

**Feedback from Kirklees Local Authority on the Holme Valley Neighbourhood Development Plan (NPD) 2016 -2031 First Draft as part of the ‘Your Valley Your Voice’ consultation undertaken in summer 2018 (received on 17<sup>th</sup> August 2018)**

These comments were analysed by the Steering Group in conjunction with the public feedback and the plan updated to the Regulation 14 version. Meetings took place with Kirklees on 9<sup>th</sup> November, 19<sup>th</sup> December and 25<sup>th</sup> January to discuss the detail in the plan and the overall changes we made to policies as they were refined from 16 to 13. Our proposed Local Green Spaces were also discussed so additional changes not captured below were subsequently made following these meetings.

The document below includes all the comments given by Kirklees in their submission on 17<sup>th</sup> August and the Steering Group’s actions and changes to the plan as a result.

**Key**

Black text – Kirklees feedback (text as received)

Blue text - noted or included in latest draft of NDP

Green text – to be considered in next draft once more information available

Red Text – Considered but not changed at this stage

## Key Points:

- Quality of place – The draft Neighbourhood Development Plan aspires to achieve quality of place for the community and visitors within the designated Neighbourhood area through detailed planning policies - **Noted.**
- Non-planning matters – Some policies within the Holme Valley Neighbourhood Plan (HVNP) include good ideas such as reducing single use plastics however non land use policies cannot be dealt with by the Neighbourhood Plan. The Neighbourhood Plan can highlight these matters but they should be set out in a separate Annexe with proposed actions to address these, making it clear that these are not part of the statutory neighbourhood plan.

### **Added to PC actions and policies revised**

- Consistency with national policy – Some policy criteria in the HVNP do not accord with the National Planning Policy Framework (NPPF) or allow for flexibility in the policy wording. For example, in relation to policy exceptions; housing need; design considerations of which some are overly prescriptive. **Policies revised.**
- General conformity with the Local Plan – Some policy criteria do not accord with Local Plan policies or repeat them adding nothing extra. There is a general lack of regard to green belt policy. **Checked against latest version of new Local Plan.**
- Evidence justification - It is not clear what evidence some elements of the plan and policies are based on or justified by, for example is it existing Local Plan evidence (if so this should be referenced) or is there any new localised evidence? **Included evidence and references in supporting text with clearer connection to Local Plan policies.**
- Using the Holme Valley Neighbourhood Plan – some policy considerations are very lengthy and wordy and are repeated and dispersed among many different policies, such as design issues which would benefit from one specific policy. It is not clear in some cases how policy criteria can be applied in practice or the meaning of some elements. Some policy considerations are also not reasonable, are not enforceable and contradict each other or would be difficult to satisfy. **Reviewed all policy wording and checked for repetition.**

## General Comments Policies and Content:

- It is stated that there are 16 planning policies. However, the majority of policies consist of a number of criteria, this is in excess of 100 individual elements that need to be considered. **These have been reviewed and revised.**
- In policies 1 to 5 there are 50 individually numbered points to be considered, not including bullet points or subsections to some of these points. The Council looks to secure good quality design going forward, however, the overly prescriptive, disproportionate, repetitive and contradictory matters these policies contain would make it almost impossible for any scheme to achieve the requirements set out. As written, Development Management would not be able to interpret/implement them with any confidence that they were meeting the desired aims of the neighbourhood plan. The National Planning Policy Framework (NPPF) para 59 states that design policies ‘should avoid unnecessary prescription or detail’ but rather ‘guide’ new development in relation to neighbouring building and the local area. A design code/guidance document to be read with the neighbourhood plan could remove many of the overly prescriptive, repetitive and contradictory policies.

## These have all been reviewed and revised.

Consider Locality Technical Support for Design Codes for allocated sites. **Steering Group has approached AECOM for support as part of the Strategic Environmental Assessment process and this includes consideration of the Historic Environment so this will be of most relevant to how the design policies / guides have been produced. The Steering Group has previously been advised that Kirklees has yet to develop design guides which would affect the area but intends to do so in the future. We decided we wanted to keep the design detail in our policies so it was given sufficient weight above and beyond a Design Code.**

A couple of examples of design guidance:

Dewsbury Design Guide September 2013 (Kirklees Council)

North Yorkshire Moors National Park Authority Local Development Framework Design Guide (old document but comparable area)

The Cotswold Design Code March 2000 (old document, concise)

- Many of the issues in the policies overlap. For example, most of the 16 policies contain reference to the design of development. If these could be contained in one design policy it would be much easier to extract the relevant information and much clearer as to what is expected. **Reviewed policies and reduced repetition and overlap.**
- Many of the individual criteria under the policy headings are not related to land use; for example restricting axle weight or protecting libraries from closure. These are not relevant to the consideration of planning applications for development. **Added to PC Actions.**
- Some aspects of the policies contradict one another; for example the encouragement of both green roofs and the need for traditional roof design. □ Many of the individual criteria under the policy heading appear to be unreasonable and not supported by evidence. Why should all extensions be ‘small’ for example, and is meant by ‘small’? **Policies reviewed and revised.**
- Many of the individual criteria are not explained or highlighted as an action for the Parish Council; for example what is meant by a ‘gateway to the valley’, where are they and what specific design principles apply? **Policies reviewed and revised**
- The HVNP does not state whether the policies are intended to apply within the area that is within the **Peak District National Park** and the Neighbourhood Plan needs to be in conformity with the Peak Park Plan. Part of **Holme village is in the Peak District National Park** and this should be recognised. **Wording amended.** It is surprising to see Austonley included in a list of villages. Is this not in the area? **Austonley is a hamlet in the Holme Valley.**
- A very large proportion of the area is green belt but the HVNP makes little reference to compliance with green belt policy. **This has been added at key points in the text.**

## Opportunities:

### Development Briefs

The HVNP does not take the opportunity to propose development briefs for the allocated sites in the Local Plan. Holme Valley Parish Council (HVPC) could take the opportunity to look at each allocated site and state what design principles should apply specifically to that site and whether there are any important views or nearby heritage assets that need to be considered. **The Steering Group has sought to provide general design principles which apply across the valley. Most of the allocated sites are already progressing through the planning process so by the time the NDP comes into force, it will be too late to influence their design.**

### Specific Biodiversity Policy

Although biodiversity is briefly mentioned in a number of places, there is no specific policy. There is an opportunity through the neighbourhood plan to guide development proposals towards the protection and enhancement on the specific ecology of the Pennine fringe. There is no reference to biodiversity net gain and a policy on how biodiversity net gain will be provided would make it clear. There is no mention of the use of existing biodiversity data. This is available from West Yorkshire Ecological Services. There is no reference to the Kirklees Wildlife Habitat Network (KWHN) in any of the policies. This has been developed by West Yorkshire Ecological Services and where approached they have provided refined mapping specific to Neighbourhood Areas on other parts of West Yorkshire. There is no mention of Kirklees Biodiversity Opportunity Zones which indicated broad habitat classification of the District and relate this to the list of ‘habitats and species of principle importance’ compiled by the secretary of state for the environment under section 41 of the Natural Environment and Rural Communities Act 2006.

Appendix 1 is a list of protected sites and no mention is made of the prevailing habitats of the Pennine fringe or the species that use these areas. An understanding of biodiversity assets does not appear to have informed the policies to any great extent.

**Policy on sustainability has now been expanded to cover biodiversity & references made to Kirklees level analysis and mapping done for the Local Plan.** **Steering Group does not want to duplicated work /analysis already done for Local Plan.**

### Holme Valley Riverside way

Paragraph 4.2.12 states that the charity ‘River Holme Connections’ has formed to help improve the condition and visibility of and access to the River Holme and its tributaries. Over a number of years Kirklees has sought to create the ‘Holme Valley Riverside Way’, a large part of which has

been achieved through negotiation with the developers of riverside sites, such as Prickleden Mills. It would be useful if this could be recognised as a policy in the HVNP, showing where the route has been provided and where there are still gaps, so that it can be considered as part of any future relevant planning application.

Will seek to do this in the next plan once information sought from Kirklees to enable this.

### **Document Formatting:**

- A box under each policy showing links to the Local Plan policies would be useful to assist applicants and decision makers. Also it would possibly allow for the deletion of repetition between the Local Plan and the Neighbourhood Plan. **Done**
- Not all of the policies have criteria; which makes it difficult to reference. **Most have now.**
- Landscape Character Areas: This might be better as an appendix or a supplementary document. There's a lot of information in here. **Steering Group thinks this is important to be reflected in core text as identifies why each part of the Valley has different characters / values.**
- Conservation Areas: Again, this separate information would be better as an appendix or a supplementary document. **Steering Group thinks this is important to be reflected in core text as identifies why each part of the Valley has different characters / values.**

**Specific Comments:**

**2.0 Planning Context for Holme Valley NDP**

Page	Para/ Policy	Comments/Questions	Steering Group Response
16 Built Heritage	2.14	English Heritage now Historic England	Accepted and incorporated.
16 Providing Housing	2.16	‘... should reflect the overarching policies and neighbourhoods should plan positively to support them’. Doesn’t make sense.	Accepted and amended
17 Providing Housing	2.15	The Local Plan does not have a lower density for sites in the Holme Valley. All Local Plan sites have used 35 dwellings per hectare unless planning permission or site promoter evidence has indicated an alternative. If 200+ dwellings site referred to is the H38 Scholes POL site in the draft local plan, it should be noted that this site has now been split into 3 sites in the publication draft local plan (2 housing and 1 safeguarded) therefore needs amending see new sites capacity table in later comments.	Accepted. Deleted reference to lower housing density in Holme Valley.
17 Providing Housing	2.17	There are no population projections available for the lower level, but it is inaccurate to say “the additional houses are likely to take this number above 30,000” – a range of factors lead to the changing population, not just housing. Household formation rates could well change and the population may remain static.  The Local Plan policy PLP 11 requires a range of housing to meet local needs and the sites should provide 20% affordable housing. The impact on infrastructure has been considered in the Local Plan. Developments will provide Community Infrastructure Levy (CIL)	Accepted and updated.

<b>Page</b>	<b>Para/ Policy</b>	<b>Comments/Questions</b>	<b>Steering Group Response</b>
		<p>funding to go towards infrastructure.</p> <p>There is a large number of people commuting out of the area, mostly by car. There is an opportunity for the Neighbourhood Plan to look at this in further detail such as promoting and supporting alternative modes of transport perhaps.</p>	

Page	Para/ Policy	Comments/Questions	Steering Group Response																																				
83	4.10	<p>The 2011 travel to work data shows where people in the Valley work (using the 3 MSOAs covering the Holme Valley area):</p> <table border="1" data-bbox="456 272 967 1034"> <tbody> <tr> <td>Greater Manchester</td> <td>425</td> <td>3.1%</td> </tr> <tr> <td>Within Holme Valley</td> <td>2619</td> <td>18.8%</td> </tr> <tr> <td>Elsewhere in Kirklees</td> <td>4876</td> <td>35.0%</td> </tr> <tr> <td>Barnsley</td> <td>314</td> <td>2.3%</td> </tr> <tr> <td>Bradford</td> <td>287</td> <td>2.1%</td> </tr> <tr> <td>Calderdale</td> <td>535</td> <td>3.8%</td> </tr> <tr> <td>Leeds</td> <td>707</td> <td>5.1%</td> </tr> <tr> <td>Wakefield</td> <td>395</td> <td>2.8%</td> </tr> <tr> <td>Sheffield</td> <td>191</td> <td>1.4%</td> </tr> <tr> <td>Elsewhere in UK</td> <td>627</td> <td>4.5%</td> </tr> <tr> <td>At home / not fixed</td> <td>2940</td> <td>21.1%</td> </tr> <tr> <td>Total</td> <td>13916</td> <td>100.0%</td> </tr> </tbody> </table> <p>For your information, at the end of this report is some data on Travel to Work patterns in the district.</p> <p>Some headlines for the Holme Valley are:</p> <ul style="list-style-type: none"> <li>62.3% of people who live in Kirklees also work in Kirklees, this figure is higher for Holme Valley – 67.3% - therefore Holme Valley has less out-commuting</li> </ul>	Greater Manchester	425	3.1%	Within Holme Valley	2619	18.8%	Elsewhere in Kirklees	4876	35.0%	Barnsley	314	2.3%	Bradford	287	2.1%	Calderdale	535	3.8%	Leeds	707	5.1%	Wakefield	395	2.8%	Sheffield	191	1.4%	Elsewhere in UK	627	4.5%	At home / not fixed	2940	21.1%	Total	13916	100.0%	<p>Noted.</p> <p>Additional information has been inserted after para 4.10.2 as evidence in relation to high proportion of car use and text updated.</p>
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		<p>to other districts</p> <ul style="list-style-type: none"> <li>Looking at a more local level – 32.2% of people who live in Holme Valley also work there (including home workers). This is only higher in Huddersfield and Dewsbury</li> <li>Holme Valley has a relatively high amount of people commuting outside of West Yorkshire</li> </ul>	

### 3.0 Holme Valley NDP Vision and Objectives

Page	Para/ Policy	Comments/Questions	Steering Group Response
6/19	Objectives	<p>General:</p> <p>Some of these are quite generic and could be made more specific, for example: “To improve accessibility” – for whom? Where? Why?</p> <p>How will the neighbourhood plan promote education and life-long learning for all?</p> <p>What about transport and the wider connectivity of the valley? There is a lot of out-commuting from the valley, which is noted elsewhere in the document so it would be interesting to see the response of the Neighbourhood Plan to this.</p>	<p>The NDP Vision and Objectives have been reviewed by the Steering Group in the light of comments submitted by local residents and stakeholders.</p> <p>Overall 84% of respondents supported the Vision and Objectives, with a range of 88% support or Objective 6 Building homes for the future" up to 99% for Objective 11 Protecting Local Green Space.</p> <p>The vision and objectives has been presented differently capturing the key elements rather than providing more detail so that it is a simple summary of priorities.</p>
6/19	Objective 2	Should this be just valuable open spaces rather than every open space?	See above

**Policies:**

<b>Page</b>	<b>Para/ Policy</b>	<b>Comments/Questions</b>	<b>Kirkwells Response</b>
35/36	Draft Policy 1: protecting and enhancing the landscape character of Holme Valley (14 criteria)	<p>General:</p> <p>There is lack of a strategic overview about where development should be located in the plan, as demonstrated by criteria 1 of the policy. If there is a proposal for an unallocated greenfield site, how can the policy be used?</p> <p>The information / key characteristics presented on each character area in the Landscape Character Area assessments, i.e. land use and cover, greenspace and public realm, views, settlement pattern and built form, could be used as a building block for the policy.</p> <p>Development should have regard to these features – there doesn't seem to be much of a link there. There are eight different areas with different characteristics but the policy does not make use of these, instead applying the same policy approach across the Neighbourhood Plan area.</p> <p>In addition, the same headings are not used within each Landscape Character Area, making comparisons between areas or finding differences against which to assess proposals difficult. The title of the 2016 report also leads to confusion as to whether this policy relates to landscape or to built form.</p> <p>Perhaps the HVNP could itself identify the specific landscape features that development would need to have regard to in each landscape character area.</p>	<p>Partially accepted.</p> <p>The Parish Council commissioned AECOM consultants through the Locality Technical Support package to prepare the Heritage and Character Assessment to inform and support the evidence base of the NDP. Holme Valley is an extensive and complex area comprising many different settlements and landscape character areas and this is evident in the identification of 8 Local Character Areas in the study.</p> <p>The Steering Group intended to bring together key aspects of the study to inform one single policy for protecting the landscape character of the different areas of the Valley, rather than have multiple policies for 8 different areas which would in practice have a number of similar requirements and be repetitious.</p> <p>The NDP includes a summary of the key features of each Landscape Character Area in the supporting text. It is not necessary or desirable to repeat these in detail in a planning policy as planning policies are required to be succinct.</p> <p>Minor amendments made to improve the linkages to the characteristics identified in the study and summarised in the supporting text.</p>

Page	Para/ Policy	Comments/Questions	Kirkwells Response
35	Criteria 1	'Prioritise the use of brownfield sites and/or the re-use of existing buildings where possible;' - how would you demonstrate this in a planning application?	Criteria 1 has been amended
35	Criteria 2	Where are the significant views referred to? Is the Parish Council going to identify them and if so will this be a stated action? What is meant by 'dramatic upland areas of moorland and moorland fringe'? How would you demonstrate this in a planning application?	The policy refers to the views identified in the supporting text in section 4.2 but it is accepted that these are subjective and are broadly descriptive and have not been mapped.  Criteria 2 has been revised
35	Criteria 3	What is meant by 'rural development' and how is this compatible with green belt policy?	Criteria 3 amended to more closely link to PLP54:
35	Criteria 4	This could be supported by a design guide to state what materials/colours/styles may be considered acceptable.  What is a 'local native species'? - How would you demonstrate this in a planning application?  'larger buildings should be "broken up" Not sure how this works in reality? what is broken up by break in the roof span	Partially accepted.  There is no intention at the current time for the Parish Council to commission a design guide but this may be considered at some point in the future. In the meantime there is an intention to minimise the visual impacts of large, modern industrial-type agricultural buildings in the rural area.  See comment below about native species in landscaping schemes - this is duplicated in criterion 12 so has been deleted from 4. Criteria 4 has been reworded.

Page	Para/ Policy	Comments/Questions	Kirkwells Response
35	Criteria 5	Dry-stone walls are not found in every part of the valley. The policy is too prescriptive in this respect. (Also see comments on criteria 13)  Add the words 'where possible' on the end for flexibility.	Accepted & reworded.
36	Criteria 6&7	These need to be compatible with Local Plan policy PLP 33.  Where possible, we cannot necessarily protect all trees due to health for example.	Accepted: Criteria 6 and 7 combined and slightly amended.
36	Criteria 8	To what types of development does this policy apply?	Criteria amended. (now number 7)
36	Criteria 9	Which wildlife resources and will green corridors be identified?	Accepted.  Steering Group considered liaising with local groups over any specific wildlife sites and asking Kirklees for any details they retain. Will seek to do this in next plan once information sought from Kirklees to enable this.
36	Criteria 10	This relates to design and materials but only examples of materials are given. This could be accompanied by a design guide to state what sort of designs and which materials would be acceptable. As worded it is difficult to see how this would work in practice. The immediate surrounding area may not be predominantly of stone construction for example. There seems to be a confusion of policy relating to the landscape and policy relating to built form, which would be better placed in Draft Policy 2.	Criterion deleted and moved to Policy 2. Steering Group has approached AECOM for support as part of the Strategic Environmental Assessment process and this includes consideration of the Historic Environment so this will be of most relevant to how the design policies / guides have been produced. The Steering Group has previously been advised that Kirklees has yet to develop design guides which would affect the area but intends to do so in the future. We decided we wanted to keep the design detail in our policies so it was given sufficient weight above and beyond a Design Code.

Page	Para/ Policy	Comments/Questions	Steering Group Response
36	Criteria 11	<p>This is a green belt policy consideration and applies equally to settlements wherever they are located. This criteria is less about protecting the landscape and more about strategic place shaping considerations. This issue is covered by green belt policy in NPPF paragraph 80.</p>	<p>Accepted and criteria deleted.</p>
36	Criteria 12	<p>Refers to ‘traditional and appropriate species’ while criteria 4 refers to ‘local native species’.</p> <p>What are traditional species, native?</p> <p>Appropriate’ - How would you demonstrate this in a planning application?</p> <p>Considerations relating to landscaping using native species should be incorporated into one criteria for clarity.</p> <p>‘Traditional and appropriate species’ within landscaping schemes could be interpreted in a number of different ways and therefore may not lead to the desired biodiversity enhancement. Opportunity for specific biodiversity policy – see opportunities section above.</p>	<p>Accepted and criteria amended with reference to biodiversity.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
36	Criteria 13	<p>Refers to residential boundaries requiring to be marked by native tree species. Does the inclusion of criteria 13 mean that criteria 5 relating to new stone walls as boundary treatments does not apply to residential development? Trees are not always appropriate as residential boundaries due to potential shadowing for example. Does the requirement for either dry stone walls or hedges as boundary treatments depend on the wording in the relevant Landscape Character Area (LCA) and what if the LCA is silent?</p> <p>Native hedgerow planting is more for external facing boundaries, not plot separation.</p>	Criteria updated.
		<p>As highlighted above, there appears to be a conflict between the encouragement of both hedgerows and drystone walls as boundary treatments (both of which have a biodiversity value) and it is unclear which takes precedence.</p>	This has been addressed by reference to the Local Character Area in the criteria.
36	Criteria 14	<p>Does this apply to all applications? How would this work in practice?</p> <p>Doesn't mention the Kirklees Wildlife Habitat Network. (see biodiversity comments in opportunities)</p>	Wording updated including reference to Kirklees Wildlife Habitat Network

Page	Para/ Policy	Comments/Questions	Kirkwells Response
51	Draft Policy 2: protecting and enhancing the built character and conservation areas of the Holme Valley (7 criteria)	<p>General:</p> <p>Is any distinction going to be made between development within and outside the Conservation Areas?</p> <p>Requiring some of these criteria to be met by ‘all developments’ is considered to be too onerous especially when proposals are small scale.</p>	<p>Accepted.</p> <p>The criteria have been revised in line with comments below. Some have been moved to other NDP policies and others deleted. The Policy should be read as applying to all new development. References to the conservation areas have been incorporated into criteria where appropriate.</p>
51	Criteria 1	As Draft Policy 1 refers to built form, do the different landscape character areas apply to criteria 1?	Criteria 1 has been amended to refer to the Local Character Area.
51	Criteria 2	<p>Is this just anywhere? Is this only for historic buildings? Some alterations do not require any form of permission so how does this policy apply?</p> <p>Is the identification of non-designated heritage assets going to be an action for the Parish Council?</p> <p>‘underground’ does this refer to archaeology? Also, not all development would affect conservation areas</p> <p>‘will be required to demonstrate careful consideration’ – Design and access statements/Heritage statements are only required in specific circumstances</p>	<p>Criteria 2 refers to all new development - not just historic buildings. It has been amended to refer to alterations which require planning consent.</p> <p>The Parish Council intends to work with local heritage groups and Kirklees Council as set out in Holme Valley parish Actions 2 in the NDP.</p> <p>"Underground" refers to archaeology and this has been added.</p> <p>Wording updated.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
51	Criteria 3	<p>Duplicates legislation</p> <p>How will someone know what is a non-designated heritage asset without a local list?</p>	<p>Accepted. Criterion closely reflects the wording in the revised NPPF para. 189 and has been deleted.</p> <p>The Parish Council intends to progress work to identify a local heritage list and has included the first lists in Appendix 2.</p>
51	Criteria 4	<p>The two parts of this policy may be contradictory. Development that reflects locally characteristic buildings may not necessarily be able to be harmonious with neighbouring properties if the neighbouring properties are built of a different material. It would be useful to have examples of what are considered to be locally characteristic buildings. This is also contradictory to the policy that encourages the use of green roofs for example.</p> <p>See wording of Local Plan policy PLP 24: criteria a: the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape; this wording allows for innovation. What if the neighbouring properties are of poor design quality – the design details and materials shouldn't be 'harmonious' with them – but should seek to enhance the overall character of the area.</p>	<p>Accepted.</p> <p>The Parish Council does not wish to stifle innovation and indeed wishes to promote sustainable and innovative design - see other policies in the NDP. The Criterion has been updated.</p> <p>Criterion 1 already refers to the Local Character Areas and the Holme Valley Heritage and Character Assessment provides examples of characteristic local architecture.</p>



Page	Para/ Policy	Comments/Questions	Steering Group Response
51	Criteria 5	<p>What does this mean? It is unclear what is meant by ‘providing visual references to past industrial and agricultural heritage’. It would not always be desirable for example to expect new housing development simply to mimic historic building styles. Mill chimneys are expensive to maintain in the long term and may require management companies to be established. They can also be incongruous and no longer relevant if the mill they served has gone. The development may not have control over the restoration of chimneys? What are the local needs that are to be met through the use of vernacular architecture? Is this appropriate in all areas? What’s vernacular in Westcroft Honley for example?</p> <p>Some illustrations of traditional construction materials and techniques in the valley would be useful – particularly if there are any modern examples where this has been done successfully.</p>	<p>Partially accepted.</p> <p>This criterion was drawn from the Holme Valley Heritage and Character Assessment. "Visual references" could include a range of design details and does not require new development to mimic historic building styles. Remaining mill chimneys are an important local feature of industrial heritage and the Parish Council considers that they should be retained and restored wherever possible.</p>
51	Criteria 6	<p>What is meant by ‘gateways into the valley floor’ and how could they be enhanced? What does a sense of arrival mean? To which developments would this apply and how would it be applied? The ‘rural backdrop’ will in most cases be in the green belt where green belt policy will apply.</p>	<p>Wording changes in policy.</p>
51	Criteria 7	<p>This would seem to rule out everywhere a new building could be constructed. The spaces between settlements are usually washed over by green belt where green belt policy would apply. Why should gaps in built form necessarily be protected?</p> <p>Repetition from Draft Policy 1.</p>	<p>Policy wording changed.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
51	Criteria 8	<p>It is unclear what is meant by this. The older hamlets and villages tend to be characterised by high density clusters of cottages. Modern low density development is usually achieved through building larger detached properties. Most of the hamlets are overwashed by green belt (subject to knowing which hamlets this applies to), as are many of the smaller villages.</p> <p>‘Low density development patterns, where suggested by the Landscape Character Assessment?’</p>	Policy wording changed.
51	Criteria 9	<p>Is the Parish Council going to define key views and significant local landmarks?</p> <p>Thought should be given to the enhancement or even opening up new views to landmarks. Protecting a view is restrictive, but in some cases there may be an opportunity for new development to help ‘frame’ a particular view – which in turn would enhance the townscape around it.</p> <p>Repetition from Draft Policy 1.</p>	<p>There are too many views in the topography of the valley to identify specific ones. This now reflected and explained in the text in para 4.2.12.</p> <p>There are numerous significant views identified in the Character and Heritage Assessment and the Conservation Area Appraisals and these should be referred to in the policy. Wording of policies amended to avoid repetition.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
52	Criteria 10	<p>Presumably this is to avoid any on-street parking generated by new development, not to provide additional off street parking for existing vehicles?</p> <p>This suggests the overprovision of car parking on new sites to provide parking for other vehicles. What are the local valley routes and shouldn't more sustainable forms of transport be encouraged.</p> <p>What is the link with the historic environment here? Perhaps the plan could provide guidance on how parking can be incorporated into the historic environment.</p> <p>Reference to appendix 4? Already considered by Kirklees Highways Development Management in the planning application process.</p>	<p>Accepted.</p> <p>The NDP promotes sustainable transport choices but there is a need to ensure new developments do not lead to further in street parking on existing congested roads. Wording has been updated. Public car parking is addressed in Policy 14 and further text has been added to provide advice about integration into the historic environment.</p>
52	Criteria 11	<p>Is this not contrary to criteria 4?</p> <p>What is meant by a contemporary design and how would it demonstrate it was appropriate to its context?</p> <p>Who decides what exceptional quality is?</p> <p>This criterion is unnecessary. Other policy criteria NPPF para 55 along with the Local Plan PLP24 seek achieve this.</p>	<p>Policy wording updated.</p>
52	Para 4.3.48	<p>'local shopfronts' – should this be 'traditional shopfronts'?</p>	<p>Policy wording updated.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Responses
35/36	Draft Policy 1: protecting and enhancing the	<p>General:</p> <p>These two policies between them stop short of actually specifying the use of natural stone as a building material. “Ensure design and materials reflect the character of the surrounding area such as local</p>	<p>The reference to Millstone Grit and flags has been moved to Policy 2. The Neighbourhood area is complex and extensive and there are a range of local styles of vernacular architecture. Policy 2 has been revised to refer to the Local Character Area and schemes should refer to the Character and Heritage Assessment for more detail.</p>
51	<p>landscape character of Holme Valley</p> <p>And</p> <p>Draft Policy 2: protecting and enhancing the built character and conservation areas of the Holme Valley</p>	<p>Millstone grit and stone flags wherever possible”, comes the closest, but this is contained within the landscape policy. The built character policy refers to “local built character”, “design and materials appropriate and harmonious with neighbouring properties”, “vernacular architecture, construction materials and local traditions” without specifying what these are.</p>	<p>Policy wording updated.</p>
53	4.4.1	<p>‘Designated Heritage assets include Grade I, II* and II Listed Buildings, Scheduled Monuments, Registered Parks and Gardens and where relevant, battlefields, and wreck sites.’ And designated conservation areas NPPF glossary</p>	<p>Accepted.</p> <p>Sentence has been revised in line with NPPF Glossary and sentences within the paragraph have been re-arranged.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Responses
54	Draft Policy 3: conserving and enhancing local non designated heritage assets (5 criteria)	<p>General:</p> <p>This policy cannot be applied without a list of non-designated heritage assets. (see previous comments)</p> <p>Policy relevant to non-designated heritage assets is also contained in Policy 2, so needs to be cross referred to here. Alternatively, as there is some repetition here from policy 2, they could probably be combined to make it easier to follow and implement. For example:</p>	Initial list of Non-designated heritage assets included as Appendix 2.
		<p>Criterion 3 Policy 3: Any extensions or alterations should be designed sympathetically, without detracting from or competing with the heritage asset. Proposals should relate appropriately in terms of siting, style, scale, massing, height and materials</p> <p>Criterion 4 of Policy 2:</p> <p>Overall, development must reflect the scale, mass, height and form of existing locally characteristic buildings, and design details and materials should be chosen to be appropriate and harmonious with neighbouring properties</p> <p>Thought should be given to what is the policy adding that is not already covered in the Local Plan and NPPF?</p> <p>Also there is some inconsistency – “relate appropriately” or “reflect / appropriate and harmonious”</p>	Wording updated.
54	Criteria 1	‘No loss will be permitted without taking all reasonable steps to ensure the new development will proceed after the loss has occurred’ – If it’s undesignated then there are permitted development rights for demolition where we can only take into account the method of demolition	Wording updated.

Page	Para/ Policy	Comments/Questions	Steering Group Responses
54	Criteria 2	Paragraph 135 of NPPF does not refer to the reinstatement of special features of non-designated heritage assets.	Accepted. Criterion 2 has been deleted.
54	Criteria 3	If planning permission is required. There is no direct need for permission just because it is on a list.	Wording updated.
54	Criteria 5	What is meant by the positive setting of a non-designated heritage asset?  Actions: <ul style="list-style-type: none"> <li>• non-designated assets need to be identified for this policy to be implemented.</li> <li>• Would the action relating to signage be better with Policy 5, or in the built character policy?</li> </ul>	Initial list of Non-designated heritage assets included as Appendix 2.
55	Holme Valley Parish Actions 2 - Implement enforcement	How will the Parish Council enforce illegal alterations and signage within Conservation Areas?	This is in Action 1.  "Implement" has been changed to "Encourage" as the PC cannot implement enforcement.
56	Para 4.5.4	General comment: it might be good to have comments set out separately for this stage of the plan, rather than in the body of the document.	Not accepted. The comments form part of the evidence base and are drawn from extensive community consultation. They add local relevance to a technical document and help to explain how policies and why have been prepared. They should be retained in the Reg 14 Plan. Once prepared, the Consultation Statement will include much of this content and therefore at Submission Stage further editing will be undertaken.

Page	Para/ Policy	Comments/Questions	Steering Group Response
57	Draft Policy 4: Encouraging high quality design in new development (12 criteria plus additional principles in Appendix 2)	<p>General:</p> <p>For ease of use all the design elements of the plan should be contained here, rather than being dispersed among many different policies.</p> <p>Lots of must in the policy and it is highly prescriptive, does not allow for flexibility in the design of the development.</p> <p>Measures that are capable of providing a biodiversity enhancement are encouraged through this policy, which is support. However, there is a potential conflict here; ‘green roofs’ are encouraged but Appendix 2 also encourages a ‘traditional roof form’.</p> <p>Appendix 2 encourages the creation of habitats such as woodland and meadows, and discusses wildlife corridors. This part of the policy, although the overall aims are appropriate, should be developed more thoroughly to ensure maximum benefit from habitat creation, and avoid impacts through inappropriate habitat creation. For example, wildlife corridors should be linked to the existing green infrastructure resource, woodland planting could be inappropriate in some Pennine fringe situations and ‘meadow’ has a specific agricultural meaning that may not be appropriate in this context – perhaps better to state ‘wildflower rich grasslands’.</p>	<p>Noted and partially accepted.</p> <p>This Policy has been deleted.</p> <p>Most of the criteria (see below) have been incorporated into Policies 1 and 2 or where they duplicate other NDP or Local Plan policies they have been deleted. Criteria relating to sustainability and biodiversity have been incorporated into Policy 15. Overall therefore there is no need for this as a standalone policy.</p>
57	Criteria 1	<p>What are the visual amenities of the streetscene?</p> <p>How are significant wider landscape views going to be identified?</p> <p>There is repetition of Local Plan policy PLP24 and your draft policies 2 and 3.</p>	<p>Wording updated.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
57	Criteria 2	<p>Is this a reference to the standard house types of national house builders?</p> <p>As currently drafted, this appears unachievable and it is considered that it will not stand up at appeal.</p> <p>This would work better if it was worded positively and took account of Local Plan policy PLP 24 and the planning tools that are mentioned in its introductory paragraph e.g.: “Proposals must demonstrate how they take account of the locally distinctive character of the site and its context”</p>	<p>Noted.</p> <p>This is intended to resist standard house types used by developers across the UK. However it is accepted that Policies 1 and 2 provide sufficiently worded criteria requiring developers to respond to the distinctive local character and context and to include this again would be repetitious. Accordingly the criterion has been deleted.</p>
57	Criteria 3	<p>Why must all extensions be small? A small extension on a large building may not be a satisfactory design. Will this stifle extensions required for industrial premises for example? Repeats criterion c of Local Plan policy PLP 24 in referring to ‘subordinate in scale to the original building’</p>	<p>This duplicates Policy PLP 24 and has been deleted.</p>
57	Criteria 4	<p>It is not clear what this relates to. Some examples may be useful to illustrate what the policy is intended to achieve. There also appears to be an overlap between this policy and criteria in policies 1 and 2 relevant to design and materials.</p>	<p>Policies 1 and 2 have been revised but this criterion requires development to have a consistent approach to design and materials etc and this is not replicated elsewhere. The criterion has been incorporated into Policy 2.</p>
57	Criteria 5	<p>Reflects criterion d of PLP 24</p>	<p>This criterion is better suited to the Policy on Sustainability and therefore has been incorporated into Policy 15.</p>



Page	Para/ Policy	Comments/Questions	Steering Group Response
57	Criteria 7	<p>Not all farmsteads and agricultural buildings are in rural areas and if rural areas is intended to equate to ‘within the green belt’ then green belt policy would apply. What is meant by ‘historic’?</p> <p>This is already covered by criterion 1 and 2 of the policy.</p>	Policy wording amended.
57	Criteria 8	<p>It would be useful if examples were provided of how renewable energy technologies are sensitively incorporated into development. As in criterion 2 could be worded like “using renewable and low carbon energy sources and demonstrating how these have been incorporated into the development.”</p>	Policy wording amended and reflected in sustainability policy.
57	Criteria 9	<p>It would be helpful if there was some information that set out which developments would fall within the remit.</p> <p>The policy justification text should elaborate on the BREEAM method and how this can be used to achieve sustainable development</p> <p>Don’t think we could refuse or indeed invalidate any application that does not have one. What if it becomes out of date?</p>	Policy wording amended and BREEAM definition included in sustainability section.
57	Criteria 10	<p>What is meant by ‘addressing limitations of the existing system in the area’? When would an unsustainable drainage scheme be accepted? Why would a new development have to address limitations in the existing scheme unless this was directly related to that development?</p>	Now reflected in sustainability policy
57	Criteria 11	<p>Should water be retained on the development forever? These form of water attenuation facilities are only acceptable in a limited range of circumstances, see para 80 National Planning Practice Guidance (NPPG) Flood Risk re hierarchy of drainage.</p>	Now reflected in sustainability policy

Page	Para/ Policy	Comments/Questions	Steering Group Response
57	Criteria 10 & 11	There is a crossover here with Local Plan policy PLP28, Drainage. Perhaps the policy (or a separate policy in the Neighbourhood Plan on water management) could consider the methods of water attenuation / surface-water run-off reduction that are appropriate / locally specific to the Holme Valley	Now reflected in sustainability policy
57	Criteria 12	<p>Delete ‘will be supported’. Green roofs have other benefits too, perhaps these can be explored in the policy justification as well as thinking about how these fit in other policies regarding ‘materials’.</p> <p>How is this consistent with previous criteria, specifically criteria 4 above which calls for a consistent design approach, criteria 10 of Policy 1 and criteria 2 and 5 of policy 2. If such a roof is proposed, does it have to comply with criteria 11 of Policy 2?</p>	Now reflected in sustainability policy.
57	Reference to all new developments and design principles in appendix 2	Design and access statements are not required for all applications. ‘All new development will be required.....’ We cannot require it.	Accepted. The criterion has been deleted.

Page	Para/ Policy	Comments/Questions	Steering Group Response
100	Appendix 2: Design Principles	<p>General: should the design principles stated here be included as policy or in the justification rather than an appendix? Many of the themes are covered in Local Plan policies. This is lengthy and wordy without illustration and is difficult to interpret. This could be part of a design code – see previous comments</p> <ul style="list-style-type: none"> <li>• Full hard and soft landscaping schemes are not relevant to all types of applications;</li> <li>• Is section 2 on public spaces intended to apply to the development of the allocations, or to all development?</li> <li>• Part 5 – somewhat contradictory in terms of supporting modern materials and design features</li> <li>• Part 6 – needs to specify what is meant by a traditional roof form. Walls – if the use of stone is required it should be in the policy rather than the Appendix. Openings – this needs to specify whether stone sills and lintels are always required, whatever the building or materials used. How reasonable and enforceable is this, and the specification for the use of wood for doors and windows? Changes such as new doors and windows do not usually require planning permission so not sure how their design would be enforced.</li> <li>• Part 8 – this needs to demonstrate how it complies with the Local Plan.</li> </ul>	<p>Steering Group has approached AECOM for support as part of the Strategic Environmental Assessment process and this includes consideration of the Historic Environment so this will be of most relevant to how the design policies / guides have been produced. The Steering Group has previously been advised that Kirklees has yet to develop design guides which would affect the area but intends to do so in the future. We decided we wanted to keep the design detail in our policies so it was given sufficient weight above and beyond a Design Code.</p>

		<ol style="list-style-type: none"> <li>1. Setting – having regard to the views across the valley and gateways to settlements seems like a good locally distinctive design policy concern, so it should be in the policy rather than the appendix.</li> <li>2. Public Spaces – criterion b) this would benefit from something a bit more strategic – Where do the Parish Council think that there is scope for new space / where is the existing of spaces, c) This is covered by criterion I of PLP24 d) This is not appropriate for all planning applications</li> <li>3. Accessibility: There are links with Manual for Streets here – Are the approaches set out in Manual for streets appropriate for the Holme Valley or does the HVNP need to have some locally specific design guidance. There is also cross-over with emerging Highway Design Guide Supplementary Planning Document (SPD)</li> <li>4. Materials: The first para provides scope for a locally distinctive policy, the other paragraphs don't relate to materials though and are covered by PLP24 , PPG and NP policies.</li> <li>5. Innovation and responding to local context: Again, these points are covered in other policies and it would be useful for guidance to be provided on what traditional approaches are and where they have been successfully incorporated. Reference to 'Up-to-date or contemporary details, for example in window and door designs, or the use of robust, modern materials are support in new buildings' is contrary to design policies?</li> <li>6. Building form and materials: Again, it would be useful for some illustrative examples of these. I would refer to NPPF para 59: “. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.” – particularly in relations to window frames. Walls – might contemporary materials ok, part 5?</li> <li>7. Scale and proportion: This is already covered in several HVNP policies and PLP24. PLP24 looks at different tools available to try and improve design quality (so as to avoid 'off the shelf' solutions) – maybe the HVNP can elaborate more on these in a Holme Valley context. 'Architectural skill in design is recognisable and this will be expected in proposals' What does this mean?</li> </ol>
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Page	Para/ Policy	Comments/Questions
		<p>8. Amenity, Privacy and Space Standards: PLP24 represents a move away from specific distances – advice on these is likely to follow in Quality Spaces Supplementary Planning Document. Perhaps HVNP could provide locally specific advice.</p> <p>Minimum distances between dwellings is only in the UDP and is not being taken forward. ‘.. If new housing development proposals fail to achieve these dimensions, unless they are of special design such as single aspect dwellings, then it will be concluded that privacy and amenity standards will be inadequate.....’ There is no flexibility here.</p> <p>9. Parking standards – As stated above for draft policy 2 - Perhaps the plan could provide guidance on how parking can be incorporated into the historic environment. It is not likely to be feasible for all parking to be sited within the curtilage of a dwelling – particular in terms of small-scale infill developments. No mention of sustainable transport.</p> <p>10. Planting: No flexibility. When is a masterplan required? What about future maintenance?</p>

Page	Para/ Policy	Comments/Questions	Kirkwells Response
58	Design in town and local centres and public realm	General: Local Plan policy PLP25 Advertisements and shop fronts is an important policy here, but it is not mentioned.	<a href="#">Accepted. Policy referred to in para 4.6.2.</a>

Page	Para/ Policy	Comments/Questions	Steering Group Response
61	Draft Policy 5: Promoting High Quality Shopfronts, Advertisements and Public Realm (8 criteria and Appendix 3)	<p>General:</p> <p>This is a very lengthy policy supported by an even lengthier appendix, it is unworkable and inflexible. Public realm elements are mixed up in the midst of shop fronts and adverts.</p> <p>It might be appropriate for the policy to be split into two and also think about a public realm strategy for Holmfirth / Honley – what do the Parish Council want to see?</p> <p>The same for the evening economy as the policy covers the same issues as Local Plan policy PLP16 Food and drink uses and the evening economy in the Local Plan</p>	<p>The Policy has been split into 2 - the first dealing with shopfronts and advertisements and the second addressing the public realm. A third policy now addresses the night time economy.</p>
61	Criteria 1	<p>How relevant is this to shopfronts and adverts? Repetition of other policies in the HVNP ‘Overall development must...’ No flexibility</p>	<p>Policy wording has been amended.</p>
61	Criteria 2	<p>This is covered by Local Plan policy PLP25 Advertisements and shop fronts</p>	<p>Policy wording has been amended.</p>
61	Criteria 3	<p>It will be difficult to judge when the amount of signage becomes a proliferation. Is this enforceable?</p>	<p>Noted.</p> <p>Reference to proliferation has been retained in one of the criterion. Proliferation will be a matter of judgement of planning officers and the parish council will provide comments on planning applications relating to proliferation where considered relevant.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
61	Criteria 4	<p>‘All new proposals should demonstrate how they meet the following criteria’ – How is this demonstrated? Design and access statements/Heritage Statements are not always required.</p> <p>Bullet point 2 is a repeat.</p> <p>Bullet point 3 is conjectural</p> <p>Bullet point 6 – is this needed, why would they do it if it wasn’t?</p>	Policy wording has been amended..
61	Criteria 4 to 6	<p>Relate to the public realm and could sit within a ‘public realm’ policy. Criteria 4 has repetition of other HVNP policies. It should concentrate on issues like signage / clutter and make clear that it is for proposals affecting the public realm rather than ‘all new proposals’</p> <p>Highways Development Management already address issues of refuse collection and bin storage</p>	<p>Accepted.</p> <p>Some criteria are now in new public realm policy, others in shop fronts and advertisements policy.</p> <p>Accepted but this is a significant local issue and should be retained in the NDP.</p>
61	Criteria 5/6	What is the relevance of these criteria in this policy?	Criteria 5 and 6 have been moved to the public realm policy.
61	Criteria 7	How relevant is this here? The provision of litter bins should not be applicable only to the night time economy.	The reference to litter bins has been deleted and added to the criterion relating to trade waste.
61	Criteria 8	Design and access statements/Heritage Statements are only required in limited circumstances.	<p>Noted.</p> <p>This will be considered if a design code is prepared.</p>
103	Appendix 3	<p>General:</p> <p>Duplication of policy</p>	Steering Group has approached AECOM for support as part of the Strategic Environmental Assessment process and this

Page	Para/ Policy	Comments/Questions	Steering Group Response
		<p>Presumably compliments HVNP Draft policy 5, not HVNP Draft policy 2.</p> <p>This is overly prescriptive. Whilst ‘good’ shopfront and advertisement design is encouraged, there is a limitation as to what can be practically achieved. Many advertisements do not require express consent and the painting of buildings (excepting listed buildings which need Listed Building Consent) don’t need planning permission. It also assumes that everyone knows the terminology involved and what the ‘unique qualities of the Holme Valley’ are. The appendix could be replaced by a user friendly shopfront design guide. An example produced by Waverley Borough July 2016 can be found at the link below:  <a href="http://www.waverley.gov.uk/downloads/file/4845/shopfront_design_guide_spd">http://www.waverley.gov.uk/downloads/file/4845/shopfront_design_guide_spd</a></p>	<p>includes consideration of the Historic Environment so this will be of most relevant to how the design policies / guides have been produced. The Steering Group has previously been advised that Kirklees has yet to develop design guides which would affect the area but intends to do so in the future. We decided we wanted to keep the design detail in our policies so it was given sufficient weight above and beyond a Design Code.</p>



Page	Para/ Policy	Comments/Questions	Steering Group Response
103	Appendix 3 Background	What are the non-designated heritage assets, local list? See previous comments	<a href="#">See Appendix 2.</a>
103	Appendix 3 Shopfronts – Design Principles	Alterations is spelt incorrectly  Why should the advice be equally applied to shopfront proposals across the valley?	Steering Group has approached AECOM for support as part of the Strategic Environmental Assessment process and this includes consideration of the Historic Environment so this will be of most relevant to how the design policies / guides have been produced. The Steering Group has previously been advised that Kirklees has yet to develop design guides which would affect the area but intends to do so in the future. We decided we wanted to keep the design detail in our policies so it was given sufficient weight above and beyond a Design Code.
104	Appendix 3 Replacement of shopfronts	‘.....unpainted tropical hardwood or aluminum should be replaced with more appropriate designs and materials.’ These are highlighted but later on there’s a paragraph related to UPVC which is inconsistent. Metal may well be appropriate in early to mid 20 <sup>th</sup> century shop fronts therefore, the policy needs to be flexible	As above.

Page	Para/ Policy	Comments/Questions	Steering Group Response
104	Appendix 3 Accessibility	<p>The Equality Act requires reasonable adjustments to be made in relation to accessibility. In practice, this means that due regard must be given to any specific needs of likely building users that might be reasonably met”</p> <p>‘.....English Heritage’s ‘Easy Access to Historic Buildings’ was published in in 2015.</p>	As above.
105	Doors and Windows	What about the other materials referred to previously? Why is uPVC treated differently?	As above.
105	Shutters and Grilles	<p>‘In the case of unlisted buildings, externally mounted open mesh roller shutters may be acceptable 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’ – Even in conservation areas?</p> <p>‘Where roller shutters have already been installed, and enforcement action is no longer competent, the opportunity will be taken when, for example, future reconstruction or refurbishment of the premises is proposed, to encourage the installation of security measures which respect the terms of these policy guidelines’ – What does this mean?</p>	As above.
106	Advertisements General Principles 3 <sup>rd</sup> paragraph	Parish Council? The HVNP once made is implemented by Kirklees Local Planning Authority. Public safety is considered not highway safety.	As above.

Page	Para/ Policy	Comments/Questions	Steering Group Response
106	Fascia signs	General: This section appears to set out a wish list but it's overly prescriptive and unrealistic. There are a wide range of works that can be carried out using 'deemed consent' under advertisement regulations. Maybe it would be better to focus on what would require express consent.	As above.
106	Fascia signs  Intro para	Not clear what this means?	As above.
106	Fascia signs  1 <sup>st</sup> bullet	Overly prescriptive (see general comments)	As above.
106	Fascia signs  2 <sup>nd</sup> bullet	What is a traditional manner?	As above.
107	6 <sup>th</sup> Bullet	Bold colours can carefully be used in conservation areas	As above.
107	Stand-alone Advertising	A-boards on the highway don't require planning permission or advertisement consent but would require a licence from Highways. See guidance below:  <a href="http://www.kirklees.gov.uk/beta/licensing/pdf/a-boards-on-the-highway-policy.pdf">http://www.kirklees.gov.uk/beta/licensing/pdf/a-boards-on-the-highway-policy.pdf</a>	As above.
66	Paragraph 4.7.14	Presumably this paragraph relates to Policy 6, not Policy 5. There appears to be a general lack of regard to green belt policy. If this is intended to apply to development in the green belt then it should state so clearly. Infill cannot be defined and each proposal should be judged on its merits. Curtilages may be extensive and undeveloped so just adjoining a curtilage, whether residential or not, does not necessarily mean there is a continually built up frontage. It is built development that is the important consideration.	As above.

Page	Para/ Policy	Comments/Questions	Steering Group Response																																			
63	Building Housing for the Future	No general comments	Noted.																																			
64	Para 4.7.5	This figure is incorrect. The housing need from 2013 to 2031 is 31,140. The figure to be allocated was 21,324 in the submission Local Plan but there will be a reduced figure following the modifications.	Wording updated.																																			
64	Para 4.7.6	<p>There is an additional housing site as a result of the modifications at Lancaster Lane, Brockholes. Several sites have had changes in capacity.</p> <p>See updated table below:</p> <hr/> <table border="1"> <thead> <tr> <th rowspan="2">Location</th> <th>Site</th> <th>Number of Houses Proposed</th> <th>Housing or Mixed Development</th> </tr> <tr> <th>Number</th> <th></th> <th></th> </tr> </thead> <tbody> <tr> <td>Travel Station Yard, Station Road, Honley</td> <td>H48</td> <td>14</td> <td>Housing</td> </tr> <tr> <td>East of Woodhouse Rd, Brockholes</td> <td>H129</td> <td>124</td> <td>Housing</td> </tr> <tr> <td>South of Southwood Avenue, Honley</td> <td>H178</td> <td>17</td> <td>Housing</td> </tr> <tr> <td>Former Thirstin Mill, Thirstin Road, Honley</td> <td>H2586</td> <td>24</td> <td>Housing</td> </tr> <tr> <td>South of Gynn Lane, Honley</td> <td>H584</td> <td>50</td> <td>Housing</td> </tr> <tr> <td>North of Scotgate Road, Honley</td> <td>H664</td> <td>93</td> <td>Housing</td> </tr> <tr> <td>North east of Westcroft, Honley</td> <td>H786</td> <td>15</td> <td>Housing</td> </tr> </tbody> </table>	Location	Site	Number of Houses Proposed	Housing or Mixed Development	Number			Travel Station Yard, Station Road, Honley	H48	14	Housing	East of Woodhouse Rd, Brockholes	H129	124	Housing	South of Southwood Avenue, Honley	H178	17	Housing	Former Thirstin Mill, Thirstin Road, Honley	H2586	24	Housing	South of Gynn Lane, Honley	H584	50	Housing	North of Scotgate Road, Honley	H664	93	Housing	North east of Westcroft, Honley	H786	15	Housing	<p>Accepted.</p> <p>The revised table has been added to the NDP.</p>
Location	Site	Number of Houses Proposed		Housing or Mixed Development																																		
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Page	Para/ Policy	Comments/Questions				Steering Group Response
		South of Vicarage Meadows, Cinderhills, Holmfirth	H47	14	Housing	
		Bridge Mills, New Road, Holmfirth	H50	45	Housing	
		West of St Mary's Rise & St Mary's Way, Netherthong	H130	21	Housing	
		North west of New Mill Road, Thongsbridge	H214	15	Housing	
		East of Holme View Avenue & Pennine Close, Upperthong	H284	27	Housing	
		Dunford Road, Hade Edge	H288a	66	Housing	
		East of St Mary's Avenue, Netherthong	H294	32	Housing	
		East of Ryecroft Lane, Scholes	H297	39	Housing	
		South of Sandy Gate, Scholes	H597	28	Housing	
		West of Bankfield Drive, Holmbridge	H626	23	Housing	
		West of Wesley Avenue, Netherthong	H715	38	Housing	
		West of Miry Lane, Thongsbridge	H727a	39	Housing	
		West of Stoney Bank Lane, Thongsbridge	H728	53	Housing	
		Tenter Hill Road, New Mill	H729	81	Housing	

		<table border="1"> <tr> <td>West of Royds Avenue, New Mill</td> <td>H730</td> <td>53</td> <td>Housing</td> </tr> <tr> <td>South of Former Midlothian Garage, New Mill Road, Holmfirth</td> <td>H787</td> <td>12</td> <td>Housing</td> </tr> <tr> <td>South of Water Street, Holmbridge</td> <td>H2585</td> <td>19</td> <td>Housing</td> </tr> <tr> <td>Former Midlothian Garage, New Mill Road, Holmfirth</td> <td>H2587</td> <td>56</td> <td>Housing</td> </tr> <tr> <td>Dobroyd Mills, Hepworth Road, Hepworth</td> <td>MX1912a</td> <td>75</td> <td>Mixed</td> </tr> <tr> <td>Lancaster Lane, Brockholes</td> <td>H331</td> <td>14*</td> <td>Housing</td> </tr> <tr> <td>TOTAL</td> <td></td> <td>1087</td> <td></td> </tr> </table> <p>*The capacity is not included in the phasing, as it is already counted as a commitment as planning application (2016/90146) on the site.</p>	West of Royds Avenue, New Mill	H730	53	Housing	South of Former Midlothian Garage, New Mill Road, Holmfirth	H787	12	Housing	South of Water Street, Holmbridge	H2585	19	Housing	Former Midlothian Garage, New Mill Road, Holmfirth	H2587	56	Housing	Dobroyd Mills, Hepworth Road, Hepworth	MX1912a	75	Mixed	Lancaster Lane, Brockholes	H331	14*	Housing	TOTAL		1087		
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TOTAL		1087																													
64	Para 4.7.7	Some of the safeguarded land sites are to be deleted as a result of the modifications, though not the two sites listed.	Wording updated.																												
64	Para 4.7.8	The wishes to reduce reliance on cars and greenfield development supports the need for a strategic overview in the neighbourhood plan	Noted. Reducing reliance on cars is addressed in the Transport section 4.10.																												
65	Para 4.7.9	The second sentence is false. The capacity of sites in the Local Plan was calculated at a standard density of 35 dwellings per hectare throughout the district, unless a scheme for a different density had already received planning permission or has site promoter evidence justifying a different capacity.	Wording updated																												
66	Para 4.7.10	The HVNP could look at the allocated sites and the type of housing to be provided, based on local evidence.	Noted. Sentence added to text.																												

Page	Para/ Policy	Comments/Questions	Steering Group Response
66/67	Draft Policy 6: Building Homes for the Future (10 criteria)	<p>General: How reasonable is the need for public consultation on schemes of more than 2 houses, this seems onerous? Is there evidence of why more than 2 houses has been chosen? How should the developer take the comments into account?</p> <p>What is meant by ‘local expectations of location’?</p> <p>What is meant by an existing settlement boundary? Is this meant to be the same as the green belt boundary? If it is then this is not compatible with green belt policy ‘settlement boundaries’ – should have regard to exceptions housing covered in PLP11</p> <p>Criteria 1, 2 and part of 4, like other parts of other policies would work better upfront in the plan as a strategic policy</p>	Wording updated.
		<p>Issues relating to mix are already covered in the Local Plan, policy PLP11, Housing Mix and Affordable Housing and should be based on the latest evidence rather than just specifying smaller one, two and three bedroom properties. What if the evidence of need changes over time but the HVNP remains fixed?</p> <p>‘.....new housing development will only be supported within the existing settlement boundaries.... No flexibility</p>	<p>Partially accepted.</p> <p>The NDP has been prepared building on evidence from local informal community consultations, but it is accepted this provided information from a snapshot in time. Greater flexibility has been added to the policy so it now refers to the most up to date assessment.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
67	Criteria 1	<p>The redevelopment of brownfield sites in the green belt and conversion schemes should not be rejected just because they don't adjoin the built up area as this may be contrary to green belt policy.</p> <p>Conversion of existing buildings in the green belt can be appropriate development, as can the redevelopment of brownfield sites. As written this is not compatible with NPPF or the Local Plan. The wording cannot use 'etc' as it is not clear what other factors need to be considered.</p> <p>Is this in settlements or contrary to 'new housing development will only be supported within existing settlement boundaries' outside settlement boundaries?</p>	Wording has been updated.
67	Criteria 2	This is not reasonable and could not be enforced. There is no certainty that businesses could always relocate in the valley.	Wording has been updated.
67	Criteria 3	<p>What does adequate mean?</p> <p>How does additional parking provision support sustainability and where is the evidence to show that it will avoid 'overspill' parking on nearby roads?</p> <p>The standards referred to are a maximum in the UDP which are not being taken forward in the Local Plan. Does not seem sustainable. The information set out in appendix 4 is taken from the Council's Highways Development Delivery Planning Pre-application and Application Advice Note. This is not a formal document, it has not been adopted. It sets out general principles used as a starting point to be evidenced in relation to site accessibility, forecast car ownership, highway layout, existing on street parking, availability.</p>	<p>Noted.</p> <p>Adequate refers to the local authorities adopted parking standards. However there is an issue in the area with on street parking leading to added congestion and this impacts adversely on quality of life and the public realm. Therefore there is a need to ensure suitable and adequate parking is provided within schemes alongside measures to support sustainable alternatives, as set out in the transport section.</p> <p>Wording updated.</p>



Page	Para/ Policy	Comments/Questions	Steering Group Response
		Local plan policy PLP22 Parking has not set parking standards to allow for flexibility.	
67	Criteria 4	Already considered by Highways Development Management	Noted.
67	Criteria 5	Does this refer to infill in the green belt, or development in gaps between buildings within the towns and villages? How would this work in practice?  'extensions to existing built up areas' – are these beyond settlement boundaries?	Criteria 5 has been deleted as it refers to character and duplicates NDP Policies 1 and 2.
67	Criteria 6	'New housing schemes will be supported where they include an appropriate mix of house types, sizes and tenures' – will this be every time?  How will a suitable proportion be defined and what is the evidence base for this?	Wording has been updated.
67	Criteria 7	'Schemes will be supported' – will this be every time?  How would a suitable proportion be calculated and what is the evidence base for this? What is suitable?	No - not every time - other policies in the NDP will also apply.  The suitable proportion will be provided through the evidence required in the first paragraph - ie the most up to date evidence at that time.
67	Criteria 8	What's suitable? Where's the evidence?	The suitable proportion will be provided through the evidence required in the first paragraph - ie the most up to date evidence at that time.
67	Criteria 9	How does the plan seek to give priority to "the delivery of affordable housing and maximising the potential for meeting identified local needs and local affordable needs from appropriate individual development opportunities?"	Noted The Parish Council will promote suitable affordable housing provision as and when planning applications come forward.

Page	Para/ Policy	Comments/Questions	Kirkwells Response
		<p>The provision of affordable housing and the consideration of density need to be in separate criteria.</p> <p>‘Proposals will be expected to demonstrate that densities make best use and efficient use of land and reflect local settlement character’ – apart from the requirement for low densities in a previous policy?</p>	<p>Wording has been updated.</p>
67	Criteria 10	<p>This needs further explanation, and is also not consistent with criteria 9, the Local Plan or the NPPF.</p> <p>There is a chronic shortage of affordable housing in the district, therefore this criterion and what is trying to achieve is difficult to understand</p>	<p>Wording has been updated.</p>
69	4.8.7	<p>Happy with the principle but these cannot contravene the allocations and designations already established in the plan</p>	<p>Noted.</p>

Page	Para/ Policy	Comments/Questions	Kirkwells Response
69	Draft Policy 7: Supporting Small Business Generation (10 criteria)	<p>General:</p> <p>Is this supposed to apply solely to small businesses, or to all businesses? What about larger employers? What defines a ‘small’ business? Policy as worded could exclude development of larger employers within the Holme Valley such as Longley Farm, Holmfirth Dyers and HB Bearings.</p> <p>What evidence has been used to inform facts and figures? (para. 4.8.4 for example). How has this evidence informed the policy approach so it can positively respond to the issues identified?</p> <p>Need a definition of what use classes are included in the term ‘employment use’. Is this the same as the Local Plan definition? It would be more effective to use consistent terminology and definitions</p> <p>Need to consider/acknowledge a variety of Permitted Development Rights to change buildings to other uses, in particular agricultural buildings. There is more limited control we can exert than is set out in the policy.</p>	<p>The NDP supports small businesses and leaves larger scale economic development to the Local Plan policies. NDPs do not have to plan for everything.</p> <p>Wording amended in policy.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
70	Criteria 1	<p>Farm diversification schemes need to have regard to green belt policy where they are located within the green belt.</p> <p>This is contrary to Kirklees Local Plan policy PLP 10, criteria 2 and paragraph 7.28. New build can occur - not just farm diversification - outside built up areas subject to green belt policy.</p> <p>What is an identified employment area or site specifically allocated for 'that type of use'? Are these Local Plan employment allocations, Priority Employment Areas?</p>	Wording amended in policy.
70	Criteria 2	What is meant by 'sustainable expansion'?	Wording amended in policy.
70	Criteria 3	What does suitable mean? This needs to be defined or removed from policy wording.	Wording amended in policy.
70	Intro sentence to criteria a to g	<p>Are all 7 criteria relevant in every instance?</p> <p>Who is 'The Council'? Kirklees Council or the Parish Council? This needs to be clear.</p>	Wording amended in policy.
70	Criteria a	<p>Proposals would need to comply with green belt policy.</p> <p>What if it's a new attraction?</p>	Wording amended in policy.
70	Criteria b	Suggest add 'Take into account a design code' – see previous comments	See earlier comments about Design Codes.
70	Criteria c	<p>Definition needed of what constitutes 'undue problems and disturbance'?</p> <p>This is already considered by Highways Development Management through the planning application process</p>	Wording updated.

Page	Para/ Policy	Comments/Questions	Steering Group Response
70	Criteria d	Could be part of a design code – see previous comments This is already considered by Highways Development Management through the planning application process	See earlier comments about Design Codes.
70	Criteria e	How would the proposal be expected to take account of the need to reduce carbon emissions?  How does this work with the aim to have lots of parking in the preceding policies?	Schemes should aim for both adequate parking provision and promoting sustainable travel. Parking requirements should be lower if more employees used public transport or walked or cycled.  Wording has been updated.
70	Criteria f	Design Code. What is a high standard of design?	Noted. This has been deleted due to duplication with other NDP design policies - 1 and 2.
70	Criteria g	This needs to have regard to green belt policy including structures where very special circumstances can be demonstrated. Hiding a building does not make it appropriate and this is totally incompatible with green belt policy. The structures required to ‘hide’ a building can by themselves be incongruous or intrusive in the landscape, nor are trees necessarily appropriate in an otherwise open setting. This should not override proper consideration of careful siting or the consideration of local and national green belt policy.  Directly related? The terminology used is ‘reasonably necessary’ for the purposes of agriculture or forestry. Define in a glossary	Accepted.  This criterion has been deleted as it conflicts with Green Belt policy and could be left to the NPPF and Local Plan policies.
70	Final para – natural beauty and local vernacular	What’s the local vernacular in relation to small businesses?  Design Code	Refer to Design Code.

Page	Para/ Policy	Comments/Questions	Steering Group Response
71	Draft Policy 8: Encouraging Tourist and Visitor Facilities (9 criteria)	<p>General: A design code could cover most of these criteria instead of individual points.</p> <p>To strengthen the tone of the policy it is recommended to change the term 'encouraged' with 'supported' in the introductory sentence.</p> <p>The introduction suggests no new attractions unless they are in converted buildings? Only new facilities if related to existing attractions?</p>	<p><a href="#">Now part of Supporting Business Generation policy.</a></p>
71	Criteria 1	<p>Not sure this is possible bearing in mind the other policies?</p>	<p><a href="#">Now part of Supporting Business Generation policy.</a></p>
71	Criteria 2	<p>Would need to comply with green belt policy.</p> <p>Could be part of a design code</p> <p>This is repetition of criterion a) of Draft Policy 7: Supporting Small Business Generation.</p>	<p><a href="#">Now part of Supporting Business Generation policy.</a></p>
71	Criteria 3	<p>This is repetition of criterion b) of Draft Policy 7: Supporting Small Business Generation and is design focussed (design code).</p>	<p><a href="#">Now part of Supporting Business Generation policy.</a></p>
72	Criteria 4	<p>There is an inconsistency of wording about connection to the highway network. For example, Policy 7 states that proposals must be 'connected to the existing highway network' while Policy 8 states 'well related to the existing highway network'. There is also no requirement in Policy 7 for the proposal to be well related to the public transport network.</p>	<p><a href="#">Now part of Supporting Business Generation policy.</a></p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
		Definition needed of what constitutes ‘undue problems and disturbance’? Already addressed by Highways Development Management	
72	Criteria 5/6/7	This could be part of a design code  Criteria 5 - This is repetition of criterion d) of Draft Policy 7: Supporting Small Business Generation and is design focussed.  Criteria 7 - This is repetition of criterion g) of Draft Policy 7: Supporting Small Business Generation and is design focussed.	Now part of Supporting Business Generation policy.
72	Criteria 8	Proposals would need to comply with green belt policy.  ‘...may be supported providing they...’ – how worded suggests that applicants only have to meet this part of the policy	Now part of Supporting Business Generation policy.
72	Criteria 9	This is very onerous. Not all extension or expansion plans would be to diversify from the existing use. How would proposals be expected to enhance the natural beauty of an area?  ‘able to diversify the local offer and enhance landscape character and natural beauty of the area...’ ....How would this be demonstrated?  ‘Proposals will be required to show no adverse impact on the capacity of road, sewerage or other infrastructure’ - no flexibility	Now part of Supporting Business Generation policy and wording updated
72	Final para – landscape character	Could be part of a design code – see previous comments	Noted.

<b>Page</b>	<b>Para/ Policy</b>	<b>Comments/Questions</b>	<b>Steering Group Response</b>
73	Draft Policy 9: Facilitating Development in Holmfirth, Honley and other local centres (11 criteria)	General:  A lot of duplication from other areas. Bullet points 2, 4 & 5 could be part of a design code.	Policy amended and re-worded to reduce duplication.
73	Intro para	What about the other main town centre uses as defined by the NPPF? What is meant by commercial in this context? The policy needs to accord with NPPF and Local Plan policy PLP 13.	Policy amended and re-worded
73	1 <sup>st</sup> Bullet point -	Retail development should be located in the Primary Shopping Area 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. Some of the secondary shopping frontages designated in the Local Plan are outside the designated Primary Shopping Area as these are not adjoining or not closely related to the Primary shopping frontages.	Policy amended and re-worded
73	5th bullet point – Signage	Appropriate for whom?	Policy amended and re-worded
73	6 <sup>th</sup> bullet point – security	Doesn't make sense	Policy amended and re-worded



73/74	2 <sup>nd</sup> Paragraph and 2 <sup>nd</sup> bullet point – loss of existing commercial and community uses	<p>‘.....will only be supported where development does not prejudice the lawful operating conditions or viability of adjacent land uses.....</p> <p>for at least 12 months that the continued use of premises land for commercial use is not viable’</p> <p>These are untenable requirements</p>	Policy amended and re-worded
74	3rd Paragraph – primary shopping areas	<p>‘....at least 70% of the existing stock of ground floor commercial space should remain in non-residential use...’</p> <p>Need to take into account of permitted development rights and the more limited control we now have over this subject to ‘prior approval’ rather than full planning permission. Includes offices, retail, and variety of sui generis uses.</p> <p>What is meant by commercial in this context? Do you mean main town centre uses as defined by the NPPF?</p> <p>What is the evidence behind the 70% threshold?</p>	Policy amended and re-worded
74	4 <sup>th</sup> Paragraph - Last bullet point	<p>What is meant by ‘appropriate commercial and community uses’?</p> <p>If it is reasonable harm is that ok?</p>	Policy amended and re-worded

Page	Para/ Policy	Comments/Questions	Steering Group Response
75	4.9 Community, Education, Health and well-being	General: None	Noted.
75	4.9.2	'...anything used by more than a few people...' What is meant by a few? Does this mean that a facility is then valuable? What is the evidence to support this?	Wording updated.
76	4.9.8	There is no need to repeat the content of a Local Plan Policy.  PLP48 is subject to a modification as highlighted below:	Accepted.  The content of policy PLP48 has been deleted.
		Delete and insert text: "Proposals which involve the loss of valued community facilities such as shops, public houses and other facilities of value to the local community will only be permitted where it can be demonstrated that:  a. there is no longer a need for the facility <u>and all options including the scope for alternative community uses has been considered</u> ; or b. its current use is no longer viable; or c. there is adequate alternative provision in the locality to serve the local community which is an equally accessible location; or d. an alternative facility of equivalent or better standard will be provided, either on-site or equally accessible; <u>and</u> e. <u>any assets listed on a Community Asset Register have satisfied the requirements under the relevant legislation.</u>	The content of policy PLP48 has been deleted.

Page	Para/ Policy	Comments/Questions	Steering Group Response
		<p><del>In all instances, the following must be demonstrated that:</del>  <del>a) — all options for their continuance have been explored, including any scope for alternative community uses; and</del>  <del>b) — any assets listed on a Community Asset Register have satisfied the requirements under this obligation.”</del></p>	
77	Draft Policy 10: Protecting Local Community Facilities	Third sentence refers to types of buildings, however, Parks and Gardens, Recreation grounds and Village Greens which are not buildings are included in the bulleted list.	Policy wording has been amended.
79	Draft Policy 11: Protecting Local Green Space	<p>It is not considered compatible with the NPPF or green belt policy. The policy as worded seems to imply that if development does not impact on openness it would be ok.</p> <p>Page 78 para 4.9.14 – The table for assessing Local Green Space is not consistent with the criteria in NPPF or NPPG. Criteria for assessing Local Green Space also needs to include additional considerations set out in the National Planning Policy Framework.</p> <ul style="list-style-type: none"> <li>• Distance from Local Community – there is no specific distance given in either NPPF and NPPG other than it has to be ‘close to the community it serves’.</li> <li>• Evidence would be required about how the site is ‘demonstrably special and hold a particular local significance’ relating to beauty, historic significance, recreational value, tranquillity or richness of its wildlife’</li> <li>• Also, the land should not have planning permission for development or be allocated for development.</li> </ul>	<p>Steering group has identified four specific sites and evidenced them in relation to new NPPF criteria ie:</p> <p>a) in reasonably close proximity to the community it serves;</p> <p>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <p>c) local in character and is not an extensive tract of land.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
		<p>Many open spaces, sport and recreation facilities in the Holme Valley are already protected as urban green space or green belt policy. NPPG is clear that if land is already protected then consideration should be given to whether any additional local benefit would be gained by local green space designation.</p> <p>General comments</p> <p>Rather than repeating Local Plan policies/general statements - perhaps there should be more focus on how the Holme Valley Parish council would wish to see specific issues or the development of sites in villages or settlements addressed through the Neighbourhood Plan, e.g.:-</p> <ul style="list-style-type: none"> <li>• Honley &amp; Brockholes</li> <li>• Hade Edge</li> <li>• Hepworth</li> <li>• Scholes</li> <li>• Holmfirth, including Holmbridge, Upperthong, Netherthong, Wooldale, New Mill and Thongsbridge</li> </ul>	
110	Appendix 5 (Urban Green Space)	UGS909 Open Land (South site), Lancaster Lane Brockholes. The site is subject to a proposed modification to delete the UGS designation and allocate the site for housing (H331) to reflect the fact that the site has planning permission for residential use granted on appeal (modification reference SD2MM402).	Noted. Appendix 5 has been revised and site deleted.

Page	Para/ Policy	Comments/Questions	Steering Group Response
81	Draft Policy 12: Supporting Community based Education, Health and Wellbeing (5 criteria)	General comment: These are not land use based policies; although they may be appropriate for actions for the Holme Valley Parish Council. Perhaps these would be better considered as appropriate consideration for CIL.	<a href="#">The content of policy PLP48 has been deleted.</a>
81	Criteria 1	‘Small’ - Can we control the education system? We can be supportive of proposals as in the NPPF but this goes much further.	<a href="#">The content of policy PLP48 has been deleted.</a>
81	Criteria 2	Would this not be subject to any policies regarding ‘undue’ highways impacts on surrounding residents?	<a href="#">The content of policy PLP48 has been deleted.</a>
82	Criteria 3	‘.....Retention of library services will be supported....’ Who would control this?	<a href="#">The content of policy PLP48 has been deleted.</a>
82	Criteria 5	Is this not subject to any provisions? Seems to contradict small business policy doesn’t mention any design, highway, environmental considerations	<a href="#">The content of policy PLP48 has been deleted.</a>

Page	Para/ Policy	Comments/Questions	Steering Group Response
83	Section 4.10 Improving Transport, Accessibility and Local Infrastructure	Little or no evidence provided for the points made.	Steering Group has updated text with reference to evidence sources and consultation.
85	Draft Policy 13: Improving Traffic and Transport Infrastructure (no numbered criteria but multiple criteria to be considered – approx. 25)	<p>General: The draft policy is too long and unstructured. Many of the aspirations are studies and schemes rather than highways development management measures.</p> <p>This policy includes a large section about the public realm, which is also included in section 4.6 and draft policy 5. Could have a single public realm policy to make it less confusing. Comments made on that policy for public realm apply here. Aspects such as street furniture is not relevant or necessary in a policy about traffic and transport infrastructure.</p> <p>What is meant by “proposals to widen roads and provide new footways will only be supported when the utility of their provision is evidenced”. What evidence needs to be provided?</p> <p>The introduction of weight limits and 20mph zones is not land use policy. This could be an action for the HVPC to consider.</p> <p>What is meant by a green lane and is this reasonable?</p> <p>Road safety: “Transport plans for any new development should recognise the topography of the valley” – how?</p>	<p>The section on public realm has been deleted and moved to the new policy on public realm.</p> <p>Policy has been reworded and some elements moved to Actions.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
85	Traffic management and design – first bullet	‘a hierarchal approach, with pedestrians and cyclists first, and motorised vehicle user second’ – not according to policies earlier in the document	Policy has been reworded
85	Traffic management and design – second bullet	‘ a reduction in the clutter of interventions...’ How?	Policy has been reworded and some elements moved to Actions..
85	Road safety – first bullet Green Lanes	<p>‘Accommodating all road users’ appears to encourage motor vehicle traffic. Is this your intention?</p> <p>If a “popular....route” already exists (how would it be popular if it didn’t) then how is such a “green lane” to be developed?</p> <p>Do you have a network of unclassified roads or Public Rights of Way in mind?</p> <p>Are you intending to create new routes within sites, or linking to sites? Are you intending to raise funds for infrastructure works? It is noted that ‘Maintaining footpaths and bridleways’ is listed in draft policy 16.</p>	Policy has been reworded and some elements moved to Actions.
86	Accessibility	But also lots of car parking.....how does this accord with earlier policies?	Policy has been reworded and some elements moved to Actions.
86	Accessibility criteria 1	It is unclear how consideration of public transport is to be carried out.	Policy has been reworded and some elements moved to Actions.

<b>Page</b>	<b>Para/ Policy</b>	<b>Comments/Questions</b>	<b>Steering Group Response</b>
86	Parking: paragraph 4.10.11	Where housing pre-dates the car the result is more often on-street car parking.	Policy has been reworded and some elements moved to Actions.

<b>Page</b>	<b>Para/ Policy</b>	<b>Comments/Questions</b>	<b>Steering Group Response</b>
89	Draft Policy 14: Improving Parking,	General:	Policy combined so parking now part of transport, accessibility and local infrastructure policy..
	Public Transport and Accessibility (5 criteria)	Many of the aspirations are studies and schemes rather than Highway Development Management measures.	Policy combined and reworded so parking now part of transport, accessibility and local infrastructure policy..
89	Criteria 1	Not clear what this means.  ‘Proposals to develop shared parking areas...’ – As a stand alone development?  Design or materials guidance for this needs to be provided.	Noted.  Yes - the Steering Group is supportive of the creation of new car parks in areas where there is a need to alleviate on street car parking.  Policy combined and reworded so parking now part of transport, accessibility and local infrastructure policy.



Page	Para/ Policy	Comments/Questions	Steering Group Response
89	Criteria 2	This appears more relevant to event planning than to land use planning. Any proposal that resulted in permanent hard surfacing would need to comply with green belt policy (depending on its location).	Accepted.  Additional wording has been inserted:  " they comply with Green Belt policy and"
89	Criteria 3	It would be useful if ‘parking land’ near to the stations was identified for clarity.	Steering Group has identified that key land already been lost.  Will consider if possible to include in future version of plan.
89	Criteria 4	As written this would be better placed as an action for the Parish Council, otherwise it could state that new development should consider routes to school and safe cycling and walking routes.	Policy combined and reworded so parking now part of transport, accessibility and local infrastructure policy..
89	Criteria 5	How would this work in practice?  Earlier policies promote parking to alleviate congestion?	Policy combined and reworded so parking now part of transport, accessibility and local infrastructure policy..

Page	Para/ Policy	Comments/Questions	Steering Group Response
94	Draft Policy 15: Promoting Sustainability (27 criteria)	<p>General: This policy has good ideas like reducing the use of single use plastics but not sure how the planning process would implement such policies. Consideration needs to be given to how they can be implemented and how they can be monitored.</p> <p>Is this policy and all 27 criteria intended to apply to all development, irrespective of its size (residential extensions for example). Many of the criteria are not relevant to most development. This cannot be a mandatory requirement for all applications but that is how the introductory paragraph is written.</p> <p>There should be a threshold, or different expectations for different sizes of developments.</p> <p>There needs to be further justification of the methods advocated in the policy, what they mean and how they can be successfully accommodated into different sizes of development.</p>	<p>Accepted.</p> <p>Some criteria are non land use planning related and these have been moved to the new box of Parish Council Actions.</p> <p>This policy should be applied to Major Development as defined in the NPPF:L footnote added.:</p>
94	Promoting Renewable Energy Bullet point 2	<p>This needs to comply with green belt policy and Local Plan policy PLP26. What is meant by ‘limited’ wind turbine development?</p> <p>‘consultation with the local community is undertaken’ – this is a mandatory requirement for most wind turbines</p>	<p>Wording updated.</p>
94	Energy Efficiency	<p>General:</p> <p>Should this simply ask for consideration to be given to maximizing energy efficiency in new developments?</p>	<p>Not accepted.</p> <p>The Policy gives more detail about how this may be achieved.</p>

Page	Para/ Policy	Comments/Questions	Steering Group Response
94	Energy Efficiency Bullet point 2	'Use of high quality, thermally efficient building materials' – other policies refer to traditional materials?	Wording updated.
94	Energy Efficiency Bullet point 4	HVNP Draft policy 4 says BREEAM assessment only required if falls within remit	Definition of BREEAM added.
94	Energy Efficiency Bullet point 5	'use of high quality, thermally efficient building materials' – What if Millstone Grit and stone flagged roofs aren't?	Wording updated.
94	Energy Efficiency Bullet point 7	Is this reasonable and how would it be implemented? HVNP Draft policy 4 states that shouldn't be seen as a bolt-on addition. Double glazing is not normally allowed in listed buildings unless justified.	Wording updated.
94	Sustainable transport section	Much of this is repeated in other sections.	Accepted. This part of the policy has been deleted. Some elements are duplicated in transport policies, others have been added to the Parish Council actions.
94	Sustainable transport Bullet point 10	Apart from the encouragement of parking spaces, shared parking areas, parking to alleviate congestion and parking around stations is in earlier policies	Noted.
94	Sustainable transport Bullet point 11	This is inconsistent with HVNP draft Policy 7	Wording updated.

Page	Para/ Policy	Comments/Questions	Steering Group Response
95	Flooding and Extreme Weather	<p>General:</p> <p>Flood risk – the flood risk sequential test should be mentioned here because that must be passed <u>before</u> consideration of flood risk mitigation through design. As written it implies that development can occur in flood risk areas subject to mitigation through design. An exception test would also be required for residential development in flood zone 3 (where mitigation and design could be considered).</p>	Wording updated.
95	Flooding: bullet point 14	The sequential test needs to be considered as does compliance with Local Plan policies 27 and 28.	Wording updated..
95	Flooding: bullet point 16	There are Permitted Development Rights for this – subject (quite often) to permeable surfacing	Wording updated.
95	Flooding:Bullet point 18	Encouraging green roofs is inconsistent with the design elements of the document that state that design, including the design of roofs, must be compatible with traditional designs.	Wording updated.
95	Sustainable living section	How are these criteria to be applied to individual planning applications?	Wording updated.
95	Sustainable living Bullet 20	What is HoTT? Please define	Wording updated.
95	Sustainable living Bullet 21	‘...new retail developments must demonstrate how they will manage and reduce their waste...’ How?	Wording updated.

Page	Para/ Policy	Comments/Questions	Steering Group Response
95	Sustainable living Bullet 22	'...purchase of locally produced food ...' new businesses?	Wording updated.
95	Sustainable living Bullet 23	How would this be done through the planning system?	Wording updated.
95	Green infrastructure and biodiversity section	<p>General:</p> <p>This section could support the implementation of the Holme Valley Riverside Way.</p> <p>As part of the development of the Kirklees Local Plan, West Yorkshire Ecological Services produced maps to define the existing green infrastructure resource. West Yorkshire Ecological Services has the capability to refine the mapping already produced and should be consulted as part of the Neighbourhood Development Plan process.</p> <p>The wording that requires the retention of mill ponds and states that rivers should not be culverted is supported. The opportunity has, however, been missed to discuss the ecological status of such features – preservation alone will not provide a biodiversity enhancement, this is avoidance of impacts. National policy makes a distinction between avoiding impacts and providing a biodiversity net gain.</p>	Wording updated with references to Biodiversity within policy and links to Local Plan information..
95	Green infrastructure and biodiversity Bullet 24	<p>We can only control front gardens, the creation of a hard surface elsewhere in gardens is usually Permitted Development (PD).</p> <p>Not sure what adequate mitigations are and what they are mitigating against?</p>	Wording updated.

Page	Para/ Policy	Comments/Questions	Steering Group Response
95	Green infrastructure and biodiversity Bullet 25	Most trees in conservation areas are already protected by virtue of this designation. There are specific tests for imposing tree preservation orders, not blanket cover. This approach is not appropriate.	Wording updated.
95	Green infrastructure and biodiversity Bullet 27	There is no flexibility in this.	Wording updated.

Page	Para/ Policy	Comments/Questions	Kirkwells Response
97	Draft Policy 16: Focusing Developer Contributions on Local Priorities	No comments	Noted.

**Kirklees Travel to Work data:**

	Batley	Colne Valley	Denby Dale	Dewsbury	Holme Valley	Huddersfield	Kirkburton	Meltham	Mirfield	Spennings	Kirklees
Working in the same area	23.1%	15.5%	16.7%	31.1%	18.8%	43.6%	9.6%	12.9%	13.1%	21.6%	53.0%
Working at home	7.2%	9.7%	12.7%	7.9%	13.4%	8.4%	12.1%	11.5%	10.0%	8.7%	9.3%
No fixed place	6.6%	7.4%	6.8%	6.8%	7.7%	6.6%	6.8%	6.8%	5.9%	6.2%	6.7%

Commuting to another part of Kirklees	26.2%	41.6%	29.3%	21.7%	35.0%	14.9%	40.6%	46.4%	39.1%	22.7%	n/a
Commuting to elsewhere in West Yorkshire	32.4%	17.1%	20.8%	28.0%	13.8%	20.0%	20.9%	13.2%	26.5%	36.3%	24.2%
Commuting to Greater Manchester	0.6%	5.3%	1.1%	0.6%	3.5%	2.2%	2.0%	4.9%	1.4%	0.9%	2.0%
Commuting to South Yorkshire	1.1%	0.8%	9.4%	1.3%	4.3%	1.4%	4.3%	1.5%	1.1%	0.9%	1.9%
Elsewhere in the UK	2.6%	2.6%	3.1%	2.5%	3.4%	2.9%	3.7%	2.8%	2.8%	2.8%	2.8%

Source: 2011 Census via NOMIS website