for low cost housing</u> Wherever possible proposals for conversions of former mill buildings to residential accommodation should and where appropriate or includes provision for suitable commercial or employment uses as part of a mixed use schemes, including live-work type accommodation units.</p> <p>4. <u>provides</u> adequate parking for residents and visitors should be provided in accordance with <u>Local Plan Policy LP22 Parking and the council's</u> most up to date Kirklees parking standards <u>guidelines</u>, as set out in Kirklees Council's Highways Development Delivery Planning Pre-application and Application Advice Note in Appendix 4. Additional parking provision to accommodate visitors and delivery vans is encouraged to minimise additional on street parking one-nearby roads.</p> <p>Suggested change: Move the following to the justification text "<u>This document sets out general principles used as a starting point to be evidenced in relation to site accessibility, forecast car ownership, highway layout and the availability of existing on street parking availability</u>.</p>		<p>by Kirklees Council in the Allocations and Designations DPD, new housing development will be supported within existing settlements.</p> <p>Proposals are required to address the following additional considerations:</p> <ol style="list-style-type: none"> 1. Redevelopment of brownfield sites and the conversion of other suitable buildings for residential use is strongly encouraged within existing settlements. 2. Housing should be suitable in terms of design, house size and tenure and development should not lead to ribbon development which impacts adversely on the distinctive character of individual existing settlements and villages. 3. Conversion of mill buildings for low cost housing and apartments rather than demolition is preferred.

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	<p>5. Has Developments should have good access to public transport routes and encourages walking and cycling by enhancing, expanding and linking to existing routes.</p> <p>6. Proposals will be expected to demonstrate that densities make best and efficient use of land and reflects local settlement character.</p>		<p>Wherever possible proposals for conversions of former mill buildings to residential accommodation should include provision for suitable commercial or employment uses as part of mixed use schemes, including live / work type accommodation.</p> <p>4. Adequate parking for residents and visitors should be provided in accordance with the most up to date Kirklees parking standards as set out in Kirklees Council's Highways Development Delivery Planning Pre-application and Application Advice Note in Appendix 4. Additional parking provision to accommodate visitors and delivery vans is encouraged to minimise additional on street parking on nearby roads.</p> <p>5. Developments should have good access to public transport routes and encourage walking and cycling by enhancing, expanding and</p>

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>linking to existing routes.</p> <p>6. Proposals will be expected to demonstrate that densities make best and efficient use of land and reflect local settlement character.</p> <p>House types and sizes</p> <p>All housing development should address the identified local housing need of the locality through density, size, tenure and type of development. Schemes should provide suitable housing in response to the most up to date local housing need assessment, Strategic Housing Market Assessment or other up to date needs assessment.</p> <p>In particular new housing schemes will be supported, subject to aligning with other policies within the plan, where they:</p> <p>1. Include a mixture of smaller one, two and three-</p>

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			<p>bedroom properties for sale and rent.</p> <p>2. Include a suitable proportion of housing designed to meet the needs of older people and properties for first time buyers.</p> <p>3. Provide a suitable proportion of affordable housing in line with the recommendations in the Kirklees Local Plan and the NPPF. Priority will be given to the delivery of affordable housing and maximising the potential for meeting identified local needs and local affordable needs from appropriate individual development opportunities.</p> <p>4. Provide new housing through a Community Right to Build Order or other community led housing project including self-build schemes.</p> <p>Move the following to the justification text "This</p>

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					<p>document sets out general principles used as a starting point to be evidenced in relation to site accessibility, forecast car ownership, highway layout <u>and the availability of existing on street parking.</u></p>
76.	Page 81	Draft Policy 6: Proposed Developments	<p>Point 1: Repeats intentions of Local Plan Policy LP7 Efficient and Effective Use of Land and Buildings. Duplicates 'within existing settlements' from the policy introduction.</p> <p>Point 2: Unclear of the meaning and how to interpret 'suitable'. Design and character considerations are covered in Local Plan policy LP24 Design and issues relating to house size and tenure are covered in Local Plan Policy LP11 Housing Mix and Affordable Housing.</p> <p>Point 3: Repeats intentions of Local Plan Policy LP7 Efficient and Effective Use of Land and Buildings. Also suggests that market housing is not preferred which would not be consistent with NPPF or the Local Plan.</p> <p>Point 4: This policy is covered in Draft Policy 11 of the HVNDP and Local Plan policy LP22 Parking. The council's Highways Development Delivery Planning Pre-application and Application Advice Note quoted in HVDNP Appendix 4 sets out parking guidelines not standards (this is a change that will be made shortly) and reference to this document should more appropriately be made in the justification text rather than the policy in case this document becomes</p>	<p>Noted. See proposed changes above.</p>	<p>See above.</p> <p>May require some re-ordering of criteria to read more clearly.</p> <p>No further changes.</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>superseded or out-of-date. Please note typographical error in the last sentence of point 4: one.</p> <p>Point 5: Repeats matters covered in Local Plan policies LP22 Parking and LP23 Core Walking and Cycling Network.</p> <p>Point 6: Not clear about how densities should make best and efficient use of land. This matter is covered in Local Plan Policy LP7 'Efficient and Effective Use of Land and Buildings'. It may contradict the adequate separation distances required in Policy 1.</p>		
77.	Page 82	Draft Policy 6: House Types and Sizes	<p>This policy appears to repeat issues included in Local Plan policy LP11 Housing Mix and Affordable Housing. In addition, LP11 sets a size threshold of 10 units or greater than 0.4ha to provide a housing mix. Clarity is required as to whether Draft Policy 6 section 2 is intended to apply to all sizes of development however small and this would need to be evidenced and justified.</p> <p>It is suggested that this part of the policy is not necessary unless it is to establish a different threshold to that set out in LP11.</p> <p>First paragraph:</p> <ul style="list-style-type: none"> • It is unclear how this would apply to 'all housing development', for example single dwelling applications. • What is meant by 'local housing need of the locality' – what is this and where is it evidenced? • Does the last sentence of the first paragraph mean that applicants can submit their own up to date 	<p>Noted. Amend Policy as suggested.</p>	<p><u>Amend NDP.</u> See above.</p>

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	<p>needs assessment, and if so would it have equal weight to the Strategic Housing Market Assessment?</p> <p>Second paragraph: It reads that all housing development of this type will automatically be supported.</p> <p>Second paragraph point 1: It is unclear what is meant by the term 'smaller'. Suggest the word is removed.</p> <p>Second paragraph point 2: The term 'suitable proportion' of housing designed to meet the needs of older people and properties for first time buyers is imprecise and not defined. Needs clarification and justification. Housing for older people is not included in figure 18.</p> <p>Second paragraph point 3: Unnecessary criteria repeats Local Plan policy LP11 and NPPF.</p>				
	Draft Policy 7: Supporting Business Generation				
78.	Page 83	4.8.2	Evidence from Companies House needs to be properly referenced (dated etc). There are also many references to the area being 'the valley' or the 'Holme valley'. It would be helpful to clarify is this relates to the whole area covered by the HVNDP.	Refer to Steering Group.	Clarify terms.

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79.	Pages 83 and 84	4.8.3 and 4.8.4	<p>As these two paragraphs are relevant to tourism they may be better placed on page 86 in the 'Tourism and the Visitor Economy' section.</p> <p>Suggestion: include reference to more regular (and locally derived) events, such as the Festival of Folk, Holmfirth Art Week and the Food and Drink Festival.</p>	<p>Accepted.</p> <p>Move 4.8.3 and 4.8.4 to the Tourism section and refer to local festivals.</p>	<p><u>Amend NDP.</u></p> <p>Move 4.8.3 and 4.8.4 to the Tourism section and refer to local festivals as suggested.</p>
80.	Page 84	4.8.6	<p>Change allocated employment <u>area</u> to allocated employment <u>site</u> and change <u>identified</u> employment to <u>designated</u> employment. Update reference from <u>will be</u> to <u>are</u> safeguarded to reflect adoption of the Local Plan.</p>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p><u>Amend NDP.</u></p> <p>4.8.6: Change allocated employment <u>area</u> to allocated employment <u>site</u> and change <u>identified</u> employment to <u>designated</u> employment.</p> <p>Update reference from <u>will be</u> to <u>are</u> safeguarded to reflect adoption of the Local Plan.</p>
81.	Page 84	4.8.8	<p>Update to reflect the adoption of the Local Plan. This paragraph is a mix of small business and green belt policy (note the correct heading for LP54 is 'Buildings for agriculture <u>and forestry</u>'). Suggested wording to support this paragraph could be "<u>address how the economy can be supported in keeping with green belt policy.</u>"</p>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p><u>Amend NDP.</u></p> <p>Update to refer to adopted Local Plan.</p> <p>Correct heading for LP54 is 'Buildings for agriculture <u>and forestry</u>'.</p> <p>Suggested wording to support</p>

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					this paragraph could be "address how the economy can be supported in keeping with green belt policy." Delete " also cover this area"
82.	Page 85	4.8.10 and 4.8.11	<p>These two paragraphs may be better placed to support Draft Policy 8 rather than Draft Policy 7.</p> <p>It would also be helpful to set out whether or how the trends outlined, particularly in paragraph 4.8.10 are supported in the HVNDP.</p>	Accepted. Move paragraphs 4.8.10 and 4.8.11 to supporting text for Policy 7.	<u>Amend NDP.</u> Move paragraphs 4.8.10 and 4.8.11 to supporting text for Policy 7.
83.	Page 86	4.8.14	While the supporting text makes reference to the need to manage litter reduction, this point is not included in Draft Policy 7 (although it is included as policy elsewhere).	Noted. This is not really a planning policy. Add this to Parish Actions 4.	<u>Amend NDP.</u> Add to Parish Council Actions 4: The Parish Council will work with local businesses and Kirklees Council to manage opening hours and control litter.

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84.	Page 87	Draft Policy 7 General comment	<p>It would be helpful to explain where the thresholds for business sizes has been derived from, as would reference to the evidence that underpins this section.</p> <p>The term 'business' should also be clearly defined; does it relate to all 'B' class uses for example. There does not appear to be any supporting text as to why the policy is restricted to certain sizes of business. 'Micro' and 'small' are presumably derived from the EU definition of SMEs, but the EU definition of SMEs also includes medium sized businesses which appear to be excluded from this policy. The policy appears to apply only to small business but the use of the word 'particularly' implies this is not a closed list. Clarity is required.</p> <p>Given the first clause 'Subject to Green Belt policies' this policy only applies in the green belt. Reference to the green belt should be removed from the first paragraph and a sentence at the end of the policy added: <u>"In all cases where development is proposed in the Green Belt regard must be had to the relevant local and national planning policy."</u></p> <p>It is especially important to remove reference to a general support for business development on a greenfield site adjacent to a 'main settlement, village or group of buildings' (imprecise) if the site is within the green belt.</p> <p>What is meant by 'sustainable expansion'?</p> <p>As it reads all 7 criteria need to be met for the proposal to be supported.</p>	<p>Accepted.</p> <p>Insert reference for business thresholds if retained.</p> <p>All criteria (as amended) should be met.</p>	<p><u>Amend NDP.</u></p> <p>See below.</p>

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			<p>Suggested change: <u>Supporting Business Generation</u> <u>Supporting the Local Economy</u></p> <p>Add sub-heading: <u>Small businesses</u></p>		
85.	Page 87	Draft Policy 7	<p>Point 1: This contradicts the first clause of the policy in terms of location outside the green belt. Point 1 is also not necessary as it is simply a list of types of allocated land and locations. If it is retained, it would be helpful if it could be specified that the other villages referred to are not overwashed within the green belt.</p> <p>Point 2: Not necessary as it repeats the first paragraph of the policy. It may also be unreasonable to restrict extensions to within the existing site;</p> <p>Point 3: It is unclear what this is trying to achieve in relation to a greenfield site. No justification has been provided. What is meant by a 'main settlement' or 'village', and is this</p>	Accepted. Amend Policy as suggested. 1. Retain - the reference to the Green Belt has been deleted from the first paragraph - see 84 above.	<u>Amend NDP</u> The Policy now reads: 'Draft Policy 7: Supporting Economic Activity The area designated Natural Zone in the Peak District National Park authority part of the Neighbourhood Area is protected from development other than in exceptional circumstances. Supporting Businesses in the

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	<p>necessary given that proposals may be allowed next to any 'existing group of buildings' (of what number of buildings?) This is imprecise.</p> <p>Points 4, 5, 6 and 7: 'It', or 'the application site' – not 'They' in points 4, 6 and 7. It is unlikely that a new development could be conceived that did not generate any additional traffic impact. Points 4, 5, 6 and 7 are not necessary as these matters are adequately covered by Local Plan policies, in particular LP20 Sustainable Travel, LP21 Highways and Access, LP22 Parking, LP23 Core Walking and Cycling Network and LP24 Design, LP26 Renewable and Low Carbon Energy and LP30 Biodiversity and Geodiversity.</p> <p>Point 6: Beauty it a subjective concept so it may be difficult to comply with this criterion.</p>			<p>Holme Valley</p> <p>In the Kirklees Council part of the Neighbourhood Area, proposals will be supported which result in the creation or sustainable expansion of existing and new businesses, particularly those defined as micro (sole traders or those with fewer than ten fewer employees) or small (ten to fifty employees) in all business sectors within the Neighbourhood Plan designated area.</p> <p>Such proposals will be supported where the following all apply:</p> <ol style="list-style-type: none"> 1. The site is located outside the Green Belt; 2. The proposal supports new business investment or the expansion of an existing business within its existing site; 3. The proposal is for the

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			<p>sensitive conversion or redevelopment of existing buildings or makes use of a previously developed site;</p> <p>4. The site is connected to the existing highway and transport network and will not generate additional and unacceptable adverse traffic impacts on surrounding roads;</p> <p>5. The site is large enough to accommodate the necessary car parking, service areas and appropriate landscaped areas;</p> <p>6. The proposals take account of their impact on the natural environment and contribute to the protection, conservation and enhancement of the natural beauty and distinctive local character of the landscape; and</p> <p>7. The proposals recognise the overall aim to reduce carbon emissions through sustainable design and promoting access by walking,</p>

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			<p>cycling and public transport.</p> <p>Where the proposal is part of a farm diversification scheme or comprises new development within the Green Belt, it must be acceptable having regard to Green Belt policy and Kirklees Council's Local Plan Policy LP10.</p> <p>Supporting Homeworking</p> <p>Proposals which promote the role of home-working within the economy will be supported. These include, where planning permission is required, improvements to broadband and telecommunications infrastructure and small-scale extensions to existing residential dwellings which are subsidiary to the main dwelling, subject to other policies in the NDP, Kirklees adopted Local Plan Policies LP10 and LP20 and national planning policies.</p>

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			<p>Development proposals should incorporate suitable infrastructure to support integrated communication technologies as part of the initial design process.</p> <p>Encouraging Tourist and Visitor Facilities</p> <p>Proposals that contribute to and strengthen the visitor and tourist economy of Holme Valley are supported. These include the creation of new accommodation and tourism facilities through the conversion of existing buildings or associated with existing attractions and new development, where proposals are acceptable having regard to other policies in the NDP.</p> <p>In addition to consideration of the criteria above, all proposals must demonstrate how they meet the following specific criteria:</p> <ol style="list-style-type: none"> 1. New caravan, chalet,

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					<p>cabin or lodge style developments may be supported where they address other policies in the NDP, are appropriately screened, provide adequate car parking spaces, are accessible to people with disabilities, contribute to the conservation of the landscape character and natural environment, do not have a material adverse impact on the natural beauty of the area and do not generate additional traffic movements of a scale and type likely to have material adverse impact on highway safety and efficiency, neighbouring properties and other existing users of the area..</p> <p>2. Proposals for development of existing caravan, camping or visitor accommodation sites should contribute to improving the offer to tourists and not have a material adverse impact on the landscape character and natural beauty of the area.</p>

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					<p>Proposals should mitigate any adverse impact on the capacity of road, sewerage or other infrastructure and contain adequate provision for parking and access for people with disabilities.'</p>
86.	Page 87	Draft Policy 7 1st paragraph after point 7	The paragraph relating to farm diversification repeats Local Plan policy LP10 and is not necessary. As previously commented, the term 'rural area' would need to be defined if it had a meaning other than 'within the green belt'.	Accepted. Amend Policy as suggested.	<u>Amend NDP</u> See above.
87.	Page 87	Draft Policy 7 2nd paragraph after point 7	The paragraph relating to home working would need to justify why extensions should be 'small scale'. Reference would also need to be made to other relevant policies in both the Local Plan and nationally.	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> See above.
88.	Page 87	Draft Policy 7 Night Time Economy	This section does not introduce anything new from the Local Plan as these 2 criteria are covered by LP16 'Food and Drink uses and the evening economy' and LP52 'Protection and improvement of environmental quality'. Lacks clarity on what developments would fall to be considered under the 'night time economy'. If it is intended to apply to pubs/bars, restaurants and take-aways most of these open during the day as well as into the evening. Local Plan paragraph 9.32 could be usefully referenced here.	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> See above.

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89.	Page 88	Draft Policy 7 Encouraging Tourist and Visitor Facilities	<p>Local Plan policy LP10 covers supporting the rural economy.</p> <p>The criteria here add further considerations when proposals are received, but it is unclear why proposals for new facilities should be considered differently to proposals for development within existing sites. A new site for example needs to consider sewerage and other infrastructure while this is not a consideration for development within existing sites. It is also unclear whether point 10 is aimed specifically at proposals for wholly new sites and what the distinction is between the types of development that each point is intended to apply to.</p> <p>No proposal outside the green belt could comply with points 10 and 11. Suggested change: remove reference to the green belt from point 10 and change the last sentence as follows:</p> <p>In all cases <u>where development is proposed in the Green Belt regard must be had to relevant local and national planning policy should be acceptable in terms of green belt policy.</u></p> <p>Replace '<u>type likely to cause undue problems or disturbance</u>' with '<u>type that would be detrimental to highway safety and efficiency, and the convenience of local residents.</u>'</p> <p>Point 11: It is unreasonable and unduly prescriptive to rule out any potential expansion of an existing site.</p> <p>And Point 11: Insert 'material' in front of 'adverse impact'.</p>	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> See above.

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	Draft Policy 8: Facilitating Development in Holmfirth, Honley and other Local Centres				
90.	Page 89	4.8.19	<p>Paragraph 4.8.19 is in general conformity with the NPPF. However, it is incorrect and inconsistent with Local Plan policy LP13 (Town Centre Uses) to refer to Scholes as a local centre. It is Scholes Cleckheaton which is identified as a local centre in the Local Plan and not Scholes Holmfirth (Ref LCB47, page 196 of the Local Plan 'Allocations and Designations' document).</p> <p>Suggested change: Amend 'streets' to 'frontages' to be consistent with Local Plan policy LP14 Shopping Frontages and NPPF. It would be helpful in this paragraph to refer to the relevant Local Plan policies which would also apply to development within town and local centres.</p>	Accepted. Amend text as suggested.	<u>Amend NDP.</u> Amend 4.8.19 to: " Policy LP13 (Town Centre Uses) identifies the hierarchy of town centres. Holmfirth is defined as a Town Centre, with a town centre boundary, where primary and secondary shopping streets frontages have been identified. Honley is identified as a district centre also with a defined boundary. Brockholes, New Mill and Scholes Cleckheaton are defined as local centres. Other Local Plan policies which apply include Policy LP14 Shopping frontages, Policy LP15 Residential use in town centres, and Policy LP16 Food and drink uses and the evening economy. Move to just before Policy 8: The following policy, Policy 8 relates to development within the hierarchy of centres and should be read in conjunction

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					with the NDP Policy 4 relating to shop fronts, advertisements and Policy 5 which addresses the public realm.
91.	Page 90	Draft policy 8 General Comments	<p>This policy repeats considerations set out in Local Plan policies LP13 (Town Centre Uses), LP14 (Shopping Frontages), LP15 (Residential Use in Town Centres), LP16 (Food and Drink Uses and the Evening Economy). It is a generic policy which adds little in terms of the uniqueness and local context of the Holme Valley. This section is not supported by evidence or justification text.</p> <p>The policy and/or supporting text needs to acknowledge permitted development rights for the change of use from retail to residential, particularly in relation to paragraphs 4 and 5.</p>	<p>Noted.</p> <p>The Policy has been prepared in response to the public consultations on the NDP.</p> <p>Add further text after 4.8.19 - perhaps move town centre related text from earlier in the chapter to here eg 4.8.10 - 4.8.14 as no longer so relevant to Policy 7.</p> <p>Add further detail from public consultations relating to Policy.</p>	<u>Amend NDP.</u> <p>Move town centre related text from earlier in the chapter to here eg 4.8.10 - 4.8.14 as no longer so relevant to Policy 7.</p> <p>Add further detail from public consultations relating to Policy</p> <p>Add further text acknowledging permitted development rights for the change of use from retail to residential, particularly in relation to paragraphs 4 and 5.</p>
92.	Page 90	Draft policy 8	<p>Paragraph 1: This is in general conformity with Local Plan policy LP13 (Town Centre Uses) but local centres are not included. There is inconsistency between the policy title and first paragraph in terms of where the policy is intended to apply.</p> <p>Paragraph 2: It is not necessary to refer to Draft Policy 2 in Policy 8. The policy title refers to 'other local centres' but this paragraph only refers to 'both centres' which</p>	<p>Accepted.</p> <p>Amend Policy as suggested and following further discussions with Kirklees Council.</p>	<u>Amend NDP.</u> <p>Policy 8 now reads:</p> <p>Draft Policy 8: Facilitating Development in Holmfirth Town Centre and Honley District Centre and Brockholes and New Mill Local Centres</p>

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	<p>presumably means Holmfirth and Honley. This paragraph also implies that Draft Policy 2 only applies to conservation areas. Reference to 'both centres are Conservation Areas' is not correct as the boundaries of Holmfirth town centre and Honley district centre are smaller than the conservation area boundaries.</p> <p>Suggested change: delete paragraph 2 from Draft Policy 8 and instead include the sentence in the supporting text at the end of paragraph 4.8.19 with the following amendment "the provisions of HVNDP policy 2 should also be considered as both centres are <u>within</u> conservation areas".</p> <p>Paragraph 3: This is inconsistent with the policy title and the first paragraph in terms of where the policy is to be applied, for example 'village centres'. Reference to 'village centres' is inconsistent with the policy title which refers to other local centres. Suggested change:</p> <p>"Development proposals in <u>Holmfirth town centre</u> and <u>village Honley district</u> centres-will be assessed against the following criteria:</p> <p>Paragraph 3 - point 1: This criteria is not supported by evidence and it is unclear who would decide if the offer is balanced and on what basis. It is unclear how the second sentence should be considered.</p> <p>Paragraph 3 - point 2: This criteria is too restrictive and is contrary to NPPF (paragraph 85) which requires planning policies and planning decisions to support the role of town</p>		<p>Within Holmfirth Town Centre and Honley District Centre, development for retail, leisure, office, commercial, cultural and tourism and other main town centre uses will be encouraged where they help enhance the viability and vibrancy of the centres.</p> <p>Development proposals in town, district and local centres will be assessed against the following criteria:</p> <ol style="list-style-type: none"> New developments and changes of use should complement existing provision and ensure that the town, district or local centre offer provides a range of uses appropriate for the relevant type of centre. Care should also be taken to ensure that development does not adversely affect other amenities and facilities, such as open and green space. Proposals should ensure that there is adequate provision for pedestrians, such

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	<p>centres by ‘taking a positive approach to their growth, management and adaptation’. It lacks evidence and supporting text and may be unreasonable, for example in terms of the control over street lighting. It is imprecise for decision makers in terms of what are the measures of ‘adequate provision for pedestrians’, ‘sufficient cycle and car parking’, ‘walking distance’, ‘useful signage’ and ‘sustainable street lighting’. Seating and litters bins provide extra detail beyond the Local Plan and should be supported by justification text. Some of the considerations in this criteria repeat Local Plan policy LP13 (Town Centre Uses) which refers to ‘All proposals shall be inclusive for all users and be attractive to pedestrians, cyclists and public transport users.’</p> <p>Point 2 references adequate seating which may be better placed with Draft Policy 5 relating to high quality public realm.</p> <p>Paragraph 3 – point 3: This criteria is not necessary as it repeats Local Plan policies LP13 (Town Centre Uses) and LP14 (Shopping Frontages). It is not clear what is meant by ‘retail uses’ for the purposes of this criteria. If it is Class A1 uses this should be explained in the justification text. This criteria also lacks clarity in respect of what consideration should be given to development within the local centres as they do not have identified primary shopping areas in the Local Plan.</p> <p>Paragraph 3 - point 4: For town centres this point repeats the intention of Local Plan policy LP15 (Residential Use in Town Centres) in terms of supporting the re-use of upper</p>		<p>as seating and pavements, sufficient cycle and car parking (including electric charging points) and public transport facilities within walking distance, clear and useful signage, facilities for the disposal of litter and sustainable street lighting.</p> <p>3. Retail development should be located in one of the primary shopping areas as set out in NPPF and Local Plan Policy PLP 13, part B. If outside the primary shopping area, retail proposals are subject to the sequential test .</p> <p>4. The re-use of upper floors for residential use and other uses is supported in accordance with Kirklees' Local Plan.</p> <p>5. Distinctive and detailed historic architectural features of buildings should be retained and enhanced in accordance with NDP Policy 4.</p> <p>Business premises should contribute towards retaining the historic nature of the town</p>

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	<p>floors for residential purposes and implies this will be acceptable without consideration of prejudicing other established uses, for example on ground floors. 'Other uses' are not defined and these should also consider impact on adjoining uses.</p> <p>Paragraph 3 – point 5: It would be helpful to provide guidance in the justification text on what is meant by 'distinctive and detailed features' to provide a decision maker with clarity of how to apply this consideration.</p> <p>Paragraph 3 - point 6: Needs justification text to explain how business premises should 'contribute towards a varied and interesting frontage'. It is unclear how will this will be judged and on what basis.</p> <p>Paragraph 4: This criteria is inconsistent with the flexibility allowed through LP14 (Shopping Frontages) which would enable the use of vacant ground floor premises. The restriction to 'main town centre uses' does not allow flexibility for the use of long term vacant units for non-town centre uses. What is meant by 'majority' – this lacks evidence. 'Open to the public' is not a land use planning policy matter and goes beyond the scope of a neighbourhood plan.</p> <p>Paragraph 5: It is unclear what is meant by 'permanent loss' and what constitutes 'retail' for the purposes of applying this criteria, for example is this Use Class A1 (shops) only or all A Class uses? This criteria should be supported by clarification and justification in the text as to what evidence</p>		<p>and district centres by maintaining their varied and interesting frontages for instance through the retention and enhancement of traditional shop fronts as set out in Policy 4.</p> <p>Within the primary shopping areas of Holmfirth Town Centre and Honley District Centre the majority (i.e. 60% - 70%) of ground floor frontages should remain as retail (A1) uses and 40% in the secondary shopping areas.</p> <p>Proposals which would lead to the loss of retail units should be supported by evidence to demonstrate that their continued use for retail is no longer viable, or that an alternative use would enhance the viability and vitality of the town centre.</p> <p>Within Brockholes and New Mill local centres, development for top-up shopping and local services,</p>

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	<p>an applicant would have to submit to demonstrate that retail use is longer viable, for example see Local Plan Strategy & Policies document paragraph 17.17. There is a lack of acknowledgement that the Council has limited control in terms of changes of use. Many changes have permitted development rights and others are subject to 'prior approval'.</p> <p>Suggested change:- Proposals which would lead to the permanent loss of retail units should be supported by evidence to demonstrate that their continued commercial and public use <u>use for retail</u> is no longer viable or that an alternative use would positively enhance the viability and vitality of the town centre.</p> <p>Paragraph 6: It is unclear what is meant by the terms 'appropriate commercial, public and community uses', 'appropriate scale' in point 7 and 'amenities' in point 8, for example, is this noise, smell, visual? These are not defined in the justification text and there is a lack of supporting evidence.</p>		<p>particularly food and drink as set out in Local Plan Policy LP13, will be considered acceptable in principle providing:</p> <p>8. They satisfy other policies elsewhere in the NDP;</p> <p>9. Suitable mitigation measures are provided to address any adverse impacts on residential amenity resulting from additional noise, smell and visual intrusion;</p> <p>10. They are of an appropriate scale in relation to the centre; and</p> <p>11. The amenities of local or adjoining residents or users are protected.</p> <p>The Night Time Economy</p> <p>In addition, new developments associated with the night-time economy (i.e. activities that take place between the hours of 6.00 p.m. and 8.00 a.m.) should demonstrate the following:</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>12. Consideration of appropriate opening hours to mitigate any adverse impact on surrounding residential properties; and</p> <p>13. Consideration of managing the noise pollution caused by the congregation of customers or vehicles outside the premises and in neighbouring areas and streets.</p>
	Draft Policy 9: Protecting and Enhancing Local Community Facilities				
93.	Page 92	4.9.3	Comments about what additional services were needed included 'A trampoline park and more things for teenagers to do' and 'more youth clubs'. These comments are included but there is no responding policy to address them.	<p>Noted.</p> <p>Further supporting text has been added following consideration of the Play Strategy and Open Spaces Strategy.</p> <p>See also 97 below.</p>	<p><u>Amend Plan</u></p> <p>Policy 9 now reads:</p> <p>'Draft Policy 9: Protecting and Enhancing Local Community Facilities'</p> <p>Community facilities are defined as facilities which are of value to the local community and they will be protected and enhanced where possible. Examples are given in paragraph 4.7.11.</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>The loss or change of use of community facilities to non-community uses will only be supported where all of the following apply:</p> <ol style="list-style-type: none"> 1. It has been demonstrated that it is in accordance with relevant policies of the Kirklees Local Plan; and 2. It can be demonstrated that its ongoing provision is not viable, or is no longer needed or justified; and 3. It can be demonstrated that the provisions offered by the facility can be accommodated at an equal or higher standard elsewhere in the local area (within the NDP area;) and 4. It can be demonstrated that every attempt has been made to identify and support local community or voluntary groups wishing to continue the operation of the facility. <p>Education, Health and Community Learning</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>1. Proposals to create, expand or alter schools will be supported, whilst recognising the ongoing social value of small, community based schools.</p> <p>2. The expansion of health provision in the Valley will be supported.</p> <p>3. Proposals to expand the provision of Forest Schools and natural play environments, and to improve provision of accessible natural and semi natural greenspace, amenity greenspace and allotments, will be supported subject to being in accordance with other policies within the plan.'</p>
94.	Page 93	4.9.9	The last sentence on page 93 (and beginning of page 94) relating to percentages of retired people is confusing. It is also not clear where the figure has been derived from.	<p>Noted.</p> <p>Amend sentence to improve clarity.</p>	<p><u>Amend NDP</u></p> <p>Amend 4.9.9 to:</p> <p>In fact, the larger percentage of retired people in the Holme Valley (<u>17% all residents were aged 65 or over in 2011 as opposed to 15.2% in Kirklees as a whole</u>) (insert reference to 2011 Census) potentially</p>

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					creates a wider pool of volunteers who may be able to offer their time and expertise to support the ongoing development of these facilities.
95.	Page 96	4.9.17	There is opportunity to update this paragraph to reflect Cityfibre's plans to roll out high speed broadband across Kirklees by 2020.	Noted.	<p><u>Amend NDP.</u></p> <p>Add in further information about Cityfibre's plans to roll out high speed broadband across Kirklees by 2020.</p>
96.	Page 97	Draft Policy 9 General Comments	<p>Most of the first part of this policy repeats the provisions of Local Plan policy LP48 (Community Facilities and Services).</p> <p>However, the requirement in criteria 3 for alternative provision to be within the NDP area could be detrimental, for example, if there is a suitable alternative just beyond the boundary of the NDP area. The location requirement set out in Local Plan policy LP48 (Community Facilities and Services) requires alternative provision 'to serve the local community which is in an equally accessible location'. If retained, guidance on what evidence an applicant would be required to provide in terms of complying with Draft Policy 9 part 1 criteria 3 and 4 will be necessary.</p>	<p>Noted.</p> <p>See detailed changes below.</p>	No further change to detailed changes set out below.
97.	Page 97	Draft Policy 9 Protecting and Enhancing Local Community	Paragraph 1 (second sentence), paragraphs 2 and 3 and the list are not policy. It is suggested these are included within the justification text. If retained the criteria 1-4 must be separated by 'or' so it is clear that the proposal would not have to meet all the criteria.	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>Move suggested part of policy to supporting text.</p>

	KIRKLEES COMMENTS		PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>Facilities</p> <p>Suggested changes: “Community facilities are defined as facilities which are of value to the local community and they will be protected and enhanced where possible.</p> <p><i>Move the following to justification text:</i> “They are recognised as an essential part of providing accessible and varied services for the area.</p> <p>For the purposes of the Holme Valley Neighbourhood Plan this includes buildings and open spaces.</p> <p>Examples of the types of building and facility that fall under this category include but are not limited to:</p> <ul style="list-style-type: none"> • Village Halls • Civic Halls • Community Centres • Churches • Libraries • Parks and Gardens • Recreation grounds and facilities • Leisure facilities • Village Greens • Schools, colleges and adult education facilities • Market Halls • Doctors Surgeries • Medical services” <p>The development or change of use of the identified</p>			<p>See above for new Policy wording.</p> <p>Move the following to justification text: “They are recognised as an essential part of providing accessible and varied services for the area.</p> <p>For the purposes of the Holme Valley Neighbourhood Plan this includes buildings and open spaces.</p> <p>Examples of the types of building and facility that fall under this category include but are not limited to:</p> <ul style="list-style-type: none"> • Village Halls • Civic Halls • Community Centres • Churches • Libraries • Parks and Gardens

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>community facilities (and similar ones not listed) to non-community uses will not be supported unless:</p> <ol style="list-style-type: none"> 1. It has been demonstrated that it is in accordance with relevant policies of the Kirklees Local Plan; <i>or</i> 2. It can be demonstrated that its ongoing provision is not viable, <i>or is no longer needed or justified; or</i> 3. It can be demonstrated that the provisions offered by the facility can be accommodated at an equal or higher standard elsewhere in the local area (within the NDP area); <i>or</i> 4. It can be demonstrated that every attempt has been made to identify and support local community or voluntary groups wishing to continue the operation of the facility.” <p>Suggestion: Draft policy 9 could consider how the HVNDP could help address deficiencies in open space, sports and recreational facilities in the neighbourhood plan area. Local evidence is provided in the council's Open Space Study (Revised 2016), Playing Pitch Strategy and draft Playable Spaces Strategy. Changing trends in sports and leisure activities and issues regarding the quality and capacity of existing provision can lead to pressures on the system. Whilst major capital projects are intended to serve a wider catchment area, if the right opportunity exists to host one of these within the HVNDP area, then it could be considered supported by evidence and justification.</p> <p>Local Plan policy LP50 could be referenced.</p>		<ul style="list-style-type: none"> • Recreation grounds and facilities • Leisure facilities • Village Greens • Schools, colleges and adult education facilities • Market Halls • Doctors Surgeries • Medical services” <p>Insert further text with regard to guidance for 1, 3 and 4 above - ask Kirklees for advice.</p>

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98.	Page 98	Draft Policy 9 Education and Community Learning	<p>General Comment: Most of section 2 'Education and Community Learning' is not land use related.</p> <p>Point 1: Not land use related.</p> <p>Point 2: Not necessary because if the facilities fall under the same use class (Class D) planning permission would not be required</p> <p>Point 3: Repeats point 1 (in part) and part 1 of Draft Policy 9.</p> <p>Point 4: It is unclear why policy relating to the expansion of health provision is contained in the section headed 'Education and Community Learning'. This point would be better placed in the first part of the policy and could also be supported by reference to having regard to the Primary Care Network in the justification text.</p> <p>Point 5: It is unclear what is meant by 'open up areas of green space'.</p> <p>Suggested changes:-</p> <ol style="list-style-type: none"> 1. The continuing provision of high quality primary education through the network of community based schools and secondary education through the existing comprehensive schools is encouraged and any necessary Proposals to create, expand or alter schools expansion to provide additional space or facilities will be supported. 2. Proposals for the use of schools and other suitable facilities as centres of extra-curricular learning for all through extended opening hours or community use of facilities in evenings 	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> See revised Policy wording above.

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	<p>and weekends is encouraged.</p> <p>3. The development of educational opportunities for all ages in the Valley including the retention of library services will be encouraged.</p> <p>Move point 4 to the first part of the policy with the following amendments:-</p> <p>"The expansion of health provision in the Valley using existing community facilities or new locations or technology will be supported."</p> <p>Suggested change point 5:</p> <p>"Proposals to expand the provision of Forest Schools and open up areas of green space to make them accessible to all ages will be supported subject to <u>being</u> in accordance with other policies within the plan."</p>				
	Draft Policy 10: Protecting Local Green Space				
99.	Page 99	General comment	The heading 'Local Green Space' is confusing as paragraphs 4.9.24 and 4.9.25 relate to Urban Green Space which has a different meaning and is covered by different policy. It may be better to introduce this section with general information about types of open space and how they may be protected and then have a specific section relating to Local Green Space.	Noted. Amend text as suggested.	<u>Amend NDP.</u> Delete title "Local Green Space" and provide new title " Open Space ". Move Local Green Space to a new sub heading and 4.9.23 to before 4.9.27.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
100.	Page 99	4.9.24	The adopted policy is 'LP61' and 'emerging' should be removed when referencing the Local Plan as the plan is now adopted.	Noted. Update text as suggested.	<u>Amend NDP.</u> Update so refers to adopted Local Plan Policy LP61.
101.	Page 99	4.9.26	<p>The first sentence is not consistent with NPPF para 175 (c) which relates to the protection of irreplaceable habitats. Not all woodlands are irreplaceable habitats and it therefore incorrect to suggest woodland in general is given particular protection in relation to the NPPF.</p> <p>It is useful background to show that the protection of woodlands, such as Hagg Wood and Honley Wood, were advocated through the consultation process in relation to the question about Local Green Space. However, these sites are not proposed as Local Green Space in the HVNDP and it may be helpful to explain these are protected through separate designation as Local Wildlife Sites and afforded protection under Local Plan policy LP30. If these sites were discounted for LGS designation due to other protections it would be beneficial to include and explain this.</p> <p>Paragraph 4.9.26 includes information relating to the mapping of woodland and local community work being carried out in connection with the River Holme and woodland planting. Again this is not relevant to the Local Green Space chapter in terms of supporting the designation of Local Green Spaces sites or the implementation of the Local Green Space policy.</p> <p>Figure 29 is not clear and the areas awarded woodland grant cannot easily be identified from this map.</p>	Noted. Amend text as suggested.	<u>Amend NDP.</u> Add "Ancient" to beginning of sentence before "woodland". Add further text to 4.9.26: " However these are already protected through separate designation as Local Wildlife Sites and afforded protection under Local Plan policy LP30 and therefore do not need to be given protection as designated areas of Local Green Space." See 99 above - 4.9.6 now comes before the Local Green Space section. Further cross referencing and editing may be required so the sections do not overlap. Request higher resolution A4

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102.	Page 100	Figure 29	This figure is not clear. It is too small to see effectively and is difficult to understand what the different notations are without the benefit of a key.	Noted.	See 101.
103.	Pages 100-101	4.9.27	The adopted policy is 'LP62' and 'emerging' should be removed when referencing the Local Plan as the plan is now adopted.	Accepted. Update references to Local Plan Policies as suggested.	Amend NDP. Update to refer to adopted Local Plan Policy LP62.
104.	Page 101	Draft Policy 10: Protecting Local Green Space	<p>The wording that new development which 'impacts adversely on the openness of these sites' will not be permitted except in very special circumstances' is not consistent with NPPF or Local Plan policy LP62 (Local Green Space).</p> <p>Suggested change:-</p> <p><u>"The following locations sites have been identified are designated as Local Green Space in the Holme Valley Neighbourhood Plan. Development affecting Local Green Spaces should be considered against Local Plan Policy LP62."</u></p> <p><u>New development which impacts adversely on the openness of these sites will not be permitted except in very special circumstances in accordance with Policy PLP62 of the Kirklees Local Plan.</u></p>	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> Amend Policy to: <u>"The following locations sites have been identified are designated as Local Green Space in the Holme Valley Neighbourhood Plan. Development affecting Local Green Spaces should be considered against Local Plan Policy LP62"</u>
105.		Well Garden, Marsh Road, Scholes	Designation of this site as Local Green Space (LGS) meets the NPPF and NPPG criteria for LGS designation as it performs the function of a village green within Scholes village and has	Noted.	No change.

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			a particular local significance based on its community use.		
106.		Sandygate Fields, Scholes	<p>The council does not support the proposed designation of this site as Local Green Space on the basis that:-</p> <ul style="list-style-type: none"> • it is not in conformity with the development plan as part of the site includes land allocated for housing in the adopted Kirklees Local Plan (site HS182); • it is not consistent with national policy and criteria for LGS designation set out in NPPF (para 99) or NPPG (para 007 ID: 37-007-20140306) as the inclusion of land allocated for housing in the Local Plan (site HS182) undermines planning for sustainable development to meet identified housing needs in the area; and • the land does not meet the criteria for LGS designation set out in NPPF (para 100) as its use as agricultural fields does not have any particular local green space value and its contribution to the setting of two listed buildings (farmhouses) and objection to development are not in themselves grounds for LGS designation. The site itself is not considered to have specific unique qualities to be considered demonstrably special. 	<p>Not accepted.</p> <p>The Steering Group would like the Examiner to consider this and make a final recommendation.</p>	No change.
107.		Chapel Field, Wooldale	The council does not support the proposed designation of this site as Local Green Space on the basis that the site's use as 'agricultural grazing space' and past community activities are not considered demonstrably special.	<p>The Steering Group would like the Examiner to consider this and make a final recommendation.</p>	No change.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
108.		The Triangle, Hade Edge	<p>Designation of the whole of this site as Local Green Space is not supported by the council. As shown in Map 20 the site includes an area of highway verge and hardstanding used for parking which do not have any particular local green space value. However, the remainder of the site comprises an area of amenity greenspace which has a particular local significance based on its use by the community and is considered to meet the NPPF criteria for LGS designation.</p> <p>Suggested change: Amend site boundary to remove highway verge and parking area.</p>	<p>The map has been amended.</p> <p>The Steering Group would like the Examiner to consider this and make a final recommendation.</p>	No change.
	Draft Policy 11: Improving Transport, Accessibility and Local Infrastructure				
109.	Page 107	4.10.5	The accompanying text is background information and does not inform Draft Policy 11.	<p>Not accepted.</p> <p>This paragraph provides part of the local context.</p>	No change.
110.	Page 108	4.10.6	The study referred to should be referenced.	<p>Noted.</p> <p>Steering group to provide reference.</p>	<u>Amend NDP.</u> Insert reference to study.
111.	Page 111	4.10.16	<p>It is suggested that the first sentence is deleted as Local Plan policy LP22 (Parking) does not advocate establishing parking standards but gives guidance to the developer on providing evidence based parking requirements and mitigation on a case by case basis.</p>	<p>Accepted.</p> <p>Delete first sentence as suggested.</p>	<u>Amend NDP.</u> Delete first sentence of 4.10.16. Delete: <i>"In addition, however, the Valley"</i> and replace with " The Parish Council "

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112.	Page 113	4.10.23	Appears to be a typographical error in the last sentence.	Accepted. Amend text.	Amend NDP. Delete: " are important ways"
113.	Page 113	4.10.26	'Would support' is preferable to 'would like'.	Accepted. Amend text as suggested.	Amend NDP. Delete: " would like" and replace with "support"
114.		Draft policy 11 General comment	This policy is not supported by sufficient evidence and justification.	Noted. See detailed responses and proposed changes below.	No further changes to detailed changes set out below.
115.		Draft policy 11 General comment from Major Projects Team	Improving transport and promoting sustainability. Policy 11 appears to contradict itself in places; it reads as if there is support for the policy but then put blocks in the way of doing it – like “minimal interventions”, protecting the key characteristics of transport corridors etc – As an example how could the Plan implement say – the Major “bypass” scheme as it would fail the policy.	Noted. See detailed responses and proposed changes below.	No further changes to detailed changes set out below.
116.	Page 114	Draft policy 11 Traffic Management and Design	General comment: There is a significant overlap with HVNDP Draft Policy 5 (Promoting High Quality Public Realm). Draft Policy 11 appears more suited to a design code than a policy. It is suggested that this policy could be more explicit in promoting a walking/cycling first, then public transport then the car, as set out in the user hierarchy in Local Plan policy LP20 (Sustainable Travel). Discouraging car use is likely to be the key catalyst to reducing pollution, and encouraging people to be more active. Greater prominence of pedestrianised areas would similarly encourage more people	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> Policy 11 now reads: ' Policy 11: Improving Transport, Accessibility and Local Infrastructure Traffic Management and Design

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	<p>to walk, whilst increasing safety.</p> <p>Point 1: The Kirklees Highway Design SPD is not yet adopted. Suggested change: 'Proposals should follow the principles set out in the Kirklees Highway Design SPD <u>council's latest guidance on highway design</u>.'</p> <p>Point 2a: This is not consistent with the hierarchy set out in Local Plan policy LP20 (Sustainable Travel).</p> <p>Point 2b: Suggested change: "(b) minimal interventions, thereby enhancing <u>that do not adversely impact on</u> the historic environment and public realm."</p> <p>Point 3: Lacks evidence. Clarification is needed on what are the 'key characteristics' of transport corridors and where this information can be found.</p> <p>Point 4: It is not clear what evidence of need would be expected. This point could reflect the potential impact on non-car users (pedestrians, cyclists, wheelchair users etc). If the basis for this part of the policy is paragraph 4.10.11 then points 3 and 4 could be merged.</p> <p>Points 5 and 6: These considerations cannot be considered through planning applications. Suggested change: Delete points 5 and 6.</p>		<p>1. In the part of the Neighbourhood Area which is in Kirklees Council area, proposals should follow the principles set out in Kirklees Council's latest guidance on highway design. In the part of the Neighbourhood Area which is in the Peak District National Park Authority Area proposals should follow the principles set out in the Peak District National Park Authority Transport Design Guide.</p> <p>2. Traffic management interventions should be managed on the basis of two principles:</p> <ul style="list-style-type: none"> • A user hierarchy which follows the hierarchy set out in Kirklees Local Plan Policy LP20 of: <ul style="list-style-type: none"> a) pedestrians b) cyclists c) public transport d) private vehicles; and • Minimal interventions that do not adversely impact on the historic environment and public realm.

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>3. Any new schemes should aim to protect the key characteristics of transport corridors which contribute to the local distinctiveness of the Landscape Character Areas of the Holme Valley as described in the Heritage and Character Assessment. These include for instance grass verges, traditional road surfaces such as stone setts, and dry stone walls as reflected in other policies within this NDP. Road widening schemes to improve traffic flow should also consider potential impacts on non-car users (pedestrians, cyclists and wheelchair users).</p> <p>Accessibility and Infrastructure</p> <p>4. All development proposals should, where appropriate, include safe and legible access to local streets, footpaths, and publicly accessible spaces for all users to help support healthier lifestyles and active travel.</p>

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>Developments adjacent to the River Holme should consider access improvements to the River Holme footpath network.</p> <p>5. Existing green infrastructure should not be compromised by new development, and proposals to enhance access, particularly to the River Holme for leisure activities, will be supported.</p> <p>6. Layouts should be imaginative in approach and include traffic calmed streets and nodal points, with frequent changes of direction, and introduce a sense of enclosure to reflect the traditional design and layout found in the Valley.</p> <p>7. Public transport, pedestrian and cycle routes should be incorporated in the layout wherever possible, especially where these can provide safe and convenient routes to schools, local shops and other facilities. The</p>

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>potential to connect the new development to the existing settlement by providing pedestrian and other non-vehicular routes through the site should be fully explored.</p> <p>8. Major developments should consider opportunities to provide car share or car-pooling facilities.</p> <p>Parking Provision and Standards</p> <p>9. Where planning permission is required proposals to convert existing garaging into non-parking provision are discouraged unless suitable alternative off-road parking is available.</p> <p>10. In the Kirklees Council part of the Neighbourhood Area proposals to develop 'park and walk' or 'park and ride' facilities to access Holmfirth town centre or festivals / events in the valley will be supported provided</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>they comply with other relevant policies and mitigate any detrimental impact on the landscape through appropriate surfacing and screening as necessary. Park and ride would not be appropriate in the Peak District National Park part of the Neighbourhood Area as it would harm the valued characteristics of the area.</p> <p>11. New developments in Kirklees Council part of the Neighbourhood Area should provide off-road parking provision in line with Kirklees Local Plan policy LP22 (Parking) and the Council's latest guidance on highway design. Parking areas should be designed sensitively and use suitable materials which are sympathetic to the character of the local area (see Heritage and Character Assessment). Proposals should also aim to maximise accessibility for all groups through careful and considerate design. Development schemes should</p>

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>include provision of electric vehicle charging points wherever practicable.</p> <p>12. Where communal parking is required for apartment development, it should be conveniently located close to the dwellings it is intended to serve.</p> <p>Insert further supporting text before 4.10.6:</p> <p>"The Heritage and Character Assessment report by Aecom provides more detail about the distinctive local characteristics of routes and networks in the Holme Valley. Narrow winding streets and use of stone setts in road surfaces are prevalent in built up areas, and more rural roads are often edged with grass verges and dry stone walls. The characteristics of each defined Landscape Character Area are defined in the report."</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
117.	Page 115	Draft Policy 11 Accessibility and Infrastructure	<p>General Comment: Draft Policy 11 could take the opportunity of requiring developments adjacent to the River Holme to consider improved access to the river Holme footpath network.</p> <p>Point 7: This point repeats Local Plan policy LP21 (Highways and Access). It is unclear whether this criteria is intended to apply to vehicles or pedestrians in respect of 'all users'. 'Active travel' (without the use of a vehicle) could be a consideration in this point</p> <p>Suggested change: "All development proposals should, where appropriate, include safe and legible access to local streets, footpaths, and publicly accessible spaces for all users to help support healthier lifestyles <u>and active travel</u>."</p> <p>Point 8: It is unclear what is meant by 'down play the uninspiring', 'frequent changes of direction' or 'sense of enclosure'. Who would make these judgements and on what basis? This point should perhaps be better placed and evidenced in Draft Policy 1 or 2.</p> <p>Point 9: This point repeats Local Plan policy LP21d (Highways and Access). It is not clear how this policy is intended to be applied. It perhaps also repeats the intentions of point 10.</p>	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> See changes above to Policy 11.
118	Page 115 Parking Provision and Standards		<p>General comment: There is a significant amount of repetition, contradiction and overlap throughout this section.</p> <p>Point 12: At householder scale this is unlikely to require</p>	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> See changes above.

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>planning permission.</p> <p>Point 13: This criteria is repeated at point 17.</p> <p>Point 14: A proposal not in the Green Belt could not comply with point 14. Suggested change: ‘... with Green Belt policy <u>other relevant policies</u>’.</p> <p>Point 15: The first sentence repeats point 1 of draft policy 11. The word ‘must’ is discouraged in planning policies. It is unclear what is meant by ‘sufficient’. The council does not have adopted parking standards but does have parking guidelines. Point 15 is too restrictive as off street parking may be acceptable. Clarity is required as to what may be a suitable surface material. For example, setts may not be compatible for people with mobility issues or visual impairment.</p> <p>Suggested change: “New developments must <u>should</u> provide sufficient off-road parking provision in line with Kirklees Council’s adopted parking standards (see Appendix 4) <u>Local Plan policy LP22 (Parking)</u> and the council’s latest guidance on highway design to ensure schemes do not contribute to further on street parking.”</p> <p>Point 16: This point is unreasonable. It is not clear if this relates to new areas of communal parking (also covered in points 13 and 17). Also, screened courtyards may not benefit from natural surveillance.</p> <p>Point 17: This repeats point 13. It is unclear what is meant by ‘extra and new’. Is the HVNDP advocating additional communal parking over and above what would be expected</p>		

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>and who would be expected to provide this?</p> <p>Point 18: Does communal parking for flats and apartments (which do not need to be differentiated here) also have to comply with point 16? There is considerable confusion and overlap with the considerations set out in points 15, 16 and 18.</p>				
	Draft Policy 12: Promoting Sustainability				
119.	Page 121	4.11.9 (e)	Correction needed: figure 38 <u>9</u>	Accepted. Amend text as suggested.	<u>Amend NDP.</u> <u>figure 38<u>9</u></u>
120.	Page 123	Draft Policy 12: General Comments	<p>There is significant duplication with Local Plan policies, in particular policies LP24 (Design), LP26 (Renewable and Local Carbon Energy), LP27 (Flood Risk), LP28 (Drainage) and LP29 (Management of Water Bodies).</p> <p>The policy is not supported by sufficient explanatory text, supporting information or evidence. It would appear more relevant as a design code or text supporting the application of the Local Plan policies.</p> <p>It unclear if this policy is intended to apply only to major developments (paragraph 1) or all developments, for example as set out in the Energy Efficiency section points 2,4, and 5. Many of the points are written as though they apply to all development.</p> <p>This policy and the preceding policy present good examples</p>	<p>Accepted.</p> <p>Amend Policy as suggested in line with detailed changes below.</p> <p>The supporting text provides significant justification to the Policy. Further evidence could be included referring to more recent published reports on climate change and loss of habitat etc.</p> <p>The policy should be amended to provide more detail on which types of</p>	<u>Amend NDP</u> Consider further references in supporting text to more recent reports on climate emergency and loss of biodiversity. Review all NDP Policy numbering so consistent

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			of the inconsistency of policy numbering. Draft Policy 11 presents all points in number sequence 1-18 (which makes referencing parts of the policy easier) whereas Draft Policy 12 returns to point 1 after every sub-heading (which makes referencing different parts of the policy less easy).	development should address which criteria.	
121.	Page 123	Draft Policy 12: Promoting Renewable Energy	<p>Point 1: Repeats the intentions of Local Plan policy LP26 (Renewable and Local Carbon Energy). Suggested change: Insert '<u>combustion</u>' and/or '<u>anaerobic digestion</u>' after 'biomass'.</p> <p>Point 2: This point appears to encourage wind turbine developments within moorland habitats in the HVNDP area, much of which forms part of the South Pennine Moors European protected sites (the South Pennine Moors Special Protection Area and Special Conservation Area). Development of this nature is unlikely to be consistent with the conservation objectives for these sites. In addition, promoting 'limited wind turbine development' may also be in conflict with NPPF (para 151b) and NPPG (Renewable and Low Carbon Energy paragraphs 005 and 032). The 'moorland area as defined by AECOM' is insufficient to identify an area suitable for wind energy. There is no supporting text to explain which of the Landscape Character Areas this refers to. LCA1 Wessenden Moors and LCA2 Holme Moorland Fringe both contain the word 'moor' in their title but it is not clear if these are the intended areas.</p> <p>Suggested change: Delete point 2.</p> <p>Point 3: Delete this point as the consideration of heat</p>	Accepted. Amend Policy as suggested and following further discussions with Kirklees Council.	<u>Amend NDP.</u> The revised Policy reads: Policy 12: Promoting Sustainability All major development as defined in the NPPF must prepare a sustainability statement which outlines how the development will evaluate and contribute to the following elements of sustainability. Promoting Renewable Energy 1. In the Kirklees Council part of the Neighbourhood Area, proposals for individual and community scale energy from hydro-electric, solar photovoltaic panels, biomass, anaerobic digestion and ground source heating will be

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>networks is covered by Local Plan policy LP26. In any case, the requirement 'should' is too restrictive and the word 'must' is discouraged. This would need to be supported by evidence of viability testing and that it is feasible in the Holme Valley.</p> <p>Point 4: Not necessary as this repeats point 1 and in any case this would need to be demonstrated as part of a planning application.</p>		<p>supported where they can be achieved without conflicting with the NDP polices to protect and enhance the landscape and built character of the Valley. In the Peak District National Park Authority part of the Neighbourhood Area, renewable energy generation will be permitted only where valued character is not compromised and proposals for anaerobic digestion must be related to individual farms or those in close proximity. 'Moorland areas' within the NDP are in the natural zone where development is not permitted.</p> <p>2. New developments should install district heating from renewable resources and will be expected to deliver an on-site heat network, unless it can be demonstrated that this would render the development unviable. In this case, developers must demonstrate that they have worked with 3rd parties, commercial or</p>

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>community, to assess the opportunity.</p> <p>Energy Efficiency</p> <p>3. Sustainable, energy efficient designs should be used. Reclaimed materials from sustainable sources should be used where possible.</p> <p>4. Wherever possible all new non-residential buildings should achieve a BREEAM rating of excellent or outstanding.</p> <p>5. All new buildings should aim to meet a high level of sustainability, design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This might include:</p> <ul style="list-style-type: none"> A. Orientation to optimise passive solar gain. B. Use of high quality, thermally efficient building materials, subject to consideration of local character and context - see

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>Policies 1 and 2.</p> <p>C. Installation of loft and wall insulation and double/triple glazing.</p> <p>D. On site energy generation from renewable resources.</p> <p>6. Wherever possible, all new buildings should incorporate technologies which generate 50% energy from low carbon or renewable sources.</p> <p>7. Retrofitting of older properties to reduce energy demand and to generate renewable energy is encouraged where proposals are sensitive to local character. Alterations to existing properties should be designed to reduce energy demand and comply with sustainable design and construction.</p> <p>Encouraging Recycling & Sustainable Living</p> <p>8. Proposals to increase</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>the level of recycling of waste will be encouraged and retail developments must demonstrate how they will manage and reduce their waste in planning statements or other supporting documents. These should include proposals to support the principle of plastic free living.</p> <p>9. The creation of community gardens and further allotments space in the valley for local food growing will be supported.</p>
122.	Page 123	Draft Policy 12: Energy Efficiency	<p>Point 1: This point requires supporting text to explain what is meant by reclaimed materials 'from sustainable sources'.</p> <p>Point 2: This may be unreasonable as the use of BREEAM may not be suitable for development below a certain size. While the HVNDP could support and encourage its use on all buildings, justification including viability evidence is needed if this is to be a requirement.</p> <p>Point 3: Overlaps with points 1 and 2. Largely (excluding loft and wall insulation and double/triple glazing) repeats Local Plan policy LP24 (Design).</p> <p>Point 4: The wording 'It is recommended...' is not necessary.</p>	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> <p>1. Add footnote to " Reclaimed materials from sustainable sources"</p> <p>"Reclaimed materials are those that have been previously used in a building or project, and which are then re-used in another project. The materials might be altered, resized, refinished, or adapted, but they are not reprocessed in any way, and remain in their</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>No supporting information or evidence of viability testing is provided to justify why at least 50% of total energy should be from renewable sources.</p> <p>Point 5: Use of 'must' is discouraged. It is unclear:-</p> <ul style="list-style-type: none"> • what is meant by 'retrofitting'; • what types of development it would apply to; and • how it would be measured and by whom. 		<p>original form. Sustainable sources are likely to include local suppliers with products reclaimed locally from within or around the Yorkshire or Peak District area."</p>
123.	Page 124	Draft Policy 12: Flooding and Extreme Weather	<p>The council recommends the deletion of this section for the reasons set out below.</p> <p>Points 1, 2, 3 and 4: Not necessary as these points repeat the general intentions of Local Plan policies LP27 (Flood Risk), LP28 (Drainage) and LP29 (Management of Water Bodies) but do not go as far as these policies. Suggested change: Delete these points as the LPA recommends reliance on Local Plan policies in relation to these matters.</p> <p>Point 5: This point would be better placed with draft policy 2.</p> <p>Point 6: Repeats Local Plan policy LP34 (Conserving and Enhancing the Water Environment) point 5. Suggested change: Delete this point.</p> <p>Point 7: Not necessary as this point repeats the permitted development rights for the surfacing of front gardens.</p> <p>Point 8: It unclear when this point would apply as planning permission is not required to plant trees. Issues could be incorporated into the 'planting' section of Draft Policy 2. This would have the benefit of bringing all the considerations relating to planting into one policy area.</p>	<p>Accepted. Delete section.</p>	<p>Amend NDP. Delete section of Policy.</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
124.	Page 124	Draft Policy 12: Sustainable living in new development proposals	<p>Points 1 and 2: These are aims or actions for the Parish Council and are not policy. It is unclear what type of planning applications this would apply to.</p> <p>Point 3: Duplicates Local Plan policy LP24 d (vi) in terms of encouraging facilities for waste recycling and the intention of LP43 (Waste Management Hierarchy). It is unclear why this point should only apply to new retail developments and reducing 'the use of single use plastics' is not a land use planning matter.</p> <p>Point 4: The use of locally produced food by local shops and businesses is not a land use planning matter.</p> <p>Point 5: Not applicable to this section and is covered by Local Plan policy LP24 (b). The use of 'must' is discouraged. It unclear what is meant by 'general amenity' and how this is different to noise, odour and light. Issues could be incorporated into Draft Policy 2.</p>	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> See amended Policy above.
125.	Page 124	Draft Policy 12: Green Infrastructure and Biodiversity	<p>The council recommends the deletion of this section for the reasons given below:-</p> <p>Point 1: Repeats point 7 in the 'Flooding and Extreme Weather' section 'that front gardens should not be hard covered'. #</p> <p>Point 2: Repeats Local Plan policy LP24 (Design) criteria (i) and exactly repeats Local Plan policy LP33 (Trees). This point</p>	Accepted. Delete section. Consider inclusion of new Biodiversity policy in consultation with Kirklees Council and following consideration of SEA.	<u>Amend NDP.</u> Delete section. Consider inclusion of new Biodiversity policy in consultation with Kirklees Council and following consideration of SEA.

	KIRKLEES COMMENTS	PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
	<p>is also already covered in HVNDP Draft Policy 1 point 6.</p> <p>Point 3: Clarification is required about how existing green infrastructure should not be ‘compromised’. ‘Proposals for enhancing access’ are unlikely to be stand-alone proposals and are more likely to be considered as part of development scheme. This means these considerations could more appropriately be moved to HVNDP Draft Policy 11 under ‘Accessibility and Infrastructure’.</p> <p>Point 4: Not necessary as it repeats Local Plan policy LP27 (Flood Risk) and LP29 (Management of Water Bodies).</p> <p>The HVNDP could consider a specific biodiversity policy requiring a measurable biodiversity net gain as a result of development in line with the National Planning Framework and National Planning Practise Guidance and the government’s ambitions as set out in https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirement.</p>		<p>New Policy now reads: Policy 13: Protecting Wildlife and Securing Biodiversity Net Gain</p> <p>All development proposals should demonstrate how biodiversity will be protected and enhanced including the local wildlife, ecological networks, non-statutory locally designated wildlife sites and habitats.</p> <p>The priority for new development should be to create a net gain in natural capital and biodiversity. Direct and indirect impacts upon biodiversity and/or geodiversity should be avoided. Where impacts cannot be avoided, mitigation and then as a last resort compensatory measures (for example biodiversity offsetting) should be provided.</p> <p>A biodiversity net gain can be achieved through development</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>by:</p> <ol style="list-style-type: none"> 1. managing habitats retained within the development site to improve quality; 2. securing local off-site habitat management to provide an overall benefit; 3. a combination of the above.
	Draft Policy 13: Focusing Developer Contributions on Local Priorities				
126.	Page 126	4.12.1	<p>This paragraph requires updating to reflect the current position with CIL.</p> <p>Please note the charge rates set out in the CIL Draft Charging Schedule could be subject to change as a result of the CIL Examination Hearing (taking place on the 16th September) and any subsequent recommendations from the Examiner.</p>	<p>Noted.</p> <p>Update 4.12.1.</p>	<p><u>Amend NDP.</u></p> <p>Insert new text to replace first sentence of 4.12.1: "Community Infrastructure Levy (CIL) is a system to charge developers to help pay for extra infrastructure across the district. The money can be spent on infrastructure which benefits our communities, including new schools, roads, transport services, sports facilities, playgrounds and green spaces.</p> <p>Following submission of the draft charging schedule to the Planning Inspectorate for Examination on 25th April</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>2017, revisions to the National Planning Policy Framework and associated National Planning Practice Guidance have been published. This led Kirklees Council to review the draft charging schedule and update the viability evidence in line with the revised guidance. The CIL Draft Charging Schedule was submitted to the Secretary of State for Communities and Local Government together with the Kirklees Local Plan, so that it could be examined by an independent Examiner. The CIL Examination Hearing took place and closed on Monday 16th September 2019. The charge rates set out in the CIL Draft Charging Schedule could be subject to change as a result of the CIL Examination Hearing." (Reference Kirklees Planning Policy website, Community Infrastructure Levy (CIL))</p>
127.	Page 126	4.12.2	CIL is intended to focus on the provision of new infrastructure and should not be used to remedy pre-existing deficiencies unless those deficiencies will be made more	Accepted. Amend wording as	Amend NDP Insert additional wording to

	KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP								
	severe by new development. Suggested change: "CIL is a levy payable on specific types of development. CIL money does not need to be used for providing infrastructure on the site it is collected from. The relationship therefore between a site's infrastructure requirements and level of contributions made is broken although any infrastructure which is directly required as a result of a development <u>to make a development acceptable in planning terms</u> will continue to be sought through Section 106.				suggested.	beginning of 4.12.2: " CIL is a levy payable on specific types of development. CIL money does not need to be used for providing infrastructure on the site it is collected from. The relationship therefore between a site's infrastructure requirements and level of contributions made is broken although any infrastructure which is directly required as a result of a development <u>to make a development acceptable in planning terms</u> will continue to be sought through Section 106."								
128.	Page 126	4.12.4	Correction: Community Investment <u>Infrastructure</u> Levy		Accepted. Amend text as suggested.	<u>Amend NDP</u> <u>Community Investment Infrastructure Levy</u>								
129.	Page 126	4.12.5	The table in paragraph 4.12.5 should be updated to reflect the 2019 Draft Charging Schedule. Suggested change:		Accepted. Insert new table as suggested.	<u>Amend NDP.</u> <u>Insert new table as provided.</u>								
			<table border="1"> <tr> <td></td><td></td><td>More than 10 units</td><td>10 units or less</td></tr> <tr> <td>Residential</td><td><u>£80</u></td><td>£80 per sq. metre</td><td>£100 per sq. metre</td></tr> </table>				More than 10 units	10 units or less	Residential	<u>£80</u>	£80 per sq. metre	£100 per sq. metre		
		More than 10 units	10 units or less											
Residential	<u>£80</u>	£80 per sq. metre	£100 per sq. metre											

	KIRKLEES COMMENTS							PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					metre				
		Retail and Warehousing	£0	£100 per sq. metre district wide					
		All other uses	£0						
130.	Page 127	Draft policy 13 Focusing Developer Contributions on Local Priorities	General comment: It is unclear whether this list is in order of priority. There is opportunity to be more project specific and community specific by giving examples, such as the parish council action to provide a free water fountain in Holmfirth under Draft Policy 12. Paragraph 1: This point is unreasonable and not necessary and cannot be enforced. It is suggested this paragraph is deleted. Paragraph 2: The Parish Council cannot influence 'other developer contributions' if these are intended to be Section 106 Agreements. If these are not intended to mean Section 106 Agreements than 'other developer contributions' should be clarified. Suggested changes: <ul style="list-style-type: none">• The provision of better facilities for either young people and/or older people.• "<u>Local</u> highway improvements for the benefit of local residents"	Accepted. Amend Policy as suggested.	<u>Amend NDP</u> Insert "not in order of priority" after "aims" New Policy now reads: Policy 14: Focusing Developer Contributions on Local Priorities The Parish Council will prioritise funds received through the Community Infrastructure Levy and other developer contributions to support and enable projects which seek to address the following aims (not in order of priority): <ul style="list-style-type: none">• Improvement of public rights of way including access along the River				

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>Holme</p> <ul style="list-style-type: none"> • The provision of better facilities for either young people and / or old people • Local highway improvements • Environmental or heritage projects seeking to improve the built and natural environment • Improvements to car parking provision • The ongoing retention and support of community facilities including public toilets. <p>The Parish Council actions listed in this Neighbourhood Development plan also identify specific locations where potential projects have been identified for further consideration.</p>
	Appendix 4				

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
131.	129	Appendix 2	Candidate Local heritage assets – unreadable in the paper copy	SG - please provide as Word document.	Improve clarity - insert as Word document.
132.	138	Appendix 4	<p>The council's Highways Development Delivery Planning Pre-application and Application Advice Note quoted in HVDNP Appendix 4 sets out parking guidelines not standards (this is a change that will be made shortly).</p> <p>Replace 'Standards' with 'Guidance' in the first sub-heading and delete 'as at November 2017'.</p> <p>Delete the second sub heading and replace with 'General Residential Parking Guidance'.</p>	<p>Amend as suggested.</p>	<p>Update as suggested:</p> <p>The council's Highways Development Delivery Planning Pre-application and Application Advice Note quoted in HVDNP Appendix 4 sets out parking guidelines not standards (this is a change that will be made shortly).</p> <p>Replace 'Standards' with 'Guidance' in the first sub-heading and delete 'as at November 2017'.</p> <p>Delete the second sub heading and replace with 'General Residential Parking Guidance'.</p>

Table 2 Peak District National Park Authority Comments

Ref. No.	Page No.	Para. No.	Vision / Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NP
1.	All					Noted.	No change.
2.	All / General				<p>Unfortunately there are several neighbourhood policies that are not in general conformity with strategic planning policy. Although the neighbourhood plan acknowledges that a large part of the neighbourhood area is within a national park, it doesn't then consider the implications of this in terms of needing a different approach.</p> <p>Detailed comments are in the attached document but some of the key issues include:</p> <ul style="list-style-type: none"> ② Lack of understanding of and no reference to strategic policies that prevent <i>any</i> development in most of the national park part of the neighbourhood area ② Constant reference to the 'rural area' which is undefined and 'green belt policy' which doesn't apply to the national park 	Noted.	<p>No change.</p> <p>See detailed changes below.</p>

				<ul style="list-style-type: none"> ☒ Undermining of strategic policies by lack of reference or badly worded replication ☒ Lack of understanding of housing policy inside the national park <p>The other major area of concern is that many of the policies are not 'clearly written and unambiguous' as required by para 16d of the NPPF.</p>		
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Detailed Comments from PDNP

Abbreviations:

PDNPA Peak District National Park Authority

PDNP Peak District National Park

CS Core Strategy Part 1 Local Plan

DMP Development Management Policies Part 2 Local Plan

HVNP Holme Valley Neighbourhood Plan

General Conformity - Does HVNP policy or content conform with (& supplement), conflict with or replicate adopted policy? Does HVNP policy or content undermine NPA strategic policy?

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
3.	5		All responses will be considered very carefully and used to inform the submission version of the NDP (Regulation 15) which will be submitted to Kirklees Council later in 2019.	The Plan must also be submitted to the Peak District National Park Authority			Accepted.	<u>Amend NDP.</u> Refer to need to submit to PDNPA and update timescale.
4.	7	Where do NDPs come from?	Once made (adopted) it becomes part of the statutory development plan, and is used to help determine planning applications in the Valley, alongside strategic	In that part of the neighbourhood area that is within the Peak District National Park HVNP will be used to help determine planning applications alongside strategic policies in the Peak District National Park			Accepted.	<u>Amend NDP.</u> Insert additional wording as suggested. "In that part of the neighbourhood area that is within the Peak District National Park HVNP will be used to help determine planning applications

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			policies in the Kirklees Local Plan.	Authority's Core Strategy and Development Management Policies (Part 2 Local Plan).				<p>alongside strategic policies in the Peak District National Park Authority's Core Strategy and Development Management Policies (Part 2 Local Plan)."</p> <p>Refer in each policy section (where relevant) to the PDNPA policies.</p>
5.	8	How does the NDP reflect these views?	and informal feedback from Kirklees . . .	PDNPA also gave informal feedback (by email to Rachel Hogley on 09.07.18)			Accepted.	<u>Amend NDP.</u> <u>This section has been updated.</u>
6.	9	What are the proposed policies?	The policies flow from the objectives and will be used to determine planning applications submitted to Kirklees	Applications for development inside the PDNP will be submitted to the PDNPA.			Accepted.	<u>Amend NDP.</u> <u>Insert:</u> <u>" and applications for development inside the PDNP which will be submitted to the PDNPA.</u>

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			Council.					
7.	10	What are the benefits . .		PDNPA does not operate CIL so need to ensure this is in reference to KMBC only.			Accepted.	<u>Amend NDP.</u> Note that PDNPA does not operate CIL.
8.	11	What happens next?	and it is then submitted by end 2019 to Kirklees Council.	The plan must also be submitted to PDNPA.			Accepted.	<u>Amend NDP.</u> Note that the NDP will also be submitted to the PDNPA.
9.	11	What happens next?	Kirklees then review the Plan and publish it as the Regulation 16 version for a further public consultation in early 2020.	This process must be undertaken jointly by Kirklees MBC and PDNPA.			Accepted.	<u>Amend NDP.</u> Amend to: "Kirklees <u>Council and PDNPA</u> will jointly review the Plan ...
10.	11	What happens next?	will be formally made (adopted) by Kirklees	It must also be formally made by PDNPA			Accepted.	<u>Amend NDP.</u> Amend to: "will be formally made (adopted) by Kirklees <u>and the</u>

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
								<u>PDNPA"</u>
11.	13	timeline	Parish Council approve Regulation 15 NDP and submit to Kirklees Council	It must also be submitted to PDNPA			Accepted.	<u>Amend NDP</u> Insert: <u>" and PDNPA"</u>
12.	13	timeline	Kirklees Council check and approve publication of Regulation 16 NDP	PDNPA must also check and approve publication of Regulation 16			Accepted.	<u>Amend NDP</u> Insert: <u>" and PDNPA"</u>
13.	13	timeline	Kirklees Council submit NDP to appointed Examiner	Kirklees MBC, Qualifying Body and PDNPA must jointly agree appointment of examiner			Accepted.	<u>Amend NDP</u> Insert: <u>" and PDNPA"</u>
14.	18	2.4	and the Peak District Local Plan 2001 'Saved'	The Peak District National Park development plan comprises the			Accepted.	<u>Amend NDP.</u> Update to:

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			Policies4. Part 2 of the Local Plan for the Peak District National Park, the Development Management Policies document and includes a Policies Map, will guide and manage development across the National Park alongside the adopted Core Strategy up to 2026 and will replace the remaining policies in the Local Plan adopted in 2001. The published version of the	Core Strategy (2011) and the Local Plan Part 2: Development Management Policies (May 2019)				"and The Peak District National Park development plan which comprises the Core Strategy (2011) and the Local Plan Part 2: Development Management Policies (May 2019)"

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
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			Development Management Policies Document and Policies Map, along with an addendum of modifications, was submitted to the Secretary of State on 19 February 2018.					
15.	18	Planning Context		An important part of the planning context that is missing from this assessment is that the strategic planning policies of the Peak District National Park Authority must meet the purposes and duty of a national park as set out in the 1995 Environment Act. These are: • to conserve and			Accepted.	<u>Amend NDP.</u> <u>Amend first sentence of 2.5 to:</u> <u>" Holme Valley is a large civil parish.</u> <u>The part of the Parish to the north and east is located in the Metropolitan Borough of Kirklees in West Yorkshire,</u> <u>and the part of the Parish to the south and east lies within the Peak District National Park,</u>

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
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				<p>enhance the natural beauty, wildlife and cultural heritage of the national park</p> <ul style="list-style-type: none"> • to promote opportunities for the understanding and enjoyment of the special qualities (of the parks) by the public • to seek to foster the economic and social well-being of their local communities 				<p>England. The strategic planning policies of the Peak District National Park Authority must meet the purposes and duty of a national park as set out in the 1995 Environment Act. These are:</p> <ul style="list-style-type: none"> - to conserve and enhance the natural beauty, wildlife and cultural heritage of the national park - to promote opportunities for the understanding and enjoyment of the special qualities (of the parks) by the public - to seek to foster the economic and social well-being of their local communities.
16.	20	2.14/2.15		This section should make clear	CS DS1		Accepted.	<u>Amend NDP.</u>

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
				that the requirement to provide housing does not apply to that part of the neighbourhood area that is within the National Park.				Insert additional text: " <u>Supporting the provision of new housing in that part of the NDP area within Kirklees Council</u> is a major issue for the Holme Valley NDP. The requirement to provide housing does not apply to that part of the neighbourhood area that is within the National Park."
17.	20	2.15	Neighbourhood plans should be in general conformity with the strategic planning policies in the Local Plan and should plan positively to support them.	insert 'and'			Accepted.	<u>Amend NDP</u> Insert "and" as suggested.
18.	20/21	2.17		new development within the PDNPA			Accepted.	<u>Amend NDP.</u>

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
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				is not subject to CIL requirements				After " funding" insert " in the Kirklees Council area "
19.	21	2.19	has been interpreted in a different way "Local Plan policy PLP 11 requires a range of housing to meet local needs and states that sites should provide 20% affordable housing."	insert 'a' Need to make clear that PLP 11 does not apply to land within the National Park where there is no such requirement.	CS DS1		Accepted.	<u>Amend NDP.</u> insert 'a' Add further sentence to end of paragraph: " There is no such requirement in the National Park".
20.	21	2.20	larger towns such as Huddersfield.	insert 'as'			Accepted.	<u>Amend NDP.</u> insert 'as'
21.	21	2.20	higher managerial, administrated and professional occupations (15.45% of all	administration ages			Accepted.	<u>Amend NDP.</u> Change to " administration " and "ages"

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			aged					
22.	3.3	23	The primary purpose of a Neighbourhood Development Plan is for a Parish Council to produce a set of policies against which planning applications submitted to Kirklees Council will be assessed.	submitted to KMBC or PDNPA			Accepted.	<u>Amend NDP.</u> Change to: " submitted to Kirklees Council or the Peak District National Park Authority"
23.	vision	23	The Holme Valley of the future will continue to be a beautiful rural landscape offering safe environments for wildlife and celebrating its culture, heritage and splendour for	sense? for wildlife and a place where celebrating its culture, heritage and splendour are celebrated by for the benefit of local people and visitors.			Accepted. (But retain "sense")	<u>Amend NDP.</u> Amend Vision as suggested. <u>"for wildlife and a place where celebrating its culture, heritage and splendour are celebrated by for the benefit of local people and visitors."</u>

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			the benefit of local people and visitors.					
24.	4.1.8	28	Much of the rural area of the Parish is protected by Green Belt.	Much of the rural area is protected by national park status and within that as 'natural zone'. There is no green belt in the national park.	CSL1		Accepted.	<p>Amend NDP.</p> <p>Amend final sentence to:</p> <p>" <u>Much of the rural area is protected by national park status and within that as 'natural zone'.</u> Large parts of the rural area of the Parish within Kirklees Council are protected by Green Belt.</p>
25.	4.2.2	31	<i>agricultural fields enclosed by millstone grit walls which form an immediate fringe to the Peak District</i>	the landscape character area is within the PDNP as well, not just an 'immediate fringe'			<p>Noted.</p> <p>Refer to Table 1B Kirklees Council comments.</p> <p>This section is to be deleted from the main text</p>	No further change.

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Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			<i>National Park;</i>				and bullet points only from the Heritage and Character Assessment inserted into an Appendix.	
26.	4.2.9	38	neighbourhood level policy to complement those of the Kirklees Local Plan.	and the PDNPA local plan			Accepted.	<u>Amend NDP.</u> Insert: " and the PDNPA local plan"
27.	4.2.9		Kirklees Local Plan policies and the NPPF provide protection for large areas of countryside in the Parish as much of the rural area is Green Belt.	Most of the neighbourhood area that lies within the PDNP is designated 'natural zone' where development is not permitted.	CSL1		Accepted.	Amend NDP. Insert before "Kirklees" " Most of the neighbourhood area that lies within the PDNP is designated 'natural zone' where development is not permitted and " Insert " in the Kirklees Council area " after "the rural area"
28.	4.2.14-4.2.15			reference also	CS L1 and L2		Accepted.	<u>Amend NDP</u>

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
				PDNPA natural environment policies				Refer to PDNPA natural environment policies CS L1 and L2
29.	4.2.16							
30.	Policy 1	40		Rural areas are not precisely defined. 'Rural areas' inside the PDNP are not green belt.	CS GSP2C CS GSP3 CS L1 DMP DMC1 DMP DMC2 DMP DMC3 DMP DME1 DMP DMC5 DMP DME2	Not in general conformity with PDNPA strategic policies. LCA1 and LCA2 are within the natural zone of the national park where no development is permitted. Neighbourhood policy is confusing as it is a mix of spatial strategy & design code and does not have sufficient clarity to meet NPPF test (para 16d)	Noted. The Policy has been amended taking into account comments from Kirklees Council. Amend Policy as suggested.	Amend NDP Delete • LCA 1: Wessenden Moors • LCA 2: Holme Moorland Fringe From bullet points. Add to policy: " Note: Wessenden Moors (CA 1) and Holme Moorland Fringe (CA 2) are in the Natural Zone of the Peak District National Park where other than in exceptional circumstances, proposals for development will not

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
						Neighbourhood Policy replicates and undermines existing strategic policy (para 16f).		be permitted. Refer in each relevant policy section to the PDNPA policies.
	Policy 1 Section 2				CS DS1	CS DS1 would permit development in or on the edge of a settlement but the Authority would need to be sure of capacity with regard to character and setting (DMS 1 E)	Criterion 2 has been deleted.	No further change.
	Policy 1 Section 2				CSL1	There is no green belt in the national park.	Criterion 2 has been deleted.	No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
	Policy 1 Section 3			Where are the significant views? For this policy to work you would need much more detail. Fails NPPF para 16d.			Noted. See amended Policy following comments from Kirklees Council. The policy refers to the views identified in the Heritage and Character Assessment report. As explained in the supporting text the Steering Group considers that there are very many important views in the NDP area and it would be too difficult to pick out further individual views as significant.	No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
	Policy 1 Section 4				CS L1 DMP DME1	Contrary to PDNPA CS L1 which does not permit development in the natural zone. Contrary to DMP DME 1 - in the National Park part of the neighbourhood area it is not sufficient for new agricultural buildings to have screening, landscaping and neutral colours. Neighbourhood policy replicates and undermines existing strategic policy.	Noted. This has been amended in response to Kirklees comments to refer only to that part of the NDP area in the Green Belt. It would not apply to the National Park area.	No further change.
	Policy 1 Section 8		"Development should protect wildlife resources, green corridors and key	Badly phrased policy. How should a developer do this? Contrary to NPPF para 16d.			Noted. This criterion has been deleted following comments from Kirklees Council.	No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			biodiversity assets as identified ..."					
	Policy 1 Section 12			<p>Badly phrased policy. How do you define a 'rural area'?</p> <p>'Rural areas' inside the National Park are not green belt. Contrary to NPPF para 16 d and f.</p>	CS L1 DMC5	<p>Not in general conformity with PDNPA strategic policies.</p> <p>Replicates and undermines existing strategic policy.</p>	Accepted. Delete 12.	Amend NDP. Delete 12.
	Policy 2	61			CS L3 DMP DMC3	<p>In general conformity with NPA strategic policies subject to further comments listed below</p> <p>Policy does not satisfy NPPF para 16 d.</p> <p>Would benefit from being</p>	Noted. See amendments in response to comments from Kirklees Council.	Review structure of Policy once finalised and consider further breakdown into clauses and subclauses. No further change in addition to those set out below. Refer in each policy section to the PDNPA policies.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
						broken down into separate policies and clauses.		
	Policy 2(6)		d) a full hard and soft landscaping scheme is to be submitted with all planning applications.	6d should not be part of this list – it is a different /separate requirement and should stand alone			Accepted. Delete this part of the policy.	Amend NDP. Delete from Policy 2 and move to Policy 1 Criterion 9: "a full hard and soft landscaping scheme is to be submitted with all planning applications where appropriate."
	Policy 2(9)		Scale, height and massing of development should not be an “off the shelf” solution	NPPF para 16b. Negative statement.			Accepted. This has been reworded in response to Kirklees Council's comments.	No further change.
	Policy 2(10) Amenity, Privacy and Space Standards		Housing developments should be designed so that individual dwellings have	possible conflict with Policy 2 (7) “Designs should reflect the scale, mass, height and form of existing			Accepted. This has been deleted following consideration of Kirklees'	No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			reasonable distances between and around them so that users can enjoy privacy in which to enjoy their amenity space. If new housing development proposals fail to achieve these dimensions, unless they are of special design such as single aspect dwellings, then it will be concluded that privacy and amenity standards will be inadequate.	locally characteristic buildings.” What is a reasonable distance? 'Locally characteristic buildings' often do not have 'reasonable distances' (or in fact any distance!) between and around them. this policy is saying that either houses should be 'individual dwellings with reasonable distances between and around them' or 'single aspect' ie with windows only on one side.			comments.	

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
				<p>Is this really what is meant?</p> <p>Possible conflict with NPPF 16d that requires 'policies that are clearly written and unambiguous'.</p>				
	Policy 2 (11)		Planting around the external boundaries should include an appropriate mix of native trees, hedgerows and new woodland areas (although not in Pennine Fringes),	What is the justification for excluding Pennine Fringe?			<p>Noted.</p> <p>This has been reworded following consideration of Kirklees' comments and does not now exclude the Pennine Fringe.</p>	No further change.
	Policy 2 (11)		Planting should be seen as an integral part of the overall master plan	repetition of first sentence of clause 11			<p>Noted.</p> <p>This has been reworded following consideration of</p>	No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
							Kirklees' comments and does not now exclude the Pennine Fringe.	
	policy 2 (11)		"use native species <i>where appropriate</i> " vs "Native species <i>should be used</i> "	which is it? Possible conflict with NPPF 16d that requires 'policies that are clearly written and unambiguous'.			Noted. This has been reworded following consideration of Kirklees' comments and does not now exclude the Pennine Fringe.	No further change.
	Policy 3	65			CS L3 DMP DMC5 DMP DMC 10	Proposals affecting heritage assets within the PDNP should refer to DMP DMC5.	Accepted.	Amend NDP. Refer to DMP DMC5 in amended policy. Refer in each policy section to the PDNPA policies.
	Policy 3(2)		detracting from or competing with	what is 'competing with'? Possible conflict with NPPF 16d			Noted. The Policy wording has	No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
				that requires 'policies that are clearly written and unambiguous'.			been amended following consideration of comments from Kirklees Council.	
	Policy 4	68	Many of the Holme Valley's buildings date from the 18th and 19th centuries. During this period shopfront design sought to achieve a successful relationship between the shopfront itself and the building as a whole. Some adaption may be necessary to take account of technological change....	This is not as policy but supporting text.	DMP DMS4	Some elements of this policy undermine NPA strategic policy – see below for details.	Noted. The Policy wording has been amended following consideration of comments from Kirklees Council.	Refer in each policy section to the PDNPA policies. No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
	Policy 4	68 Sections 9 and 10	Section 9 states that 'shutter boxes that are <i>shown to be necessary</i> ' should be 'integrated into the overall design' whereas Section 10 states 'shutter boxes to the exterior of a historic building is unacceptable' but for 'unlisted buildings, externally mounted externally mounted open mesh roller shutters may be acceptable provided that the box housing is concealed ...'	What would an applicant have to demonstrate to show that a shutter box 'was necessary'? 'Historic buildings' may also be 'unlisted' so section 10 is unclear. Possible conflict with NPPF 16d that requires 'policies that are clearly written and unambiguous'.		Conflict of Policy 4 sections 9 and 10 with PDNPA DMP DMS 4 which states 'external security roller shutters will not be permitted'. The policy should make clear that any shopfronts in the PDNPA part of HVNP will not be permitted to have external security roller shutters.	Noted. The Policy wording has been amended following consideration of comments from Kirklees Council. Section 9 has been deleted. Roller shutters are now dealt with in anew, amended section and should be amended to refer to the PDNPA comments.	Amend NDP. Add further wording to new 10: " ... in the Kirklees Council part of the neighbourhood area. Any shopfronts in the Peak District National Park Authority part of Neighbourhood Area will not be permitted to have external security roller shutters. " Add to d and e: " In the Kirklees Council part of the Neighbourhood Area only"
	Policy 4	Section 11	Illuminated signs should be		DMP DMS 5 (B)	Conflict of Policy 4 section	Accepted.	Amend NDP.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			treated as an integral part of the overall design, and should seek to be discreet, energy efficient and substantially hidden from view.			11 with PDNPA DMP DMS 5 which states that internal and external illumination will not be granted consent except in certain prescribed circumstances. The policy should make clear that any shopfronts within the PDNPA part of HVNP will not be permitted illuminated signs except in accordance with DMP DMS 5.	Add further text referring to the PDNPA area policy.	Add further text to 11: "Any shopfronts within the Peak District National Park Authority part of Neighbourhood Area will not be permitted illuminated signs except in accordance with DMP DMS 5. In the Kirklees Council part of the Neighbourhood Area...." Refer in each policy section to the PDNPA policies.
	Policy 5	74		policy would benefit from numbering		In general conformity	Accepted.	Review numbering. Refer in each policy section to the PDNPA policies.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			Adequate public waste bins should be provided where uses are likely to lead to increased littering by customers.	not a planning policy			Accepted. This part of the Policy has been deleted following consideration of comments from Kirklees Council	No further change.
	Policy 6	81		The title is misleading and contradicts the first line. 'Areas not protected by green belt' are different to 'within existing settlements.'	CS L1 CS DS1	Not in general conformity with strategic policy: *areas outside settlements are not 'green belt'. *CS DS1 only permits new <i>affordable</i> (ie not open market) housing in 'named' settlements. *in this case the only place in the NP where	Accepted. Revise Policy so first part refers to Kirklees Council area.	<u>Amend NDP.</u> Insert at the start of the revised policy: " In the Kirklees Council part of the Neighbourhood Area, new ..." Insert at the end of the Policy new wording: " In the Peak District National Park Authority part of the Neighbourhood Area, in line with Core Strategy Policy Development

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Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
						<p>this policy could apply is 'in or on the edge of' Holme village.</p> <p>*reference to 'best use of land' undermines CS DS1 where the main focus is 'capacity for development' judged by an assessment of site alternatives with reference to the pattern of development, character and setting of buildings and landscape character.</p>	<p>This part of the Policy now only refers to development in the Kirklees area.</p>	<p>Strategy DS1, only new affordable (ie not open market) housing will be permitted in or on the edge of Holme village."</p> <p>Refer in each policy section to the PDNPA policies.</p>
	Policy 6 section 'proposed developments'	81	Housing should be suitable in terms of design, house size and	suitable by what criteria?			<p>This part of the Policy now only refers to development in</p>	No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
	2		tenure				the Kirklees area and has been amended following consideration of Kirklees Council's comments.	
	policy 6 Policy 6 section 'proposed developments' 4	81/82	this document sets out general principles used as a starting point to be evidenced in relation to site accessibility, forecast car ownership, <i>highway layout, existing on street parking, availability.</i> Additional parking provision to accommodate visitors and delivery vans is encouraged to minimise	grammar and typo			This part of the Policy now only refers to development in the Kirklees area and has been amended following consideration of Kirklees Council's comments.	No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			additional on street parking <i>ono</i> nearby roads.					
	Policy 7	87		the policy is too long and covers too many different elements that ought to be separate policies. It is difficult to understand and in some places appears contradictory. Conflict with NPPF 16d that requires 'policies that are clearly written and unambiguous'.		Not in general conformity with PDNPA strategic policies – see below for details	Noted.	No further change. Refer in each policy section to the PDNPA policies.
	Policy 7	87	Subject to Green Belt policies, proposals will be supported ..	should also be subject to PDNPA polices	CS L1 (B) CS RT2 CS RT3 DMP DME2 DMP DME5 DMP DME7	Conflict with PDNPA CS L1. Most of the 'Neighbourhood Plan designated area' within the	Accepted. Amend Policy 7 as suggested to refer to PDNPA policies.	<u>Amend NDP.</u> Insert at the start of the policy " In the Kirklees Council part of the

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
						PDNP is not designated 'green belt' but it is 'natural zone' and protected from development other than in exceptional circumstances.		<p>Neighbourhood Area,..."</p> <p>Insert at the end of the Policy:</p> <p>"The area designated 'natural zone' in the Peak District National Park Authority part of the Neighbourhood Area is protected from development other than in exceptional circumstances."</p>
		Subject to Green Belt policies, proposals will be supported which result in the creation or sustainable expansion of existing and new businesses, particularly those defined as micro (sole	confusing construction: eg sustainable expansion of <i>new</i> businesses? eg those with less than ten fewer employees			Noted. The Policy has been amended following consideration of detailed comments submitted by Kirklees Council.		No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			traders or those with less than ten fewer employees) or small (ten to fifty employees) in all business sectors within the Neighbourhood Plan designated area.					
	Policy 7 Section 1	87	The site is located outside the Green Belt	Must also be outside the Natural Zone	CS L1	Conflict with CS L1	Noted. The Policy has been amended following consideration of detailed comments submitted by Kirklees Council.	No further change.
	Policy 7		Where the proposal is part of a farm diversification scheme or comprises new development	how do you define rural area? Is Holme village 'a village' as described by clause 1, or is it 'within the rural	DMP DME 2 (farm diversification) DMP DME 5 (B1 development)	Conflict with DMP policies DME 2,5,7 must also be acceptable having regard	Noted. The Policy has been amended following consideration of detailed	No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			within the rural area, it must be acceptable having regard to Green Belt policy.	area'?	in countryside outside settlements) DMP DME7	to PDNPA policy, not green belt policy	comments submitted by Kirklees Council.	
	Policy 7 section 10	88	New caravan, chalet, cabin or lodge style developments may be supported providing they comply with Green Belt policy . . .		RT3	Conflict with CS RT3 static caravans, chalets and lodges are not permitted in the PDNP	Noted. The Policy has been amended following consideration of detailed comments submitted by Kirklees Council.	No further change.
	Policy 8					not applicable to PDNP	N/A	N/A
	Policy 9	97				In general conformity with PDNPA strategic policies		Refer in each policy section to the PDNPA policies.
	Policy 9 sections 1-4		how would an applicant be expected to demonstrate these things? What evidence should be				Noted. The Policy and supporting text has been amended following	No further change.

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
				submitted?			consideration of detailed comments submitted by Kirklees Council.	
	Policy 10	101				not applicable to PDNPA	N/A	N/A
	Policy 11 4.10.15		and the opportunity to pay at no cost on residential streets	typo			Noted.	Amend typo: and the opportunity to park at no cost on residential streets Refer in each policy section to the PDNPA policies.
	Policy 11 section 1	114	Proposals should follow the principles set out in the Kirklees Highway Design SPD37.	In the PDNP, proposals should follow the principles set out in the PDNPA Transport Design Guide			Accepted.	Amend NDP Amend 1. To: " In the part of the Neighbourhood Area which is in Kirklees Council area, proposals should follow the principles set out in Kirklees Council's latest

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
								guidance on highway design. In the part of the Neighbourhood Area which is in the Peak District National Park Authority Area proposals should follow the principles set out in the Peak District National Park Authority Transport Design Guide."
	Policy 11 parking provision and standards	115		it would be useful for the policy to differentiate between residential, business and visitor parking			Noted. The Policy has been amended following consideration of detailed comments submitted by Kirklees Council.	No further change.
	Policy 11 Section 14		Proposals to develop 'park and walk' or 'park and ride' facilities to	park and ride would not be appropriate in the PDNP as it would harm the valued	CS L1 CS T7D	conflict with PDNPA strategic policy	Noted. Amend text to differentiate policy in the	Amend NDP. Amend 14 to: "In the Kirklees Council part of the

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			access Holmfirth town centre or festivals / events in the valley will be supported provided they comply with Green Belt policy and mitigate any detrimental impact on the	characteristics of the area.			PDNPA area and Kirklees Council area.	Neighbourhood Area proposals to develop 'park and walk' or 'park and ride' facilities to access Holmfirth town centre or festivals / events in the valley will be supported provided they comply with Green Belt policy other relevant policies and mitigate any detrimental impact on the landscape through appropriate surfacing and screening as necessary. Park and ride would not be appropriate in the Peak District National Park part of the Neighbourhood Area as it would harm the valued characteristics of the area."

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
	Policy 12	123		<p>the policy is constructed in a confusing way. The first part is a requirement for a sustainability statement for major development, but the associated list could be applied to – and reads as though it should be applied to – any development.</p> <p>If the whole policy <i>is</i> constructed around a requirement for a sustainability statement then the policy does not offer any guidance as to whether the items listed will be given planning permission and in</p>			<p>Noted. See detailed changes below.</p>	<p>Refer in each policy section to the PDNPA policies.</p>

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
				<p>what circumstances.</p> <p>Some of the elements, while obviously important, are not a planning matter eg 'increase the use of local shops', 'urban gardening', 'planting of trees on hillsides'. They should be included as a 'parish action' instead.</p> <p>Possible conflict with NPPF 16d that requires 'policies that are clearly written and unambiguous'.</p>				
	Policy 12 Promoting	123	1. Proposals for individual and		CS L1 CS CC2	Conflict with CS L1, CC2 and	Noted.	<u>Amend NDP</u>

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
	renewable energy section 1 and 2		community scale energy from hydro-electric, solar photovoltaic panels, biomass, anaerobic digestion plants and ground source heating will be supported where they can be achieved without conflicting with the NDP polices to protect and enhance the landscape and built character of the Valley. 2. Proposals for limited wind turbine development on the 'moorland' area		CS CC4	CC4. Renewable energy generation is permitted with the PDNP but only where valued character is not compromised. Anaerobic digestion must be related to individual farms or those in close proximity. 'Moorland areas' within the NP are natural zone where development is not permitted. Avoiding 'conflict with Green Belt Policy' does not	The Policy has been amended following consideration of detailed comments submitted by Kirklees Council. Amend further as suggested.	Amend 1 to " In the Kirklees Council part of the Neighbourhood Area , proposals for individual and community scale energy from hydro-electric, solar photovoltaic panels, biomass combustion' and/or 'anaerobic digestion, anaerobic digestion plants and ground source heating will be supported where they can be achieved without conflicting with the NDP polices to protect and enhance the landscape and built character of the Valley. In the Peak District National Park Authority part of the Neighbourhood Area , renewable

	Holme Valley Neighbourhood Plan			PDNPA comment			Parish Council Consideration	Amendments to NDP
Ref	page	section or policy	extract	general comment	corresponding NPA Policy	In general conformity?		
			as defined by AECOM, will be supported where they do not conflict with Green Belt policy, provided potential harmful impacts are avoided and the required consultation with the local community is undertaken.			give sufficient protection as the PDNP does not have any Green Belt.		energy generation will be permitted only where valued character is not compromised and proposals for anaerobic digestion must be related to individual farms or those in close proximity."

Table 3 Consultation Bodies' Responses

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
1. Clerk, Cawthorn e Parish Council	All		General	Support	May I take this opportunity to say what a well thought out and presented document the Draft Plan is. I particularly liked the Summary of Policies given.	Noted.	No change.
2. Historic England	All		General	Comment / Support	We offered detail comments and advice on the draft Neighbourhood Plan in our letter of 18 April 2018, and note that our advice has been positively responded to. We also welcomed the comprehensive nature of the draft Neighbourhood Plan. We therefore do not consider it necessary to make any additional comments at this stage, and look forward to be consulted upon the Submission Draft in due course.	Noted.	No change.
3.	All		General	Comment	An assessment has been	Noted.	No change.

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
National Grid					<p>carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.</p>		
4. Natural England	All		General	Comment	<p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities</p>	Noted.	No change.

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					that should be considered when preparing a Neighbourhood Plan.		
5. Sport England	All		General	Comment	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.</p> <p>Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and</p>	<p>Noted.</p> <p>The NDP identifies open spaces and recreational areas for protection and enhancement and encourages healthy lifestyles by promoting walking and cycling.</p>	No change.

Consultee Name Address	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
Ref. No.							
					<p>employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to</p>		

Consultee Name Address	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
Ref. No.							
					<p>the development and implementation of planning policy is the evidence base on which it is founded.</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources</p>		

Consultee Name Address	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
Ref. No.							
					<p>gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					<p>should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p>http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					<p>facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered.</p> <p>Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					<p>for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be</p>		

Consultee Name Address	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
Ref. No.							
					<p>improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p>		

Table 4 Local Community Groups

Consultee Name Address	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
Ref. No.							
Holmfirth Transition Town (HoTT) 1.1			Policy 1	Support / Comment	<p>Although it is important to protect the landscape, this should not be to the exclusion of renewable energy projects such as wind turbines.</p> <p>Kirklees Council and the Parish Council have declared Climate Change Emergencies and any construction which can reduce our carbon footprint must have at least equal consideration as the landscape.</p> <p>Further comment should be included on retaining peat bogs and restoring the peat bogs to retain their carbon sink.</p>	<p>Noted.</p> <p>Renewable energy is supported in Policy 12. However this does not refer to wind turbines because national planning policy (NPPF 154 b) footnote 49)sets out that:</p> <p><i>"Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be</i></p>	No change.

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						<p><i>demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing."</i></p> <p>Retaining and restoring peat bogs is not a planning matter but a land management / biodiversity issue. Much of the moorland part of the NDP area is in the PDNPA area and will be protected from development.</p>	
1.2			Policy 2	Comment	<p>Although it is important to protect the built character and conservation areas, this policy should not exclude developments to promote renewable energy.</p> <p>Better waste storage should be considered as, particularly business storage is an eyesore</p>	<p>Noted.</p> <p>Renewable energy is supported in Policy 2 and more detail is provided in Policy 12.</p> <p>Waste management is not a planning matter but the</p>	No change.

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					<p>in Holmfirth and Honley.</p> <p>We would like to see Listed buildings being given the opportunity to add energy efficient measures eg double glazing.</p>	<p>Parish Council will continue to promote improved local facilities.</p> <p>Proposals affecting listed buildings are required to consider impact on character and planning decisions should take a balanced approach by finding solutions that protect heritage assets whilst improving energy efficiency.</p>	
1.3			Policy 3	Support	<p>We agree that non designated assets should be preserved, however possibly not Listed as this will prevent the buildings adding energy efficient measures.</p>	<p>Not accepted.</p> <p>Local listing of heritage assets is different from the statutory list. Identified non designated heritage assets are an important local asset and should be protected from inappropriate or insensitive change.</p>	No change.
1.4			Policy 4	Support	Advice should be taken from other villages that have	Noted.	No change.

Consultee Name Address	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
Ref. No.							
					achieved a consistency in shop design and colour schemes that has enhanced the experience for visitors to Holmfirth/Honley.	The Policy has been revised following consideration of comments submitted by Kirklees Council and now no longer refers to colour. The Parish Council will continue to promote high quality and sensitive designs as set out in the revised Policy.	
1.5			Policy 5	Support	The policy would benefit from the inclusion of better waste storage for businesses, such as communal underground waste storage with access at pavement level.	<p>Noted.</p> <p>The Policy has been revised following consideration of comments submitted by Kirklees Council and now no longer refers to waste storage and collection.</p>	No change.
1.6			Policy 6	Support	HoTT consider that the Council should undertake stock management whereby the needs of the local community are considered in each planning application considered. Community led	<p>Noted.</p> <p>Planning applications are published for public consultation.</p> <p>Policy 6 could be amended to support community led</p>	<u>Amend NDP.</u> <u>Insert additional text into Policy 6 eg include under House Types and Sizes:</u> <u>" Provide new housing through a Community Right to Build Order or other</u>

Consultee Name Address	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
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					housing/self-build/housing associations should have a priority.	housing in the neighbourhood area.	<p>community led housing project including self-build schemes."</p> <p>Insert into supporting text:</p> <p>"Neighbourhood Development Orders (NDOs) were introduced through the Localism Act 2011 and grant planning permission for specific development in a particular area. Community organisations can bring forward a 'Community Right to Build Order' which is a type of NDO. This allows certain community organisations to bring forward smaller-scale development on a specific site, without the need for planning permission. Communities have the freedom to develop, for instance, small-scale housing and other facilities that they want. Any benefit from this development stays within the community to be used for the community's benefit, for example, to maintain affordable housing stock."</p>
1.7			Policy 7	Support	Community business and eco businesses should be promoted and supported.	<p>Noted.</p> <p>The Policy supports</p>	No change.

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					Existing charity businesses should be supported by, for example, lower business rates.	investment in suitable local businesses which would include community led / eco businesses and charities subject to other NDP policies. Business rates are not a planning policy matter.	
1.8			Policy 8	Support	All development should include a higher proportion of renewable energy, insulation and glazing than required by building regulations to ensure reduced carbon footprint in the Holme Valley.	Noted. Refer to revised Policy 12.	No further change.
1.9			Policy 9	Support	Protecting and increasing community facilities should take priority to new development on a particular site.	Noted. Refer to revised Policy 9. The first line now sets out that community facilities will be protected and enhanced where possible.	No change.
1.10			Policy 11	Support	The installation of electric charging points should be	Noted.	No change.

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					<p>FAST charging points.</p> <p>The Plan should be looking at ways to prevent or discourage HGVs from coming through Holmfirth/Honley. All new car parks proposed should be permeable areas not tarmac. Cars and particularly buses should be discouraged from idling when stationary.</p>	<p>EVC points are promoted in Policy 5.</p> <p>Traffic management including HGV routes and discouraging idling are not planning policy matters. Promoting the use of sustainable drainage is included in Local Plan policies and the Flooding and Extreme Weather section of Policy 2 has been deleted on the advice of Kirklees Council.</p>	
1.11			Policy 12	Support / Comment	<p>As Kirklees Council and the Parish Council have declared a Climate Change Emergency, the NP should include support to these declarations.</p> <p>Sustainability must be considered in all policies to mitigate climate change, and based on the Climate Change declaration, the Parish Council must impose clear</p>	<p>Noted.</p> <p>Policy 12 has been revised following consideration of comments submitted by Kirklees Council.</p> <p>Planning policies cannot include technical standards and currently energy efficiency and low carbon technologies are more</p>	<p><u>Amend NDP.</u></p> <p>Provide additional text in relation to PC declaring a Climate Emergency.</p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					<p>requirements in all aspects of the PC work to reduce carbon and achieve zero energy.</p> <p>Renewable Energy must be better supported through the NDP, as its inclusion will be central to the Climate Change Action Plan.</p> <p>All new buildings should be zero energy rated by the inclusion of insulation and renewable energy installations. Older buildings should be encouraged to attain a better energy efficiency by use of various techniques which are applicable to the particular building.</p> <p>HOTT will be promoting thermal imaging techniques this winter to educate building owners of the areas of loss of heat on their homes and give advice on ways to mitigate</p>	<p>likely to be addressed through Building Regulations.</p> <p>The supporting text could be strengthened with reference to the Climate Change Emergency declaration.</p>	

Consultee Name Address	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
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					heat loss. These techniques should be promoted by the NDP.		
1.12			General	Support	Ticked yes to support the aims of the plan and its future progression to referendum.	Noted.	No change.
Scholes Future Group 2.1	101		Policy 10 Protecting Local Green Space	Support	<p>We make these written comments in response to the regulation 14 public consultation of HVPC's Draft Neighbourhood Plan. Our comments are strictly to our view that certain land in Scholes should be designated as Local Green Space.</p> <p>1. Justification for designating the land formally in H597 as Local Green Space / NPPF 99-101</p> <p>The land which we think should be designated as Local Green Space is that coloured orange in the</p>	<p>Noted.</p> <p>The LGS 1) Scholes Marsh Road Well Garden will be retained in the NDP.</p>	<p>Amend NDP</p> <p>Review submitted comments and add to LGS justification where appropriate.</p>

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					<p>drawing in Appendix 1.</p> <p>The designation of land as Local Green Space is governed by paragraphs 99, 100, and 101 in the NPPF of July 2018. We will look at each of the three paragraphs separately.</p> <p>Para 99</p> <p>From what we have seen so far of the NDP, we believe the designation of this land as Local Green Space will be consistent with the NDP in terms of sustainable development and complement investment in sufficient homes, jobs and other essential services.</p> <p>As the designation is being used as part of the preparation of the NDP,</p>		

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					<p>and will be able to endure beyond the end of the plan period, the final sentence of para 99 is satisfied.</p> <p>Para 100</p> <p>Looking at each of the three sub-paragraphs of para 100 :</p> <p>a) It is fairly self-evident that the space is close to the community it serves. It is bounded to the east and south by existing housing developments, and to the north and west by older, sparser dwellings.</p> <p>Appendix 3 is the letter of 6 June 1996 from a Planning Inspector dismissing an appeal to allow the building of 91 dwellings on a 2.68</p>		

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					<p>hectare site at the north-east on the present site. At para 20, the Inspector says :</p> <p style="padding-left: 40px;">“Although the site comprises open fields, there is no dispute that the site is located within the broad framework of Scholes.”</p> <p>b) Para 100(b) requires that the green space must be demonstrably special to the local community and hold a particular local significance. Examples are given of beauty, historic significance, recreational value, tranquility, and richness of wildlife – but the list is not exhaustive.</p> <p>All the land comprising the green space has for many</p>		

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					<p>years been grazed as cattle and sheep. It is certainly important to the local farmers.</p> <p>Appendix 5 is an extract from the Appendix to Historic England's representations to the PDLP Inspector on KMC's Natural and Historic Environmental Policies.</p> <p>Appendix 4 is an extract from KMC's Heritage Impact Assessment ("HIA") on H597. The HIA states that the Grade II Listed Sandy Gate Farmhouse adjacent to the north side of H597, and its environs are important heritage assets. The HIA states of the Farmhouse that :</p> <p style="padding-left: 40px;">The access roads are of High Significance</p> <p style="padding-left: 40px;">The views from H597</p>		

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					<p>towards it are of High Significance</p> <p>The boundary walls of H597 are of High Significance</p> <p>The land adjacent to Sandy Gate Farmhouse is of Moderate Significance</p> <p>The land adjacent to The Olde House Hamlet (to the west of H597) is of Moderate Significance</p> <p>The remaining areas of H597 are of Slight Significance</p> <p>Historic England's representations were that they were all of sufficient significance that H597 should be reduced to just one field at</p>		

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					<p>its south end. The PDLP Inspector agreed. Appendix 2 is her direction to do so, and Appendix 6 explains why.</p> <p>One thing is certain – that the area of this Local Green Space is, if nothing else, special to the local community because of its historic significance.</p> <p>The space is also special and significant to the residents of Scholes in that it preserves the character and setting of Scholes. The Planning Inspector in 1996 (Appendix 3) refers to this at para 22 of his decision. He says :</p> <p style="padding-left: 40px;">“From my observation, it appears to me that the form of the settlement is typified by clusters of building punctuated by open</p>		

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					<p>gaps which allow views out to the countryside beyond. The appeal is one such gap. Although the proposed development would not encroach unduly into the surrounding countryside, the sense of openness of this part of the village would be markedly diminished by the proposed development.”</p> <p>Preserving this local space as special would prevent this.</p> <p>c) The land concerned is not an extensive tract of land. It is self-contained with clearly-defined edges, and is not open countryside.</p> <p>Para 101</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					We assume that the HVPC will manage development, with the owner if necessary, within the Local Green Space if it is included in the NDP.		

Table 5 Developers' and Landowners' Comments

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
Gladman Developments Limited 1.1			General	Comment	Holme Valley Neighbourhood Development Plan This section highlights the key issue that Gladman would like to raise with regards to the content of the HVNP as currently proposed. It is considered the requirements of national policy and guidance are not always reflected in the plan. Gladman have sought to recommend a modification to ensure compliance with basic conditions.	Noted.	No change.
1.2	60		Policy 2	Object	Policy 2 sets out a list 13 design principles that all proposals for residential and commercial development will be expected to adhere to.	Noted. This Policy has been revised following consideration of comments submitted	No change.

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					Whilst Gladman recognise the importance of high-quality design, planning policies and the documents sitting behind them should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a 'one size fits all' solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles. Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to	by Kirklees Council and the PDNPA. The Policy allows for a degree of flexibility but aims to promote high quality design which respects the local context and unique and distinctive character of the NDP area.	

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					<p>impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 126 of the Framework which states that:</p> <p>"To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					would be justified."		
1.3	101		10 – Protecting local green space	Object to Local Green space number 2 (Scholes Sandygate Fields)	<p>Policy 10 identifies 4 tracts of land as potential Local Green Space designations. The designation of land as Local Green Space (LGS) is a significant policy designation and effectively means that once designated, they provide protection that is comparable to that for Green Belt land. As such, the Parish Council should ensure that the proposed designations are capable of meeting the requirements of national policy if they consider it necessary to seek LGS designation.</p> <p>The Framework 2018 is explicit in stating at paragraph 100 that '<i>Local Green Space designation will not be appropriate</i></p>	<p>Noted. The NDP refers to the criteria and wording set out in the NPPF in relation to Local Green Spaces.</p> <p>Not accepted. The Parish Council wish to retain this area in the NDP for the Examiner to determine.</p>	No change.

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					<p><i>for most green areas or open space'. With this in mind, it is imperative that the plan makers can clearly demonstrate that the requirements for LGS designation are met. The designation of LGS should only be used:</i></p> <ul style="list-style-type: none"> ¶ Where the green space is in reasonably close proximity to the community it serves; ¶ Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and ¶ Where the green area concerned is local in character and is not an extensive tract of land. 		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					<p>Gladman further note §015 of the PPG (ID37-015) which states, '§100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land.</p> <p>Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate.</p> <p>Gladman do not believe that HVNP supporting evidence is sufficiently robust to justify the proposed allocation of 2) Scholes Sandygate Fields (Map 18) as LGS, given its lack of particularly special features.</p> <p>The issue of whether LGS</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					<p>meets the criteria for designation has been explored in a number of Examiner's Reports across the country and we highlight the following decisions:</p> <ul style="list-style-type: none"> - The Sedlescombe Neighbourhood Plan Examiner's Report³ recommended the deletion of an LGS measuring approximately 4.5ha as it was found to be an extensive tract of land. - The Oakley and Deane Neighbourhood Plan Examiners Report⁴ recommended the deletion of an LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation. - The Alrewas Neighbourhood Plan 		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					<p>Examiner's Report 5 identifies both proposed LGS sites 'in relation to the overall size of the Alrewas Village' to be extensive tracts of land.</p> <p>The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha.</p> <p>Highlighted through a number of Examiner's Reports set out above and other 'made' neighbourhood plans, it is considered several sites have not been designated in accordance with national policy and guidance and subsequently are not in accordance with the basic conditions.</p> <p>Gladman suggest that the</p>		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					Parish Council review the evidence supporting the proposed designations and ensure compliance with all the above requirements. Whilst the Parish Council have sought to undertake some form of evidence base it does not overcome the failure to meet the specific policy requirements set out above with regards to the scale of land to be designated, particularly in relation to '2) Scholes Sandygate Fields (Map 18)' which appears to form an extensive tract of land and the only location, not included within the existing green belt boundary in the vicinity. In terms of meeting the second test there is no evidence base to support this designated LGS being		

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					'demonstrably special to a local community.' In relation to its beauty, it is of no particular scenic quality. The Policy has not therefore been made in accordance with basic conditions (a) and (d). Gladman recommend that the LGS Policy be revisited to ensure the designations are compliant in their entirety.		
1.4			General	Object	Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has	Not accepted. The NDP policies and supporting text have been revised and updated to take account of comments submitted by Kirklees Council and the PDNPA. The Basic Conditions Statement sets out in more detail how the Submission NDP	No change.

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NP
					<p>sought to clarify the relation of the HVNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.</p> <p>Gladman is concerned that the plan in its current form does not comply with basic condition (a) in its conformity with national policy and guidance and is contrary to (d) the making of the order contributes to the achievement of sustainable development for the reasons set out above.</p>	<p>meets the required basic conditions and ultimately testing the NDP against these will be a matter for the examiner.</p>	

Table 6A Residents' Responses to Policy 1 – Landscape Character

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
1			Comment	Banning all HGVs from the town centre	<p>Noted.</p> <p>This is not a planning policy matter.</p>	No change.
4			Comment	Please do something about the cheap and nasty, bright, white LED street-lights. The night-time character of the valley has already been destroyed, yet public lighting is not even mentioned in the NDP. My suggestion for improving the landscape character of the area is to leave it alone. As the NDP is not allowed to contradict national policy I would expect it to make no difference to the ongoing urbanisation. The NDP appears to be a guide for developers.	<p>Noted.</p> <p>Lighting is addressed in revised Policy 2. This sets out that "Light pollution should be minimised, and security lighting must be appropriate, unobtrusive and energy efficient."</p> <p>Policy 4 also addresses lighting in shop fronts.</p> <p>The policies in the NDP should be used to guide development and are required to be positively phrased.</p>	No change.
5			Support	That sounds great , it's so important to keep the sides of the valley unbuilt on otherwise our lively town will loose its	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				character.		
8			Support	it's good	Noted.	No change.
9			Comment	More tree planting within schemes, not to "normally retain important trees". In the scheme recently built in Scholes the original plan had fewer houses and more tree planting - this ended up as more houses and not a single tree/grass kerb. We need more houses but let's build these schemes sensitively and make them beautiful like their surroundings and not just prioritise the profits of the builders for once.	Noted. Retaining trees and tree planting is encouraged in revised Policy 1.	No change.
15			Comment	Reduce new build in the Holme Valley	Not accepted. The NDP cannot propose less housing than the Local Plan which sets out the strategic housing requirement for Kirklees area and identifies a number of housing site allocations.	No change.
17			Comment	To make sure housing developers are sympathetic to	Accepted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				the local environment.	The NDP includes a range of policies which require development to respect and be sensitive to local character.	
20			Comment	Landscape the river 'island' outside Picturedrome - currently it is a tangled mess of weeds yet with imagination it could be beautiful and planted with native wild flowers attracting insects as well as tourists	<p>Noted.</p> <p>This is not a planning policy matter - refer to Parish Council for possible action working with other groups.</p>	No change.
21			Comment	Stop all building on green field sites and the plague of wind turbines	<p>Noted.</p> <p>The NDP cannot propose less housing than the Local Plan which sets out the strategic housing requirement for Kirklees area and identifies a number of housing site allocations.</p> <p>The NDP cannot promote wind turbines in line with national planning policy (unless certain circumstances apply).</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
22			Comment	Plant more trees	<p>Noted.</p> <p>Retaining trees and tree planting is encouraged in revised Policy 1.</p> <p>Refer to the Parish Council for possible action.</p>	No change.
29			Support	I agree with it	Noted.	No change.
30			Comment	Working with the many groups (HoTT River Connections landowners) to promote managing the green spaces in an environmentally sensitive way.	<p>Noted.</p> <p>Refer to the Parish Council for possible action.</p>	No change.
31			Comment	Ensure the Green Belt is preserved and ensure no building on areas that would have a deleterious impact on visual impact to the landscape.	<p>Noted.</p> <p>The Green Belt is protected in national and local planning policy.</p> <p>The NDP cannot propose less housing than the Local Plan which sets out the strategic housing requirement for Kirklees area and identifies a number of housing site allocations, some of which</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					required a change to the Green Belt boundary.	
33			Comment	One of the key features of the valley is the wealth of historic buildings and features. It is important to protect these features whether they are Listed or not	Noted.	No change.
36			Support	I fully agree with the intention of maintaining and enhancing the green areas, (the trees and hedgerows) and using local materials to retain the historic and individual character of the Holme Valley with its dry stone walls, its paths and traditional pedestrian ways.	Noted.	No change.
42			Comment	Riverside paths should be promoted and extended to form a continuous route. Especially where new developments are along rivers.	Noted. Policy 11 has been revised and sets out that "Developments adjacent to the River Holme should consider access improvements to the river Holme footpath network."	No change.
44			Comment	Too many housing developments must be monitored as the Valley is	Noted. The NDP cannot propose	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				already at saturation point.	less housing than the Local Plan which sets out the strategic housing requirement for Kirklees area and identifies a number of housing site allocations.	
48			Support	I agree that the development should aim to respect the character of our Holme Valley and preserve the significant views from built up areas of moorland and also that wildlife should be protected as it is coming under increasing threat.	Noted.	No change.
49			Comment	Why only new agricultural buildings need screening. some housing estates make a visual impact too eg Upperthong	Noted. The Policy has been revised in relation to boundary treatments following consideration of comments submitted by Kirklees Council. Refer also to revised Policy 2 which addresses planting schemes.	No change.
52			Comment	I think the preservation of existing open views is	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				particularly important	The Policy wording has been revised following consideration of comments submitted by Kirklees Council.	
54			Comment	No, but I particularly like the sections about retaining valuable trees in relation to wildlife habitats and public amenity. Also planting appropriate species.	Noted. The Policy wording has been revised following consideration of comments submitted by Kirklees Council.	No change.
55			Comment	This should reflect a broader importance of our landscape - not just to preserve it but to maximise its environmental value in light of the climate emergency ie. restore peat bogs, plant trees etc.	Noted. The NDP supporting text will be reviewed and updated taking account of the climate emergency declaration.	No change.
56			Comment	Bullet 5 should say that the preference is for the continuing use of dry stone walls rather than closed panel fencing in rural areas except where stock fencing is required. Solid wooden fencing closes off views and changes the character of areas as well as being vulnerable to	Noted. The Policy does not promote closed panel fencing in boundary treatments. Not all fencing requires planning permission. A new Policy (13) has been	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				damage in high winds and not offering wildlife habitats. Bullet 8 should not only protect wildlife resources etc. but seek to enhance them.	prepared in relation to promoting biodiversity.	
59			Comment	Development should not only protect wildlife resources, green corridors and key biodiversity assets as identified in Kirklees Green Corridors, Tree and Woodland and Biodiversity Strategies including areas of woodland on valley slopes, it should enhance and improve these, e.g. by linking areas together to prevent these from becoming isolated wildlife islands. Rewilding projects should be prioritised and supported throughout the valley.	Noted. New biodiversity policy has been added as Policy 13 'Protecting Wildlife and Securing Biodiversity Net Gain'	
60			Comment	1.1 Whilst protecting the landscape is important, this policy should not be used to preclude renewable energy development given the Climate Emergency recently declared by the Parish Council. I wish to see an overarching	Noted. Refer to revised Policy 12.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				statement to this effect in the HV NDP		
63			Comment	yes, stop the building of further new developments in the Holme Valley- its character of the town's immediate surroundings has been destroyed already and it does nt need making worse. Kirklees Council only cares about its quota of homes being built in our area and our highways schools and countryside (what is left of it) cannot support further building safely and aesthetically.	Noted. The NDP cannot propose less housing than the Local Plan which sets out the strategic housing requirement for Kirklees area and identifies a number of housing site allocations.	No change.
67			Comment	Full support for organisation like the Holme River Trust	Noted.	No change.
72			Comment	Trees and green spaces	Noted.	No change.

Table 6B Residents' Responses to Policy 2 – Built character & conservation areas

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
1			Comment	This should be a matter of course when applications for development are considered. Not left to the whim of the builders	Noted.	No change.
3			Comment	Reference should be included to Kirklees Council's proposed traffic plan which would be detrimental to pedestrian movement and the character of Hollowgate.	Noted. Refer to Policy 11. The NDP has little influence over Kirklees Council's proposals for traffic schemes.	No change.
4			Support	It sounds good to me. It is not implemented at present so my suggestion would be to implement the policy.	Noted.	No change.
9			Comment	We live in a green and rural community, please more open green spaces, keen side, adjoining houses, trees on road sides etc. Small Spaces but plenty of them would make all the difference .	Noted. The NDP includes a range of policies which protect the natural environment and promote landscaping and tree planting.	No change.
15			Comment	Ensure any new builds that have to happen are in	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				traditional design and local stone	Policy 2 supports designs which protect and enhance local built character and distinctiveness and use locally appropriate materials.	
19			Comment	Where there are to be new developments be mindful of the size. The new building at Hade Edge has completely swamped the original vernacular architecture.	<p>Noted.</p> <p>The Kirklees Local Plan allocates a number of strategic housing sites in the NDP area and these already have an indicative housing capacity figure. The NDP policies should be used to inform future applications which may come forward over the plan period. New (non-allocated) sites are likely to be relatively small in scale as they will only be acceptable in areas not protected by the Green Belt or PDNPA policies.</p>	No change.
21			Comment	Convert derelict buildings to housing and develop brown field sites only	<p>Noted.</p> <p>Policy 6 supports the redevelopment of</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					brownfield sites and the conversion of other suitable buildings for residential use. The Kirklees Local Plan allocates a number of strategic housing sites in the NDP area and a number of these are on green field sites.	
22			Comment	Plant more trees	Noted. Policy 2 supports tree planting as part of landscaping schemes.	No change.
26			Comment	Stop building estates of more than 10 houses	The Kirklees Local Plan allocates a number of strategic housing sites in the NDP area and these already include schemes of more than 10 houses.	No change.
29			Comment	There should be a balance between maintaining the tradition and outlandish design: do not lock people into the past	Noted. The NDP Policies seek to protect and enhance local character but also support contemporary and sustainable designs where	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					appropriate as set out in Policy 2 and Policy 12.	
30			Comment	Don't tidy up too much, the diversity is part of the South Pennines character. Make do and mend. Promote rehab and new design which accommodates the demands of Climate Change.	Noted.	No change.
31			Comment	Ensure the use of brownfield sites for development, not Green Belt.	Noted. Policy 6 supports the redevelopment of brownfield sites and the conversion of other suitable buildings for residential use. The Kirklees Local Plan allocates a number of strategic housing sites in the NDP area and a number of these are on green field and / or former Green Belt sites.	No change.
33			Comment	Coordinated policy to the include trade and domestic residents.	Noted. Policy 2 refers to residential and commercial	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					development.	
34			Comment	Para 10 allows almost any meaning! It could be rewritten to require adequate privacy for residents whilst still encouraging tight visually meaningful relationships between buildings.	<p>Noted.</p> <p>Paragraph 10 has been deleted following consideration of comments from Kirklees Council.</p> <p>Amenity issues are now addressed in the final paragraph.</p>	No change.
36			Comment / Support	I support the use of traditional local materials enhanced by modern additions where appropriate to support the continuing needs of the public in our public spaces.	Noted.	No change.
42			Comment	Low energy design should be encouraged. New developments should include public space/realm and space for wildlife.	<p>Noted.</p> <p>Policy 2 addresses these 2 matters. Biodiversity is addressed in new Policy 13.</p>	No change.
43			Comment	There should be a ban on blocking views from listed buildings, i.e. sheds, summer houses, extensions, trees.	<p>Not accepted.</p> <p>Private views from buildings cannot be protected but the NDP protects some public</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					<p>views.</p> <p>The setting of listed buildings is a consideration in the determination of planning applications.</p>	
44			Comment	<p>Point 9; Scale and Proportion</p> <p>Point 10; Distance between properties Neither of the above have been considered on the Broad Lane, Upporthong development. Properties are totally out of character with surrounding houses and buildings. The building known as "Franks Farm", a Listed Building was in the process of being KNOCKED DOWN on 5th/6th September 2019!!!</p>	<p>Noted.</p> <p>The NDP cannot influence decisions on planning applications that have already been made.</p>	No change.
48			Support	I very much agree with what is stated here. Advertisements have started creeping into fields and on stone walls and these spoil the character of the area and are unregulated.	Noted.	No change.
49			Comment	Promoting industry would reduce travelling for jobs	<p>Noted.</p> <p>Refer to Policy 7.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
51			Comment	I feel strongly about the great buildings and character of our town. It should be enhanced and treasured.	Noted.	No change.
52			Comment	I think scale and proportion is particularly important as is the issue of materials and design	Noted.	No change.
54			Comment	No, I like the comments re significant trees, water courses, structures and significant features being incorporated into new designs	Noted.	No change.
56			Comment	Bullet 8 should discourage solid fencing in heritage areas and generally discourage the 'gating' of communities whereby electronic gates discourage neighbourly interaction or community contact as they create elite pockets of housing where the public cannot enter. Also, can we make being in a conservation area more important when applying for planning permission and give guidance to applicants so they understand what is expected of them.	Noted. Policy 1 now encourages the use of dry stone walls, iron railings and hedges in boundary treatments. The reference to resisting gated communities could be inserted into the policy. The Parish Council and Kirklees Council could do more to promote the significance of the conservation areas.	<u>Amend NDP</u> Insert additional text to Innovation and Responding to Local Context: "Gated communities which restrict permeability are not characteristic of the Holme Valley area and will be resisted."

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
57			Comment	All developments and alteration to existing premises should demonstrate adequate means of bin storage to avoid unsightly clusters of wheelie bins etc and prevent littering in the vicinity of the bins.	<p>Noted.</p> <p>References to bin stores have been largely removed from the NDP policies as these duplicate policies in the Local Plan - see Kirklees Council's comments. Policy 5 however refers to screening of bin stores to protect the public realm.</p>	No change.
59			Comment	All new dwellings should have sufficient usable garden space around them to enable those living there to grow their own fruit and vegetables, i.e. equivalent to a standard allotment. All new developments will have native hedgerows planted and maintained as boundaries to ensure that there are no solid boundaries that could inhibit the free flow of wildlife, e.g. hedgehogs. All new development will be carbon neutral, both in terms of	<p>Noted.</p> <p>These matters are largely addressed in NDP Policies or Kirklees Local Plan policies.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				building materials and future usage.		
60			Comment	2.1 Whilst protecting the built character and conservation areas is important, this policy should not be used to preclude renewable energy development and home energy efficiency measures, given the Climate Emergency recently declared by the Parish Council. I wish to see an overarching statement to this effect in the HV NDP	Noted. The NDP supporting text has been reviewed in the context of the climate emergency.	No further change.
61			Comment	Housing to be built in a manner sympathetic to existing buildings in the area, using local materials	Noted. This is addressed in Policy 2.	No change.
63			Comment	Carry on as previous ensuring that developers refurbish/renovate existing unused properties to an attractive standard. Ensure no HGVs pollute and congest the conservation areas and centre of Holmfirth	Noted. These matters are largely outside the influence of planning policies.	No change.
67			Comment	Only high quality should receive approval.	Noted.	No change.
72			Comment	Green roofs and wild areas	Noted.	New biodiversity policy added as policy 13

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				nearby for bees		'Protecting Wildlife and Securing Biodiversity Net Gain'

Table 6C Residents' Responses to Policy 3 – Non-designated heritage assets

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
1			Comment	This should be a matter of course when applications for development are considered. Not left to the whim of the builders	Noted.	No change.
4			Comment	Wouldn't we just do this as a matter of course?	Noted.	No change.
15			Comment	Established countryside should also be classed as a heritage asset.	Noted. Countryside is protected in other NDP policies such as Policy, Kirklees' Green Belt Policies and PDNPA policies.	No change.
19			Comment	Maintenance of areas needs to be considered, no use tidying an area up if there is no follow tidying.	Noted. Maintenance of areas is outside the role of the NDP.	No change.
22			Comment	Remove all temporary signs and especially banners.	Noted. Policy 4 addresses advertisements but control is matter for Kirklees Council.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
25			Comment	Looks Ok - would like to see this enforced.	Noted. Enforcement is a matter for Kirklees Council.	No change.
30			Comment	Promote sustainable traffic solutions by thinking outside the box, to improve the environment and reduce traffic pollution.	Noted. Refer to Policy 11.	No change.
33			Comment	Protect drystone walls. Enforce current policies	Noted. Refer to Policy 1.	No change.
36			Support.	It is highly desirable that non-designated heritage assets be protected and preserved wherever possible.	Noted.	No change.
42			Comment	Allotments should be protected and certainly not designated as 'Brownfield' sites.	Noted. Allotments have additional protection outside planning policies but are also protected in Kirklees' planning policies.	No change.
48			Comment	Holmfirth has managed to retain existing shop fronts which make it an attractive place to visit- vital for businesses. I strongly agree with having design principles for adverts.	Noted. Refer to Policy 4.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
51			Comment	The villages of Scholes, Hepworth and Wooldale should to be conserved, traffic is a big issue in the narrow streets. There should be action to prevent or limit further housing in these areas.	<p>Noted.</p> <p>Hepworth and Wooldale both have existing conservation areas. The existence of conservation areas in a village does not preclude new housing, but designs should be sensitive to the context.</p>	No change.
52			Comment	How are these assets identified	<p>Holmfirth Conservation Group has started the process following advice from Historic England. The proposed non designated heritage assets will be subject to consultation and approval by Kirklees Council.</p>	No change.
53			Comment	Kirklees MBC can, as far as I can tell, list or de-list whatever asset it likes as a non-designated heritage asset - the process by which assets are listed is not particularly transparent - so HV parish council should consider alternative ways to achieve the end this policy intends	<p>Not accepted.</p> <p>The Parish Council and partners will work with Kirklees Council to identify the non designated heritage assets.</p>	No change.
54			Comment	It's positive that the presumption should be in	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				favour of retention.		
60			Comment	3.1 Whilst conserving local non-designated heritage assets is important, this policy should not be used to preclude renewable energy development and home energy efficiency measures, given the Climate Emergency recently declared by the Parish Council. I wish to see an overarching statement to this effect in the HV NDP	Noted. Protection of heritage assets has to be balanced against other planning considerations including energy efficiency. Energy efficiency is addressed in Policy 12.	No change.
63			Comment	As at the first question. Stop developers raping the fields which are left purely for monetary gain so that there are green areas, planted with new trees.	Noted. The Kirklees Local Plan identifies a number of site allocations for new housing to meet the assessed need. The NDP will provide a positive planning framework for other proposals which may come forward and promotes brownfield development and conversions of existing buildings in Policy 6.	No change.
72			Comment	Local help	Noted.	No change.

Table 6D Residents' Responses to Policy 4 – Shop fronts & advertisements

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
5			Comment / Support	I will be a shop owner come September. I am a visual merchandiser and understand the importance of shop frontage. window displays and signage make an enormous difference to the look and feel of the high street. Damaged rotting and falling apart signage like the little shop next to the picturedrome should be addressed by the council. It looks terrible! Also the shop local signage should be changed back to how it was before they stuck a blue tacky sign over the beautiful original sign they had. It makes the high street look tacky and unappealing. It's very important to keep visitor numbers up which in return boosts economy in the area. If the shops don't look appealing numbers will start dropping.	<p>Noted.</p> <p>Policy 4 has been amended following consideration of comments submitted by Kirklees Council. The Policy recognises the importance of attractive shop fronts and the role that traditional shop fronts can play in making a shopping area attractive to visitors and residents.</p> <p>Maintenance and repairs are a matter for building owners and occupiers.</p>	No change.
6			Support	Agree with suggestions but it	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				MUST be implemented very strictly which it quite obviously isn't at the moment. Don't suggest what you are unable to achieve.	The NDP will become part of the development plan and used to help determine planning applications once it has been through examination and a referendum and has been made by Kirklees Council.	
7			Support	4.6 Design in Town and Local Centres and Public Realm under "Design in Town and Local Centres and Public Realm" there is nowhere that mentions about disability access into shops and community buildings. There should be an amendment added to page 69, 3. Replacement of shopfront. This should read where ever possible when shopfronts are changed there should be a consideration for disabled access. There may also be other sections of the neighbourhood plan that needs to be amended in relation to disability access. As	Accepted. Policy 4 has been amended following consideration of comments submitted by Kirklees Council. Accessibility is addressed in more detail in the amended Policy and further information will be added to the supporting text. References to paint colours have been deleted from the Policy. References to A boards have been deleted from	No further change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>we know Square Peg have been and done a disability access assessment of Holmfirth and I strongly believe that this should be added or lay alongside the neighbourhood plan. I will be contacting Square Peg to update them on my findings. See Page 108.</p> <p>Page 108 4.10.7 Disability is mentioned in relation to wheelchair access along the street some pavements but nowhere does it mention about disability access into shops and facilities around Holmfirth and the Holme Valley. If I'm right in thinking the neighbourhood plan is for all towns and villages including Honley which also has access issues along the pavements and roads so section 4.10.7 needs amending to cover all areas of the home Valley and not just Holmfirth and to cover shops and public facilities. See page 67</p> <p>Page 70 8. Materials and Windows Can we add here in relation to</p>	<p>the Policy.</p>	

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>paints, Mat or Eggshell. Many heritage paints are in Eggshell so this is why I would add it</p> <p>https://www.farrow-ball.com/our-finishes/exterior-eggshell In relation to 8. Materials and Windows paragraph 2 “avoidance of strong, strident colours” BLOC is a strong a colour of yellow and it looks nice so I would try to re-word this paragraph as it would be not advisable to detract from the Holme Valley from moving forward in design and trend by having the wording “avoidance of strong, strident colours” 14. Stand-Alone Advertising Can we add here Any A-Boards must adhere to Kirklees Licensing and permits rules.</p> <p>https://www.kirklees.gov.uk/beta/licensing/apply-for-a-boards-display-of-goods.aspx</p> <p>licensing@kirklees.gov.uk</p> <p>https://www.kirklees.gov.uk/beta/licensing/pdf/a-boards-on-the-highway-policy.pdf</p>		
15			Comment	Slow down the approval rate	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				and growth of supermarket chains, giving life back to High Streets	Planning applications are determined by Kirklees Council and account should be taken of proposals in relation to the retail hierarchy of centres as set out in the Local Plan.	
21			Comment	Restrict the size of advertising boards. Make the people who put up signs on lamp posts etc., take them down after use. Have a standard type sign on shops.	<p>Noted.</p> <p>References to A boards have been deleted from the Policy following consideration of comments from Kirklees Council.</p> <p>Policy provides detailed guidance for fascia signs and projecting signs.</p>	No change.
22			Comment	Ban all temporary signs and banners.	<p>Noted.</p> <p>This would be a matter for Kirklees Council.</p>	No change.
25			Comment	Looks Ok - wish it could be applied to some existing shops. Need to encourage business's with car parks to	<p>Noted.</p> <p>Refer to Policies 5 and 8 for EV charging points in</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				offer low power (7KW) charging for ev's and mobility scooters.	new development. The NDP cannot influence businesses and development which already have planning consent.	
30			Comment	Promote good repair and maintenance without losing the diversity and quirkiness of the Valley.	Noted. Maintenance and repairs are not really planning matters but the NDP promotes high quality and sensitive designs where changes need planning consent.	No change.
33			Comment	Promote tasteful coordinated shopfronts, for the common good	Noted.	No change.
34			Comment	I think para (d) could be better worded. It should encourage individual design, but not specific issues such as different stallriser heights. For example, where there are two shop fronts on one building (and there are examples of this in Holmfirth), although they need not be identical, such elements as the stallrisers & the fascias should be in alignment.	Noted. The Policy wording has been amended following consideration of comments submitted by Kirklees Council.	No further change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
36			Comment	I would wish for the outlined policy to be fully implemented and for ongoing discussions to be encouraged so that the overall look of shop fronts be synchronized to give a unified feel to rows and streets of shops. This would greatly improve the visual impact of the villages and towns within the Holme valley.	Noted. Once the NDP has been made the planning policies should be used by Kirklees Council to help determine planning applications.	No change.
42			Comment	This should be better enforced.	Noted. Once the NDP has been made the planning policies should be used by Kirklees Council to help determine planning applications	No change.
49			Comment	Independent shops would be good instead of more eateries!	Noted. Changes of use in town centres do not always require planning consent.	No change.
51			Comment	Very important. Need to have some consensus on colour of shop fronts and type of businesses- to encourage tourists- a bit like Hebden Bridge.	Noted. Advice on colour has been deleted from the Policy following comments from Kirklees Council.	No change.
52			Comment	How this might be	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				implemented		
53			Comment	<p>1. delete "During this period shopfront design sought to achieve a successful relationship between the shopfront itself and the building as a whole" unless you can support this statement with evidence</p> <p>2. "Shopfront design should reflect the characteristics of the street where a variety of different building styles may be prevalent." - I don't think this is the intended meaning, but the statement appears to encourage new shopfronts to be designed to reflect the characteristics of the several different building styles already present on that street - i.e. a hodgepodge. I think the wording should be tightened up to make it clear that the intention (if this is indeed the intention, and I think it should be) is that new shopfronts should be designed to reflect the characteristics of JUST ONE</p>	<p>Noted.</p> <p>The Policy has been substantially revised following advice from Kirklees Council.</p> <p>1. Some text has been deleted and added to the supporting text.</p> <p>2. This has been addressed in the amended Policy.</p> <p>3. Accepted.</p>	<p><u>Amend NDP.</u></p> <p>Delete:</p> <p>a) "in most cases the shop name alone;</p> <p>From 12 a.</p>

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>of the existing building styles on the street.</p> <p>3. "Lettering should: a) Convey the essential message of the retailer, in most cases the shop name alone"; delete "in most cases the shop name alone"... it is outside the remit of the NDP to dictate what the "essential message" of each local retailer is</p>		
54			Comment	<p>Very positive to retain period style and reveal and restore hidden fascias, etc. Could there be more emphasis on replacing inappropriate ones? At the moment the retained ones really stand out and are lovely. It should be that they are the norm. Fully support the non use of UPVC</p>	<p>Noted.</p> <p>The amended Policy encourages the retention of original shopfronts and restoration of traditional features.</p>	No further change.
56			Comment	<p>Can we control the automatic use of corporate branding on national chains in our towns / villages eg. the WHSmith stickers in the windows at Holmfirth Post Office were out of keeping but were 'the brand'. There must be options</p>	<p>Noted.</p> <p>The Policy seeks to manage signage and shopfronts where planning consent is required but cannot influence existing businesses.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				for a more heritage like approach in other historic towns eg. more traditional script on signage etc.		
61			Comment	Consider reducing shop ground rent to enable local shopkeepers to continue trading	Noted. The NDP has no influence over rents.	No change.
72				More local cheaper businesses	Noted.	No change.

Table 6E Residents' Responses to Policy 5 – Public realm

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
4			Comment	The installation of the new street-lights make a mockery of the two proposals listed at the start of the notes. Please read the first paragraph under 'Gateway and Highways'. Visitors arriving via Dunford Rd are met by the sight of a field that for four years has been chemically poisoned once every three months by a developer who wants to build there. The policy should be extended to include existing problems and just new ones.	Not accepted. The NDP policies can only be used to help determine future planning applications.	No change.
9			Comment	Green infrastructure?????? Where is it?	Noted. The amended NDP includes a definition of GI as set out in the NPPF.	No change.
17			Comment	Better use of the natural environment surrounding the Holme valley. For example in other European countries	Noted. This is not something the NDP can include as a	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				they would make use of the reservoirs and lakes for recreational use.	planning policy. Reservoirs are generally privately owned by water companies or the Canal and Rivers Trust eg.	
22			Comment	Plant some trees.	Noted. Policy 2 supports tree planting.	No change.
25			Comment	Looks Ok. Again look at provision of ev charging at transport gateway car parking areas.	Noted. This is included in the revised Policy.	No further change.
30			Comment	Promote zero carbon local economy, cherish the green spaces.	Noted. Refer to Policies 7 and 9.	No change.
34			Comment / Support	No. This is an area that has been ignored for too long in Kirklees.	Noted.	No change.
36			Comment	Clean, tidy streets with street furniture that is well maintained and in keeping with the character of villages is of great value as it enhances the quality of everybody as they go about	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				their daily life.		
42			Comment	<p>Utility works in the roads and pavements should replace the original paving materials or actually improve them.</p> <p>Shops should be made responsible for cleaning the pavements in front of their shops and keeping streets clear of bins and rubbish.</p> <p>Public toilets should be retained in centres to discourage pub users from urinating in the streets and doorways.</p>	<p>Noted.</p> <p>The amended Policy requires designs and materials in highways schemes to be sensitive to local character.</p> <p>The other matters cannot be addressed in NDP planning policies.</p>	No change.
48			Comment	Please maintain the adequate public waste bins in Holmfirth and the cleaner who does a very good job!	<p>Noted.</p> <p>This cannot be addressed in NDP planning policies.</p>	No change.
55			Comment	Need to find a way of reducing the visual impact of trade waste bins as they scar the public realm eg. on Hollowgate.	<p>Noted.</p> <p>The Policy has been amended following consideration of comments submitted by Kirklees Council and now no longer refers to waste</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					storage and collection.	
56			Comment	<p>Need to find a way of reducing the impact of trade waste bins in the centre of Holmfirth. Waste bins should allow segregation of recycled waste.</p> <p>Opening up more visibility of the river is to be encouraged not just in the towns but from other public areas eg. alongside sports pitches etc. In the centre of our towns and villages, we need to make more shared use spaces which can become pedestrianised for a period of time eg. during a festival / event and therefore look like a shared space, not a pavement and road all the time. Road signage / markings can be more muted which encourages more careful driving.</p>	<p>Noted.</p> <p>The Policy has been amended following consideration of comments submitted by Kirklees Council and now no longer refers to waste storage and collection.</p> <p>The other points are addressed in the amended Policy.</p>	No change.
57			Comment	Where on street bin storage is unavoidable (eg Hollowgate), these areas	<p>Noted.</p> <p>The Policy has been</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				should be fenced off with sufficient height to avoid blowaway littering.	amended following consideration of comments submitted by Kirklees Council and now no longer refers to waste storage and collection.	
60			Comment	<p>5.1 Specific references and import should be given to walking, cycling and access to public transport in the public realm areas and less focus and import given to motor vehicles, reflecting the recent Climate Emergency declaration by the Parish Council. should include measures to support the Climate Emergency recently declared by the Parish Council.</p> <p>5.2 Improved access for waste collection is rightly considered in the NDP. In the public realm, this should be extended into improved access for removal of wastes</p>	<p>Noted.</p> <p>The amended Policy and other policies give a higher priority to pedestrians and cyclists.</p> <p>The Policy has been amended following consideration of comments submitted by Kirklees Council and includes reference to waste storage and collection.</p> <p>Climate Emergency is now included throughout the document.</p> <p>Refer also to amended</p>	Climate Emergency is now included throughout the document.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				for converting into resources. For example public systems should also be extended to multiple bins systems, the use of which will inevitably required with the coming of the new UK Waste and Resources strategy. Such measures as multiple bin systems, large underground waste bins with surface pillar boxes to chute wastes down, should be considered, as used in places like Spain and Germany. These allow for the larger special volumes needed for waste recycling into resources, but also keep unsightly waste bins out of sight.	Policy 11.	
63			Comment	Health and Wellbeing. By using EU signs at M1 at calder Grove, the Flouch, etc. ensure that HGV's are re-routed to where they should go, i.e. \m1 then M62 to get to Lancashire. The HGVs and massive articulated lorries are using Holmfirth centre as a short cut, overloading	Noted. This is beyond the influence of the NDP.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				Greenfield Road to get to Manchester and beyond. The traffic noise and pollution is unacceptable.		
67			Comment	Don't close down facilities like the Tech or Phoenix.	Noted.	No change.
72			Comment	More known time and accessible time.	Noted.	No change.

Table 6F Residents' Responses to Policy 6 – Homes for the future

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
1			Comment	The impact on school places and traffic increase should be a major consideration before planning is granted.	Noted. This is a matter for Kirklees Council and is addressed in the Infrastructure Delivery Plan.	No change.
2			Comment	Houses are far too expensive for young local people - the majority of new builds are £300K plus and are out of the reach of young people born and bred in the Holme Valley so they are forced out of their home town. There should be a scheme to help young local people get on the housing ladder in the Holme Valley. The number of young families in the area (children under 7) seems to drop year on year - this has a knock on effect for local schools who struggle to fill Reception and KS1 classes causing budgets to fall even further.	Noted. The NDP recognises that affordability is an issue in the NDP area. The Kirklees Local Plan includes a Policy requiring contributions towards affordable housing and so this is not duplicated in the NDP. Letting homes as holiday cottages does not require planning consent.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				The issue of smaller cheaper houses being sold to be holiday cottages or airbnb letting properties should also be looked - we need more young families living in the area NOT just weekend visitors		
3			Comment	Perhaps more emphasis on variations in style and materials for new developments?	Noted. Design is addressed in Policies 1, 2 and 12.	No change.
4			Comment	I would like to suggest building as few as possible, none with more than three bedrooms and only ever on brownfield sites. But the NDP is not allowed to say this.	Noted. The amended Policy promotes use of brownfield sites and conversions and smaller dwellings to meet local need.	No change.
7				Page 77 4.7 Building Housing for the Future 4.7.1 Apart from smaller homes being more affordable can we also add "smaller		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				houses are also a good way of reducing the carbon footprint as they use less energy to build less energy to run and less energy on the upkeep. Smaller and affordable homes are a good way of reducing the carbon footprint and would help toward the "climate change emergency" within the Holme Valley.		
8			Comment / Support	Puts limits on the number of larger houses allowed. There are too many and too few small dwellings. The balance needs to be redressed. Who needs/ can afford a 5 bedroom house?	Noted.	No change.
9			Comment	Where to start. We live in such a beautiful area and our economy depends on keeping it this way. We need houses but why are the developers building the same old stuff, packing in houses with little thought to the environment, smallest gardens possible and lack of public green spaces. We should be leading the way	Noted. Design is addressed in Policies 1, 2 and 12.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				with award winning environmental mixes developments . Why do we stick with the same builders who put as many houses in a space as possible? Small, forward thinking mixed developments, with green credentials which will mean The Valley is still a place to visit in 50 years.		
11			Comment	Minimal builds. Infill building. Brown sites. Mill conversion.	<p>Noted.</p> <p>The amended Policy promotes use of brownfield sites and conversions and smaller dwellings to meet local need.</p>	No change.
15			Comment	Be sensitive, do not infringe on existing country side unless of very special reasons, ensure "affordable housing" is also in keeping with the area.	<p>Noted.</p> <p>Design is addressed in Policies 1, 2 and 12.</p> <p>Affordable housing will be delivered through Kirklees Council's planning policies.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
17			Support	The policy is right, unfortunately Kirklees planning do not enforce it, and allow developers to make amendments to approved plans once permission is granted.	Noted. Enforcement is a matter for Kirklees Council.	No change.
18			Support.	No. High priority this one	Noted.	No change.
19			Comment	Before any new housing is permitted there needs to be proper consideration to the infrastructure, not just lip service! Roads, drains, sewerage, schools, shops.	This is a matter for Kirklees Council and is addressed in the Infrastructure Delivery Plan and where necessary, improvements should be provided as part of the development management process..	No change.
22			Comment	Be the first authority to insist on re-use of brown field sites.	Noted. The Policy promotes this but cannot insist on it.	No change.
24			Comment	Build more little homes	Noted. The Policy promotes smaller homes to meet local need.	No change.
25			Comment	More should be done to set time frames and milestones	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				for large plots which have planning permission. Too many sites go undeveloped for too long, or not completed. Prevent developers from getting permission to develop other sites, when there existing sites are unfinished. Avoid cramming too many houses into one development - insist on green spaces to break up groups of plots. Encourage low power (7kw) chargers at each house consideration to be given to grid infrastructure.	These are not matters the NDP can address.	
26			Comment	Ensure that affordable homes are built first on any large development, and incorporate features which mitigate the effects of climate change	Noted. Affordable housing will be delivered through Kirklees' Local Plan policies.	No change.
29			Comment	Take into consideration traffic level in the area, not just local parking	Noted. The NDP promotes sustainable travel and reduced reliance on the private car.	No change.
30			Comment	Promote building sustainable homes appropriate to the	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				needs of people living in the valley and the supporting infrastructure whilst maintaining the rural feel and respecting the wildlife havens provided by brownfield sites.	Refer to Policy 12.	
31			Comment	No building on the Green Belt or where there would be a negative visual impact.	Noted. Green Belt is protected in national planning policies and in Kirklees Local Plan.	No change.
33			Comment	Small development on the outskirts of existing villages rather than large scale development	Noted. The NDP does not include site allocations but some larger site allocations are proposed in the Local Plan. Policies 1 and 2 should help to protect local character.	No change.
36			Support	I particularly applaud the aim to provide houses both for sale and rent which will give young people, families and older people the possibility of having a home which is reasonably priced and of a good standard.	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
37			Comment	Parking standards for housing should be set within the NDP as a minimum requirement in all cases, rather than to refer to Kirklees guidance or any other reference point. I would suggest the NDP looks at the requirements in the previous Kirklees UDP and compares that to the guidance in the Kirklees Local Plan.	<p>Noted.</p> <p>The NDP refers to Kirklees' parking standards as NDPs cannot include their own parking or other technical standards without strong evidence.</p>	No change.
42			Comment	Must be sustainable.	<p>Noted.</p> <p>Refer to Policy 12.</p>	No change.
44			Comment	<p>Comments on Draft Policy 2 apply here too.</p> <p>Upperthong area is now at saturation point, already one serious accident has happened at the Broad Lane/Ashgrove Road junction and the development is still 12 months plus from completion. Poor sight lines, narrow roadways and limited pavement provision must be an obvious problems, which are always pointed out as objections for</p>	<p>Noted.</p> <p>The NDP cannot influence developments which already have planning permission.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				future building work. "House type and sizes" - The Broad Lane development FAILS on all three of "supported points for new housing schemes".		
48			Comment	I agree strongly with not encouraging ribbon development which would impact on existing developments. Curb the builders who build 'one off' detached houses on large plots which just encourage traffic and sit isolated from the community.	Noted.	No change.
49			Comment	No % given for smaller houses / OAP suitable per development.	Noted. Planning policies are required to be flexible and cannot include targets without robust evidence of need. Housing for older people is encouraged in the Policy.	No change.
51			Comment	Scholes, Hepworth, Wooldale- no more housing in these areas, the roads, services,	Noted. The NDP cannot influence	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>schools etc, can't handle an influx of new residents. New homes should be built on brown fields only. Green belt to be preserved.</p>	<p>developments which already have planning permission.</p> <p>Green Belt is protected in national planning policies and in Kirklees Local Plan.</p>	
53			Comment	<p>"Housing should be suitable in terms of design, house size and tenure " - suitable can mean many things. You should specify: suitable for who? For what? (you could just delete this sentence because it is covered in the following section "house types and sizes")</p>	<p>Noted.</p> <p>The Policy has been amended following comments from Kirklees Council and refers to the most up to date needs assessment for more detail.</p>	No change.
55			Comment	<p>We need to break the cycle of developers building 4+bed detached houses which suit commuters rather than providing smaller houses for young and old and those needing to downsize. 70% local people said they want more affordable and smaller houses but all the new ones being built are large so are out of kilter with public demand.</p>	<p>Noted.</p> <p>These matters are addressed in various policies in the NDP.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				Developers also seem able to buy their way out of commitments to build smaller houses. The quality of the new houses is also often poor - they should all have solar panels / ground source heat pumps and provide the sustainable design required in this climate emergency. We need to break the leverage of builders by supporting different ways of construction such as community builds and self-builds.		
56			Comment	This policy should reflect sustainability and inclusion of solar panels / renewable energy. The design of new estates should also encourage more walking as well as provide green spaces for play / trees (not just private gardens) - the new development in Netherthong seems not to have a footpath through to Deanhouse thereby making an unnecessarily long walk from the end of the road up to the centre of the village / school. If	Noted. Refer to Policy 12.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				we only build large houses, we will not retain the current mix of housing stock or people in the valley.		
58			Comment	It seems that there is much new building in progress in the area. Is sufficient of this of an affordable nature??	Noted. Affordable housing should be delivered through policies in the Kirklees Local Plan.	No change.
59			Comment	Proposals will be expected to demonstrate that densities make best and efficient use of land, are carbon-neutral, do not impact on local wildlife and reflect local settlement character.	Noted. The Policy includes reference to densities.	No change.
60			Comment	P 23 Objective C – to provide the type of housing that meets the needs of the local population – THE NDP DOES NOT FURTHER THIS OBJECTIVE AS IT IS TOO GENERAL AND DOES NOT ACTIVELY PROMOTE THE PARTICULAR NEEDS OF THE HOLME VALLEY COMMUNITY, NAMELY MORE AFFORDABLE HOUSING, STARTER HOMES FOR YOUNG	Not accepted. The NDP provides more detailed policies to compliment and not duplicate policies in the Local Plan. The NDP supports the provision of more smaller homes, including houses for older people and first	No further change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>PEOPLE, WORK/LIVE HOMES FOR HOME WORKERS, HOMES FOR 65+ PEOPLE ETC. THE NDP AND POLICY 6 ARE TOO PASSIVE AND DO NOT ACTIVELY SHAPE THE FUTURE THE HOUSING THIS VALLEY NEEDS!</p> <p>The Holme Valley faces exceptional circumstances in terms of housing supply and demand: -</p> <ul style="list-style-type: none"> • the under-occupancy of family homes by older people, some of whom have expressed a desire to remain in the Valley, but in a more appropriate home; • as a consequence of the above, a number of family dwellings are “locked - in” by the use of an inappropriate and poorly calibrated approach to housing stock management which fails to recognise potential ways to release these dwellings; • resulting from the above, there is an insufficient supply of family homes to meet the 	<p>time buyers.</p> <p>Affordable housing should be delivered through Kirklees Local Plan policies.</p> <p>The site allocations are set out in the adopted Local plan and the NDP has to be in general conformity with this.</p> <p>The amended policy now supports community led housing schemes.</p> <p>The revised NDP will include more information about the climate emergency but planning policies cannot include technical requirements; energy efficiency measures are delivered through building regulations.</p> <p>Stock management is not a planning policy matter.</p>	

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>expressed needs of young people for either rented accommodation or homes to purchase at an affordable price. The real and most effective solution to these problems is not to build more large and expensive homes within the Valley, but rather to address the evident undersupply of homes that are suitable for: (a) younger people, many of whom wish to live and work in the area, but are unable due to unaffordable rents and house prices (b) older people, many of whom have particular social and health care requirements. An active stock management solution is all the more appropriate given the increasing number of elderly in the population of the Valley, and it has the considerable merit of making appropriate housing provision, as well as releasing existing affordable family homes that can be rented or purchased by those</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>selecting housing.</p> <p>P 63 Section 4.7 Building Housing for the Future</p> <p>1. This NDP section is too general and needs strengthening as it currently does not address adequately:</p> <p>1.1. The changing needs of the local population in the HV</p> <p>1.1.1. It just accepts the housing allocations given by Kirklees in the Local Plan, 27 sites – it does not assess, challenge or prioritise any of these allocations.</p> <p>1.1.2. it does not assess or accommodate the changing demographics and impact on local housing need, particularly the housing needs for an ageing population, the need to retain the young people who want to live and work here, the needs of the increasing numbers for homeworkers who do not want to commute, the needs for more communal or shared living homes.</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>1.2. An ongoing role for the local community in future housing development in the HV</p> <p>1.2.1. It does not follow the basic and widely accepted principle of ACTIVE STOCK MANAGEMENT, whereby the local community can influence its housing needs rather than it being left to the market, i.e. private developers, to decide what houses are built and where.</p> <p>1.3. Community-led housing (CLH) – community self-build schemes, housing associations, housing co-operatives, co-housing schemes, self-help housing etc.</p> <p>1.3.1. It does not mention of community-led housing in the document, a growing and increasingly important sector of the housing market for building the future homes we need.</p> <p>1.4. Climate Emergency declaration</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>1.4.1. It does not yet address or make any recognition of the recent Climate Emergency commitments made by the Parish Council on 25th March 2019, and its impending Action Plan.</p> <p>2. Community led housing (CLH) is increasingly important – this third sector involvement which mobilises community resources and increases community cohesion, provides another route for building homes for the people in our community.</p> <p>Also, CLH is predominantly about affordable housing which is in short supply. The NDP should include a policy to support and encourage community led housing. See reference below for ways in which the NDP could do this:</p> <p>2.1. The Planners guide to Community-led Housing document offers advice and guidance about how an NDP can be written to encourage and facilitate CLH. The guide</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>has been developed by Jo Lavis MRTPI, with support from Community First Yorkshire and input of urban and rural planners, in partnership with the Royal Town Planning Institute (RTPI), the Town and County Planning Association (TCPA), National Community Land Trust Network (NCLT) and Action with Communities in Rural England (ACRE). Nationwide Foundation and DEFRA provided funding for the guide's development. See link https://communityfirstyorkshire.org.uk/plannersguide/. It is suggested that the HV NDP should include the best practice from this guide to support Community Led Housing in the Holme Valley.</p> <p>2.2. Rural Exception Sites – the NDP should include a policy on these to encourage their use for Community Led housing schemes.</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>3. Active Stock Management</p> <p>3.1. Local housing need - the NDP should include a policy and provision for 'active stock management', to address the ongoing housing needs of the Holme Valley community, reflecting the mix of housing needed. The NDP should adopt an intelligence - based, active stock management approach, which looks at the detailed components and age specific issues which determine housing need, demand and supply, rather than regarding housing need as a uniform aggregate of unmet demand. This active stock management approach should also be calibrated to reflect the needs of an individual place in order to conform to the requirements of the Kirklees Local Plan (Policies PLP1, PLP2 and PLP11). It is also evident that the demographic and socio-economic circumstances of the Holme Valley require the use of a method of</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>approach that reflects the exceptional circumstances that are currently encountered in the Holme Valley (NPPF paragraph 60) and that, in accord with the guidance provided by the NPPF (paragraph 68), it is desirable to enhance the contribution made by brownfield sites (paragraph 118) and by small and medium-sized sites. 3.2. Community voice - the Parish Council should be given have an ongoing role in the NDP in relation to housing policy and active stock management as the 'voice of the community', as part of the active stock management practice for the ongoing housing needs of the Holme Valley area. This voice is needed to counter the self-interests of developers and landowners, to ensure that community needs are balanced against those of the market. Note this is not the same role as that of the Planning committees. It is</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>suggested the Parish Council have a specific subcommittee devoted to housing – to monitor, report on and influence local housing matters, to help the Parish Council to be a voice for the community on local housing.</p> <p>3.3. Phased release of sites – the NDP should allow for a phased release of sites, preferencing brownfield sites over greenfield sites, small & medium sites over large sites; extant permitted sites over unpermitted sites, to ensure land is released in an orderly and appropriate manner, reflecting community needs, and minimising the potential for land banking of sites by developers and speculators.</p> <p>4. Affordable housing</p> <p>4.1. The NDP should include an assessment of need and also a specific policy statement on Affordable housing, including encouraging CLH as one of the</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>routes for delivery.</p> <p>4.2. More specific provision should be detailed for affordable housing.</p> <p>4.3. The NDP should confirm that at least 20% of all housing units on market housing sites should be affordable</p> <p>4.4. The NDP should confirm that planning permission will be granted exceptionally for affordable homes in the small free standing rural settlements within the Holme Valley area on land which would not normally be permitted for housing development, but where there is otherwise little proposal of meeting local need (Rural Exception Sites). These affordable homes should generally be for rent and should remain affordable in perpetuity.</p> <p>5. Work Live homes</p> <p>5.1. The NDP should include</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				<p>an assessment of need and also a specific policy statement on Work/Live homes, including encouraging CLH as one of the routes for delivery.</p> <p>5.2. More specific provision should be detailed for suitable Work/Live homes where home workers can both live and work in their dwellings.</p> <p>6. Elderly people homes</p> <p>6.1. The NDP should include an assessment of need and also a specific policy statement on homes for elderly people, 65+, including encouraging CLH as one of the routes for delivery. It is known that a lack of provision for this type of housing, locks in larger family homes in the Home Valley, where older people are living but are reluctant to move out because of the shortage of suitable smaller housing to suit their needs.</p> <p>6.2. More specific provision should be detailed for suitable</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				homes for the Elderly, with their particular needs for access and mobility.		
61			Comment	Builders to be held to account to build a number of affordable homes to enable young people to remain in the valley	<p>Noted.</p> <p>Refer to the Kirklees Local Plan policies on affordable housing.</p>	No change.
62			Comment	I would like to have seen a greater emphasis on the encouragement of a shift towards social and affordable housing, even to the extent that we encourage a definition of such more ambitious and more appropriate than that provided by the NPPF and adhered to in the NDP. The inadequacy of the current approach is illustrated not in the commitments in the NDP itself (which are in many ways admirable), but in the habitual approach of developers in ignoring or superseding social / affordable housing guidelines, and the powerlessness of local bodies in combatting this. It is of	<p>Noted.</p> <p>The Policy has to provide flexibility but includes references to tenure and renting. The precise mix of each scheme will be a matter for negotiation and addressed through the development management process by Kirklees Council.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				course recognise that it is not in the remit of this plan to implement legislative change to this end, but I feel a united stance against such abuse is required as a way of creating social and political pressure for such a change.		
63			Comment	The only homes I would like to see a few more of are over 55 apartments in the valley bottom (near Birks) to cater for today's baby boomers who can then downsize from their family homes and provide larger accommodation for new families.	Noted.	No change.
67			Comment	No building on any greenbelt land.	Noted. Green Belt is protected in the Kirklees Local Plan and national planning policies.	No change.
68			Comment	C. To provide sufficient housing for residents, then over 55's apartments in the valley need to be encouraged so that residents with family homes can downsize and release larger homes for	Noted. The policy supports more housing for older people.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				families. The McCarthy Stone land needs help in accessing the building area using smaller vehicles and the Council could help with this. Apartments could be built further along either side of the river, still with a footpath so that older residents can enjoy easy access via bus routes to the town centre. The local "free" bus could be routed to encourage this and the non-use of cars so they do not clog the parking provision in the centre.		
72			Comment	Small terrace type communities and green space	Noted. Refer to Policies 1, 2 and 12.	No change.

Table 6G Residents' Responses to Policy 7 – Business generation

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
3			Comment	In paragraphs 10 and 11, replace "car parking" by "parking" to include parking for cycles, motor cycles and motor caravans.	Partially accepted. Amend policy to refer to cycling. Revised Policy 5 addresses cycle parking. Other vehicles should be accommodated on the site as part of the visitor accommodation scheme.	Inserted reference to cycle parking into Policy 5.
5			Comment	Good, I think the amount of charity shops should be capped otherwise it will cause the distraction of the high street, I also think they should be made to keep their shop frontage tidy and painted.	Noted.	No change.
7			Comment	Should also encourage delivery times to out of rush hour times on busy or congested roads	Noted. Delivery times are not something the NDP policies can address.	No change.
11			Comment	More shops. Less charity shops. No pound shops. Quality retail. Craft shops.	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				Supporting local produce and business. No large chain shops. No more supermarkets.	Refer to Policy 8. The NDP supports smaller businesses and independent shops but some changes of use in town centres do not require planning consent	
15			Comment	Keep small business rates at zero. Offer development grants where increased employment is likely.	Noted. The NDP cannot influence business rates or provide grants.	No change.
19			Comment	Better broadband for people to be able to work from home.	Noted. This is already addressed in the Policy.	No change.
21			Comment	Build development and trade parks with easy and quick access to the motorway network	Noted. This is a matter for Kirklees Council for areas closer to motorways.	No change.
22			Comment	Have free wi-fi in town centre.	Noted. The NDP cannot provide this.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
25			Comment	looks ok - again consider ev charging provision	Noted. EV charging is addressed in other planning policies.	No change.
30			Comment	Promote sustainable transport whilst retaining the character of the valley. Promote education and training opportunities and start-up facilities.	Noted. The NDP promotes sustainable transport and improved learning facilities in other policies.	No change.
33			Comment	Mentoring	Noted.	No change,
34			Comment	In addition to encouraging camp sites, etc., would it be a good thing to encourage new tourist accommodation generally, e.g. would a new hotel be a good thing?	Noted. The Policy supports appropriate tourism related development.	No change.
36			Comment	Micro and small businesses need all the help that they can get and their promotion is crucial for the future prosperity of the Home Valley. Suitable technologies are fundamental to their growth. The Holme valley is beautiful and the idea of expanding areas for camping,	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				cabins and caravans will allow more people to have access to it.		
42			Comment	Should encourage shops and reduce rates etc where possible. Limit number of bookies / gambling outlets.	Noted. Refer to Policy 8. Rates are outside the NDP's influence.	No change.
48			Comment	Noise pollution should be restrained as the policy suggests.	Noted. The night time economy section of the Policy has been deleted following comments from Kirklees Council. Refer to Revised Policy 8.	No change.
51			Comment	Some good new independent shops now appearing in a Holmfirth- this should be encouraged.	Noted.	No change.
53			Comment	" those defined as micro (sole traders or those with less than ten fewer employees)" typo. should read "...those with fewer than ten employees"	Noted. This part of the Policy has been reviewed following comments from Kirklees Council.	No further change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
54			Comment	I would just like to reinforce the comments on considering the natural environment and natural beauty of the landscape as well as conservation and enhancement	Noted. Refer to Policies 1 and 2.	No change.
55			Comment	More sustainable businesses that support the climate emergency approach should be encouraged with repair cafes, cooperatives and eco businesses supported.	Noted.	No change.
56			Comment	Can we do anything to limit charity shops if they do not pay the same rates? Whilst we need some as they play a key role in recycling and supporting charities, when they sell new things, they seem to be a threat to existing businesses when selling the same things.	Noted. Some changes of use in town centres do not require planning consent.	No change.
57			Comment	Pubs and takeaways should mitigate against public nuisance by avoiding use of plastic/polystyrene containers. Customers should be policed to prevent/minimise the	Noted. The NDP does not now address waste and litter following comments from Kirklees Council.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				carrying away of glass containers. Litter disposal facilities should be reviewed to ensure they are adequate enough to cope with all litter contingencies arising from the night-time economy. Consider emptying of bins at the end of day prior to the evening session. Too many times, bins are already at capacity at 5pm, not to be emptied again until the following day.		
60			Comment	The NDP and Policy 7 does not mention community businesses (Community Benefit Societies, Coops etc such as Fair Trader, and hence does not support or promote them. The NDP should actively support and promote them as part of sustaining our local economy	Noted. These would not be differentiated in terms of planning policies.	No change.
61			Comment	Free car parking available for shoppers. reduced rates for local businesses	Noted. These are not matters that the NDP can address through planning policies.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
62			Comment	I would like to have seen a greater encouragement of local wealth-building schemes in the Holme Valley, and an indication of a willingness to explore more innovative business opportunities, such as co-operative and social enterprises and community partnership schemes, possibly involving the parish council.	Noted. These are not matters that the NDP can address through planning policies.	No change.
63			Comment	Encourage via Kirklees (Ha ha) shops/businesses other than charity shops and cafe's. We have more than enough already	Noted. Some changes of use in town centres do not require planning consent.	No change.
72			Comment	Keeping rates to a minimum	Noted. This is not a matter that the NDP can address through planning policies.	No change.

Table 6H Residents' Responses to Policy 8 – Development in Holmfirth etc

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
2			Comment	scrap the road 'improvement' scheme. Holmfirth should not be turned into a lorry bypass	Noted. This is not a matter the NDP can address.	No change.
4			Comment	I see nothing in the notes to clarify what is meant by 'development'. What one person calls development may to another seem like vandalism. This leaves me unable to answer.	Noted. Development in terms of town planning includes the construction of new buildings, conversions and changes of use of existing buildings.	No change.
6			Comment	As long as it isn't town centres	Noted.	No change.
7			Comment	Page 93 4.9.9 As the Home Valley neighbourhood plan is supposed to be non-political then it would be advisable to omit the wording "The feedback from the Holme Valley South Labour Party" as this looks to be political and as other political parties have greatly contributed to the neighbourhood plan so it	Accepted. Remove reference to political parties.	Reference to political party in 4.9.9 removed.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				would be seen as disadvantageous to other political parties if they are not mentioned too. The neighbourhood plan in the eyes of the local residents is a non-political plan and should not be worded for political gain.		
9			Comment	The suggested scheme for the centre of Holmfirth was appalling and seemed to just prioritise traffic. More pedestrian areas, again more trees and wider pavements, lets make people want to visit and spend time in Holmfirth.	Noted. This is not a matter the NDP can address. The NDP promotes walking and cycling through various policies.	No change.
15			Comment	Keep the areas construction wise separate, work towards developing amenities and tourism.	Noted.	No change.
17			Comment	To add that local residents views should be taken into consideration when considering such planning, and not dismissed by planning officers and council members with their own political agenda.	Noted. Planning applications are published for public consultation as part of the decision making process.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
21			Comment	Less development, more conservation	<p>Noted.</p> <p>The NDP has to plan positively for sustainable development and as part of this has economic, social and environmental objectives.</p>	No change.
22			Comment	All new developments to be vetted by local residents living within 0.5 mile	<p>Noted.</p> <p>Planning applications are published for public consultation as part of the decision making process.</p>	No change.
24			Comment	Don't let the council think of Holmfirth as a traffic scheme - it is a town	<p>Noted.</p> <p>This is not a matter the NDP can address.</p>	No change.
30			Comment	Promote zero carbon economy, reduce pollution, promote sustainable transport. Make local centres people friendly and improve disabled access.	<p>Noted.</p> <p>Refer to Policies 11 and 12.</p>	No change.
33			Comment	Promote festivals and loyalty scheme. Provide car parking free	<p>Noted.</p> <p>The Parish Council support various festivals.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
36			Comment	Holmfirth and Honley in particular are at the heart of the Holme Valley and their tasteful development will reflect the development of the Valley as a whole. This needs to be sensitive to the individual character of the area and in keeping with the type of vision we have for the future.	Noted. Refer to Policies 1 and 2.	No change.
42			Comment	Retain public toilets.	Noted. This is not a matter the NDP can address.	No change.
44			Comment	Charity shops in particular seem to be in abundance, especially in Holmfirth. a more balanced approach to retail outlets should be carefully considered.	Noted. Some changes of use in town centres do not require planning consent.	No change.
48			Comment	Please consider the number of charity shops in the centre and put on some restraints as they can affect local businesses in a negative way. For example, on Victoria Street in Holmfirth there is an excellent newsagents which has been there since I came here 40 years ago. It provides an	Noted. Some changes of use in town centres do not require planning consent.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				excellent service but is also a hub for community interaction - just chats in the morning or catching up with the local news. Just along the road, however, a charity shop has started to sell greetings cards and this directly challenges what the newsagents are doing. Local businesses should be encouraged and I think that there is a high percentage of charity shops (which are very useful for recycling) now.		
53			Comment	"Within the primary shopping areas of Holmfirth Town Centre and Honley District Centre the majority of ground floor space should remain in main town centre uses open to the public." " I don't understand what this is trying to say. Consider rephrasing or deleting it.	Noted. The Policy has been revised following consideration of comments from Kirklees Council.	No further change.
54			Comment	No, but we need to be aware that there must not be a hidden agenda of running something down purposefully so that it then appears to be no longer viable!	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
57			Comment	Consider the need to have a Post Office sorting office in valuable space within the town centre. This could probably be far more efficient if sited out of town.	Noted. This is not something the NDP can address.	No change.
72			Comment	More public involvement	Noted. There will be further opportunities to take part in public consultations on the NDP: once the plan is submitted to Kirklees Council it will be published for a further 6 weeks consultation and then eventually it should be subjected to a local referendum.	No change.

Table 6I Residents' Responses to Policy 9 – Local community facilities

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
1			Comment	This should be a matter of course on the part of the council	Noted.	No change.
8			Comment	Please can we have a Lido? or allow us to swim/ canoe/paddleboard in the reservoirs? It's not true that they are 'too cold' as the sign says. In the Alps people swim in glacier melt water lakes.	Noted. This is not a matter for the NDP.	No change.
9			Comment	Don't bulldoze the market hall to make way for a road!!!! Bulldoze the eyesore that is the Sainsbury's building and send the road up there and pedestrianise Hollowgate.	Noted. This is not a matter for the NDP.	No change.
22			Comment	Put emphasis on new facilities !	Noted. The Policy promotes the protection and enhancement of facilities.	No change.
30			Comment	Sustainable accessible transport. Improving access to community	Noted. Refer to Policy 11.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				facilities.		
33			Comment	Promote village halls	<p>Noted.</p> <p>These are included in the list of community facilities (Which is now in the supporting text).</p>	No change.
34			Comment	Should the policy list selected key buildings such as the Civic Hall, the Technical College and the Masonic Hall?	<p>Noted.</p> <p>These are addressed in the conservation / heritage section of the NDP.</p>	No change.
36			Comment	Community facilities are also key to the development of the Holme Valley as a whole. We need to protect and enhance existing facilities and find communal uses for them which will encourage community spirit and a sense of belonging and mutual support.	Noted.	No change.
42			Comment	Protect allotments. They should not be considered as 'Brownfield' sites for development.	<p>Noted.</p> <p>These are included as Green Infrastructure.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
43			Comment	Churches - including their tower and bells	<p>Noted.</p> <p>Churches are included in the list and can also be heritage assets.</p>	No change.
48			Comment	The retention of the library facilities at the centre of the villages is vital! Please do not move them out of the centre. Holmfirth Library is the hub of our community acting as a library, a tourist office, a food bank, a Community Plus hub, a local meeting place for community groups (poetry groups, knitting groups, mum and baby groups) as well as a place where people can access computers. When out local mill closed a couple of years ago, some workers were able to go there to sign on as they didn't have computers at home. Libraries (and the staff) are worth so much to community cohesion and	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				need to be developed more.		
51			Comment	More playing fields for children, sports facilities to be upgraded and enhanced.	Noted. This is a matter for Kirklees Council.	No change.
61			Comment	Ensure the future security of Holmfirth Technical College	Noted. This is not something the NDP can address in a planning policy.	No change.
63			Comment	No, the grant system encouraging this is good.	Noted.	No change.
67			Comment	Don't close down facilities like the Tech or Phoenix Centre.	Noted. This is not something the NDP can address in a planning policy.	No change.
72			Comment	More information on the past. Have a museum.	Noted. This is not something the NDP can address in a planning policy.	No change.

Table 6J Residents' Responses to Policy 10 – Comments on Local Green Spaces

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
1			Comment / Support	These green spaces are becoming increasingly rare and precious. Preserve at all cost.	Noted.	No change.
4			Comment	I don't quite understand the question. There are thousands of local green spaces, so why these four? Are we not going to try to protect all of them?	Noted. These are open spaces that do not currently have protection from development. Local Green Space designation is a new type of designation and is similar to Green Belt but for small sites which meet certain criteria as set out in the NPPF.	No change.
5			Support	All should be protected	Noted.	No change.
7			Comment	Page 137 4) Hade Edge "Triangle" Can we make sure the parking remains between the two green areas that are currently on the "triangle" There is a lack of parking for events and recreation with people	Noted. Refer to Kirklees Council comments.	Map amended to reduce area and justification made clearer.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				wanted to park up so they can go out cycling or walking. The roads are too dangerous in that area to push vehicles onto the sides of the road from the current community parking area. Parking needs will also increase when the pub reopens.		
9			Comment	Community orchard? Please leave some green space alone.	Noted.	No change.
11			Comment	Roads are too busy currently. Protect our clean air. More cars more pollution.	Noted.	No change.
12			Comment	any further development around these sites would seriously impact on the village setting of Scholes and add to the already unsustainable traffic.	Noted.	No change.
13			Comment / Support	These sites should be protected to prevent a negative impact on the village in terms of traffic, infrastructure etc that further development would cause.	Noted.	No change.
15			Comment	This area was entrusted to Hade Edge as open space	Noted.	Map amended to reduce area and justification made clearer.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				almost 70 years ago and as the village develops is being nurtured and used more by families and retired persons creating an attractive and non developed area, as a small park.	Add to justification.	
19			Comment	The local community have been looking after the condition of this area for around 30 years and it has become a place which both residents and travellers passing through the area can enjoy.	Noted. Add to justification.	Map amended to reduce area and justification made clearer.
21			Comment	Stop complaining about South America chopping down trees and protect our own	Noted.	No change.
22			Comment	Include Green Belt encroachment in this topic.	Noted. Amendments to Green Belt boundaries are a matter for Kirklees Council.	No change.
23			Comment	Needed for grazing!	Noted.	No change.
25			Support	keen to see these areas protected	Noted.	No change.
27			Support	There is enough	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				development already in this area , we do not want to destroy what little green space remains for the residents of Scholes and the surrounding areas		
30			Support	Provision of homes/habitat for wildlife	Noted.	No change.
34			Support / Comment	The principle is good, but I wonder why these sites have been selected and on the basis of what survey. The Sandygate Fields are not open to public use. And there must be other sites in other parts of the district that should also be protected.	Noted. The LGS were promoted through the NDP public consultations and assessed according to the criteria set out in the NPPF.	No change.
35			Support	I support the inclusion of these sites as local green spaces as they represent important places in the communities and provide context of our rural past.	Noted.	No change.
42			Comment	This space should be better maintained and made more useable by the public to further justify protection.	Noted.	No change.
43			Comment	the lanes are too narrow to support more traffic, it is already impossible for	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				emergency vehicles to get down Bill Lane due to parking on the road		
44			Comment	Green Space in Upporthong is disappearing fast - this must be addressed soon. Dean Road seems to be at risk.	Noted.	No change.
48			Comment	Wooldale Chapel Field is like a little green lung for the residents and for the 2 pre-schools located there. It also means that there is less traffic at a tricky junction than if it were built on. It helps to retain the historical character of the village. Hade Edge Gateway is often played upon by children on bikes and keeps them off the fast road. Again it is the open entrance to an old village which is already experiencing radical building. It preserves the nature of the village.	Noted.	Map for Hade Edge Gateway amended to reduce area and justification made clearer.
49			Comment	The Wooldale field is surrounded by housing and not used for agriculture - does that not make it infill?	Noted and considered in light of Kirklees' feedback.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
58			Comment	We feel that particularly areas within the Conservation area should be protected from building.	Noted.	No change.
59			Comment	No, but I would like to add all of the fields to the west of Netherthong (up to the boundary with Meltham golf course to the list. These are rich in wildlife (hares, hedgehogs, birds, bat feeding area, wild flowers, etc.) and should be protected from development.	Noted. Local Green Space designation can only be used for areas that are local in character and not an extensive tract of land.	No change.
63			Comment	Please protect whatever green space is left above Upperthong from Greedy farmers who have already made a mint fro selling fields they have inherited and can sell moe for development. We need green spaces for the village, and also no more strain on highways and the local school. .	Noted. Local Green Space designation can only be used for areas that are local in character and not an extensive tract of land.	No change.
64			Comment	The land was sold under the enclosure act, but has not been walled (as was required	Noted.	Map amended to reduce area and justification made clearer.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				by the act) . This suggests that it may still be common land. There has been no opposition to a part of the area being taken over by the local community. In the 1960s, this area was used by WRCC for tipping road gravel. The central area has been in constant use by vehicles accessing Bent Lane. It has been used since 1948 by vehicles from Longley Farm and is vital for access as there are no viable alternatives for large vehicles.		
65			Comment	Dunford Road is already getting busy and crowded with all the traffic unless something is done about the traffic first then development should not be allowed to continue, and so should be protected from development.	Noted.	No change
67			Support	Totally support the no development policy.	Noted.	No change.
72			Comment	Plus now areas where small woodlands can be preserved.	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					Ancient woodlands and areas of wildlife interest are already protected.	

Table 6K Residents' Responses to Policy 11 – Transport, accessibility & infrastructure

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
1			Comment	Apart from banning all vehicles in Holmfirth it is difficult to see what can be done to improve the present traffic shambles	Noted.	No change.
2			Comment	scrap the road 'improvement' scheme. Holmfirth should not be turned into a lorry bypass	Noted. The NDP cannot address the Holmfirth road scheme.	No change.
3			Comment	Paragraph 2 - insert "at least" between "treated with" and "equivalent priority".	Noted. This paragraph has been reworded following consideration of Kirklees Council's comments.	No change.
5			Comment	The new road proposal should never go through this will damage the look of the town stop all the festivals that bring in people and money, destroy all the lovely little shops on hollogate, for the saving of a couple of mins time to	Noted. The NDP cannot address the Holmfirth road scheme.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				drivers. It's the worst idea I have ever heard!		
6			Comment	Make sure Kirklees don't play havoc with Hollowgate. All we need is no lorries and there us definitely no need for most of them to even be there early intervention at points further away would ensure this nightmare doesn't exist.	Noted. The NDP cannot address the Holmfirth road scheme.	No change.
7			Comment	Disability requirements should be added here too. Square Peg could help to amend this section.	Noted. The Policy has been amended to promote improved accessibility and active travel.	No change.
8			Comment	All schools to have safe cycle access with priority over cars. (like happens abroad) Pedestrians, cycling and public transport should be prioritised ABOVE car use not equal.	Noted. The Policy has been reworded following consideration of Kirklees Council's comments and now prioritises pedestrians and cyclists.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
11			Comment	Electric buses. Bus fumes are disgusting Make buses affordable. Provide a local bus just for the Local area. In and out of Holmfirth, Holme, Holmbridge, honley, Meltham,, Brockholes etc free to the elderly.	Noted. This is a matter for Kirklees Council.	No change.
15			Comment	Better bus services to rural areas. Before granting housing development planning, look again at the Holme Valley road infrastructure, it is at breaking point.	Noted. This is a matter for Kirklees Council.	No change.
17			Comment	To ensure that the planning departments use of data on road use is accurate, and in the correct places.	Noted. This is a matter for Kirklees Council.	No change.
19			Comment	Change the junction at the point where Dunford Rd, Penistone Rd and Longley Edge Rd meet. It is an accident waiting to happen at present. The local community group have produced suggested ideas which have been passed on	Noted. This is a matter for Kirklees Council.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				to local Parish Councillors.		
21			Comment	A safe, protected cycle track between Holmfirth and Huddersfield, and possibly beyond would ease traffic. Ban hgv's from Holmfirth, most are cutting through.	Noted. This is a matter for Kirklees Council.	No change.
22			Comment	Use more frequent mini buses to feed a rapid direct Holmfirth to Huddersfield bus service.	Noted. This is a matter for Kirklees Council.	No change.
25			Comment	More should be done to prevent large vehicles using the Holme valley as a bypass- this would improve congestion. We need to be more proactive in supporting ev charging - we are still a rural area, with many roues not having public transport, and many residents unable to use bicycles. I support the ideas around park and ride/walk - include incentives for parking and ev charging	Noted. This is a matter for Kirklees Council.	No change.
30			Comment	Making sure that 'improvements' are	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				appropriate for people living in the valley by seeking creative solutions addressing climate change, pollution, flooding.	The NDP has a strong emphasis on sustainable development but this is a matter for Kirklees Council.	
34			Comment	<p>I worry about the wording of point 4. The issue of widening roads & footpaths should not be a matter for highways engineers only!</p> <p>The issues of visual amenity and a sense of place must also play a part. When I was involved with new developments, many years ago, I found it almost impossible to get the developers of new housing schemes to think of anything but standard layouts with dwellings set out 70feet apart in straight lines. The idea of creating attractive spaces by the setting back or forward of suitably designed buildings seemed impossible for them to grasp. And, seeing what is being built today it</p>	<p>Noted.</p> <p>4 has been deleted.</p> <p>Visual amenity and sense of place are addressed in Policy 5.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				seems no progress has been made.		
36			Support	I support the aim to promote balance in private and public transport, cycling and walking. Cycle lanes would be an advantage and would promote the use of the bicycle and especially the electric bicycle as an alternative to the car as a general mode of transport.	Noted.	No change.
42			Comment	Need to reduce through traffic in Holmfirth especially HGVs. Sat navs are directing unfamiliar vehicles along this route. Speed restrictions should be enforced and speeds reduced on transpennine routes to reduce this. There should be more speed enforcement and traffic calming especially around school areas. Consider 20mph zone in Holmfirth similar to Meltham.	Noted. This is a matter for Kirklees Council.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
43			Comment	Move the zebra crossing from outside Lloyds in Holmfirth and move it further up Station Road near Holmeside Gardens - this will help the traffic flow better.	Noted. This is a matter for Kirklees Council.	No change.
44			Comment	It is good that the "2019 Holmfirth Town Centre Access Plan" is being reconsidered. However, three "pinch-point" areas to consider are; 1. Back Lane/Station Road, Holmfirth junction - make one way down hill (towards back of Co-op) with no right turn off Station Road. 2. Hollowgate - One way westbound, no HGV access and no left turn at bottom of Rocher. 3. Main juction box in New Mill redesigned. The removal of zebra crossing at bottom of Victoria Street, Holmfirth could also improve flow of traffic.	Noted. This is a matter for Kirklees Council.	No change.
48			Comment	Please keep pedestrians in mind. I walk to Holmfirth	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				on a daily basis and there are some dangerous parts to walk along- even if you are on the pavement (eg when walking by the Mason's Hall on station road where the traffic space narrows because of parking- you have to watch out for lorry wing mirrors and larger lorries coming up on the pavement).		
53			Comment	delete reference to "uninspiring, standard highway engineered standard" in paragraph 8, which is a value judgement. Introducing a "sense of enclosure" does not sound like a particularly good idea. Consider deleting paragraph 8 altogether.	<p>Noted.</p> <p>This is a matter for Kirklees Council.</p> <p>The Policy has been amended and part of the wording deleted.</p>	No change.
54			Comment	Maybe consider how you identify main routes eg some roads are not classed as main roads, but have become major routes and rat runs, including being used by large lorries/HGVs. Introduce more double	<p>Noted.</p> <p>This is a matter for Kirklees Council.</p>	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				yellow lines if park and walk/ride is introduced.		
55			Comment	We should aspire to reduce HGV movements and have signage before people reach the towns discouraging HGV access. We must also actively stop cars / buses / taxis from idling their engines as they have done in cities such as York.	Noted. This is a matter for Kirklees Council.	No change.
56			Comment	Encouraging 20mph in all our town and village centres is important. Road markings in our conservation areas should be more muted eg. thinner yellow lines so they are less visually intrusive. Discouraging HGVs which are not local businesses and are just using the valley as a through route is important. Priority boxes for cyclists should be provided at key signalled junctions particularly on the main roads near schools so children can	Noted. This is a matter for Kirklees Council.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				cycle more safely to school. Station Road to Holmfirth High School for example could have a marked bike lane going up the hill from Holmfirth and potentially a different access to the school to encourage more children to cycle to school. New developments should include footpaths and connectivity into the centre of villages etc. The hill up Greenfield Road to the Ford Inn should be reduced in speed to 50mph to make it safer.		
57			Comment	Ensure the current proposed traffic improvements are in line with the local neighbourhood plan and are designed to enhance the town and its amenities and not just improving Holmfirth as a commuter ratrun.	<p>Noted.</p> <p>This is a matter for Kirklees Council.</p> <p>The Policies in the NDP promote active travel and prioritise pedestrians and cyclists.</p>	No change.
59				There should be dedicated cycle lanes, physically separated from vehicles		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				with high kerb barriers, along all the main highways linking Holmfirth and New Mill to Huddersfield to encourage more people to cycle to and from Town for work and leisure. Cycling should be prioritised over car use to promote greener living. Cycle and renewable energy (electric plug-in) car parking spaces should be provided in all car parks, at least equivalent in number to the number of car parking spaces. The car parking for all new developments should be provided with electric plug-in points to encourage the use of electric vehicles.		
60			Comment	11.1 The NDP and Policy 11 should include measures to support the Climate Emergency recently declared by the Parish Council. The two major changes will be the switch from fossil fuelled mot vehicles to clean energy	Noted. This has been reviewed by the Steering Group.	No further change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				vehicles e.g. EV electric cars, and the switch from using personal transport to public transport. The NDP and Policy 11 should promote and support these changes. E.g. facilitate installation of EV charging points in both private and public road spaces.		
63			Comment	As at 1) Stop HGVs and massive articulated lorries getting into the town centre and up Greenfield Road, which is like a motorway, by ensuring signage/deterrents so that M1 and M62 is used instead.	Noted. This is a matter for Kirklees Council.	No change.
66			Comment	In any new suggested improvements for the traffic situation in Holmfirth, a full public consultation should be held, as was held for the previous one which was ultimately rejected. It also needs to take into consideration that the historic Hollowgate needs	Noted. This is a matter for Kirklees Council.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				to remain as it is, as does Holmfirth Market Hall - a regular, useful purpose needs to be found for this building in order to prevent it from being targeted as a building that can be taken away.		
67			Comment	Re-open Holmfirth railway line!	<p>Noted.</p> <p>This is a matter for Kirklees Council.</p>	No change.
68			Comment	F. Health and wellbeing. Until you get rid of HGV's altogether, by using signage from the M1 to divert HGVs to the M62 to reach Lancashire, then we shall have the current intolerant air pollution for ever more. Holmfirth is a small mill town and it was never meant for such heavy and articulated vehicles, some of which currently block 3 lanes in the town centre.	<p>Noted.</p> <p>This is a matter for Kirklees Council.</p>	No change.
70				3 things that could be done immediately while you decide on a bigger project:		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				1) Remove one pedestrian crossing 2) Make Hollowgate one way. 3) No parking on Victoria Street		
71			Comment	I have just been through the Holme Valley NDP (not for the first time) and although there is plenty of reference to cycling and sustainability and a map showing an indicative cycle route I cannot see the detail of the attached document included in the NDP plans. I will email the documents through separately and I would encourage you to meet with Bill Hunter to discuss these and how they could be included in the NDP.	Noted.	No change.
72			Comment	Evening transport	Noted.	No change.

Table 6L Residents' Responses to Policy 12 - Sustainability

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
3			Comment	Provision of electric vehicle charging points in new developments will be looked upon favourably.	Accepted.	Policy 11 amended to include: " Development schemes should include provision of electric vehicle charging points wherever practicable."
4			Comment	I feel it the word 'sustainability' fairly meaningless. Events beyond the Holme Valley make it all too clear that human beings are not sustainable.	Noted. Refer to definition of sustainable development in the NPPF.	No change.
7			Comment	The only way forward in this area is organic growth so as not to leverage costs onto the consumer especially of housing. "smaller houses are also a good way of reducing the carbon footprint as they use less energy to build less energy to run and less energy on the upkeep. Smaller and affordable homes are a good way of reducing the carbon footprint and would help toward the "climate change emergency" within the	Noted. The GI section has been deleted from the Policy following comments from Kirklees Council.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
				<p>Holme Valley without financially adding to the cost of a new home.</p> <p>Green Infrastructure and Biodiversity</p> <p>1. Proposals to reduce garden space and convert it with hard cover in front gardens will be resisted. This should not be added as some people may want to use the front garden for parking so as to de-congest parking on the road. However, permeable surfaces should be used.</p>		
8			Comment	<p>as above re transport. Car use must be prioritised LOWER than pedestrian, cycle or public transport access.</p>	<p>Noted.</p> <p>Refer to Policy 11 as amended.</p>	No change.
9			Comment	<p>Greener housing! Kirklees has declared a climate emergency - all new housing in The Valley could be passive? At least improve what is being built right now and the lack of trees and green spaces which are promised in one plan and</p>	<p>Noted.</p> <p>The Steering Group are considering the climate emergency and implications for the NDP.</p>	No further change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
				then allowed to not appear in the final build.		
15			Comment	Tourism	Noted.	No change.
22			Comment	Encourage younger people to become Councillors.	Noted. This is outside the influence of the NDP.	No change.
24			Comment	Encourage tree planting	Noted. NDP Policies support tree planting in landscaping schemes.	No change.
30			Comment	Addressing the impact of climate change, flooding, promoting sustainable transport.	Noted.	No change.
32			Support	Yes. In "sustainable living in New developments proposals" I think that All retail, not just new, should be encouraged to go plastic-free and consider sustainability. Not fair to require only new ones to do this. Similarly with choosing energy providers.	Noted. Planning policies cannot address plastic waste management.	No change.
33			Comment	Promote Insulation	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
					The Policy supports energy efficiency.	
36			Support	This policy seems to me, well thought through and attainable if given sufficient time and money.	Noted.	No change.
38			Comment	Emphasise the value of dedicated cycle routes to increase non-car commuting, especially towards Huddersfield and between Holme Valley settlements	Noted. Refer to Policy 11.	No change.
43			Comment	Listed buildings should be allowed to install double glazing as long as it looks exactly like the single glazing it is replacing.	Noted. Refer to Energy Efficiency point 5.	No change.
52			Comment	Tree planting should be encouraged ... where it is appropriate ... It may not be appropriate for high or open sites and the species proportions need to be taken into account eg major oaks, sycamore or beech would not be appropriate for many sites	Noted. NDP Policies support tree planting in landscaping schemes.	No change.
54			Support	Very positive	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
55			Comment	The strands of the climate emergency should be reflected through the document with every policy considering sustainability and how we can address this. Renewable energy sources should be mandated for new developments and every effort be taken for sustainability to permeate every element of the valley from house building to traffic.	<p>Noted.</p> <p>The Steering Group are considering the climate emergency and implications for the NDP. The NDP has been revised throughout to strengthen climate change related policies and actions.</p>	No further change.
56			Comment	The new Climate Change action plan should be read in conjunction with the NDP to see if the themes within it are appropriately included as this has evolved during the lifetime of the NDP development and it is important that the NDP facilitates some of the Climate Change actions in a complementary way and more importantly does not block them.	<p>Noted.</p> <p>The Steering Group are considering the climate emergency and implications for the NDP.</p>	No further change.
59			Comment	All new developments should	Noted.	No further change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
				<p>be built 'carbon-neutral' and should be designed so that they can be lived in 'carbon-neutral'. If not, the Council will be failing in its obligation to be carbon neutral.</p> <p>Development on any fields which act as natural retention sites for rainwater prior to it draining into the river system should not be permitted. Green infrastructure and biodiversity should be expanded to link up existing sites to prevent these from becoming isolated islands.</p> <p>The impact of any necessary new development should be offset by the developer buying an equivalently sized and adjacent piece of 'green' land which will then be held in trust, in perpetuity, by the local community residents, protected from future development, to encourage protected wildlife habitat</p>	<p>The Steering Group are considering the climate emergency and implications for the NDP.</p> <p>The part of the policy addressing flooding and extreme weather has been deleted following comments from Kirklees Council but an additional policy has been added on protecting wildlife and securing biodiversity net gain.</p>	

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
				rings to be established around the built environment.		
60			Comment	<p>12.1 The NDP and Policy 12 should include measures to support the Climate Emergency recently declared by the Parish Council, as sustainability is the central to all actions necessary to mitigate the impact of climate change.</p> <p>12.2 Promoting Renewable Energy – the wording in this section should be tempered to match the recent commitment of the Parish Council to combat climate change and its promise of action. Words in points 1 and 2 such as ‘conflict with’ should be changed to ‘balanced against’, ‘avoided’ changed to ‘minimised’. The NDP should help in prioritising the clash between our desire for a ‘beautiful’ local environment and the need to save the</p>	<p>Noted.</p> <p>The Steering Group are considering the climate emergency and implications for the NDP.</p>	No further change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
				<p>planet from the carbon emission impact of our current lifestyle. Installing more renewable energy, including wind energy, is clearly an action opportunity and the Holme Valley community should play its part. The Parish Council should show leadership on this point. 12.3 Building Energy efficiency – the wording in this section should be tempered to match the recent commitment of the Parish Council to combat climate change and its promise of action. Whilst the wording is generally good, NDP should try to push for all new buildings and retrofitted/restored older buildings to be at least NET ZERO ENERGY i.e. building fabric energy losses are offset by new renewable energy installations. This allows in a practical way for the challenges of making</p>		

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
				older properties energy efficient – it would allow such buildings to be low-energy rated rather than zero energy rated e.g. Passivhaus standard. Priority should still be given to building fabric energy efficiency measures but recognises the practical difficulties of retrofitting older buildings.		
68			Comment	H. For climate change targets, air pollution you need to encourage those who have fields lying pretty much unoccupied, maybe with a few sheep or cattle, or for hay, then they could plant trees and a scheme to encourage this needs to be generated and field owners contacted and given inducements. The Woodland Trust encourages us to grow oak trees from acorns in the valley – I have 2, but then it says we need immaculate provenance from an approved nursery, so then	Noted. This is not a planning policy matter.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
				such planting by well meaning individuals who are only doing as they are asked, is wasted and we are left feeling "why do we bother".		
72			Comment	Teaching how to use less heat etc.	Noted. This is not a planning policy matter.	No change.

Table 6M Residents' Responses to Policy 13 – Development contributions on local priorities

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
1			Comment	All development should first and foremost be focussed on the benefit to the community and not on the profit for the developer.	Noted.	No change.
2			Comment	force developers to include more 2-3 bedroom houses in their plans - within the financial reach of young families. Ask developers to contribute a fraction of their profits from any development towards local schools	Noted. Refer to Policy 6. Negotiations about developer contributions is a matter for Kirklees Council.	No change.
3			Comment	Improvements to parking provision, including the provision of electric vehicle charging points.	Noted. NDP policies already require these.	No change.
6			Comment	Make sure Kirklees don't play havoc with Hollowgate. All we need is no lorries and there us definitely no need for most of them to even be there early intervention at points further away would ensure this nightmare	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				doesn't exist.		
7			Comment	Page 128 Appendix 1: Biodiversity Assets Local Geological Sites Can we add to this list the Old Bull Ring that is situated three fields above Digley, Holme direction from the reservoir. I have sent all the details from Historic England and a photo to Rachael	Noted. Refer to Kirklees Council.	No change.
9			Comment	Local people also want sustainable and attractive housing, spaces for their kids to play and walk to school, so not all about cars.	Noted.	No change.
15			Comment	It would appear in many cases that once planning is gained developers no longer completely fulfil any planning gain asked for. Besides checking constructions via building control, possible also check their community contribution.	Noted. Negotiations about developer contributions and enforcement are matters for Kirklees Council.	No change.
17			Comment	If the developer takes away a green space that was used by the community and affects the village amenity, they	Noted. NDP Policies and Kirklees Local Plan policies require	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				should include green spaces in their design and ideally a park/area for the public to use to make up for the loss.	re-provision unless certain circumstances apply.	
19			Comment	The local community group at Hade Edge is aware that developer contributions from recent new housing has not been spent in the neighbourhood.	Noted. Negotiations about developer contributions and enforcement are matters for Kirklees Council.	No change.
22			Comment	Initiate a points system for current developments and refuse future planning permission for developers who fail to achieve a minimum standard.	Noted. Developer contributions and enforcement are matters for Kirklees Council.	No change.
25			Comment	This needs to be more transparent - were are these levy's being spent?	Noted. These are just suggestions and further details would need to be provided, building on community consultations.	No change.
30			Comment	Focus contributions to addressing climate change and zero carbon economy.	Noted. These are just suggestions and further details would	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					need to be provided, building on community consultations.	
33			Comment	Ensure that 106 money is spent in the valley.	Noted. CIL could be spent locally in the Valley but S106 contributions may be spent in a wider area eg on schools.	No change.
34			Comment	I would add spending on environmental works, particularly in Holmfirth Town Centre.	Noted.	No change.
36			Comment	It will be a great opportunity to use the CIL to be of real help in promoting positive and practical initiatives such as those outlined in the Plan.	Noted. These are just suggestions and further details would need to be provided, building on community consultations.	No change.
38			Comment	Improve cycle parking and dedicated cycle tracks.	Noted. These are just suggestions and further details would need to be provided, building on community	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					consultations.	
42			Comment	River front public pathways should be mandatory along rivers.	<p>Noted.</p> <p>These are just suggestions and further details would need to be provided, building on community consultations.</p>	No change.
43			Comment	All foliage needs removing from around road signs as they are becoming invisible - this is a countrywide problem.	<p>Noted.</p> <p>These are just suggestions and further details would need to be provided, building on community consultations.</p>	No change.
44			Comment	"Developer Contributions" - to be used in the Holme Valley and not directed elsewhere by Kirklees Council.	<p>Noted.</p> <p>CIL could be spent locally in the Valley but S106 contributions may be spent in a wider area eg on schools.</p>	No change.
48			Comment	Strong need to think about car parking and the need to retain public toilets that are clean and of a high standard.	<p>Noted.</p> <p>These are just suggestions and further details would need to be provided,</p>	No change.

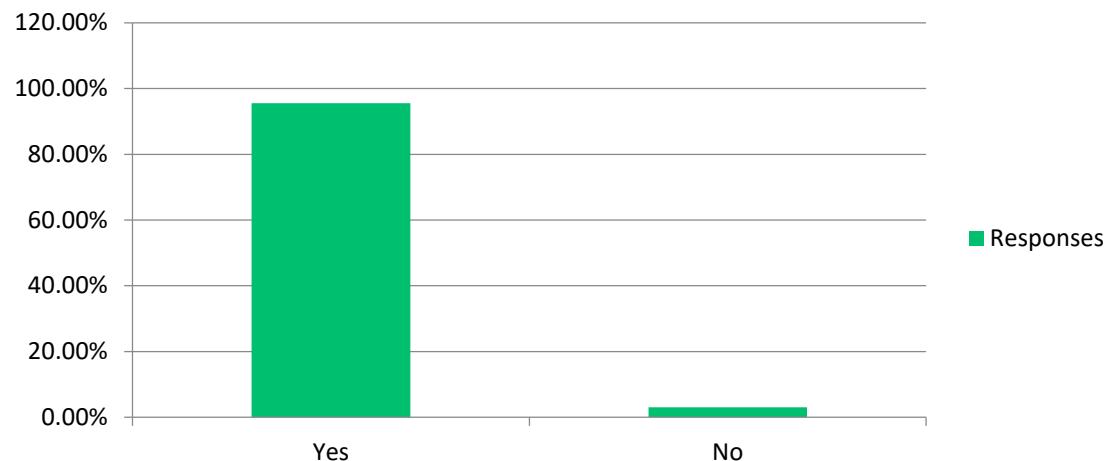
Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					building on community consultations.	
59			Comment	<p>The provision of better facilities for the whole of the community, not just younger and older people. Improvements to 'green' parking provision (bikes and electric cars).</p> <p>No improvements to car parking provision as this only serves to encourage more 'greenhouse gas emission' car use. The creation of green spaces, for communities to own, in trust, in perpetuity, protected from development for the benefit of local residents and wildlife. All developers should be required to purchase 'green' land, equilvalent in size and adjacent to their development, for this purpose.</p>	<p>Noted.</p> <p>These are just suggestions and further details would need to be provided, building on community consultations.</p>	No change.
63			Comment	Ensure Kirklees behaves responsible when passing	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				developments so that all councillors care what is happening within our area. KMC Planning passes anything just to get more council tax in.		
72			Comment	Still keep to small development. Always plus green space and wildflowers.	Noted. These are just suggestions and further details would need to be provided, building on community consultations.	No change.

Table 6N Residents' Responses to Question 14

Do you support the aims of the plan and its future progression to referendum?

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



Answer Choices	Responses	
Yes	95.52%	64
No	2.99%	2
Comments		14
	Answered	67
	Skipped	5

Consultee Name Address	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
Ref. No.						

Consultee Name Address Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
1			Comment	I've answered yes but it was a close call. I don't agree with this approach to local policy-making, but it's a worthy effort.	Noted.	No change.
4			Comment	Yes but only if amendments are made to it	Noted.	No change.
5			Comment	It's great!	Noted.	No change.
6			Comment	Too many "if possible" and "normally" at the beginning of sentences allowing developers to wriggle out of things. Also not enough priority on the environment, sustainability and green spaces. Houses can be built which prioritise these things - we need to aim higher in terms of what we want from our housing in the future and aim for award winning passive housing developments in this valley.	Noted. Planning policies have to be flexible and not overly prescriptive.	No change.
8			Comment	Generally. Not happy with more housing	Noted.	No change.
14			Comment	I am concerned that it will be dismissed by planning in favour of targets for numbers of houses built.	Noted.	No change.

Consultee Name Address	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
Ref. No.						
30			Comment	There is a financial benefit in doing so!	Noted.	No change.
32			Comment	The plan provides the foundation for ensuring appropriate development in the Valley i.e. development that reflects our past and supports our future as one of the most stunning and distinctive places in the UK	Noted.	No change.
33			Comment	We have a unique opportunity to have a real say in the development of our local area and direct the future of the Holme Valley in the way local residents want our community to evolve.	Noted.	No change.
42			Comment	Great work. I can see how this will make the Holme Valley a great place to live for many years to come	Noted.	No change.
43			Comment	It is necessarily complex but nevertheless excellent	Noted.	No change.
50			Comment	I support the aims of the plan and agree it should be voted on but I do not agree with every element of it as currently	Noted.	No change.

Consultee Name Address	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
Ref. No.						
				drafted.		
51			Comment	I think it is an excellent idea	Noted.	No change.
61			Comment	It is a very detailed and thorough document. It needs a section on implementation and authority, in that there will be likely opposition from Kirklees Council and housing developers.	Noted.	No change.
62			Comment	I've answered yes but it was a close call. I don't agree with this approach to local policy-making, but it's a worthy effort.	Noted.	No change.

Table 60 Residents' Responses to Policy 15 – Comments on the draft NDP

Consultee Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
4			General	Comment	I see these plans as a means of rubber-stamping what's going to happen anyway. "Neighbourhood plans, and orders should not promote less development than set out in the Local Plan or undermine its strategic policies." Enough said.	Noted.	No change.
5				Comment	It seems that too many identical looking housing estates are allowed to be built on what was a green field I don't understand how this is allowed to happen ?	Noted.	No change.
7				Comment	I want to reiterate that the plan had more policies related to disability	Noted.	No change.
8				Comment	You forgot the lido!	Noted.	No change.
9				Comment	Climate emergency? You wouldn't know it from looking at this plan.....	Noted.	No change.
10				Comment	An excellent Plan which aims to retain the local character	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
					of Holme Valley whilst not stifling development and innovation		
14				Comment	Well done	Noted.	No change.
15				Comment	Holme Valley is a beautiful and becoming well visited area, be extra sensitive with any development.	Noted.	No change.
17				Comment	It should include consequences for when it is not met, and what powers the local community have to use it to challenge submitted developments.	Noted.	No change.
18				Comment	Very comprehensive.	Noted.	No change.
21				Comment	Dreamland	Noted.	No change.
22				Comment	Overly bureaucratic.	Noted.	No change.
25				Comment	We need to be more ambitious promoting the use of electric vehicles.	Noted.	No change.
33				Comment	Well done for persisting in the teeth of unfounded criticism and apathy	Noted.	No change.
34				Comment	No - I am generally impressed by what has been achieved.	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
40				Comment	It is well thought out and comprehensive. I have tried hard to find areas where I could improve on it but I have been unsuccessful!	Noted.	No change.
43				Comment	they key thing is to be sensible when building new houses as not everyone wants or can afford a 5 bedrooomed executive home. What about young families who need an affordable 2 bed starter home - where are they? The focus needs to be on the community and not the profit of the builder. And, be sensible with regards to access - some roads are impossible to get down due to ridiculous parking and lack of double yellow lines and traffic wardens.	Noted.	No change.
44				Comment	Be strong and don't allow "those who will not suffer their crackpot decisions" to take control.	Noted.	No change.
45				Comment	Good to see the	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
					modifications and developments from the first edition		
48				Comment	Thank you for the work and the thought that has gone into this plan.	Noted.	No change.
54				Comment	Having said all of the above I hope it is adopted and then used. My fear is that historically (and I know we're talking about the future here) permissions haven't been monitored and enforced, so some people have got away without redress. This mustn't happen, going forward, so the resources to monitor and enforce must be there, otherwise all of this is pointless. Please follow it through!!!!!!	Noted.	No change.
55				Comment	The Survey Monkey crashed before submission of my full comments so these have been explained to Cllr Hogley to input on my behalf.	Noted.	No change.
59				Comment	The Council needs to be		

Consultee Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
					much bolder by stating that no development on 'green' field sites should take place until all brownfield sites have been exhausted and all 'second homes' are permanently resided in. In order to meet the stated aim of being 'carbon neutral by 2030' all new development must be carbon neutral from the outset, both in terms of the build and the future occupation/use.		
64				Comment	It is really very hard to read the plan and fill out this questionnaire.	Noted.	No change.
68				Comment	Firstly your page 5 how to comment is ambiguously worded and you give a link for queries which I am using. I do not see in your index a page for the questionnaire which you also refer to. This, together with the huge Raft of information is probably why you have so few replies. B Your objectives at B	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
					<p>cannot be done as Kirklees Planning passes just about everything as its criteria is so lax and so huge meaning that any development is passed in order to get more council tax revenue which the Holme Valley can generate. The Holme Valley is already over-developed and councillors from other areas pass developments in the Holme Valley area as they do not care, so long as it is not their own. I have seen the Chair of the Planning Committee actually give directives to councillors to pass a development which has been objected to and the councillors just do as they are directed. As another example, 2 houses at Burnlee just below the school were built too high but nothing was done to correct this. The Upperthong area is overbuilt and its highways are</p>		

Consultee Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
					overburdened with 2 cars per new house, in the current 2 years alone this is in the region of 54 extra houses. The view of Upperthong from its opposite valley is staggeringly built up. The farmers who own the remaining fields at the top of Upperthong will simply sell to developers as and when they please and more building will occur. Highways always says the roads are adequate and clearly they are not.		
69				Comment	My reaction to this is the same as to the previous version: I have trouble with the vision statement and can't properly get past that. Everything should stem from that statement and it is seriously lacking because it fails to address the fundamental question: how do you see the way the population will live over the	Noted.	No change.

Consultee Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP	
					term of the plan? There are several options: - A population of largely working age people - A population servicing the tourist industry - A population of non-working people. These have different requirements. If you have people of working age then either you have to balance provision of workplaces against homes or improve transport links. If you see a need to provide balance you need to ask how this is to be done given that years of development have trashed most of the places where people were employed - those "brownfield sites" were the reason why the vast majority of people living in the valley could be employed there back in the '50s. Turning them over to housing has made the valley commuter country. If			

Consultee Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
					<p>commuter country is what you see as the future you have to face the fact that (a) it has sustainability problems and (b) needs a major upgrade to roads (rail is a distant memory) at whatever cost that brings for the countryside. If you see tourism as the future there needs to be an abrupt halt to house-building. The countryside is the main resource and more building over it is going to destroy it. If you have a non-working population then you need to think about social provision. You need to switch development to social housing and look at provision of health services if that population is seen as retirees. At present the main hospital provision is on the far side of Huddersfield. Even the public transport within the valley would need to be fixed - we have our</p>		

Consultee Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Councils' Consideration	Amendments to NDP
					two GP practices side-by-side which cannot be reached from the top end of the valley without changing buses. Your objectives and policies need to flow from your vision statement but your vision statement fails to address the essentials. Until this is addressed the rest is meaningless.		
72				Comment	Talk to people more.	Noted.	No change.

Table 6P Residents' Responses to Question 16 re the Strategic Environmental Assessment (SEA)

ALL THESE RESPONSES WERE SHARED WITH AECOM TO ENABLE THEM TO UPDATE THE STRATEGIC ENVIRONMENTAL ASSESSMENT

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration
4				<p>The NDP does not mention public-lighting, which after dark is the main determinant of the character of the neighbourhood. Great care has been taken in the past to light Holmfirth sympathetically but the policy has changed. Why was lighting once an important enough issue to warrant incurring extra expense for flattering and pleasant lighting in the centre of Holmfirth, but is now not important enough even to be mentioned in the local plan? How can bright, white lights that stay on all night be irrelevant to an environmental or ecological survey? Residents of the area, be they people, insects, birds or sheep, are here 24/7.</p>	<p>ALL THESE RESPONSES WERE SHARED WITH AECOM TO ENABLE THEM TO UPDATE THE STRATEGIC ENVIRONMENTAL ASSESSMENT</p>
7				I feel that this was a costly	

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration
				<p>add on as when you read it, it is a generic report and not a specific one for the Holme Valley but also understand that we are requires to tick boxers. I just do not like to waist public money weather this is local or central government money as we need it for other things like schools. hospitals, police and for venerable people that need our support!</p>	
9				<p>Minor long term positive effects? This is not good enough. We should be setting ourselves higher standards.</p>	
15				<p>Stop burning on the moors, its a disgraceful occurrence that affects many people locally and is only for the benefit of grouse shooting.</p>	
21				<p>What enviromental strategy</p>	
22				<p>Employ local experts to comment on these matters.</p>	
28				<p>I have read report and have nothing to add</p>	

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration
32				No. Very thorough.	
43				How much did this useless document cost? Why is a company in Bristol producing a document for the Holme Valley??!	
54				It seems common sense, but at the end it still says "would need a more detailed Environmental Assessment" so was this a pointless exercise at this stage?	
63				No, just stop excessive building and ask the Planning Chair not to direct Councillors to agree to any kind of further building in the Holme valley, except over 55 apartments in a few places, by a bus route.	
70				The NDP does not mention public-lighting, which after dark is the main determinant of the character of the neighbourhood. Great care has been taken in the past to light Holmfirth sympathetically but the policy has changed. Why was	

Consultee Ref. No.	Page No.	Para. No.	Support / Object / Comment	Comments received	Parish Council's Consideration
				<p>lighting once an important enough issue to warrant incurring extra expense for flattering and pleasant lighting in the centre of Holmfirth, but is now not important enough even to be mentioned in the local plan? How can bright, white lights that stay on all night be irrelevant to an environmental or ecological survey? Residents of the area, be they people, insects, birds or sheep, are here 24/7.</p>	