

Holme Valley Draft Neighbourhood Development Plan – Regulation 14 Consultation Responses

15th July to 15th September 2019

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	Accepted.	No further change to detailed amendments set

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		<p>comments provided by Kirklees Council are in relation to the use of the HVNDP in determining planning applications where Kirklees Council is the relevant 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.</p>	<p>Detailed comments have also been submitted by the Peak District National Park Authority and these will also be addressed in amendments to the NDP.</p>	<p>out below.</p>
All	Comment	<p>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 17th August 2018 and alongside the minutes of the meeting held on 19th December 2018 between the Council and members of the Holme Valley Neighbourhood Plan Steering Group.</p>	Noted.	No change.
115 124	Comment	<p>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</p>	Accepted - see responses to detailed points below.	No further change to detailed amendments set out below.

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		<p>the introduction of weight limits (HVNDP Draft Policy 11). An example of a Neighbourhood Plan which has an emphasis on HGV weight limits but 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 - 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 - 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</p>	Noted.	No further change to detailed amendments set out below.

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		<p>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 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.</p>		
40 61 91 82 124	Comment	<p>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-</p>	Noted.	No further change to detailed amendments set out below.

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		<p>Neighbourhood-Plan-Made-May-2016.pdf Neighbourhood Plans do not have to separate community/town/parish council actions 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.</p>		
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</p>	Noted.	No further change to detailed amendments set out below.

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		use of numbers, headings and sub headings which makes referencing parts of policies difficult. Issues are dispersed among different policies and reasoned 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	Noted. The Parish Council does not	No change.

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		the plan could take the opportunity to provide design guidance to inform the development of the remaining allocated development sites.	intend to prepare design guidance to inform the development of the remaining site allocations. This is 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.	Amend NDP 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.	Not accepted. The Steering Group and Parish Council consider that it is preferable to retain this as a single objective.	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.	The map was reproduced from the AECOM Holme Valley Heritage and Character Assessment report. The Steering Group has revised and improved Map 2 to improve clarity.	Insert new map with improved clarity.
4.2 Landscape Character Areas					
6.		Draft Policies 1 and 2: General comment	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	Noted. (NPPG paragraph 041 states: How should the policies in a neighbourhood plan be drafted? <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>	No further change to detailed changes discussed and agreed 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>	<p>No further change.</p>

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.

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			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: <i>"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."</i></p>	<p>Accepted.</p> <p>The Policy wording has been discussed with officers at Kirklees Council and amended.</p>	<p>Amend Policy 1.</p> <p>Change first paragraph to:</p> <p>'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>
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	<p>Accepted.</p> <p>Refer to p22 of the HCA</p>	See above.

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			<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>

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				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 <i>Landscape</i> Character Area.	Accepted.	<p>Amend NDP</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.	<p>Accepted.</p> <p>See below. Points 1 and 2 should be deleted.</p>	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>Amend NDP</p> <p>Delete point 1.</p>

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19.		Draft Policy 1	Point 2: Unnecessary as repeats national and local policy. If retained the list of Local Plan policies should be removed.	Accepted. <u>Amend NDP</u> Delete 2.	
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>	<p>Partially accepted.</p> <p>The public views are an important and highly valued attribute of the Holme Valley NDP area.</p> <p>Amend the Policy to refer to "public views" and delete text after Conservation Area Appraisals as suggested.</p> <p>The remaining text referring to the Conservation Area Appraisals and the text which the Council suggests should be deleted could be moved to Policy 2.</p> <p>(As Policy 2 refers to the Conservation Areas it may make more sense perhaps to delete the text after "Heritage and Character Assessment")</p>	<p><u>Amend NDP</u></p> <p>The paragraph now reads:</p> <p>1. Development should respect long distance public views from development to the upland areas of CA 1: Wessenden Moors, CA 2: Holme Moorland Fringe and CA 3: Hade Edge Upland Pastures and protect public views towards any significant local landmarks as identified in the Heritage and Character Assessment report. In addition, views across the Valley must be considered, including from other areas looking towards the development scheme and proposals should pay particular regard to any long distance visual impacts on approaches to settlements, and along through routes. Overall development proposals should minimise any adverse visual</p>

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					impacts on the wider landscape setting of the development.
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>	<p>Accepted.</p> <p>Amend Criterion 4 as suggested.</p>	<p><u>Amend NDP.</u></p> <p>Provide further explanatory text to explain screening and colours in supporting text. Replace final sentence in 4.2.11 with:</p> <p>'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</p>

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					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.	<u>Amend NDP.</u> This now reads: '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.'
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.	<u>Amend NDP.</u> This now reads: '5. A full hard and soft landscaping scheme is to be submitted with all planning applications where

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					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.'
24.			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.	Accepted. Amend criterion 7 as suggested. This should refer to "major" development which is defined in the NPPF. This	<u>Amend NDP.</u> This now reads: ' 4. New major development should include pedestrian linkages to existing tracks and routes'

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				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>	<p>Accepted.</p> <p>Delete criterion 8.</p>	<p><u>Amend NDP.</u></p> <p>Deleted. Now addressed in 5.</p>
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 traditional and appropriate <i>native plant species or other species where appropriate</i> to</p>	<p>Accepted.</p> <p>Amend criterion 9 as suggested.</p>	<p><u>Amend NDP.</u></p> <p>See new wording for 5 above.</p>

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			support and enhance biodiversity as outlined in Kirklees Biodiversity Policy. <i>in line with the council's Biodiversity Action Plan and the relevant Biodiversity Opportunity Zones.</i> The species should take account of <i>Regard should be had to</i> the location, <i>setting, species height, planting</i> density and need for on-going <i>maintenance and</i> management.		
27.		Draft Policy 1	Point 10: Multiple criteria deal with boundary treatments which is confusing. This point may not be enforceable.	Noted. Delete criterion 10. This is covered in the revised criterion 9 as above. (Criterion 5 refers to dry stone walls.)	<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.

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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)

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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.</p> <p>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.</p> <p>See detailed responses below.</p> <p>The Policy has been revised following further discussions with Kirklees Council.</p>	No further changes - see detailed changes below.

KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
		<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	<p>Point 1 Local Character</p> <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</u> respond to the context 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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					mitigate damage.'
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>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p>Amend NDP</p> <p>2. Now reads:</p> <p>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.</p>
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>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p>Amend NDP</p> <p>Views are now addressed in Policy 1 and Gateways are covered in Policy 5.</p>
27.	Page 60	Point 4 Utilising Existing Assets	<p>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'.</p>	<p>Accepted.</p> <p>Amend Policy 2 as suggested.</p>	<p>Amend NDP.</p> <p>This now reads:</p>

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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 <i>buildings</i> 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 contemporary modern materials and design <u>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 meant 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:- “(d) a full hard and soft landscaping scheme is to be submitted with all planning applications <i>where appropriate.</i>” Open spaces should be designed <i>to meet the needs of the development</i> 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:- "Designs should reflect <u>respect</u> the scale..."</p>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p>Amend NDP.</p> <p>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.'</p>
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>	<p>Accepted.</p> <p>As boundaries are addressed in more detail in Policy 1 (see 22 above) delete criterion 8 in Policy 2.</p> <p>Amend wording in Policy 1 to refer to natural stone or cast</p>	<p><u>Amend NDP.</u></p> <p>See Policy 1 above.</p>

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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 <i>natural</i> 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: “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>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>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.'</p>
33.	Page 62	Point 10 Amenity, Privacy and Space Standards	<p>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.</p>	Amend 10.	<p><u>Amend NDP.</u></p> <p>This now reads: <u>10) Protecting Amenity</u> Proposals should minimise</p>

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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: “Planting proposals <i>on or close to site boundaries</i> should <i>where appropriate</i> be designed to be an integral part of all new development and use <i>include a suitable mix of primarily native species where appropriate</i>. Proposals will only be supported when it is clear that Careful consideration has been <i>should be</i> given to the creation of a strong landscape structure throughout the site and <i>be appropriate to the setting</i>. 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. <i>Proposed planting should consider and complement and</i></p>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>This now reads:</p> <p>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.</p> <p>Once all changes made cross check planting in NDP for duplication and include in a</p>

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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: “Sustainable urban drainage schemes using porous materials should <u>could</u> be integrated <u>incorporated</u> within the planting scheme <u>where appropriate</u>. 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	<p>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.</p> <p>Suggested change:</p>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p>Amend NDP.</p> <p>Accepted. This now reads:</p> <p>'9) Mixed Uses If a shop or service is proposed as a part of a</p>

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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.” <i>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.</i></p>		<p>development scheme applicants will be encouraged to locate the facility where it is accessible to the wider community.</p>
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>	<p>Accepted.</p> <p>The Policy duplicates policies in the Local Plan and should be deleted.</p>	<p><u>Amend NDP.</u></p> <p>Delete criterion 13.</p>
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>	<p>Accepted.</p> <p>Amend Policy title as suggested.</p>	<p><u>Amend NDP.</u></p> <p>Change title to " Conserving and Enhancing Heritage Assets."</p>

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38.	Page 64	4.5.1	The last sentence should be up-dated to reflect the adopted Local Plan.	Accepted.	Amend NDP Update 4.5.1 to refer to adopted Local Plan.
39.	Page 64	4.5.2	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> '. There is insufficient robust supporting evidence.	Accepted. Amend to "non designated" heritage assets.	Amend NDP. 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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	<p>Heritage Assets</p> <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><u>The following non-designated heritage assets have been identified in the Holme Valley Neighbourhood Plan.</u> <u>Development affecting a non-designated heritage asset should be considered against Local Plan Policy LP35 Historic Environment</u> :- (list the sites)</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.	Noted. The Steering Group could not find a good example locally.	No change. (However other photographs have been added to the NDP to illustrate shopfronts.)
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.	Accepted. Amend paragraph to improve clarity and reduce uncertainty.	Amend NDP. Amend paragraph 4.6.6 to: " Developers are advised to discuss proposals for new shopfronts and advertisements in historic areas (such as conservation areas) in

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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.	Partially accepted. The Heritage and Character Assessment describes the local character of centres within the various Landscape Character Areas. Refer to this in the text.	<u>Amend NDP.</u> 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."
47.	Pages 68-72	Draft Policy 4 General Comments	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. Many of the principles of Draft Policy 4 are covered by Local Plan policy LP25 (Advertisements and Shop Fronts).	Noted. See further detailed responses below.	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>Amend NDP</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> <p>b) Use shopfronts that do not dominate the architecture of the main building;</p> <p>c) Avoid linking two or more buildings with one fascia unless historically already established by continuous architectural pattern or shop use;</p> <p>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;</p> <p>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</p> <p>f) Make use of recessed</p>

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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	Point 2 duplicates Local Plan policy LP25.	Accepted.	<u>Amend NDP</u>

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		<p>Existing Shopfronts</p> <p>Suggested change:-</p> <ul style="list-style-type: none"> Simplify point 2 to the key aim that <i>"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 possible."</i> 	Amend Policy as suggested.	<p>The Policy now reads:</p> <p>2) Retention of Existing Shopfronts</p> <p>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 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	<p>Point 3 Replacement</p>	This point repeats the intentions of Local Plan Policy LP25 and duplicates the general principle in point 1 of draft policy	Accepted.	<u>Amend NDP</u>

		KIRKLEES COMMENTS		PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
		of Shopfronts	<p>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 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>Delete point 3.</p> <p>Parts of the policy may be moved to the supporting text as part of the justification.</p>	<p>Delete 3.</p> <p>Insert the following text after 4.6.4: "The replacement of modern shopfronts with traditional 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>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><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</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<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 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>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>improve accessibility for all is supported. Accessibility should be improved wherever practically possible, provided the special interest of any historic building or buildings is 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</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>character. Historic England's document "<i>Easy Access to Historic Buildings, 2004</i>" and the Department for Communities and Local Government's "<i>Planning and 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</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					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, 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."
52.	Page 69	Point 5 Historic Areas	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.	Accepted. Delete the title "5. Historic Areas" and move the content to "1. General Principles"	Amend NDP Delete the title "5. Historic Areas" and move the content to "1. General Principles"

KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP	
			<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 HVNDP area for example.</p> <p>It is unclear what is meant by 'unconvincing or clumsy results' in criteria a).</p>		
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>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>The Policy now reads: 4) Fascias</p> <p>Proposals for shopfronts should seek to incorporate moulded cornices weathered with a properly detailed lead flashing above the fascia.</p> <p>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</p>

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					and avoid long-term maintenance issues."
54.	Page 70	Point 7 Doors and Windows	This point is overly prescriptive.	Accepted. Amend 7 Doors and Windows as suggested to increase flexibility.	<u>Amend NDP.</u> The Policy now reads: '5) Doors and Windows 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.'
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.	<u>Amend NDP</u> Point 8 has been deleted.
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.	<u>Amend NDP</u> Point 9 has been deleted.

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
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.	<u>Amend NDP</u> The Policy now reads: ' 6) Shutters and Grilles 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 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. The following suitable alternatives will be supported: 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

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>removed during working hours - decorative options may be applicable, themed on shop trade</p> <p>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, does not result in increasing its depth or the creation of a sub-fascia.'</p>
Design Principles for Advertisements					
58.	Page 71	Point 11 General principles	<p>Much of point 11 is imprecise. Additional information in terms of how 'proliferation' and clutter' should be judged is required.</p> <p>It is not reasonable to expect an illuminated sign to be 'substantially hidden from view'.</p>	<p>Accepted.</p> <p>Amend Policy as suggested to improve clarity.</p>	<p><u>Amend NDP.</u></p> <p>The Policy now reads: ' 1) General Principles</p> <p>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.</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>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.</p> <p>Cumulative impacts of advertisements should be considered in relation to street scene and visual clutter. 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. 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</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					efficient.
59.	Page 72	Point 13 Projecting Signs	Unclear what is meant by 'clearly appropriate'.	Accepted. Amend Policy as suggested.	Amend NDP. 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 characteristic feature of the surrounding area. The use of internally illuminated projecting box signs that form a projecting part of a fascia should be avoided. 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

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>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> <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. 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</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					restricted to one sign per building and should relate only to the business which occupies the premises.
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.
Public Realm					
59.	Page 74	4.6.17	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.	Noted. Draft Policy 5 is intended to apply to areas of public realm generally, not just to the routes identified. The preceding paragraphs	<u>Amend NDP.</u> Amend 4.6.17 to: <u>"The public realm is not limited to highways, but road networks in the valley form a significant part of the public</u>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
				4.6.10 - 4.6.16 also provide part of the justification to Policy 5.	<p><u>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>Without careful management, these locations can become 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</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					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	<p>The section relating to public realm enhancements may be more appropriate as Parish Council actions. It is unclear what types of development this policy is intended to apply to and how it will be applied to planning applications.</p> <p>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.</p>	<p>Noted.</p> <p>See more detailed responses below.</p>	No further change to detailed amendments set out below.
61.	Page 74	First section	<p>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).</p> <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>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>The Policy now reads: ' 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</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>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 centres, so that new developments improve rather than hide existing points of interest. c) Prioritise pedestrians and then cyclists, providing seating and safe, accessible routes for all. <p>Where public realm</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>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>
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 is intend to relate to are not specified; • gateway locations are not identified and it would be 	<p>Accepted.</p> <p>Insert further supporting text as suggested.</p>	<p><u>Amend NDP.</u></p> <p>The Policy now reads: ' Gateways and Highways</p> <p>Where new residential or commercial development is close to gateways into the Holme Valley, for example at entry points along the main</p>

KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
		<p>helpful to show these on a map for this policy to be clear and effective;</p> <ul style="list-style-type: none"> • a description of what 'gateway improvements' are is 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>		<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> a) Design and materials in public realm improvements and highways schemes should be sensitive to local character. b) Traffic dominance should be minimised through surface treatment and layout; c) Visual clutter should be limited; d) Provision of shared public

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>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> <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>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					Insert a new map identifying above locations.
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> <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>Accepted.</p> <p>Amend Policy as suggested.</p>	<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 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</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			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		<p>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: " 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 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.</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<p>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>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>
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.	<p><u>Amend NDP.</u></p> <p>Insert before second sentence:</p> <p>"Public consultations for the NDP (see the Consultation</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					Statement, consultation on Issues and Options and emerging First Draft Plan) have shown that .."
66.	Page 78	4.7.5	<p>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).</p> <p>Suggest change: Delete "(Modification SD1-MM33, 2018)".</p>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p>Amend NDP.</p> <p>Amend 4.7.5: Delete first five lines.</p> <p>Insert relevant text from Local Plan Strategy and Policies document paragraph 8.6 (page 59).</p> <p>"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 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</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP																																
					based on up-to-date demographic evidence it takes account of any need arising from shortfalls in delivery against previous targets."																																
67.	Page 78	Table 2	<p>Suggest change: Amend the table title to "Local Plan Housing <i>and Mixed Use</i> 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> <tr><td>H664</td><td>HS168</td></tr> <tr><td>H786</td><td>HS171</td></tr> <tr><td>H47</td><td>HS174</td></tr> <tr><td>H50</td><td>HS175</td></tr> <tr><td>H130</td><td>HS176</td></tr> <tr><td>H214</td><td>HS177</td></tr> <tr><td>H284</td><td>HS178</td></tr> <tr><td>H288a</td><td>HS179</td></tr> <tr><td>H294</td><td>HS180</td></tr> <tr><td>H297</td><td>HS181</td></tr> </tbody> </table>	Previous site number	New site number	H48	HS159	H129	HS161	H178	HS162	H2586	HS164	H584	HS167	H664	HS168	H786	HS171	H47	HS174	H50	HS175	H130	HS176	H214	HS177	H284	HS178	H288a	HS179	H294	HS180	H297	HS181	<p>Accepted.</p> <p>Amend title as suggested.</p>	<p>Amend NDP.</p> <p>Amend the table title to "Local Plan Housing and Mixed Use Site Allocations".</p> <p>Insert new figures in table as provided.</p>
Previous site number	New site number																																				
H48	HS159																																				
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			<table border="1"> <tr><td>H597</td><td>HS182</td></tr> <tr><td>H626</td><td>HS183</td></tr> <tr><td>H715</td><td>HS184</td></tr> <tr><td>H727a</td><td>HS185</td></tr> <tr><td>H728</td><td>HS186</td></tr> <tr><td>H729</td><td>HS187</td></tr> <tr><td>H730</td><td>HS188</td></tr> <tr><td>H787</td><td>HS189</td></tr> <tr><td>H2585</td><td>HS190</td></tr> <tr><td>H2587</td><td>HS191</td></tr> <tr><td>MX1912a</td><td>MXS12</td></tr> <tr><td>H331</td><td>HS173</td></tr> </table>	H597	HS182	H626	HS183	H715	HS184	H727a	HS185	H728	HS186	H729	HS187	H730	HS188	H787	HS189	H2585	HS190	H2587	HS191	MX1912a	MXS12	H331	HS173		
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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.	Noted. Refer to the Consultation Statement and provide further evidence.	<u>Amend NDP.</u> Provide further specific evidence.																								
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.	Noted. 4.7.10 needs to be updated.	<u>Amend NDP.</u> Delete first seven lines of 4.7.10 and update.																								
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.	No change.																								

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
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. Steering Group / PC - please can you advise how developers should consult?	<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 properties to undertake public consultation with local residents and stakeholders."
74.	Page 81	Draft Policy 6 Title	The policy title implies that building homes on land protected by other designations (e.g. employment or urban greenspace) is acceptable. Suggested change: Building Homes for the Future in Areas Not Protected by Green Belt	Accepted. Amend title as suggested.	<u>Amend NDP.</u> Provide new title for Policy 6: " Building Homes for the Future in Areas Not Protected

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					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, <u>New housing development which accords with the Local Plan</u> will be supported within existing settlements where the proposal:</p> <p>Proposals are required to address the following additional considerations.</p> <ol style="list-style-type: none"> 1. <u>involves</u> redevelopment of a brownfield sites and <u>or</u> the conversion of other <u>a</u> suitable buildings for residential use is strongly encouraged within existing settlements. 2. <u>Is</u> 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. 3. <u>includes</u> conversion of an <u>existing</u> mill buildings for low cost housing and apartments rather than 	<p>Accepted.</p> <p>Amend Policy 6 as suggested.</p>	<p>Amend NDP.</p> <p>The Policy now reads: ' Draft Policy 6: Building Homes for the Future</p> <p>General Principles</p> <p>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.</p> <p>In the Kirklees Council part of the Holme Valley NDP area, in addition to the sites allocated 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</p>

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		<p>demolition is preferred, <i>especially for low cost housing</i> 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 <i>units</i>.</p> <p>4. <i>provides</i> adequate parking for residents and visitors should be provided in accordance with <i>Local Plan Policy LP22 Parking and the council's</i> most up to date Kirklees parking standards <i>guidelines</i>. 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>Suggested change: Move the following to the justification text "This document sets out general principles used as a starting point to be evidenced in relation to site accessibility, forecast car ownership, highway layout <i>and the availability of existing on street parking. availability</i>.</p> <p>5. <i>Has</i> 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. <i>Proposals will be expected to d</i>Demonstrates that densities make best and efficient use of land and reflects local settlement character.</p>		<p>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. 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

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					<p>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 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>

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					<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> <ol style="list-style-type: none"> 1. Include a mixture of smaller one, two and three-bedroom properties for sale and rent. 2. Include a suitable proportion of housing designed to meet the needs of older people and properties for first time buyers.

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					<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 document sets out general principles used as a starting point to be evidenced in relation to site accessibility, forecast car ownership, highway layout <i>and the availability of existing on street parking.</i>”</p>

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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 superseded or out-of-date. Please note typographical error in the last sentence of point 4: onø.</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</p>	<p>Noted.</p> <p>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>

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			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.		
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 needs assessment, and if so would it have equal weight to the Strategic Housing Market Assessment? <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</p>	<p>Noted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>See above.</p>

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			<p>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.
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>

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80.	Page 84	4.8.6	Change allocated employment area to allocated employment <i>site</i> and change identified employment to <i>designated</i> employment. Update reference from will be to <i>are</i> safeguarded to reflect adoption of the Local Plan.	Accepted. Amend text as suggested.	<u>Amend NDP.</u> 4.8.6: Change allocated employment area to allocated employment <i>site</i> and change identified employment to <i>designated</i> employment. Update reference from will be to <i>are</i> safeguarded to reflect adoption of the Local Plan.
81.	Page 84	4.8.8	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 <i>and forestry</i> '). Suggested wording to support this paragraph could be " <i>address how the economy can be supported in keeping with green belt policy.</i> "	Accepted. Amend text as suggested.	<u>Amend NDP.</u> Update to refer to adopted Local Plan. Correct heading for LP54 is ' Buildings for agriculture <i>and forestry</i> '. Suggested wording to support 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	These two paragraphs may be better placed to support Draft Policy 8 rather than Draft Policy 7.	Accepted.	<u>Amend NDP.</u>

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			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.	Move paragraphs 4.8.10 and 4.8.11 to supporting text for Policy 7.	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.
84.	Page 87	Draft Policy 7 General comment	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. 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. Given the first clause 'Subject to Green Belt policies' this policy only applies in the green belt. Reference to the green	Accepted. Insert reference for business thresholds if retained. All criteria (as amended) should be met.	<u>Amend NDP.</u> See below.

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		<p>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>Suggested change: Supporting Business Generation <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>Accepted.</p> <p>Amend Policy as suggested.</p> <p>1. Retain - the reference to the Green Belt has been deleted from the first paragraph - see 84 above.</p>	<p><u>Amend NDP</u></p> <p>The Policy now reads: 'Draft Policy 7: Supporting Economic Activity</p> <p>The area designated Natural Zone in the Peak District National Park authority part of the Neighbourhood Area is protected from development</p>

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		<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 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 is a subjective concept so it may be difficult to comply with this criterion.</p>		<p>other than in exceptional circumstances.</p> <p>Supporting Businesses in the 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 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

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					<p>business within its existing site;</p> <p>3. The proposal is for the 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</p>

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					<p>recognise the overall aim to reduce carbon emissions through sustainable design and promoting access by walking, 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</p>

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					<p>adopted Local Plan Policies LP10 and LP20 and national planning policies.</p> <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</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>meet the following specific criteria:</p> <p>1. New caravan, chalet, 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</p>

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					offer to tourists and not have a material adverse impact on the landscape character and natural beauty of the area. 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.'
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	Accepted. Amend Policy as suggested.	<u>Amend NDP.</u> See above.

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			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.		
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><i>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></i></p> <p>Replace 'type likely to cause undue problems or disturbance' with '<i><u>type that would be detrimental to highway safety and efficiency, and the convenience of local residents.</u></i>'</p> <p>Point 11: It is unreasonable and unduly prescriptive to rule out any potential expansion of an existing site.</p>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>See above.</p>

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			And Point 11: Insert 'material' in front of 'adverse impact'.		
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>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p><u>Amend NDP.</u></p> <p>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 <u>Cleckheaton</u> are defined as local centres. <u>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.</u></p> <p>Move to just before Policy 8:</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					The following policy, Policy 8 relates to development within the hierarchy of centres and should be read in conjunction 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 form public consultations relating to Policy.</p>	<p><u>Amend NDP.</u></p> <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 form 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	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>Accepted.</p> <p>Amend Policy as suggested and following further discussions with Kirklees</p>	<p><u>Amend NDP.</u></p> <p>Policy 8 now reads:</p> <p>Draft Policy 8: Facilitating</p>

KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
		<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 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 <i>within</i> 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 <i>Holmfirth</i> town <i>centre</i> and village <i>Honley district</i> 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>Council.</p>	<p>Development in Holmfirth Town Centre and Honley District Centre and Brockholes and New Mill Local Centres</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> <p>1. 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</p>

KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
		<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 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>open and green space.</p> <p>2. Proposals should ensure that there is adequate provision for pedestrians, such 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>

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		<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 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'</p>		<p>Business premises should contribute towards retaining the historic nature of the town 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>

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		<p>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 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>Within Brockholes and New Mill local centres, development for top-up shopping and local services, 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</p>

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					<p>of 6.00 p.m. and 8.00 a.m.) should demonstrate the following:</p> <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: ' Draft Policy 9: Protecting and Enhancing Local Community Facilities</p> <p>Community facilities are defined as facilities which are of value to the local</p>

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					<p>community and they will be protected and enhanced where possible. Examples are given in paragraph 4.7.11.</p> <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

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
					<p>operation of the facility.</p> <p>Education, Health and Community Learning</p> <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>Amend NDP</p> <p>Amend 4.9.9 to:</p> <p>In fact, the larger percentage of retired people in the Holme Valley (17% all residents were</p>

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					<u>aged 65 or over in 2011 as opposed to 15.2% in Kirklees as a whole</u> (insert reference to 2011 Census) potentially 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.	<u>Amend NDP.</u> Add in further information about Cityfibre's plans to roll out high speed broadband across Kirklees by 2020.
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.

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97.	Page 97	Draft Policy 9 Protecting and Enhancing Local Community Facilities	<p>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> <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 	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p>Amend NDP.</p> <p>Move suggested part of policy to supporting text.</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

	KIRKLEES COMMENTS			PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP
			<ul style="list-style-type: none"> • Market Halls • Doctors Surgeries • Medical services” <p>The development or change of use of the identified 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; <u>or</u> 2. It can be demonstrated that its ongoing provision is not viable, <u>or is no longer needed or justified; or</u> 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;)<u>or</u> 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</p>		<ul style="list-style-type: none"> • 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>Insert further text with regard to guidance for 1, 3 and 4 above - ask Kirklees for advice.</p>

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			<p>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>		
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 	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>See revised Policy wording above.</p>

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			<p>facilities <i>will be</i> supported.</p> <p>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 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:- “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: “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 <i>being</i> in accordance with other policies within the plan.”</p>		
Draft Policy 10: Protecting Local Green Space					
99.	Page 99	General comment	<p>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</p>	<p>Noted.</p> <p>Amend text as suggested.</p>	<p>Amend NDP.</p> <p>Delete title "Local Green Space" and provide new title "Open Space".</p>

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			Space.	Move Local Green Space to a new sub heading and 4.9.23 to before 4.9.27.	
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.	Amend NDP. 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>Noted.</p> <p>Amend text as suggested.</p>	<p>Amend NDP.</p> <p>Add "Ancient" to beginning of sentence before "woodland".</p> <p>Add further text to 4.9.26:</p> <p>After "Honley Wood" add: " 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."</p> <p>See 99 above - 4.9.6 now comes before the Local Green Space section.</p> <p>Further cross referencing and editing may be required so the</p>

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			Figure 29 is not clear and the areas awarded woodland grant cannot easily be identified from this map.	sections do not overlap. Request higher resolution A4 map from Kirklees.	
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.	
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><i>"The following locations sites <u>have been identified are designated</u> as Local Green Space <u>in the Holme Valley Neighbourhood Plan. Development affecting Local Green Spaces should be considered against Local Plan Policy LP62.</u></i></p> <p>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.</p>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p>Amend NDP.</p> <p>Amend Policy to:</p> <p><u>"The following locations sites <u>have been identified are designated</u> as Local Green Space <u>in the Holme Valley Neighbourhood Plan. Development affecting Local Green Spaces should be considered against Local Plan Policy LP62"</u></u></p>

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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 a particular local significance based on its community use.	Noted.	No change.
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.	The Steering Group would like the Examiner to consider this and make a final recommendation.	No change.

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108.		The Triangle, Hade Edge	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. Suggested change: Amend site boundary to remove highway verge and parking area.	The map has been amended. The Steering Group would like the Examiner to consider this and make a final recommendation.	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.	Not accepted. This paragraph provides part of the local context.	No change.
110.	Page 108	4.10.6	The study referred to should be referenced.	Noted. Steering group to provide reference.	<u>Amend NDP.</u> Insert reference to study.
111.	Page 111	4.10.16	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.	Accepted. Delete first sentence as suggested.	<u>Amend NDP.</u> Delete first sentence of 4.10.16. Delete: " In addition, however, the Valley " 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). 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: <ol 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.

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					<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>

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					<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 <i>and active travel.</i>"</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>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>See changes above to Policy 11.</p>
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>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>See changes above.</p>

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) and the council’s latest guidance on highway design to ensure schemes do not contribute to further on street parking.</u>”</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 <u>389</u>	Accepted. Amend text as suggested.	<u>Amend NDP.</u> figure <u>389</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>	<p><u>Amend NDP</u></p> <p>Consider further references in supporting text to more recent reports on climate emergency and loss of biodiversity.</p> <p>Review all NDP Policy numbering so consistent</p>

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 '<i>combustion</i>' and/or '<i>anaerobic digestion</i>' 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>	<p>Accepted.</p> <p>Amend Policy as suggested and following further discussions with Kirklees Council.</p>	<p><u>Amend NDP.</u></p> <p>The revised Policy reads:</p> <p>Policy 12: Promoting Sustainability</p> <p>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.</p> <p>Promoting Renewable Energy</p> <p>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</p>

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> <p>A. Orientation to optimise passive solar gain.</p> <p>B. Use of high quality, thermally efficient building materials, subject to consideration of local character and context - see</p>

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>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP.</u></p> <p>1. Add footnote to " Reclaimed materials from sustainable sources" "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, re-sized, 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. 		original form. Sustainable sources are likely to include local suppliers with products reclaimed locally from within or around the Yorkshire or Peak District area."
123.	Page 124	<p>Draft Policy 12: Flooding and Extreme Weather</p> <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 is 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>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p>Amend NDP.</p> <p>See amended Policy above.</p>
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 g125.ardens 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>	<p>Accepted.</p> <p>Delete section.</p> <p>Consider inclusion of new Biodiversity policy in consultation with Kirklees Council and following consideration of SEA.</p>	<p>Amend NDP.</p> <p>Delete section.</p> <p>Consider inclusion of new Biodiversity policy in consultation with Kirklees Council and following consideration of SEA.</p>

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. 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	<p>Amend NDP</p> <p>Insert additional wording to</p>

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP								
			<p>severe by new development.</p> <p>Suggested change:</p> <p>"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 <u>as a result of a development to make a development acceptable in planning terms</u> will continue to be sought through Section 106.</p>	suggested.	<p>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 <u>as a result of a development to make a development acceptable in planning terms</u> will continue to be sought through Section 106."</p>								
128.	Page 126	4.12.4	Correction: Community Investment Investment <u>Infrastructure</u> Levy	Accepted. Amend text as suggested.	<u>Amend NDP</u> Community Investment Infrastructure Levy								
129.	Page 126	4.12.5	<p>The table in paragraph 4.12.5 should be updated to reflect the 2019 Draft Charging Schedule. Suggested change:</p> <table border="1" data-bbox="584 1177 1178 1391"> <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.</td> <td>£100 per sq. metre</td> </tr> </table>			More than 10 units	10 units or less	Residential	<u>£80</u>	£80 per sq.	£100 per sq. metre	Accepted. Insert new table as suggested.	<u>Amend NDP.</u> Insert new table as provided.
		More than 10 units	10 units or less										
Residential	<u>£80</u>	£80 per sq.	£100 per sq. metre										

KIRKLEES COMMENTS				PARISH COUNCIL CONSIDERATION	AMENDMENTS TO NDP												
			<table border="1"> <tr> <td></td> <td></td> <td>metre</td> <td></td> </tr> <tr> <td>Retail and Warehousing</td> <td>£0</td> <td>£100 per sq. metre</td> <td>district wide</td> </tr> <tr> <td><i>All other uses</i></td> <td>£0</td> <td></td> <td></td> </tr> </table>			metre		Retail and Warehousing	£0	£100 per sq. metre	district wide	<i>All other uses</i>	£0				
		metre															
Retail and Warehousing	£0	£100 per sq. metre	district wide														
<i>All other uses</i>	£0																
130.	Page 127	Draft policy 13 Focusing Developer Contributions on Local Priorities	<p>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.</p> <p>Paragraph 1: This point is unreasonable and not necessary and cannot be enforced. It is suggested this paragraph is deleted.</p> <p>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.</p> <p>Suggested changes:</p> <ul style="list-style-type: none"> The provision of better facilities for either young <i>people and/or</i> older people. "<u>Local highway</u> improvements for the benefit of local residents" 	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p><u>Amend NDP</u></p> <p>Insert "not in order of priority" after "aims"</p> <p>New Policy now reads:</p> <p>Policy 14: Focusing Developer Contributions on Local Priorities</p> <p>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):</p> <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>	Amend as suggested.	<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>