

Kirklees Council Housebuilders Design Guide Supplementary Planning Document (SPD)

Consultation Statement – June 2021

1. Introduction

- 1.1 The Housebuilders Design Guide SPD provides detailed guidance on how Local Plan policy LP24 (Design) should be implemented in determining planning applications. This Consultation Statement sets out the early engagement and public consultation carried out to inform the preparation of the Housebuilders Design Guide Supplementary Planning Document (SPD).
- 1.2 The Consultation Statement has been prepared in accordance with Town and Country Planning (Local Planning) (England) Regulations 2012 to support the adoption of the Housebuilders Design Guide SPD and the council's Statement of Community Involvement (SCI). The SCI outlines how the council will work with local communities and stakeholders in developing planning policy documents, including SPDs.
- 1.3 In accordance with the Regulations, this consultation statement sets out:
 - who was consulted during the preparation of the SPD,
 - how they were consulted,
 - a summary of the main issues raised during the consultation,
 - how those issues have been addressed in the adopted SPD.

2. Background

- 2.1 The Housebuilders Design Guide SPD aims to promote high standards of design for residential developments in Kirklees that reflects national guidance and supports Local Plan Design Policy LP24. The guidance is to raise the place making agenda and be clear and precise about what the council would expect for well-designed residential development. The guidance is designed to support applicants, developers, design professionals and agents in preparing proposals for residential development.
- 2.2 The purpose of the SPD is to inform prospective applicants, agents, architects, members of the public with an interest in an application, elected members of the Council and other decision-making bodies what the council considers to be good residential design and how to ensure the district's future housing development has the required high quality and inclusive design to help deliver better places. This SPD provides detailed guidance and additional information about the implementation of Kirklees Local Plan policy LP24 'Design' and will be a material consideration in the determination of planning applications.

- 2.3 The draft Housebuilders Design Guide SPD provides detailed advice on the implementation of Kirklees Local Plan policy LP24 ‘Design’ and other relevant Local Plan policies. The SPD will also reflect how good design can help in adapting locally to a changing climate to address the council’s Climate Emergency.
- 2.4 The policy was subject to public consultation undertaken on the Kirklees Local Plan and the Statement of Public Consultation and Summary of Main Issues (April 2017) sets out the issues covered. Modifications were made to policy LP24 as requested by Local Plan Inspector to clarify the requirements of design criteria to be applied in relation to policy LP24, specifically with regard to sustainability.
- 2.5 The council is committed to improving the design of residential development. The aim is to ensure that the districts future housing development has the required high quality and socially inclusive design to help deliver quality places. This commitment is established through the Kirklees Local Plan and is further advocated through the draft 567186 Guide SPD, which aims to create high quality buildings and places.

3. Timetable of SPD production

- 3.1 The SPD was prepared by a project team led by the council’s Planning Policy team, including input from Development Management, Conservation & Design, Highways DM, Flood Management and Drainage, Public Health, Landscape Architect, West Yorkshire Police Designing Out Crime Officer and Waste & Recycling Operations Planning Co-ordinator.
- 3.2 The production of the Housebuilders Design Guide SPD has followed a number of stages. The timetable for the production of the SPD is set out below.

Table 1: SPD Timetable

Dates	Stage or Consultation Topics/Event
January – August 2020	Evidence gathering and early internal stakeholder engagement
July – August 2020	Strategic Environmental Assessment screening and consultation
1 st April 2020	Early Engagement Workshop (cancelled)
March – May 2020	Early Engagement Design Questionnaire
19 th October 2020 – 14 th December 2020	Public consultation on the Housebuilders Design Guide SPD

4. Early Engagement on the preparation of the SPD

- 4.1 Early engagement on the preparation of the Housebuilders Design Guide SPD was undertaken with internal and external stakeholders to understand their expectations and priorities to help inform the scope and content of the SPD. This period of internal officer engagement was held from March 2020 until August 2020.
- 4.2 The following council specialisms were consulted as part of the preparation and initial drafting of the SPD:
- Climate Change Officer
 - Development Management
 - West Yorkshire Police Designing Out Crime Officer
 - Client Design Advisor
 - Highways Development Management
 - Waste & Recycling Operations Planning Coordinator
- 4.3 Early engagement with the project team and wider internal specialisms identified several issues which are set out in the tables below together with the council’s response on how the draft SPD has dealt with this issue. This included drop-in sessions.

Table 2: Draft Housebuilders Design Guide SPD: Internal Early Engagement

Main Issue	How Issue Dealt with in the SPD
<p><u>Crime</u> Specific section required in relation to designing out crime to accord with NPPF (sections 8 and 12) and the National Design Guide.</p> <p>Incorporate the ‘Crime Prevention Through Environmental Design’ 5 principles developed by Huddersfield University.</p> <p>Relate to the Secured by Design Guidance in terms of walking permeability to avoid leaking cul-de-sacs and consider mitigation measures.</p>	<p>Principles incorporated into the SPD relating to surveillance, movement control, management and maintenance, defensible space and physical security.</p>
<p><u>Climate Change</u> Maximise fabric-first approach to ensure energy efficiency and minimise energy requirements. Suggest or signpost to standards/principles to consider, e.g. Passivhaus and state that these approaches would be welcome.</p>	<p>Principles incorporated into the SPD relating to fabric first. Reference made to density, maximising solar gain and green roofs.</p>

<p>Consider mechanical ventilation/cooling.</p> <p>Include sources of energy and a hierarchy approach relating to different scale of development from micro-renewables to larger development sites.</p> <p>Balance density requirements with ability to achieve high energy efficiency standards. Encouraging developments that maximise solar gain (such as Passivhaus) for reasons of orientation may make it difficult to achieve 35 dwellings per hectare.</p> <p>Green roofs and walls can have a beneficial heat regulating effect and materials should be considered carefully.</p>	
<p><u>Waste Management</u></p> <p>Incorporate changes emerging from the new national Resources and Waste Strategy and the forthcoming council strategy.</p> <p>Consider management of waste on-site/ dwelling sorting.</p> <p>Refer to the council's 'Waste Management Design Guidance for New Developments'</p> <p>Refer to Building Regulations Part H6 and British Standard for waste management</p> <p>Sufficient space required adjacent houses for bins as can conflict with on-plot parking.</p> <p>Recommendations for screening for bins and design of bin stores, including green roofs</p> <p>Density – getting the balance right between high density and highways to an adoptable standard for collection vehicles (Link to Highways Design SPD)</p>	<p>The SPD refers to the storage of bins and appropriate reference from the Highways Design Guide SPD regarding storage for waste.</p> <p>Reference made to Council's Waste Collection Guidance.</p> <p>Refer to guidance document NHBC 'NF60 Avoiding Rubbish Design'</p>

<p>Conversion of town centre buildings and issues with lack of space and waste appropriate facilities</p> <p>Communal bins should be supported provided they can be accessed by refuse collection vehicles</p> <p>Parking – need to plan for tandem parking as this can impact on RCVs</p> <p>the SPD should not be over prescriptive on distances in relation to bin drag and carry distances</p>	
<p>Highways</p> <p>Adoptable highway layouts should be considered early in the design process.</p> <p>Private drives can have implications in terms of maintenance and length can create difficulties.</p> <p>Standardised design types limit scope for creative highway design solutions.</p> <p>Greening the street – soft landscaping should be encouraged, e.g. along verges and build-outs.</p>	<p>Principles considered reference to Green Streets included.</p> <p>The SPD references the relevant information from the Highways Design Guide SPD in the document. The highways Design Guide SPD will still be a material planning consideration for determining planning applications.</p>
<p>Parking</p> <p>Getting provision right. Consequences of low parking standards can lead to on-street parking which can create accessibility problems.</p> <p>Communal parking – small high density schemes work well if safety issues can be overcome, i.e. safe and well lit.</p> <p>Car parking is important but avoid hard landscape. Need to future proof, such as access to electrical charging points.</p>	<p>Reference made to the standards set out in the Highways Design SPD.</p> <p>Principles incorporated into the SPD.</p>
<p>Design</p> <p>Definition of terms required for ‘good design’ and ‘green design’</p> <ul style="list-style-type: none"> • Sign post to Building Regulations Part L and Part Q and Part M (4) 	<p>Principles incorporated within the SPD.</p>

<ul style="list-style-type: none"> • Ensure homes have access to fresh air, natural light and are well ventilated • Design guidance and architectural support should be offered early in the design process • Maintenance needs to be considered in relation to materials and communal areas • Important to consider site circumstances, e.g. work with site topography • Prioritising people 	
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4.4 A targeted workshop with external stakeholders, developers and interested organisations was to be held on 1st April 2020. This was cancelled due to the Covid-19 situation and design questionnaires were subsequently sent to all invitees (see Appendix 1 for list of Stakeholders) to seek their comments on:

- **Good design** - How successful have Kirklees been in securing good design in new housing developments? Are there any examples of good design in Kirklees or from elsewhere and what are the qualities that make these examples successful?
- **Barriers** - What are considered the main barriers to achieving good design in new housing developments or for extensions and alterations to existing residential properties. Are there any barriers to achieving good design in Kirklees which have been successfully overcome in other local authorities and can you provide examples of these?
- **Design Guidance in the SPD** - What key principles and elements of good design should be included in the Residential Design SPD and what guidance would be helpful to achieve this.

4.5 Questionnaires were received from five respondents. The main issues raised were:

- West Yorkshire Combined Authority: No specific comments on good design in Kirklees. Barriers to good design include the lack of design resource in local authorities, link between planning and highway authorities, under-funding of parks / landscape maintenance, lack of clear guidance, developers relying on standard house types and the rare take up of design review. Design guidance should include inclusive design, reduction of car dominance, addressing the climate emergency, distinctive and contextual design, design of streets and spaces and density.
- Environment Agency: All residential developments should take appropriate measures to reduce flood risk and include flood resilience and include a requirement for residential developments to result in measurable net gains for biodiversity. Distinctiveness and Density were identified as

- Historic England: No specific comments on good design and barriers to good design in Kirklees. Comments on design guidance referred to Historic England's advice notes and sought further detail to be added to policies in the Local Plan,
- Barratt David Wilson: Good design is often iterative and requires compromise and detailed collaborative conversations with officers. Barriers to good design include deliverability and market conditions as well as inconsistent messages from the Council. Key design principles used by Barratt David Wilson align with Building for Life (BfL 12) principles.
- Farrar Bamforth: Good design must be relative to context of the surrounding area, instead of a one size fits all formula, including respecting topography and building materials, working with local developers and seeking to avoid car dominated layouts. Barriers identified as managing conflicts between requirements for density against context, highways and drainage considerations, with house design seen as a secondary consideration. Required design guidance is one that gives flexibility for creativity, it is considered that meeting all policy requirements in full would not necessarily achieve an attractive place to live.

5 Consultation on Strategic Environmental Assessment Screening

- 5.1 As part of the process for developing the Housebuilders Design Guide SPD, an assessment of the requirement for a Strategic Environmental Assessment (SEA) was needed. Consultation on the SEA Screening statement started on 13th July 2020 and finished 31st July 2020.
- 5.2 The council notified the following specified bodies of the SEA screening statement by email inviting comments in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004:
- Environment Agency
 - Historic England
 - Natural England
- 5.3 Responses were received from all three of the consulted bodies. A full summary of the responses received for the SEA consultation can be seen SEA determination statement.
- 5.4 The responses received confirmed the council's position that a further SEA was not required as the SPD will not change or introduce new planning policy over and above the Local Plan and, whilst there may be some environmental effects, these have already been covered in principle in the Sustainability Appraisal of the Local Plan.

6 Public Consultation on the Housebuilders Design Guide SPD

- 6.1 Public consultation on the draft Housebuilders Design Guide SPD took place initially for a 6 week period from 19th October to 30th November 2020. This was extended for an

additional two weeks to the 14th December 2020 (8 weeks in total). The consultation was available on-line and through email and postal comments.

6.2 In compliance with regulations 12, 13 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the following actions were undertaken:

- The draft Housebuilders Design Guide SPD, SEA screening statement and SEA determination statement was published on the council’s online consultation portal.
- Details of the consultation and details of how to obtain hard copies of the documents was displayed in the windows of the customer service centres in Huddersfield and Dewsbury, on the council’s web page and on the council’s social media platforms.
- Statutory consultees, organisations and private individuals that expressed an interest in planning policy and future publication of SPDs (see Appendix 2) were contacted directly by letter or email with details about the consultation, where to view the document, how to obtain hard copies and how to comment.
- A press notice was published in the Huddersfield Examiner on 23rd October 2020 and the Dewsbury Reporter on 22nd October 2020 highlighting the consultation process.
- A feature space was placed on the council website on 19th October 2020 advertising the consultation.
- A press release was posted on Kirklees Together on 19th October 2020 and on the Council’s social media platforms from 19th October 2020.
- A notification email was sent to all councillors on 16th October 2020 detailing the start of the consultation.

6.3 During the public consultation the council also held two presentations to the Agents Forum on 3rd November 2020 and PLC developers/Registered Providers Tuesday 3rd November 2020 to raise awareness of the SPDs and the consultation process.

7 Main Issues Raised and The Council’s Response

7.1 A total of 162 comments (from 26 consultees) were received to the public consultation on the Housebuilders Design Guide SPD. Comments were received from:

Table 3: Number of Consultees

Consultee Group	Number of Consultees
Residents/Individuals	7
Developers/Planning Agents	3
National Organisations	5
Town/Parish Councils	1
Regional/Local Organisations	8
Local Planning Authorities/Councils	2

7.2 Comments were received from the following:

- Barratt and David Wilson Homes Yorkshire West
- Canal and Rivers Trust
- Coal Authority
- Environment Agency
- Historic England
- Holme Valley Parish Council
- Holme Valley Vision Network
- Huddersfield Civic Society
- Natural England
- Persimmon Homes (West Yorkshire) Ltd
- Redrow
- Spen Valley Civic Society
- Sustrans
- Trans Pennine Trail
- Upper Dearne Valley Environmental Trust
- Wakefield Council
- West Yorkshire Archaeological Advisory Service
- West Yorkshire Combined Authority
- West Yorkshire Ecology Service
- Private Individuals (x7)

7.3 A full list of public consultation comments received and the council’s responses to these can be found in Appendix 3. A summary of the main issues raised during consultation, including those from internal stakeholders, is set out below. It summarises the main points and the council’s response to how these issues have been addressed in the SPD.

Table 4: Summary of Main Issues and Council Response

Summary of Main Issue	Council Response
Several respondents made comments regarding the directness of wording. This has led to several changes being made to the text, where changes to wording (e.g. “must” instead of “should”) would accord with Local Plan policy.	There has been several wording changes throughout the document to make it read better
The Planning White Paper consultation and Building Better Building Beautiful Commission report has been raised and stated that the language should be amended to reflect this.	The Building Better Building Beautiful commission report has been included in relevant document in section 2, as it is likely to influence the direction of future policy. The National Model Design Code that has been subsequently published is now included within the document.

Comments received asked how the Council would encourage the use of Nationally Described Space Standards	The wording of Principle 16 has been revised to better link it to Local Plan policy LP24 and the Council’s design aspirations and reflects that these are now necessary for change of use to residential granted under permitted development rights.
Concerns were raised about the wording of Principle 16 requiring homes to meet Accessible Homes standards set out in Part M4(2) of Building Regulations – which are optional requirements.	The wording has been changed to link the wording better with Local Plan Policy LP11 and securing accessible and adaptable homes as part of the overall housing mix.
Concerns were raised that the separation distances set out in para 7.16 do not cover side-to-side or rear-to-side distances	Further text has been added in to explain these distances, but there is an issue that these distances are in the extensions and alterations SPD
Comments were made on the pre-application process including the scope to involve statutory consultees, community engagement and what information is required at this stage.	The text has been amended to identify the role that statutory consultees can have in the development process, with references included in the document to the Council’s Development Management Charter and Pre-application guidance.

7.4 All comments on to the public consultation have been considered in preparing the final SPD. None of these require significant changes to the overall approach. A number of comments supported the preparation of the SPD and specific guidance.

7.5 The main changes to the SPD as a result of comments received are summarised as follows:

- Amendments to ensure that the SPD better reflects policy wording as set out in the Local Plan and national policy, including making the wording of the SPD more direct where appropriate.
- Changing to wording to ensure that there is more clarity as to how the design of development meets wider development challenges.
- Further guidance on advisory separation distances between buildings
- Clarity regarding the use of Nationally Described Space Standards and the provision of adaptable and accessible homes.

7.6 The council has also taken the opportunity to make some minor additional changes to the SPD to provide clarification, corrections, or minor up-dates to text. The key changes are set out in Appendix 4 (please note Appendix 4 does not include changes that are de minimis in nature).

Appendix 1: List of Stakeholders Invited to Workshop and Sent a Design Questionnaire

National Organisation	Regional/Local Organisation	Planning Agents/Developers	Kirklees Network
Age UK CPRE Environment Agency Friends of the Earth Historic England Homes England Home Builders Federation Natural England Sport England Sustrans Yorkshire Sport	Batley & Birstall Civic Society Dewsbury Matters Huddersfield Civic Society Huddersfield Society for the Blind Huddersfield University Kirkburton and District Civic Society Onetel Spen Valley Civic Society West Yorkshire Combined Authority	Acumen Architects Barratt Homes Conroy & Brook Darren Smith Homes Emerson Farrar Bamforth Harron Homes Heppendsalls ID Planning Jones Homes Martin Walsh NLP Planning PB Planning Persimmon Redrow SB Planning Spawforths Storrie Planning Strata	Black Minority Ethnic Network Dementia Engagement & Empowerment Group Disabled Employee Network Green Employee Network Kirklees Neighbourhood Housing Kirklees Visual Impairment Network LGBT Network Well-being User Group Working Carers Support Network Young Employee Network

Appendix 2: Consultee List

Adjoining Authorities	
Barnsley Metropolitan Council Bradford Metropolitan District Council Calderdale Council City of York Council High Peak Borough Council	Leeds City Council Oldham Council Peak District National Park Authority Wakefield Council
Town & Parish Councils	
Cawthorne Parish Council Denby Dale Parish Council Dunford Parish Council Gunthwaite and Ingbirchworth Parish Council High Hoyland Parish Council Holme Valley Parish Council Kirkburton Parish Council	Meltham Town Council Mirfield Town Council Morley Town Council Ripponden Parish Council Saddleworth Parish Council Sitlington Parish Council Tintwistle Parish Council West Bretton Parish Council
Organisations	
Age UK BL Ecology British Telecom Brooks Ecological Calderdale and Huddersfield NHS Canal & River Trust Coal Authority Crestwood Environmental Environment Agency Environment Kirklees FCS Consultants Fields in Trust Foundation Trust Connect Housing CPRE Dewsbury Matters England Hockey English Cricket Board Forestry Commission England Greater Huddersfield Clinical Commissioning Group Highways England Historic England Holme Valley Vision Network Homes and Communities Agency	Mab Environment and Ecology Ltd Metro Middleton Bell Ecology Mid Yorkshire Hospitals NHS Trust Natural England National Grid National Trust Network Rail Newsome Ward Community Forum NHS Property Services Northern Gas Network North Kirklees Clinical Commissioning Group NTL Group Ltd Quants Environmental RDF Ecology Rugby Football League Rugby Football Union Sheffield Football Association Spenn Valley Civic Society Sport England South West Yorkshire Foundation Trust Sustrans Trans Pennine Trail UDVET UK Active

House Builders Federation Huddersfield and District Archaeological Society Huddersfield Birdwatchers Club Huddersfield Civic Society Huddersfield University JCA Ltd Keep Our Rural Spaces Kirkheaton Future Kirklees Active Leisure Kirklees Badger Group Kirklees Neighbourhood Housing Locala Local Enterprise Partnership Leeds City Region	Unity Housing Association West Riding Football Association West Yorkshire Archaeology Advisory Service West Yorkshire Bat Group West Yorkshire Combined Authority West Yorkshire Ecology West Yorkshire Police Authority Yorkshire Water Services Yorkshire Wildlife Trust Whitcher Wildlife Ltd Wildscenes Woodland Trust WYJS Yorkshire Housing
Planning Agents & Developers	
Acumen Architects AHJ Architects A N Designs Avant Homes Yorkshire Avison Young Bailey Smailes Solicitors Bamford Architectural Barratt Homes Bartle & Sons Barton Willmore Bellway B K Designs BNP Paribas Real Estate UK Bradley Stankler Planning Bramleys Carter Jonas Chris Thomas LTD Conroy Homes Dacre, Son & Hartley Darren Smith Homes Deloitte Design Line Architectural DK Architects ELG Planning Fairhurst Farrar Bamforth Associates Ltd F M Lister & Sons Gladmans Hallam Design Associates	Kirkwells K Rouse Malcolm Sizer Planning Limited Martin Walsh Architectural MD Associates MWP Planning NLP Planning NJL Consulting One17 Chartered Architects Paul Butler Planning Paul Matthews Architectural Persimmon Homes Peacock and Smith QUOD Rapleys LLP RG P LTD Riva Homes Robert Halstead Chartered Surveyors & Town Planners Robertshaws Chartered Surveyors Rouse Homes Sanderson Weatherall LLP Savills SB Homes Limited Spawforths SSA Planning Limited Steven Abbott Associates LLP Strata Storrie Planning

Harron Homes Hawdon Russell Heppendsalls Hourigan Connolly Iain Bath Planning Ian Baseley Associates I D Planning Indigo Planning JWPC Chartered Town Planners	Taylor Wimpey Tetlow King Planning Limited Turley Associates Vernon and Co Wake Architects Walton and Co Planning Lawyers Yorkshire Country Properties Younger Homes
Private Individuals	
Approximately 580 individuals were invited to comment, including other organisations and community groups not listed above.	

Appendix 3: Full list of comments received on the public consultation and the council's response.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB56	The Coal Authority	All document	Having reviewed the SPD, the Coal Authority has no specific comments to make.	Having reviewed the SPD, the Coal Authority has no specific comments to make.	No change. Comment noted.
SPD_HB63	Trans Pennine Trail	All document	The Trans Pennine Trail partnership supports these documents and provides further detail to evidence commitment to accessibility and the provision of green corridors.	The Trans Pennine Trail partnership supports these documents and provides further detail to evidence commitment to accessibility and the provision of green corridors.	No change. Support noted.
SPD_HB4	Private Individual	1.1	How much notice does the council take of local communities who know the area very well? I am particularly thinking of developing on known flood plains.	Listen to people.	No change. Comment noted.
SPD_HB10	Private Individual	1.1	it is my suggestion that at the planning stage that plans for houses should contain a greener solution to help with the sustainability of the planet and its resources and should include solar panels integrated into the Roofs. Also should contain water butts for using rain water capture for watering plants and for flushing of toilets and washing of cars etc	solar panels for energy and water butts for reducing water consumption	Proposed change. Amend Principle 18: "New proposals should contribute to improving the environmental sustainability of the development, by ensuring the fabric and siting of homes reduce their reliance on sources of non-renewable energy. <u>Proposals should seek to design water retention into proposals.</u> " Add new paragraph at end of section of 9.3:

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<i><u>“The design of homes should look to include measures which increase the retention of water, and are efficient in their use of water by considering elements such as rainwater harvesting, greywater recycling, the use of water butts”</u></i>
SPD_HB19	Natural England	1.1	<p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>		<p>No change.</p> <p>Comment noted.</p>
SPD_HB26	Wakefield Council	1.1	<p>Wakefield Council have no specific comments on this document. The Council supports and welcomes its introduction.</p>		<p>No change.</p> <p>Support noted</p>
SPD HB73	West Yorkshire Combined Authority	1.1	<ul style="list-style-type: none"> We are pleased that our comments provided in September have been incorporated into this version which is welcomed. 		<p>Proposed Change.</p> <p>Amend para 4.1 Masterplanning:</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<ul style="list-style-type: none"> The editing of the documents needs to be checked to avoid jargon like 'connectivity' and 'modal filter' – where there is no alternative wording then there needs to be a glossary. There is a lot of emphasis in the document about encouraging solar gain. Increased levels of insulation and south facing windows will quickly lead to overheating – and this problem is becoming worse with climate change. Passive solar construction only works where the extra heat gain can be balanced with thermal mass and solar shading – if you are encouraging solar gain then this needs to be qualified with some text about how to avoid overheating. It would be useful to look at all the uses of the word 'should' to see whether they can be replaced with 'must'. Especially where the phrase 'should consider' is used – this language will not be enough to persuade some developers to act. 		<p><i>“Local Plan Policy LP5 sets out the expectations for site masterplans, which will be sought where feasible and appropriate. This may be including where there are multiple landowners, several sites in a focused area or a large site that will take a number of years to build out. A masterplan should <u>must</u> be developed at an early stage and form the basis of subsequent planning applications on the site. A masterplan should <u>for larger sites will be prepared by a multi-disciplinary team and larger sites could benefit from the input of a team of architects and</u> consider using <u>use design competitions to promote new ideas and innovation.</u> “</i></p> <p>Amend para 4.1 Design and Access Statements</p> <p><i>“These should <u>are required to accompany major applications...</u> “</i></p> <p>Amend para 4.1 Design review:</p> <p><i>“design review should be undertaken by an independent body and provides can <u>provide advice to applicants...</u>”</i></p> <p>Amend para 4.1 Health Impact Assessment:</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p><i>“Health Impact Assessments can identify measures to maximise the health benefits of the development and avoid any potential adverse impacts. As well as considering impacts on health infrastructure and/or the demand for health care services, this can also influence the design of the proposal. <u>A Health Impact Assessment will be required for all proposals likely to have a significant impact on health and wellbeing.</u>”</i></p> <p>Amend Principle 2:</p> <p><i>“New residential development should proposals <u>will be expected to respect and enhance the local character of the area by...</u>”</i></p> <p>Amend Principle 3:</p> <p><i>“Development Site Framework should <u>will identify the purpose of each part of the site and help guide the site’s development, setting the development parameters early in the planning process.</u>”</i></p> <p>Amend para 6.11:</p> <p>Replace “connectivity” heading with “walking and cycling connections”</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p>Amend Principle 4: <i>"Net development density is expected to achieve at least 35 dwellings per hectare, though higher densities are supported in areas in or adjacent to town centres with a high level of which are well served by public transport connectivity and to secure more sustainable forms of development..."</i></p> <p>Amend para 7.14: <i>"The direction of prevailing winds and sunlight influence the microclimate of outdoor spaces, the amount of light homes received, the capacity of homes to be optimised for <u>passive solar construction</u> solar gain and the capability of a site to deal with extreme weather events."</i></p> <p>Amend Principle 5 Design and Access Statement Prompt: <i>"Are buildings on the site orientated to take account of prevailing winds and to maximise for solar gain <u>allow for passive solar construction</u>"</i></p> <p>Amend Principle 7:</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p><i>“The integration of green infrastructure and <u>accessible open space</u> should <u>must</u> be considered early in the design process by assessing:</i></p> <ul style="list-style-type: none"> <i>• the site’s context;</i> <i>• connectivity with <u>the ability to make connections with wider green infrastructure networks and</u></i> <i>• the multi-functional role green infrastructure can perform”</i> <p>Assess and consider the viable retention of <u>Proposals should retain</u> existing features within the site, such as valuable trees, natural wildlife habitats and landscape features.</p> <p>Green infrastructure can be provided through building features such as green roofs and green walls and through the design of streets to include street trees, <u>and trees within residential plots and open spaces.</u></p> <p>Open Space, particularly for recreation, should be located at the heart of the site and designed to help create identity.”</p> <p>Amend 2nd sentence paragraph 7.26:</p> <p><i>“Open Space for recreation should be located within easy reach of all residents</i></p>

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					<p><i>on the site and should be designed to be, forming an accessible space at the heart of new development. with good connectivity.</i></p> <p>Amend Principle 8:</p> <p><i>“For all sites in elevated areas, the appearance in the wider landscape should be considered and with applicants should show demonstrating how development respects the topography of the site <u>and its surroundings.</u>”</i></p> <p>Amend Principle 9:</p> <p><i>“Proposals should <u>are required to provide for a measurable net gains in biodiversity and, with ecological enhancement should be integral to the design of the development. At the outset of the design process the wildlife habitat network and Habitats of Principal Importance should be considered in addition to protected species.</u>”</i></p> <p>Amend Principle 10:</p> <p><i>“Site access should <u>will</u> recognise the different needs of people walking, cycling and using cars and prioritise the needs of</i></p>

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					<p><i>people walking and cycling, to encourage sustainable modes of travel.”</i></p> <p>Amend last sentence of para 7.39: <i>“Modal filters, barriers that restrict could be used to reduce access in existing streets for vehicular traffic but still maintain access for walking and cycling, can be used to reduce the impact of through-traffic and make residential streets a more pleasant environment.”</i></p> <p>Amend Principle 11: <i>“Streets should must be able to serve emergency and service vehicles, maintain low vehicular speeds and successfully integrate on-street car parking.”</i></p> <p>Amend Principle 12: <i>...and where appropriate working with bus operators to improve bus connectivity facilitate bus services through the site; and seeking enhancements to existing bus services.</i></p> <p>Amend Principle 14: <i>“The design of windows and doors should is expected to relate well to the street frontage and neighbouring properties and reflect local character in style and materials. Innovation for energy efficiency</i></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p><i>is encouraged, particularly for maximising solar gain <u>to allow for passive solar construction.</u></i></p> <p>Amend Principle 19:</p> <p><i>“Provision for waste storage and recycling should <u>must</u> be incorporated into the design of new developments in such a way that it is convenient for both collection and use whilst having minimal visual impact on the development.”</i></p>
SPD_HB64	Trans Pennine Trail	1.1	Good design should also include ‘fully accessible’	Good design should also include ‘fully accessible’	<p>No change.</p> <p>The definition is from the National Design Guide.</p>
SPD_HB72	West Yorkshire Combined Authority	1.1	<p>Section 1 - The introduction could include a vision statement setting out why design is so important to Kirklees – what is special about the district in terms of architecture, built and natural environment. It could talk about the climate emergency and Kirklees’ targets and ambitions for walking and cycling, as well as the health crisis of physical inactivity which can be addressed by changes to the physical environment.</p>		<p>Proposed change.</p> <p>Amend paragraph 1.1:</p> <p><i>“The purpose of this supplementary planning document (SPD) is to set out what the Council considers to be good residential design, <u>to raise the quality of housing that is delivered in the district, supporting the Local Plan Vision.</u> The main aim is to ensure that the district’s future housing development has the required high quality and socially inclusive design to help deliver</i></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p><u>quality places. The publication of the SPD provides the Council's response to the Government's emphasis on design quality being embedded within the planning system, following the publication of the National Design Guide. The document seeks to support the delivery of residential development in Kirklees that supports the Council's Climate Emergency Action Plan, for Kirklees to be completely carbon neutral by 2038.</u></p> <p>Amend paragraph 1.2:</p> <p><i>"The SPD provides applicants and developers with detailed guidance about the implementation of Kirklees Local Plan policy LP24 'Design' and other relevant Local Plan policies within the context of national planning guidance to create high quality buildings and places. <u>The document considers how the distinctive built and natural environment in Kirklees can help shape high quality residential development. The guidance will be a material consideration in the determination of planning applications for all residential development, including proposals for apartments and student housing.</u>"</i></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB57	Trans Pennine Trail	1.1	Good design should also include 'fully accessible'.	Good design should also include 'fully accessible'.	No change. The definition is from the National Design Guide.
SPD_HB37	Upper Dearne Valley Environmental Trust (UDVET)	1.1	<p>We would like to put forward the following suggestions for change:-</p> <ol style="list-style-type: none"> 1. In line with the current national move to 'planning rules', the document should not be termed a 'Guide' – these should be 'Requirements'. Unfortunately, for developers intent on getting their own way, 'Guide' implies 'optional'. We feel the Council will not achieve its 'Purpose Statement' without this change of emphasis. Additionally, a document about 'Requirements' provides better on-the-job support to Planning Officers. 	In line with the above, there is scope to tighten up wording to be more directive. i.e. 'will' not 'may', 'must' not 'should' etc. The argument for 'flexibility' is often promulgated, but often this is taken too far and focus is lost. We implore the Council not to retreat from being more directive, giving developers 'wriggle room' to avoid what is required, best practice and truly quality outcomes.	Comment noted. The SPD is unable to introduce new policy and so must reflect local plan and national policy, however the wording of the document has been reviewed to ensure it is consistent with national and local policy and that it can provide more direct wording.
SPD_HB70	Sustrans	1.1	<p>Intro</p> <p>About Sustrans</p> <p>Sustrans is the charity making it easier for people to walk and cycle. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute.</p> <p>We believe Initiatives should focus on changing streets and places to make walking and cycling the most</p>		<p>Proposed change.</p> <p>Add reference to the Government's Gear Change Walking and Cycling Vision (2020) in Section 2.</p> <p>Add text to para 7.39: "<u><i>In West Yorkshire and York, the City Connect programme works in partnership with a range of organisations to support the provision of new active travel routes to ensure that</i></u></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>attractive option for short, everyday journeys in urban areas – creating more liveable neighbourhoods. Support should be provided around this to help people change their behaviour. Therefore, there needs to be a mix of policy</p> <p>interventions (that make driving less attractive), infrastructure, and behaviour change projects to create real modal shift.</p> <p>Sustrans, in coalition with a number of other cycling and walking organisations a network consisting of leading walking and cycling organisations such as British Cycling, Living Streets, The Ramblers, and Cycling UK and Bicycle Association, are calling for 5% of the transport budget to be spent on walking and cycling, rising to 10% over the five years of the next spending round (from 2020/1 to 2024/5) to support a new CWIS.</p> <p>We are also asking for the following:</p> <p>Speed > reduced speed limits</p> <p>Space> adopt and implement best design practice</p> <p>Safety> Revise Highway the code to improve safety for cyclists and walkers, particularly at junctions</p>		<p><u>walking and cycling opportunities are accessed by a range of communities, applicants should ensure proposals complement the provision of new walking and cycling infrastructure.”</u></p> <p>The SPD, as Section 3 identifies, seeks to ensure the design of proposals satisfies a range of drivers.</p> <p>Principle 12 requires new schemes to ensure that anti-social car parking is discouraged.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>Priority> prohibit pavement parking, make streets more accessible</p> <p>Culture> provide training and behaviour change programmes to create active travel behaviour</p> <p>How do the documents align with National Policy, Regional and local context</p> <p>It's important to recognise that planning documents reflect ways to achieve national targets and incorporate the key recommendation specified in the Cycling Walking Infrastructure Strategy (CWIS) and help to make cycling and walking the natural choice for shorter journeys, or as part of a longer journey. The CWIS target of doubling the amount of journeys made by walking and cycling by 2025 will ever be achieved if cycling is not prioritised and embedded within policy, key strategies, and documents.</p> <p>How will the documents support wider regional aims of the City Connect Programme, who having just delivered big ticket infrastructure schemes such as Cycle Superhighway 1 and 2, are trying to prioritise and elevate the region as a place which is progressive and cycle friendly.</p> <p>The impact on air quality caused by building new roads also needs some serious consideration, reference and acknowledgement. Modelling results would demonstrate this and should be an elementary component of all future</p>		

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>proposals. Air Quality is an increasingly potent threat attributable to 36000 premature deaths which documents need to consider.</p> <p>How do current documents support and facilitate the delivery of Local Cycling Walking Infrastructure Plans for Kirklees. Do documents align and reflect the walking and cycling strategy for Kirklees?.</p> <p>Are the benefits of safe and prioritised walking and cycling infrastructure fully realised in the documents? Through prioritising local cycle and walking routes and emphasising their role in transforming the way in which we plan, travel, live and spend our leisure time, we can seriously start to tackle existing and future challenges of poor air quality, congestion, health inequality, and over population.</p> <p>Sustrans are working with stakeholders across the nation to ensure design standards are consistent, embedded in policy and universally applied. We value planning documents which recognise this and keen to support local authorities through offering training packages which give officers and members the opportunity to learn about the importance of good design standards and cross sector collectivism.</p> <p>Closing remarks</p> <p>Planning and design documents which support Infrastructure improvements that embed active travel, is an important part of a strategy for achieving significant</p>		

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>physical activity, environmental, and health gains in the population.</p> <p>Public transport and active travel themes should be integrated into documents.</p> <p>Good, safe pedestrian and cycle access and routes along specified corridors will also increase likelihood of multi modal journeys for residents and visitors. Some changes, e.g. improving pedestrian routes, may promote walking but not reduce car trips. Other measures such as changing parking provision, may be more effective in reducing car trips. This is also important when considering impacts on congestion and air quality.</p> <p>Travel behaviour is complex, so it is unlikely that small scale environmental changes alone will result in substantial increases in walking and cycling, but it's an excellent place to start!</p> <p>It does not necessarily follow that solutions have to be complex, as long as they are part of a more comprehensive public health strategies that address many wider factors such as housing, planning and employment policy.</p>		
SPD_HB92	Historic England	1.1	<p>We consider that there as a whole the document may be made more relevant to Kirklees by aiming to provide specific commentary on particular points that may be relevant to parts of the district under each individual section. This could highlight the high density of terraced housing in some locations, the topography,</p>		<p>No change.</p> <p>Comment noted.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					Section 5 directs applicants to demonstrating how a proposal responds to the local character and context.
SPD_HB127	Holme Valley Vision Network	1.1	<p>SUMMARY</p> <p>“We make recommendations regarding the use of design review, arguing that it should be based in empirical data on the links between built form and well-being, on a full understanding of the local natural and built environments and on clear evidence of local preferences emerging from the creation of local plans and supplementary planning documents.</p> <p>We also see the potential for an adjusted, more community-engaged design review process to be applied at the policy stage whether it be local plan or supplementary planning document.”</p> <p>Living with Beauty</p> <p>Building better Building Beautiful Commission 2020</p> <p>The production of supplementary planning documents gives councils the opportunity to build on local plans and, in conjunction with local people, the chance to influence future development in ways that enhance place and the well-being of citizens. Our comments below are based on this premise and our feedback is intended to help Kirklees Council improve its draft documents.</p> <p>There are several areas where improvements, in our view,</p>		<p>The SPD is unable to introduce new policy and so must reflect local plan and national policy, however the wording of the document has been reviewed to ensure it is consistent with national and local policy and that it can provide more direct wording and to add further clarification.</p> <p>The Government’s response to the Planning White Paper will be reviewed when its published.</p> <p>Proposed change.</p> <p>Appropriate changes have been made to provide more direct wording and further clarification. See comment HB73.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>could be made to the documents, particularly the Housebuilders Design Guide which attracted the bulk of comments. These relate in particular to the consultation process and the ways in which people could be better placed at the centre of the planning process, to wider understanding of the placemaking concept and to enhance the actions needed to respond to the climate change emergency.</p> <p>The better definition of terms used in the documents would also help the use and understanding of the document's intent.</p> <p>To ground our comments on current practice, we have carried out surveys of local developments, using criteria drawn from the Housebuilders Design Guide. The four reports, compiled by individuals working independently, and comments from three others are appended.</p> <p>We would be interested to know how the Council intends to move from the current standards, which leave a lot to be desired, to the higher standards contained in the Guide. How will the Council persuade or compel developers to comply?</p> <p>To help the Council with enforcement we make the following pleas:</p> <ul style="list-style-type: none"> ➤ Be ambitious and aim for the highest standards. Local people deserve beauty ➤ Be assertive in applying these standards 		<p>No change.</p> <p>The suite of Quality Places SPDs and guidance aims to improve the quality of residential development in Kirklees through good design, including responding to the climate change emergency.</p> <p>No change.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>➤ Be serious about the climate change</p> <p>➤ Be confident and know the Council has the support of local people in delivering these imperatives</p> <p>General comments</p> <p>There is no reason for us to question the technical accuracy of the documents. They are what we have come to expect from Kirklees Council's Planning Department during the long drawn out process of developing the Local Plan.</p> <p>While we accept that planning has to operate under the rules and regulations currently in force, this does not mean that documents such as these should not look forward and anticipate foreseeable changes. We find the documents reactive not forward looking.</p> <p>We appreciate that things have changed considerably over the five years it has taken to get this far and there are now different imperatives. The most important change to have taken place in this time is the recognition of the dangers climate change presents not least from flooding, air pollution, and adverse weather incidents. Being in the Pennines, some of the Kirklees settlements are at high risk. It is therefore regrettable that the design documents do not grasp the opportunity to add to developers' and others in the construction industry's understanding of these impacts and show them how to make changes to their practice to reduce carbon</p>		<p>The Government's response to the Planning White Paper will be reviewed when its published.</p> <p>The purpose of the SPD is to set out what the Council considers to be good residential design, to raise the quality of housing that is delivered in the district, supporting the Local Plan Vision. The SPD provides further guidance on local and national policies to achieve this and should be viewed in the context of other Local Plan and other national planning policies. Sites have been allocated through the Local Plan process, so it's important that they are put at the centre of the 'Drivers of Site Design' – however this acknowledges all the social, economic and environmental impacts that influence design.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>emissions and mitigate the risks.</p> <p>While the documents overall may be technically correct, it is not what they contain that causes concern but what else is omitted.</p> <p>Relying as they do on the existing modes of thinking, the documents do not reflect the developing thinking as outlined in the 2020 White Paper 'Planning for the Future' and the work of organisations such as the Building Better Building Beautiful Commission. It is also a shame that greater use has not been made of the Design Council's ten principles of design review. Rather than just cite the characteristics, they would have provided a useful framework and would have prevented the omission of some key factors.</p> <p>The documents place their focus on places for things not places for people. They discuss building houses not creating homes and while they outline considerations for streets and estates, they do not aim to develop neighbourhoods and communities.</p> <p>There are a few references to place shaping and place making but there appears to be a misunderstanding of these terms. Placemaking is not about constructing buildings and places. It is about creating spaces for people to live and work in and to visit. Places where they want to be, be with others, thrive and enjoy themselves.</p> <p>People are missing from the documents. This is evidenced in the Housebuilders Design Guide which places the site at</p>		<p>Proposed change.</p> <p>Amend Principle 16:</p> <p><u>"All new homes will be expected to be compliant with the government's technical housing standards for <i>should aim to be</i> accessible and adaptable homes <i>to meet the changing needs of occupants over time</i> as set out in part M4 (2) of the <i>in accordance with</i> Building Regulations. <i>The provision of homes that meet these standards should be considered within the housing mix of the wider site in line with Local Plan policy LP11 (Housing Mix and Affordable Housing)."</i></u></p> <p><u>The council will encourage the use of the Nationally Described Space Standards to ensure new dwellings <i>All new build dwellings should have sufficient internal floor space to meet basic lifestyle needs and provide high standards of amenity for future occupiers</i> have sufficient internal floor space to meet basic lifestyle needs. <i>Although the government has set out Nationally Described Space Standards,</i></u></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>the centre of the drivers of site design; not people, not the community.</p> <p>Their written style is bureaucratic which reduces their accessibility. But this is not surprising as they are aimed at professionals operating in the planning and construction sectors. Despite a more popular presentation style of the Housebuilder Design Guide, its stated purpose is 'to guide developers' and to acts as 'a material consideration in the determination of planning applications'. It is not intended to help members of the public understand and influence the sorts of development that will take place in their communities. This is regrettable.</p> <p>This and the other documents could do with some tight editing. They are verbose, contain significant amounts of duplication and their use of generalised and conditional language makes interpretation difficult. In places they are over-prescriptive; in others ambiguous.</p> <p>They are littered with imprecise and highly subjective terms such as 'good design', 'high quality' 'accessible' 'inclusive', 'quality' and 'fit for purpose'. They are bland and repeatedly use conditional phrases such 'considering the use of', 'encouraged to' and 'where practicable'. These words create loop holes and miss the opportunity to improve standards of design. For example, the Housebuilders Design Guide says; "The Council will encourage the use of the Nationally described space standards to ensure new dwelling have sufficient internal floor space to meet basic lifestyle needs". Paragraph 130 of the National Planning Policy Framework says</p>		<p><u>these are not currently adopted in the Kirklees Local Plan. The council will seek to adopt such a policy in the future in accordance with evidence and in the meantime will seek to ensure high quality living environments through the application of Local Plan policy LP24 (Design)."</u></p> <p>Comments noted.</p> <p>Changes have been to the SPD to reflect comments received on the public consultation.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>“permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.” Why is the Council afraid to use the powers it has to influence and to drive up standards?</p> <p>It is accepted that ‘good design’ is a term used by planning professionals and is used in the Nation Design Guide but its use in documents such as these be qualified by the identification of who is making the judgement. These terms all have different meanings depending on who is using them.</p> <p>There are many architectural awards for buildings deemed to be of ‘good design’. For example the Park Hill Flats in Sheffield won accolades only to be pilloried in later years. A house may be of wonderful design, and fit for a builder’s purpose and bring ‘delight’ by returning a high profit but for the householder it may be a disaster as faults and failures resulting from poor quality materials and work methods show themselves over the years.</p> <p>There is a difference between ‘good design’ and well-designed.</p> <p>The Building Better Building Beautiful Commission has moved away for the use of such vague terms and in ‘Living with Beauty’ prefers to use ‘beauty’ as an alternative construct. It also recommends that there should be a re-discovery of civic pride in architecture and that the people</p>		

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>who live in the places be involved in the design process and awarding the prizes for the most popular and beautiful buildings. Kirklees Council would be well advised to look to the soon to be formed Design Body for guidance on how to develop design codes and guides such as these that are forward looking and ambitious. This work is being led by Nicholas Boys Smith of Create Streets with whom we already have a good working relationship.</p> <p>The consultation statement, perhaps, explains why the documents have developed in the way they are now presented. It states; “the purpose of the SPD is to inform prospective applicants, agents, architects, members of the public with an interest in an application, elected members of the Council and other decision-making bodies”. There is no place for neighbours, interested local groups or others who are concerned about the impact developments have on their wider community. In future, It is possible that each locality in Kirklees will be required to have its own design code similar to the Neighbourhood Development Plan produced by the Holme Valley Parish Council in partnership with local groups and extensive public consultation. The production of these guides along these lines will give the Council the chance to be ahead of the curve.</p> <p>The Council claims to have engaged with internal and external stakeholders to “understand their expectations and priorities to help inform the scope and content of the Housebuilders Design SPD”. The list of those sent a questionnaire is a clear indication of the Council’s thinking about the identity of stakeholders. Of the 24 listed 5</p>		

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>appear to be local community groups but 9 are developers.</p> <p>The Design Council states; “Local planning authorities are expected to effectively engage their local community when developing design policies, as set out in paragraph 125 of the Framework.” It is hard to see how this guidance has been followed.”</p> <p>No groups from the rural parts of Kirklees were invited to take part. This is a serious omission and begs questions about the effectiveness of the Council’s consultation process. The one used here has inevitably resulted in the documents being skewed in favour of developers and urban issues. It is difficult to see, therefore, how the design guides can be inclusive when significant stakeholder groups have been excluded for the process of developing them.</p>		
SPD_HB65	Huddersfield Civic Society	1.1	<p>Huddersfield Civic Society (HCS) welcomes the opportunity to comment on four guidance documents published by Kirklees Council in October 2020 as Supplementary Planning Documents (SPD), which it hopes “will encourage a higher standard of design of residential developments in the area”, these being:</p> <ul style="list-style-type: none"> • Open Space SPD • Housebuilders Design Guide SPD • House Extensions and Alterations SPD • Biodiversity Net Gain in Kirklees Technical Advice Note 		<p>No change.</p> <p>Comments noted.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>We note a government summary of the purpose of SPDs at https://www.gov.uk/guidance/plan-making:</p> <p><i>“Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.”</i></p> <p>Introduction and Comments applying to all documents</p> <p>HCS applauds the intentions underlying many of the proposals contained in the SPDs regarding how national and local planning policies, as stated in the Local Plan, should be interpreted in Kirklees. However, we are concerned that, in their current – or similar - form, we believe they may well fail to achieve their objectives.</p> <p>There is much general or introductory text which may fit better in a planning textbook rather than in an SPD, eg “Food Growth: Green space on the site can be used to grow food and could form part of a wider urban agriculture scheme” and “a Design Code can set out a set of rules regarding the scale and massing of new homes; but allow for a rich diversity in architectural styles”.</p>		<p>No change.</p> <p>The purpose of the SPD is to provide detailed guidance to developers, members of the public and interested parties on the implementation on policies set out in the Local Plan.</p> <p>The council’s Development Management Charter sets out the process for consulting on planning applications.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>Whilst some text is specific to Kirklees much is not, so does it belong in a Kirklees SPD? Also, some important items are omitted, eg a requirement for consultation on major residential developments with affected residents in neighbourhoods nearby and to state how this should be done.</p> <p>In attempting to cover the application of policies to many different development circumstances it becomes difficult to follow what does, or does not, apply in any one specific circumstance, eg in a conservation area or in a space-constrained site. Which advice items here can be ignored if they conflict with a requirement stated in the relevant Conservation Area Appraisal? What happens if the shape or slope of a site does not allow 35+ dwellings per hectare?</p> <p>The coverage of a large number of local and national policy items, many of which are imprecise as well as advisory, potentially results in a higher level of subjectivity in how many of these advisory items might be interpreted – and therefore assessed - for approval or rejection. This may result in an increase in the number of Planning disputes and appeals. We also note several advisory items have examples which appear to ‘water down’ NPPF policy statements.</p> <p>HCS also finds it hard to see what, in some of these items, might help and inspire an individual, business or hoped-for Developer to come to Kirklees and improve our built and natural environment, rather than go to another district that might offer either greater simplicity of</p>		<p>No change.</p> <p>The Government’s response to the Planning White Paper will be reviewed when its published.</p> <p>No change.</p> <p>Comments noted.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>guidelines or more certainty of outcome. Many of the images that accompany sections of the guide refer to commendable developments outside Kirklees, e.g. by CITU in Leeds, but do not necessarily map clearly to a specific requirement for a developer to include in a typical development in Kirklees.</p> <p>It is also unclear how these SPDs might fit with possible changes that may be proposed along the lines of the government's recent "Planning for the Future" White Paper and whether time might be better spent now on matters such as preparing the type of Design Guide mentioned in the White Paper.</p> <p>HCS sees three possible approaches to address these concerns:</p> <ul style="list-style-type: none"> • Specifying requirements in more detail and with precision – an applicant then knows exactly what it will have to do and can therefore be more certain what will, or will not, be approved. Example: an applicant must show how new housing will be oriented so that xx% of the volume of houses will be supplied from onsite renewable energy, stating how this percentage will be met. • Covering a much smaller number of key local plan policy items of specific importance in Kirklees, stating clearly which will be the key factors when a submission is assessed. • Removing the duplication with other documents, retaining text that points to the relevant clauses 		

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>in those documents and then making clear the clarifications specific to Kirklees.</p> <p>We appreciate that these alternative solutions might themselves introduce further complications, the first because care would be needed not to fall foul of the legal requirement (referenced previously) for an SPD not to “introduce new planning policies” and the second because of there possibly not being an agreed single set of priority items that covers all common planning applications. The third, while meaning there needs to be more cross referencing, would potentially mitigate some of the issues with the first two and could provide a more focused approach to Kirklees requirements. However, this only goes to show why we think an attempt to use SPDs to provide an additional layer of guidance across the full scope of the approved Local Plan policies leaves the door open to ambiguity.</p>		
SPD_HB135	Holme Valley Parish Council	1.1	<p>The Parish Council welcomes a number of elements within the proposal.</p> <p>→ Socially inclusive design</p>		<p>No change.</p> <p>Support noted.</p>
SPD_HB126	Environment Agency	1.1	<p>General point</p> <p>We found the section and paragraph numbering confusing as they are duplicated in places, for example there is both a Section 5.1 and a paragraph 5.1, which makes it difficult when referring to particular parts of the document. It may lead to less confusion if you could consider changing the paragraph numbers to 5.1.1, etc.</p>		<p>Proposed change.</p> <p>Correct formatting issue.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB134	Holme Valley Parish Council	1.1	<p>The Housebuilder Design Guide SPD adds little clarity in terms of Kirklees" specific requirements to what is already available in the National Design Guide.</p> <p>It is important that the SPD requirements are clear and additional to the documents above the SPD in the hierarchy. The Parish Council believe that the Housebuilder Design Guides SPD needs to be both clearer and more direct, detailing instructions and „must dos" rather than guidelines which can be ignored.</p> <p>It is important that developers properly understand their obligations to those living in the area affected by their development and know what they must do in every circumstance.</p>		<p>Proposed change.</p> <p>Appropriate changes have been made regarding direct policy wording. See comment HB73.</p>
SPD_HB149	Redrow	1.1	<p>General Comments</p> <p>In our view the guide is overly focussed on urban, high density schemes with much of the supporting photographic examples including terraced, town-house and apartment developments. More balance should be provided through examples of high quality lower density schemes, including detached dwellings and more sub-urban or semi-rural settings. Many of the design principles advocated in these examples could not be reasonably applied to non-urban sites and the guide should reflect this.</p> <p>We have focussed our other comments on the 19 Principles which underpin the SPD.</p>		<p>No change.</p> <p>Comment noted.</p>
SPD_HB146	Holme Valley Parish Council	1.1	Overall		No change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<ul style="list-style-type: none"> • Welcome the issuing of these documents, which supply greater detail to supplement the provisions of the Local Plan. • Welcome being given the opportunity to comment on the documents. • Welcome the clarity of presentation • Welcome the frequent references to climate change / sustainability / biodiversity in the texts of all documents but there is no sense of urgency, given that Kirklees and HVPC have declared a climate emergency. Section 4.4 Sustainable design in SPD Extensions and alterations is noted. <p>General Response:</p> <p>Overall, the SPDs which are generally clearly laid out and provide a useful guide for applicants across the topics covered.</p> <p>They are in many ways aligned with the more detailed information within the Holme Valley Neighbourhood Development Plan which articulates more specifics about elements such as our landscape and built character and gives the views of our community. This is important as the SPDs are written from a developer's perspective so we hope that they can be used in conjunction with the NDP to better understand the relationship between buildings and the community they sit within.</p>		<p>Comments noted and welcomed.</p> <p>No change.</p> <p>Comments noted and welcomed.</p> <p>No change.</p> <p>The suite of Quality Places SPDs and guidance aims to improve the quality of residential development in Kirklees through good design, including responding to the climate change emergency.</p> <p>Comments noted.</p> <p>Comments noted.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>Climate change and the need to act on the climate emergency is reflected in the SPDs but not expressed in the strong terms required to drive real action. For example, the Householders Design Guide only encourages or supports renewable technologies / shared energy projects rather than requiring these things to be considered as standard and only not applied if rationale is provided.</p> <p>It is important that new houses are built with solar panels, ground source heating etc. considered seriously from the start, not left to individual homeowners to add later. Many of the new developments in the valley do not seem to include these and indeed, utilities often appear to be added to and put under considerable pressure thereby causing problems for existing residents. The utilities should be enhanced, and recent problems have been visible such as recent flooding at the new housing in Scholes and lack of sufficient electrical supplies to support the promised car charging provision in Hade Edge.</p> <p>The House Extensions and Alterations SPD is an extremely useful document providing a full range of positive and negative examples and we welcome this clarity which should be very helpful to those seeking to extend or alter their homes.</p> <p>Overall, we welcome the opportunity to contribute to these SPDs and the additional clarity they bring. Many terms within the SPDs are subjective such as referencing character, distinctiveness and public views and we recognise that this challenge of balancing specificity with</p>		<p>Comments noted.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>the general values of an area is a challenge for all planning documents.</p> <p>However, we hope that together with the Holme Valley specifics of the NDP, these SPDs will provide a clearer articulation of what is acceptable in the future.</p>		
SPD_HB136	Holme Valley Parish Council	1.2	<p>The Parish Council welcomes a number of elements within the proposal.</p> <p>→ SDP guidance will be a material consideration in determining planning applications</p>		<p>No change.</p> <p>Support welcomed.</p>
SPD_HB147	Redrow	1.2	<p>The SPD potentially has significant implications for housebuilders in Kirklees. Redrow have developed a number of successful housing schemes in the Borough, including most recently at Scissett and Thongsbridge. We have included images of these schemes to assist with our representations (Annex B).</p> <p>The SPD is structured around a number of design principles and seeks to supplement key policies within the Local Plan which impact on housing development design. Redrow welcome the approach to providing greater clarity and guidance on the Council's interpretation and application of these policies. This should result in improved design quality alongside faster decision making on planning applications.</p>		<p>No change.</p> <p>Support welcomed.</p>
SPD_HB5	Private Individual	What is good design?	Some new developments do not bring delight! They bring fear and anxiety about further flood damage.	Do not plan to build on flood plains	<p>No change.</p> <p>All proposals are subject to national and local policies on flood risk and drainage.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB71	Spenn Valley Civic Society	What is good design?	<p>Our main interest is in the impact of planning regulation on the environment – both natural and built. The entire world is at a critical juncture with regards to climate change/damage to the environment and it is incumbent on all of us to ensure that nothing we do has a detrimental impact. So planning at a local level is just as important as national or global decision making.</p> <p>Translating this to the local scene, we consider that in all planning development there should be a presumption in favour of retention of existing green infrastructure – trees, hedges, water courses etc, unless the developer can demonstrate it is not viable, so that the natural environment which is in place prior to development is retained. In those cases where it is clearly demonstrated that it is not possible, environmental replacement should be required. There are too many cases currently – we would cite Merchant Fields in Cleckheaton as an example – where sites are cleared of trees and hedges prior to application, which with a modicum of decent planning could have been retained and have enhanced the development. This mainly concerns sites which were previously designated green belt or urban green space, but is also relevant to many derelict sites where natural regeneration has taken place over the many years that a site has remained derelict. The required standard for natural feature replacement needs to be raised. Currently you seem to be too easily satisfied by proposals which are clearly inferior in terms of quality and quantity – one</p>		<p>Proposed change.</p> <p>Wording has been amended to ensure that the SPD reflects criterion I of Local Plan Policy LP24 and NPPF para 170.</p> <p>Paragraph 6.9 add: <u>Existing tree and landscape features should be incorporated into a scheme at the concept or initial design stage and sites should show a net gain in tree coverage.</u></p> <p>Amend Principle 7: The integration of green infrastructure and <u>accessible</u> open space should <u>must be</u> considered early in the design process by assessing: <ul style="list-style-type: none"> • the site’s context; • connectivity with <u>the ability to make connections with wider green infrastructure</u> networks and • the multi-functional role green infrastructure can perform <p>Assess and consider the viable retention of <u>Proposals should retain</u> existing features within the site, such as valuable trees, natural wildlife habitats and landscape features.</p> </p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>mature tree being replaced by one sapling being a classic example.</p> <p>We consider that Kirklees Council is ideally placed to provide an exemplar of good design and planning by working with a partner in social housing provision to construct a 'model' development on a site currently in Council ownership. This would incorporate the standards/requirements/recommendations in respect of design and build, alongside environmental protection/enhancement. In one of our many submissions to the Local Plan we suggested a number of sites in the Spen Valley owned by the Council which could be suitable for this kind of initiative. We have also visited a number of housing developments across the region which have built housing incorporating innovation, good design, and high environmental standards, and know it can be done. Kirklees Council is in an ideal position to lead by example.</p>		<p>Green infrastructure can be provided through building features such as green roofs and green walls and through the design of streets to include street trees, <u>and trees within residential plots and open spaces.</u></p> <p>Open Space, particularly for recreation, should be located at the heart of the site and designed to help create identity."</p> <p>Amend paragraph 7.23: Careful consideration should be given to the multi-functional role that green infrastructure can perform within the development, including:</p> <ul style="list-style-type: none"> - Flood mitigation - Improving urban biodiversity, through street trees, woodland creation and wetlands - Tree planting <u>A net gain of tree coverage</u> to provide shelter from rainfall, shade and to minimise impact of high winds - Providing a setting for walking and cycling connections - Natural playable spaces
SPD_HB144	Holme Valley Parish Council	What is good design?	<p>Questions and concerns</p> <p>— The Housebuilder Design Guide SPD adds little clarity in</p>		<p>No change.</p> <p>Comments noted.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>terms of Kirklees" specific requirements to what is already available in the National Design Guide.</p> <p>– It is unclear how the document can be appraised and scored exactly against the planning and SPD requirements given so many imprecise requirements.</p> <p>– To establish high quality environments, it is important that developers properly understand their obligations to those living in the area affected by the planned development.</p>		<p>The SPD will be a material consideration when determining planning applications.</p>
SPD_HB74	West Yorkshire Combined Authority	2.1	<p>Section 2 – The policy context should incorporate the importance of design in national policy and describe the most recent changes that support this – e.g. the National Design Guide, the forthcoming National Model Design Code (which we expect will be out to consultation soon), the Building Better Building Beautiful report etc. If nothing further is to be written on national policy, then the list as it stands could go in an appendix.</p>		<p>Proposed change.</p> <p>Amend paragraph 2.1 to read:</p> <p>“There are several national and local strategies and policies that form the policy context for the Residential Design SPD <u>at the time of adoption</u>, these are listed below.”</p> <p>Amend national policy bullet points add:</p> <p><u>“Living with Beauty (Building Better Building Beautiful Commission) 2020 .”</u></p>
SPD_HB93	Persimmon Homes (West Yorkshire) Ltd	2.1	<p>It would be helpful if it was noted which of the policies and documents are currently adopted and which are emerging</p>	as above	<p>Proposed change.</p> <p>Amend paragraph 2.1 to read:</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					“There are several national and local strategies and policies that form the policy context for the Residential Design SPD <i>at the time of adoption</i> , these are listed below.”
SPD_HB86	Historic England	2.1	We would suggest that documents relating to the conservation and enhancement of the historic environment that have been prepared locally are of importance to this SPD. These include the Huddersfield Blueprint, the various conservation area appraisals for conservation areas within Kirklees, and neighbourhood plans which may have been or may be made over the lifetime of this document.	Insert reference to Huddersfield Blueprint, conservation area appraisals including those which have been adopted and a general reference to those which may be prepared as well as neighbourhood plans.	Proposed change. Amend ‘Local’ bullet points to add: <ul style="list-style-type: none"> • <u><i>Kirklees Conservation area appraisals</i></u> • <u><i>Huddersfield Blueprint 2019</i></u> • <u><i>Dewsbury Blueprint 2019</i></u>
SPD_HB18	Natural England	3.1	Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).		No change. The SPD recognises biodiversity as a driver of site design in paragraph 3.1. Specific design principals related to biodiversity are included under Principle 9 which includes measures such as lighting.
SPD_HB27	Upper Dearne Valley Environmental Trust (UDVET)	3.1	We are pleased to see this type of document after, like many other community groups, years of pointing out problems associated with housing planning applications relating to quality and design. It is a source of great sorrow that this document has taken so long to produce after the Local Plan was approved, resulting in many developments in the Borough, and particularly the		No change. Comment noted.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>Dearne Valley, being approved which clearly fail to meet these new guidelines.</p> <p>We feel there are many things in this document to be welcomed, particularly:-</p> <ul style="list-style-type: none"> • That any development meets the type of homes needed in that particular locality. 		
SPD_HB76	West Yorkshire Combined Authority	3.1	‘The design of all development should consider how the design of development...’ needs to be made clearer ‘live and work’ could be ‘live, work and play’ and the sentence that begins ‘This will ensure that developments, recognise...’ is hard to understand.		Proposed change. Paragraph 3.1 amended – see SPD_HB75 response.
SPD_HB75	West Yorkshire Combined Authority	3.1	Section 3 – Drivers of site design in Kirklees – this section could be clearer and again set out more of a vision. These are the headlines of why Kirklees needs good design and what it hopes to achieve. The diagram could be explained more clearly – at the moment there are no headings for any of the paragraphs, there is some repetition (especially in section 3.4).		Proposed change. Paragraphs 1.1 and 1.2 have been amended to set out the purpose of the SPD. See comment SPD_HB75 response. Paragraphs 3.1 and 3.2 have been amended to better explain the diagram and remove repetition. Amend para 3.1 “The drivers of site design in Kirklees are set out in the diagram below. Designs should be informed by a thorough analysis of the broader context of the site and the landscape, heritage, cultural and natural character

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p>of the places which make up Kirklees, using the tools set out in Principle 1 and following the advice set out in Principle 2. The design of all development should <i>consider how the design of development can help</i> respond to wider policy challenges, <i>with development expected to: relating to climate change, biodiversity, housing need and quality, health and wellbeing, transport, inclusive growth, and flood risk and drainage.</i>"</p> <ul style="list-style-type: none"> • <i><u>"Be resilient and adaptable to the impacts of Climate Change and minimise greenhouse gas emissions, in the design of both the site and the homes within it, reflecting the factors listed in the box below.</u></i> • <i><u>Protect and enhance the district's Biodiversity and integrity of the natural environment and the locally distinctive qualities that contribute to its character. This helps strengthen the beneficial services provided by the natural environment and makes a positive contribution to the health and well-being of existing and future residents.</u></i>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<ul style="list-style-type: none"> • <u>Provide the amount, type and tenure of homes that help meet the district's Housing Need and ensuring homes are well-integrated and designed to the same high quality to create tenure neutral homes and spaces, where no tenure is disadvantaged.</u> • <u>Ensure that Housing Quality is at the forefront of housing need, supporting innovative designs that are built to modern sustainable standards adaptable to the changing demands of society and the climate.</u> • <u>Support a positive impact on Health and Wellbeing. The design of residential developments affects health in terms of its accessibility, living space, access to outdoor space and the environment in which the house is located. This also includes access to well-connected multi-modal transport, physical activity, employment and services, community safety, green space, to healthy and affordable food choices and environmental quality.</u> • <u>Support sustainable Transport choices by being well connected</u>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p><i>to the existing network of streets, have good levels of connectivity and ease of movement throughout the site itself. New development should have good links to local services and both existing and proposed public transport facilities to achieve sustainable movement patterns, reducing the reliance on cars and promoting sustainable travel.</i></p> <ul style="list-style-type: none"> • <i>Contribute to the Council's Inclusive Growth aspirations by supporting the delivery of homes for all sectors of society and ensuring that development supports the Kirklees economy through supporting learning and skills in construction; and</i> • <i>Support Flood Risk and Drainage policies by incorporating natural features such as tree planting and wetlands, that form part of an integrated multifunctional green infrastructure network."</i> <p>Amend paragraph 3.2:</p> <p><i>"Development design in accordance with the Design Principles set out in sections 6 to 9 will support Wwell-designed developments relate well to their</i></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p>immediate surroundings and the site's broader context by responding to landscape, heritage, cultural and natural characteristics. New development should <u>will</u> be integrated into the surrounding context, should and respond positively to local character, whilst being and be sensitive to its surroundings. whilst making a positive response to the Council's climate emergency declaration and other key policy drivers. The delivery of development in accordance with the principles set out in the SPD, along with Local Plan policies and relevant SPDs can ensure that the design and quality of new homes in Kirklees will make a positive contribution to the towns and villages of the district and play a critical role in addressing the Climate Emergency declared in Kirklees."</p> <p>Delete paragraph 3.3 in its entirety.</p> <p>Delete paragraph 3.4 in its entirety.</p>
SPD_HB87	Historic England	3.1	We support the references made within this section to the historic environment.	No change	<p>No change.</p> <p>Support welcomed.</p>
SPD_HB148	Redrow	3.1	The drivers of site design identified in Chapter 3 are supported and are consistent with our approach to place-making, known as the Redrow 8 (extract attached.) The principles of the Redrow 8 have		<p>No change.</p> <p>Comment noted</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>been employed for many years, however the document provides a framework to ensure that each of those principles are applied to each of our sites going forward.</p> <p>The table below demonstrates the synergy with the principles in each document. Climate change and flood risk are also embedded into the technical design and delivery of schemes.</p>		
SPD_HB6	Private Individual	3.3	Does this mean it is OK to build on a flood plain?		<p>No change.</p> <p>All proposals are subject to national and local policies on flood risk and drainage.</p>
SPD_HB8	Private Individual	3.3	It is significant that a photograph of a Kirklees development wasn't used		<p>No change.</p> <p>Comment noted.</p>
SPD_HB131	Holme Valley Vision Network	3.3	<p>Local consultation and involvement of people in the development of plans would provide far better insight into the local housing needs than the methods used during the development of the Local Plan which were heavily weighted in favour of developers and their vested interests.</p> <p>Better understanding of local people's views would also beg questions about some of the assumptions made in the documents. For example, why should homes and work places be separated? Closer integration enables more homeworking and working closer to home. It facilitates greater human interaction, reduces loneliness and is good for local businesses. It also reduces reliance on private car.</p>		<p>No change.</p> <p>Neither the policy nor the SPD stipulate that land uses should be kept separate.</p> <p>Comments on community engagement are included in paragraph 4.1.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>New developments tend towards a grouping of housing estates, attached to a business park and a shopping centre, each zone connected to the others by roads designed solely for cars. In such a development, residents must drive out of their neighbourhood for almost everything. The negative effects this has on health and the environment are well-attested, but it also feels strangely inert, as though the separate zones have no real connection with each other, and as though life stagnates within their boundaries." Living with Beauty</p>		
SPD_HB137	Holme Valley Parish Council	3.3	<p>The Parish Council welcomes a number of elements within the proposal.</p> <p>— Developments that are adaptable to climate change are essential to make sure our communities remain desirable places to live and work. Where appropriate developers will be encouraged to produce innovative designs that are built to modern sustainable standards adaptable to the changing demands of society and the climate."</p>		<p>No change.</p> <p>Support welcomed.</p>
SPD_HB9	Private Individual	3.4	<p>It is significant that a photograph of a Kirklees development wasn't used</p>		<p>No change.</p> <p>Comment noted.</p>
SPD_HB38	Upper Dearne Valley Environmental Trust (UDVET)	3.4	<p>We would like to put forward the following suggestions for change:-</p> <ol style="list-style-type: none"> 1. Section 3.4 – add the word 'heritage' to the second sentence. In addition, there is scope to say more and require more in Kirklees Rural regarding use of architecture and materials which 		<p>Proposed change.</p> <p>Para 3.4 has been deleted as part of a wider change, but heritage is included in</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>have close links to the Pennine heritage. Over the past 20+ years this seems to have been forgotten and we are now seeing new developments completely at odds with the local character and indeed are aesthetically offensive. National developers 'bog standard' designs and materials should not be tolerated. A real design gain is now needed, not developers simply using the mistakes of the past (of which there are many) to promote cheap, poor design and materials. There is scope to include more photographs of good design which reflect links to the traditional architectural character of Kirklees Rural in particular.</p> <p>2. Section 3.4 – Addressing the Climate Emergency Box – Public Transport Bullet. The Council need to consider how its Roads and Highways Guidance conflicts with extending bus routes around large developments. The latter Guidance allows ridiculously narrow roadways (often getting progressively narrower deeper into a development) quite unsuitable for public transport use. There appears to be a need to consider making provision to permit bus route extension and bus stops within large, new developments if the Council is serious about getting people out of their cars. Most people will not walk 800ms.</p>		<p>paragraph 3.1, and considered further in the document.</p> <p>No change.</p> <p>The Highway Design Guide SPD sets out street types where bus routes are appropriate, and this is covered in Principle 12 of this SPD.</p> <p>No change.</p> <p>The Open Space SPD seeks open space provision for new housing developments, including the provision for allotments where there are existing deficiencies and identified needs.</p> <p>No change.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>3. Section 3.4 – Addressing the Climate Emergency Box –Food Growth Bullet. Whilst we welcome this suggestion, we believe the Council should be more actively procuring allotment space within or close to large developments. There are huge waiting lists in our area owing to poor policies in the past.</p> <p>4. Section 3.4 – Addressing the Climate Emergency Box – Density Bullet. We wonder from where the evidence for this statement emanates. It appears to be based on supposition and hope rather than fact. Our experience in the Dearne Valley, and particularly Skelmanthorpe, is that local facilities have decreased as the population has increased! Sadly the trend is still towards increasing centralisation of community facilities and services necessitating car use.</p>		Comment noted.
SPD_HB129	Holme Valley Vision Network	3.4	There is a failure to grasp the opportunity of influencing thinking and behaviour about car ownership. Even though we consider every house should be able to charge an electric vehicle, we also consider that more should be done to actively discourage private vehicle ownership by		No change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>making car journeys unnecessary and alternative modes of travel easy</p> <p>Reference is made to the importance of public transport. The reduction in private car use will in part be dependent on the availability of better and different modes of transport. It is accepted that this is outwith the scope of the Housebuilders Design Guide but at least some reference should be made about how better public transport provision will be secured.</p>		Principle 12 recognises the need to reduce private-car use, though this is limited in the context of the SPD.
SPD_HB132	Holme Valley Vision Network	3.4	There is some limited acknowledgement of local landscape characteristics but nothing about the importance of respecting local cultural and community characteristics though the Local Plan makes great play on the need to take account of the distinctive features of the different parts of the district.		<p>No change.</p> <p>Comment noted.</p>
SPD_HB7	Private Individual	How good residential design can address the climate emergency:	Why plan to build more homes where there is no suitable transport link? Where there is inadequate space for people to use bikes? Where the nearest shops are not within walking distance for many people?		<p>No change.</p> <p>Principle 12 recognises the need to reduce private-car use, though this is limited in the context of the SPD.</p>
SPD_HB33	Upper Dearne Valley Environmental Trust (UDVET)	How good residential design can address the climate emergency:	We are pleased to see this type of document after, like many other community groups, years of pointing out problems associated with housing planning applications relating to quality and design. It is a source of great sorrow that this document has taken so long to produce after the Local Plan was approved, resulting in many developments in the Borough, and particularly the		<p>No change.</p> <p>Comments noted.</p>

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			<p>Dearne Valley, being approved which clearly fail to meet these new guidelines.</p> <p>We feel there are many things in this document to be welcomed, particularly:-</p> <ul style="list-style-type: none"> • The encouragement to include food growing areas within developments. • The orientation of homes and windows to make the maximum use of natural sunlight, whilst avoiding weather and microclimate impacts. 		
SPD_HB138	Holme Valley Parish Council	How good residential design can address the climate emergency:	<p>The Parish Council welcomes a number of elements within the proposal.</p> <p>→ The entire section on How good residential design can address the climate emergency</p>		<p>No change.</p> <p>Support welcomed.</p>
SPD_HB14	Private Individual	Principle 1	<p>If a development is perceived to be small (say 1 to 18 properties) does this mean that it doesn't need to go before the Council for approval? If this is the case then it becomes extremely difficult to object to a company building a development right in front of other properties that have had an outlook for a long time. The "development" could in theory block the outlook and light / sunlight from its neighbours and encroach right up to the boundary (building garages on the boundary if necessary to maximise the use of land). If the neighbours are bungalows this could have a serious detrimental effect on the owners losing heat (from the sunshine) and ultimately making neighbouring properties cold.</p>		<p>No change.</p> <p>Planning applications are determined in line with the council's Development Management Charter.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB77	West Yorkshire Combined Authority	Principle 1	<p>Section 4 – This is a very useful section with some pointers for the process to follow in developing and submitting a planning application. The reference to the Place Standard could be more clear – is the meaning that this is a useful tool? Or that the local insight gathered can be shared in some way? The ‘Implementing the planning permission’ is listed as a tool, but it isn’t one – perhaps the heading should say ‘preparing a masterplan’ or ‘preparing a masterplan framework’?</p>		<p>Proposed change.</p> <p>Amend paragraph 4.1</p> <p>“Community Engagement: Developers should agree what engagement will be undertaken with the local community and elected members and work as early as possible. Community engagement should be undertaken in conjunction with the council, or agreed with the council prior to being undertaken. Particular attention should be paid to how the development can make a positive contribution to placemaking, with an understanding of the aspirations and needs of the community. Kirklees have used the Place Standard tool to gain local insight from citizens in different settlements within the district, <i>the evidence from this is available on the Kirklees website (add footnote) and can ensure that applicants respond to any significant local issues.</i> The Kirklees Public Art policy considers the role that public artists can have in the community engagement process. <i>The Development Management Charter (add footnote) sets out further advice on community engagement.</i>”</p> <p>Amend paragraph 4.1:</p>

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					<p><i>Implementing the planning permission Agreeing details early: Working with the Council from an early stage and preparing detailed site masterplans can help ensure that <u>details are responses to site constraints and detailed highways designs</u> are agreed when a site receives planning permission and <u>that details</u> are not left to planning conditions. <u>This will provide more certainty and it will support the Council's aim in swiftly dealing with Discharge of Conditions applications. The Kirklees Validation Checklist sets out what information is required to accompany planning applications to ensure that sufficient information is provided at an early stage to support good design in proposals.</u></i></p>
SPD_HB66	Huddersfield Civic Society	Principle 1	<p>The Housebuilder Design Guide SPD adds little clarity in terms of Kirklees' specific requirements to what is already available in the National Design Guide. As we highlighted earlier, it is important that the SPD requirements are clear and additional to the documents above the SPD in the hierarchy. We believe this <i>SPD is not robust</i> in giving clear 'material requirements' as to what the Authority expects as mandatory from a developer and whether requirements are mandatory at certain sizes of development or other parameters.</p> <p>Principle 1 states 'Developers are expected to...'; unfortunately the legitimate expectation appears to be</p>		<p>No change.</p> <p>Comments noted.</p> <p>Appropriate changes have been made regarding direct policy wording. See comment HB73.</p> <p>Local Plan paragraph 6.23 sets out where a Masterplan would normally be required.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>lacking clarity and rigour in the specific requirements of expectation. It is unclear how the document can be appraised and scored against the planning and SPD requirements given so many imprecise requirements. An SPD is not an 'ask' document, a conflict shown in the following examples:</p> <ul style="list-style-type: none"> LP5 in the Local Plan states: <i>A management plan must be produced as part of the master-planning process to demonstrate how infrastructure and community assets will be maintained and managed following completion of development.</i> <p>Unfortunately, LP5 does not clarify which sites need a masterplan and to what degree masterplan detail is required to satisfy the Authority. Confusion arises because the legitimate expectation of LP5 is that a site will have master planning: <i>'Masterplans will be developed in consultation with the council prior to the submission of a planning application. Masterplans would only be sought where feasible and appropriate.'</i></p> <p>What is feasible and appropriate? This statement is subjective and unquantified. Isn't it the role of the SPD to make clear, while using broad parameters, when a masterplan <i>must</i> be provided and what is appropriate? <i>The opportunity to have clarity on when such a masterplan is required appears to have been missed.</i></p> <ul style="list-style-type: none"> To establish high quality environments, it is important that developers properly understand 		

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>their obligations to those living in the area affected by the planned development(s) and using their properties. Therefore, we would like to see more mandatory consideration and evidence when planning applications are submitted, with less reliance on S106 conditions being made as these can often be whittled down in subsequent negotiations or just not complied with.</p> <p>Example, cl 5.12 discusses the Urban Grain but only has a <i>'should have regard to the existing urban grain'</i>. A fundamental issue of the Context of a development is its surroundings. We would expect there to be a 'must' or 'shall' consider and then spell out the areas that the Authority needs considering. This should not add any additional onus on a developer worth their salt, as it is part of the design process, as the National Design Guide makes clear. If the Council is concerned about the impact on small developers, then minimum house volume thresholds could be introduced.</p> <p>The above are just two example of many that we could highlight using the same principles for this SPD.</p>		
SPD_HB1	Canal & River Trust	4.1	Feedback from Statutory Consultees affected by development, including the Canal & River Trust, can have an impact on the final design of development. We therefore consider that reference should be given in this section to the role of Statutory Consultees to make this document more effective. For example, development alongside our canal network could impact our network by affecting public access to our towpaths, the attractiveness	<p>A new bullet point for 'Engagement with Statutory Consultees' - Suggested text is below:</p> <p>"Developers should identify which Statutory Consultees may be affected by the</p>	<p>Proposed change.</p> <p>Amend paragraph 4.1 to include new bullet point:</p> <ul style="list-style-type: none"> • <i><u>"Statutory Consultees Advice: Developers should identify which Statutory Consultees may be affected by the proposed development and</u></i>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			of our network for public use, the stability of the canal structure, or the management of water flows to and from our waterways. Feedback from consultees such as ourselves could have a significantly impact on the final design of the development. Consideration of these matters as part of the development process is therefore vital to inform the final development. The Trust, for example, offer a (presently) free pre-application process, that would enable developers to identify matters prior to the submission of an application.	proposed development and should undertake relevant engagement with affected Consultees as early as possible. Developers should work with Statutory Consultees to ensure that the built form is appropriate to the site".	<i>should undertake relevant engagement with affected Consultees as early as possible. Developers should work with Statutory Consultees to ensure that the built form is appropriate to the site."</i>
SPD_HB78	West Yorkshire Combined Authority	4.1	Community engagement 'Developers should agree...and work as early as possible' isn't clear – 'work together', perhaps? Under Management and Maintenance, 'the street' could be better replaced by 'streets and spaces' to be more comprehensive, and it could also say 'challenges such as those presented by car parking' to encompass other challenges such as maintaining landscaping.		Proposed change. Amend paragraph 4.1 to read: <ul style="list-style-type: none"> • “ Community Engagement: Developers should agree what engagement will be undertaken with the local community and elected members and work <i>together</i> as early as possible <i>involving them in preparing plans.</i>”
SPD_HB58	Trans Pennine Trail	4.1	Management and maintenance – section should include reference to securing budget for future management or maintenance to ensure Kirklees Council or residents are not left with unexpected costs.	Management and maintenance – section should include reference to securing budget for future management or maintenance to ensure Kirklees Council or residents are not left with unexpected costs.	No change. The Open Space SPD provides guidance on the future management and maintenance of open spaces.
SPD_HB35	Upper Dearne Valley	4.1	We are pleased to see this type of document after, like many other community groups, years of pointing out		No change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
	Environmental Trust (UDVET)		<p>problems associated with housing planning applications relating to quality and design. It is a source of great sorrow that this document has taken so long to produce after the Local Plan was approved, resulting in many developments in the Borough, and particularly the Dearne Valley, being approved which clearly fail to meet these new guidelines.</p> <p>We feel there are many things in this document to be welcomed, particularly:-</p> <ul style="list-style-type: none"> • The use of independent Design Reviews but it is important its recommendations 'have some teeth'. 		Comment noted.
SPD_HB59	Trans Pennine Trail	4.1	Section 4 should also include defining links to existing sustainable transport routes or potential new routes that can be secured as part of the planning process.	include defining links to existing sustainable transport routes or potential new routes that can be secured as part of the planning process.	No change. A Travel Plan and Transportation Requirements are included in the pre-application advice section and covered in para 6.11 as part of an assessment of connections to the walking and cycling network.
SPD_HB94	Persimmon Homes (West Yorkshire) Ltd	4.1	A reference to the page overleaf where it states 'Design and access Statements should address the ten characteristics set out in the National Design Guide'		Proposed change. Amend paragraph 4.1 to read: <ul style="list-style-type: none"> • “Design and Access Statements should address the ten characteristics set out

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p>in the National Design Guide, <u>shown in figure 1.</u>"</p> <p>Amend document to include figure numbers.</p>
SPD_HB49	West Yorkshire Ecology Service	4.1	This needs to include the Biodiversity Net Gain Technical Advice Note. Biodiversity habitats need to be considered from site selection and start of the design process right through to the on-going management of land retained for enhancement.	Add the above as an extra bullet point	<p>The Biodiversity Net Gain Technical Advice Note is referred to in Section 2.</p> <p>Proposed change.</p> <p>Amend paragraph 4.1:</p> <ul style="list-style-type: none"> • “Pre-Application Advice: Setting the parameters and environmental constraints <i>and opportunities including habitats</i>, understanding developer contributions and viability issues, travel plan and transportation requirements, getting the right amount and mix of homes, conformity with local and national policy, how the site will be serviced. Further information is available on the Council website(1).”
SPD_HB39	Upper Dearne Valley Environmental Trust (UDVET)	4.1	We would like to put forward the following suggestions for change:-		<p>Proposed change.</p> <p>Amend paragraph 4.1 to read:</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>1. Section 4.1 – Community Engagement – There should be an explicit and genuine model of required ‘public engagement’, starting right at the beginning of the process before any plans are drawn up. The current system of ‘produce a plan and then defend’ type consultation exercise is bad practice (and currently outlawed in terms of Neighbourhood Plan development). KMC should be supporting a ‘best practice model’ of public involvement and consultation to rebuild public support and credibility. Simply having a local Councillor involved in early discussions is not enough – it needs a proper workshop with a cross section of the local community and its interests. The notion of ‘public buy-in’ needs to be embraced.</p> <p>2. Section 4.1 – Design Codes – given the unique, historic and heritage characteristics of many areas and habitations in Kirklees, especially in Kirklees Rural, a ‘rich diversity of architectural styles’ will be particularly inappropriate and , indeed, ugly and jarring to the eye, if the photographs contained in this document are anything to go by. We feel more emphasis needs to be placed on the requirement for historic/heritage linked architectural features. This was often the case in new housing in the 1980s/1990s but seems to have been forgotten in the past 20 years with the growing influence of</p>		<ul style="list-style-type: none"> • “Community Engagement: Developers should agree what engagement will be undertaken with the local community and elected members and work <i>together</i> as early as possible <i>involving them in preparing plans.</i>” <p>Proposed change.</p> <p>Amend paragraph 4.1 to read:</p> <ul style="list-style-type: none"> • “Design Codes: Where sites are likely to have multiple owners and where opportunities for self-build and custom-build houses are made available, a Design Code can set out a set of rules regarding the scale and massing of new homes; but allow for a rich diversity in architectural styles <i>in accordance with the site’s context, as assessed according to Principle 2. The Government Published the National Model Design Code in January 2021, which provides detailed guidance on the production of design codes, guides and policies to promote successful design.</i>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>large, national builders. Sadly, this has resulted in many truly ugly, identikit housing developments throughout the Borough with inappropriate styling and materials.</p>		
SPD_HB88	Historic England	4.1	<p>Historic England is particularly keen to work with developers at the pre-application stage to ensure that it has the best opportunity for new development to conserve and where possible enhance the significance of heritage assets and their settings. A brief sentence on developers working with partner organisations at an early stage would be beneficial here. More information on Historic England's pre-app service may be found here https://historicengland.org.uk/services-skills/our-planning-services/charter/our-pre-application-advisory-service/</p>	<p>Insert sentence for example</p> <p>“Applicants are encouraged to work with partner (footnote) organisations at an early stage to ensure new development reflects the needs of the site whilst maximising opportunities for placemaking.”</p> <p>Footnote – Partners organisations may include Historic England, Environment Agency, Natural England, Sport England etc.</p>	<p>Proposed change.</p> <p>Amend paragraph 4.1 to include new bullet point to read:</p> <ul style="list-style-type: none"> • <i>“Statutory Consultees Advice: Developers should identify which Statutory Consultees may be affected by the proposed development and should undertake relevant engagement with affected Consultees as early as possible. Developers should work with Statutory Consultees to ensure that the built form is appropriate to the site.”</i>
SPD_HB133	Holme Valley Vision Network	4.1	<p>PLACE SHAPING AND SUSTAINABILITY</p> <p>There seems to be a poor understanding of the concepts of ‘Placemaking’ and ‘Sustainability’. Breaking the terms down into specific topics misses the overarching meaning of the concepts and the importance of integrating those topics in the cohesive whole of what a place means to the people who live in it and use it. The Place Standards tool is a good start but it is superficial. Its use demands follow-up and further research to gain insight into the reasons why</p>		<p>Proposed change.</p> <p>Amend paragraph 4.1</p> <ul style="list-style-type: none"> • “Community Engagement: Developers should agree what engagement will be undertaken with the local community and elected members and work as early as possible. Community engagement should be undertaken in conjunction

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>people see their places in the ways they do. Far better ways of listening to and working with local people are available and should be used.</p> <p>Quality of place needs to be understood in terms not of 'good design' but of provable relationships between urban form with health, well-being and sustainability, as well as empirical data on what local people like." Living with Beauty</p> <p>The RTPI says; "From the community's and stakeholders' perspectives alike the earlier the engagement the better."</p> <p>If people have been listened to and they have evidence to show that their views have been taken into account in the planning and development process they will have a greater sense of ownership over the places in which they live. They will value their places, look after them and sustain them.</p> <p>The planning processes are lacking in transparency, bureaucratic, difficult to understand and use and are adversarial in nature. Local people are invited to take part in difficult to access processes and often made to feel that their comments are not welcomed.</p> <p>We appeal for far better public consultation and involvement. We accept that local officers have done the best they can and recognise, as has been done nationally, there is a significant learning need amongst planning professionals, generally.</p>		<p>with the council, or agreed with the council prior to being undertaken. Particular attention should be paid to how the development can make a positive contribution to placemaking, with an understanding of the aspirations and needs of the community. Kirklees have used the Place Standard tool to gain local insight from citizens in different settlements within the district, <u>the evidence made available from this is available on the Kirklees website (add footnote) and can ensure that applicants respond to any significant local issues.</u> The Kirklees Public Art policy considers the role that public artists can have in the community engagement process. <u>The Development Management Charter (add footnote) sets out further advice on community engagement."</u></p> <p>Amend paragraph 4.1:</p> <ul style="list-style-type: none"> • <u>"Implementing the planning permission Agreeing Details Early:</u> Working with the Council from an early stage and preparing detailed site masterplans can help ensure that <u>details are responses to site constraints and detailed highways designs are</u> agreed when a site receives planning permission and

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>The Building Better Building Beautiful Commission recommends that “The government should also encourage planning officers and inspectors to take mid-career postgraduate qualifications in urban design ... and providing a short course on the impact of urban design for local councillors who sit on planning committees.” We are also fortunate to have easy access to Manchester Metropolitan University which runs courses on placemaking.</p>		<p><i>that details</i> are not left to planning conditions. <u>This will provide more certainty and it will support the Council’s aim in swiftly dealing with Discharge of Conditions applications. The Kirklees Validation Checklist sets out what information is required to accompany planning applications to ensure that sufficient information is provided at an early stage to support good design in proposals.</u></p>
SPD_HB121	Environment Agency	4.1	<p>Paragraph 4.1 – Pre-application advice</p> <p>This section highlights the Kirklees pre-application advice service. For information, we also offer a pre-application advice service to developers and we would welcome a signpost to our service (either in this paragraph or on your website if that is considered appropriate) to encourage early discussions with us where environmental constraints are present on a site. Our pre-application service extends to all matters within our remit and aims to provide developers with the opportunity to discuss and resolve any environmental issues prior to formal application.</p>		<p>Proposed change.</p> <p>Amend paragraph 4.1 to include new bullet point to read:</p> <ul style="list-style-type: none"> • <u>“Statutory consultees advice: Developers should identify which Statutory Consultees may be affected by the proposed development and should undertake relevant engagement with affected Consultees as early as possible. Developers should work with Statutory Consultees to ensure that the built form is appropriate to the site.”</u>
SPD_HB145	Holme Valley Parish Council	4.1	<p>Questions and concerns</p> <p>– Pre-application advice. Why does this seem to have</p>		<p>No change.</p> <p>The Development Management Charter sets out advice to engage in pre-application discussions at an early stage</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>been accessed so infrequently for planning applications in the Holme Valley?</p> <p>– Community Engagement: Could there be a clear role for HVPC here? Is this something valuable which we can bring to the process?</p>		<p>and there are a range of pre-application enquiry options depending on the scale of development.</p> <p>The Council notify the Parish or Town Council to seek comments on planning applications.</p>
SPD_HB79	West Yorkshire Combined Authority	Principle 2	<p>Section 5 – Context: It would make more sense to swap the order of this section with the next, ‘Setting Design Parameters’, to keep the process elements and the urban design elements together.</p>		<p>No change.</p> <p>The order of the document reflects the hierarchical nature of going from site surroundings, to the site itself and then to the design of homes.</p>
SPD_HB40	Upper Dearne Valley Environmental Trust (UDVET)	Principle 2	<p>We would like to put forward the following suggestions for change:-</p> <ol style="list-style-type: none"> Principle 2 – the wording of this section needs to be amended as in its present form, we fear it will permit the building/planning permission mistakes of the past to be repeated. It does nothing to better the built environment e.g. if stone is the natural, heritage and historic building material of an area, then new housing should be required to follow the best. Time and time again developers use photographs of past design/materials mistakes to perpetuate cheap builds and use of their own convenient pattern books. Nasty bricks, render and red tiled roofs are offensive to the eye, the landscape and general Pennine 		<p>Proposed change.</p> <p>Amend Principle 2:</p> <p>“New residential development should proposals <i>will be expected to</i> respect and enhance the local character of the area by...”</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			environment. On our hillsides, these buildings are visible for miles and are truly 'carbuncles' on the beautiful landscapes of Kirklees Rural in particular e.g. the recent Redrow development at Highburton.		
SPD_HB165	Private Individual	5.1	a it should have modern design an diverse b dose not have to me same as that area different material can be used stone to bricks giving even colour full design from outside and other ideas available.		No change. Comment noted.
SPD_HB80	West Yorkshire Combined Authority	5.2	The word 'property' would be better replaced by 'building' or 'dwelling'		Proposed change. Amend heading above paragraph 5.9: Types Size of property dwelling Amend first sentence of paragraph 5.9: "The type and size of property dwelling will influence the built form. Amend 3 rd bullet of principle 12: <ul style="list-style-type: none"> • "Where car parking is included within the curtilage of a property dwelling...
SPD_HB95	Persimmon Homes (West Yorkshire) Ltd	5.4	Paragraphs 5.4-5.7 are on page 11, though it should be page 9		Proposed change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					Correct page numbering.
SPD_HB89	Historic England	5.4	<p>We consider it may be necessary to provide some further explanation to this paragraph through more detailed narrative for those who may not have in depth local knowledge of the area. For example being more specific on the definition of a laithe house or linear farmhouse.</p> <p>Furthermore we would emphasise the importance of historic field boundaries in shaping the form of new developments and therefore suggest stronger wording in this regard.</p>	<p>5.4. There are several settlements in the district that have medieval origins, though the textile industry is the main influence of the built form in the district, in the form of weavers' cottages, mills, workers' stone terraced housing; and municipal and commercial buildings. Kirklees has a wealth of historic farmsteads, the laithe house (a dual-purpose dwelling, comprising house and agricultural building in one range), a linear farmhouse and barn is a locally distinctive form of building commonly found in upland farmsteads of West Yorkshire. Historic field boundaries make an important contribution to local character and should have an active role in shaping the form of new developments</p> <p>Delete - can shape the form of new developments.</p>	<p>Proposed change.</p> <p>Amend paragraph 5.4: "There are several settlements in the district that have medieval origins, though the textile industry is the main influence of the built form in the district, in the form of weavers' cottages, mills, workers' stone terraced housing; and municipal and commercial buildings. Kirklees has a wealth of historic farmsteads, the laithe house (<u>a dual-purpose dwelling, comprising house and agricultural building in one range</u>), a linear farmhouse and barn is a locally distinctive form of building <u>commonly found in upland farmsteads of West Yorkshire</u>. Historic field boundaries make an important contribution to local character and <u>should have an active role in shaping the form of new developments</u> can <u>shape the form of new developments.</u>"</p>
SPD_HB21	West Yorkshire Archaeology	5.5	According to the NPPF, Conservation Areas are designated heritage assets and great weight should be given to a	The Design Guide should widen the scope of its requirements	Proposed change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
	Advisory Service		designated heritage assets's conservation (para193 NPPF). Therefore a carefully considered design should be required for any development within a Conservation Area or within the setting of a designated heritage asset (whether Listed building, Conservation Area or Scheduled Monument).	to the settings of designated heritage assets and make it clear that not just "high value" parts of Conservation Areas should require application of the Design Guide.	Amend paragraph 5.5: "Contemporary designs and high quality modern interpretations of distinctive local characteristics would be welcomed where they are demonstrably appropriate to the site context and make a positive contribution to the wider environment. A particularly carefully considered design approach will be required where the proposed development impacts on designated heritage assets and is within the curtilage of a Listed Building or within a high significance part of a Conservation Area. Great weight will be placed on the importance of good design where a proposed development may impact on a designated heritage asset or its setting. In conservation areas, it will be of great importance that development is sympathetic and responds to the context."
SPD_HB90	Historic England	5.5	Whilst we support the inclusion of the historic environment within this section we consider amended wording is necessary that is more aligned with national policy, Paragraph 193 of the NPPF states that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than	5.5. Contemporary designs and high quality modern interpretations of distinctive local characteristics would be welcomed where they are demonstrably appropriate to the site context and make a positive contribution to the wider environment. Great weight will be placed on the	Proposed change. Amend paragraph 5.5: "Contemporary designs and high quality modern interpretations of distinctive local characteristics would be welcomed where they are demonstrably appropriate to the site context and make a positive contribution to the wider environment. A

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>substantial harm to its significance.”</p> <p>The term curtilage is a legal term describing an area around a building. The setting of a heritage asset will include, but generally be more extensive than, its curtilage (if it has one). Setting is defined as the surroundings in which a heritage asset is experienced. This term setting is therefore appropriate when considering design of new development.</p> <p>In terms of conservation areas, it is important that development is sympathetic and contextual in all circumstances rather than just where it may affect a part of it where there is high significance.</p>	<p>importance of good design where a proposed development may impact on a designated heritage asset or its setting. In conservation areas, it will be of great importance that development is sympathetic and responds to the context.</p> <p>Delete - A particularly carefully considered design approach will be required where the proposed development impacts on designated heritage assets and is within the curtilage of a Listed Building or within a high significance part of a Conservation Area.</p>	<p>particularly carefully considered design approach will be required where the proposed development impacts on designated heritage assets and is within the curtilage of a Listed Building or within a high significance part of a Conservation Area.</p> <p>Great weight will be placed on the importance of good design where a proposed development may impact on a designated heritage asset or its setting. In conservation areas, it will be of great importance that development is sympathetic and responds to the context.”</p>
SPD_HB139	Holme Valley Parish Council	5.5	<p>The Parish Council welcomes a number of elements within the proposal.</p> <p>→ Contemporary designs and high-quality modern interpretations of distinctive local characteristics would be welcomed where they are demonstrably appropriate to the site context and make a positive contribution to the wider environment</p>		<p>No change.</p> <p>Comment noted.</p>
SPD_HB96	Persimmon Homes (West Yorkshire) Ltd	5.6	<p>a source link to the 'range of resources about the historic environment of Kirklees' or a few references would be helpful</p>		<p>Proposed change.</p> <p>Amend Paragraph 5.6:</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p>“Kirklees has a wealth of heritage assets which help define the district's distinctive character and special interest. Conservation area appraisals, list entries and the Historic Environment Record provide detailed information about character and distinctiveness. New residential development will be expected to be informed by the relative significance of the place in order to positively complement the place. There is a range of resources that provide a wealth of information about the historic environment in Kirklees. <u>Applicants should have regard to the range of resources listed above, agreeing relevant heritage assets with the Council at an early stage.</u> “</p>
SPD_HB81	West Yorkshire Combined Authority	5.12	The phrase ‘figure ground diagrams’ needs some explanation		<p>Proposed change.</p> <p>Amend paragraph 5.12:</p> <p>“New development should have regard to the existing urban grain this is the pattern presented by buildings and the spaces between them <u>and how the spaces enable people to move between the buildings.</u> Streets with fine urban grain <u>tend to be in the centre of towns and where development is of a higher density. Places defined by a finer urban grain</u> can add character and interest and can assist with</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p>accommodating challenging topography with good examples including the borough's streets of short traditional terraces. Larger footprints and massing may be more appropriate for the borough's flatter valley-bottom sites where similar scale and character already exists. <u>A Figure ground diagrams, which depicts buildings in black and unbuilt space in white,</u> can be useful for understanding urban grain as shown in the accompanying image."</p>
SPD_HB34	Upper Dearne Valley Environmental Trust (UDVET)	5.13	<p>We are pleased to see this type of document after, like many other community groups, years of pointing out problems associated with housing planning applications relating to quality and design. It is a source of great sorrow that this document has taken so long to produce after the Local Plan was approved, resulting in many developments in the Borough, and particularly the Dearne Valley, being approved which clearly fail to meet these new guidelines.</p> <p>We feel there are many things in this document to be welcomed, particularly:-</p> <ul style="list-style-type: none"> • That development should respect the topography of the site. • Avoidance of standard house types separated by the use of high retaining walls on steep sites. 		<p>No change.</p> <p>Comment noted.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<ul style="list-style-type: none"> • The use of more creative street design and the avoidance of bland, uninspiring and depressing street scenes. 		
SPD_HB140	Holme Valley Parish Council	5.13	<p>The Parish Council welcomes a number of elements within the proposal.</p> <p>– The treatment of steep slopes</p>		<p>No change.</p> <p>Support welcomed.</p>
SPD_HB82	West Yorkshire Combined Authority	Principle 3	<p>Section 6 – It would be worth setting out here, or in section 4, the drawings and documents that the LPA expects to see at each stage of the planning process – pre-app, outline, reserved matters, etc. The phrase ‘development framework’ needs explanation, as it is usually used in the context of a Local Plan and means something different in that context. Perhaps a useful alternative would be ‘concept masterplan’? Elsewhere in the document the phrase ‘site framework’ is used. Whatever phrase is used, it needs explanation and consistency. Under the heading ‘Slopes’, the emphasis needs to be that the developer should exploit/respond to the topography, rather than simply saying that it needs to be shown – it should be expected that sections and other drawings showing topography would be included with a planning application.</p>		<p>Proposed change.</p> <p>The pre-application advice on the council’s website includes information that would be required.</p> <p>Amend Principle 3: Replace “Development Framework” or “Site Framework” throughout the document with “Site Framework” to ensure consistency. The use of “Masterplan Framework” may imply that this only applies to where sites require a Masterplan.</p> <p><i>“Developers are expected to clearly identify and map out site constraints in the Design and Access Statement. This can help understand what constraints impact upon the developability of the site and ensure that they are fully embedded into the design of the site and that the site can be developed to make the efficient and</i></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p><i>effective use of land. A Development Site Framework should <u>will</u> identify the purpose of each part of the site and help guide the site's development, setting the development parameters early in the planning process.</i></p> <p>Amend para 5.13:</p> <p><i>"The influence of the topography of a site and how the development responds should be clearly set out in the Design and Access Statement. Opportunities to utilise Applicants should demonstrate how the topography of the site has been utilised to create well-designed and distinctive places, should be considered including bespoke house types and using the topography to provide under-croft car parking. On steep sites standard house types separated by high retaining walls should be avoided and a high-quality street scene should be maintained. <u>The topography of the site is likely to impact on the access arrangements and the development density of the site and this should be clearly identified in Design and Access Statements.</u>"</i></p>
SPD_HB97	Persimmon Homes (West)	Principle 3	We believe the principle should make reference to site opportunities, not just constraints.		Proposed change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
	Yorkshire) Ltd				Amend Principle 3 to read: “Developers are expected to clearly identify and map out site <i>opportunities and</i> constraints in the Design and Access Statement.”
SPD_HB2	Canal & River Trust	6.1	<p>We believe that the SPD should refer to the need for developers to consider waterfront design.</p> <p>Waterside locations are unique and new development needs to fully reflect their settings in terms of heritage, environmental and infrastructure impacts. With regards to decision making, we believe that there is a need for the SPD to provide a more precise guide as to how development should address the borough’s waterways. Without this, decision makers will be unable to determine how best to guide development next to waterways such as the Huddersfield Broad and Narrow Canals, or the Aire & Calder Navigation.</p> <p>Considerations for 'landscape' or the 'Relationship with neighbouring Land or buildings' are broad topics, and would fail to maximise the potential for the SPD to enhance the setting of the borough’s waterways. This is a pertinent issue in Kirklees, where the canal network flows through key Urban Areas in the borough liable for future regeneration. We are concerned that draft document does not include wording that would directly promote access to waterways, make reference to surveillance of waterway spaces, nor cover matters concerning the optimisation of views towards or along the waterways;</p>	<p>We consider that an additional constraint chapter should be included in the text:</p> <p>"Waterfront Design" - Proposals should consider how development will integrate with and improve access to, along and from adjacent canals and rivers.</p>	<p>Proposed change.</p> <p>Amend paragraph 6.6: “The relationship of the site with neighbouring buildings and the suitability of different parts of the site for different uses in the case of mixed use allocations can determine its layout. This may include heritage assets, employment uses or other sensitive uses that may require buffer zones, stand-off distances and for development to respect the neighbouring buildings privacy and amenity. <u>Where a proposal is adjacent to a canal or river, consideration should be given to how the development will integrate with them and, where appropriate, provide a safe access. For those sites around main rivers, an Environmental Permit will be required from the Environment Agency under certain circumstances, this should be identified in early discussions with the Environment Agency as advised in paragraph 4.1.</u>”</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>which all would assist in making the borough's waterways more attractive and enhancing the potential of the Blue Infrastructure Network as a leisure and recreational asset.</p>		
SPD_HB122	Environment Agency	6.2	<p>Paragraph 6.2 – Flood Risk and Drainage</p> <p>We welcome and support the inclusion of this paragraph which highlights flood risk and drainage as key considerations for the design and layout of developments. However, the first part is missing some wording from the policy.</p> <p>“The approach for flood risk is set out in Local Plan policy LP27. This policy states that development will not be permitted on any part of the site identified through a site-specific flood risk assessment as performing a functional floodplain role.”</p>		<p>Proposed change.</p> <p>Amend paragraph 6.2 flood risk and drainage to read: “The approach for flood risk is set out in Local Plan policy LP27. This policy states that development will not be permitted on any part of the site identified through a site-specific flood risk assessment <u>as performing a functional floodplain role.</u>”</p>
SPD_HB17	Natural England	6.7	<p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p>		<p>No change to paragraph 6.7.</p> <p>Proposed change.</p> <p>Amend Principle 8:</p> <p>“The transition from urban to open land should be carefully considered where development is located on the edge of the urban area.</p> <p><u>Proposals should demonstrate how the new development makes a positive</u></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p>		<p><u>contribution to the character and function of / landscape through sensitive siting and good design.</u></p> <p>For all sites in elevated areas, the appearance in the wider landscape should be considered and <u>with</u> applicants should show <u>demonstrating</u> how development respects the topography of the site <u>and its surroundings.</u>"</p> <p>Proposed change.</p> <p>Amend paragraph 7.27:</p> <p><i>"Where a site has a boundary on to open countryside or open space, or adjoins a major road, hard edges dominated by rear fences, gable ends, and outbuildings should be avoided. Houses should front on to such edges of the site; to minimise the risk of crime arising from the exposure of vulnerable areas such as rear gardens to open land. Service roads can form the edge of the site to help create a gentler transition to the edge of the development; with appropriate planting used to soften the edge. <u>Where open space and landscaping are adjacent to service roads on the site edges, well-designed measures should be put in place to ensure the spaces are not used for car parking. Links to the Public Right of Way network at the edges</u></i></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p><i>of the site should be provided in context with the local setting. <u>Where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</u></i></p>
SPD_HB22	West Yorkshire Archaeology Advisory Service	6.7	The West Yorkshire Historic Environment Record includes details of Kirklees' Historic Landscape Character and this assessment and analysis covers the whole of the District.		<p>Proposed change.</p> <p>Amend paragraph 5.6:</p> <p>“Conservation area appraisals, list entries and the <i>West Yorkshire</i> Historic Environment Record provide detailed information about character and distinctiveness”</p>
SPD_HB41	Upper Dearne Valley Environmental Trust (UDVET)	6.11	<p>We would like to put forward the following suggestions for change:-</p> <p>Section 6.1.1 – Connectivity – this section needs to stress ‘realistic’ and ‘achievable’ walking and cycling routes. Perhaps the recommendation for reasonable walking and cycling distances appearing later in this document should be stressed here. However, most people would not walk 800m to access local services these days. However, the latter definitions only serve to illustrate the truly bad planning decisions made in the Dearne Valley (Scissett and</p>		<p>No change.</p> <p>This policy is seeking to provide guidance to developers on assessing the suitability of how connections to the existing walking and cycling network can be made, to give priority to these modes in line with national and local planning policy.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			Skelmanthorpe) where large estates are being built/planned in a car dependent area.		
SPD_HB23	West Yorkshire Archaeology Advisory Service	6.12	WYAAS would suggest substituting "designated heritage asset" for "Conservation Area" in this paragraph. Listed buildings and Scheduled Monuments (such as Castle Hill, Almondbury for instance) have settings according to the NPPF and key views that need to be respected (both to and from the heritage asset).		<p>Proposed change.</p> <p>Amend paragraph 6.12:</p> <p>“Any development proposal should consider views from public vantage points to important landmarks, the scope of a development to open-up and frame new views; and the impact of development on long distance views. In the case of development within or adjacent to a conservation area, views to and from the conservation area must be considered. Proposals for taller residential buildings should consider their visual impact in terms of long-distance views, <u>as well as the townscape and the impact on the setting of heritage assets.</u>”</p>
SPD_HB24	West Yorkshire Archaeology Advisory Service	Design and Access Statement Prompts	The prompts should include "heritage" as a possible reason that precludes development (see the NPPF historic environment chapter).		<p>Proposed change.</p> <p>Add new bullet point:</p> <ul style="list-style-type: none"> • <u>“Are heritage assets within or adjacent to the site identified; and the measures</u>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<u>that would help safeguard their setting clearly identified?"</u>
SPD_HB42	Upper Dearne Valley Environmental Trust (UDVET)	Principle 4	We would like to put forward the following suggestions for change:- Principle 4 – In village and small community situations, density should be consistent with the existing average density of buildings in that area. Highly dense, large poor quality estates on the edge of villages create an aesthetically offensive ‘blot on the landscape’ and should not be permitted. We welcome the proposal to screen/soften the boundaries of developments with trees, tall hedges and other vegetation.		No change. Paragraph 7.4 sets out circumstances where lower densities may be necessary.
SPD_HB98	Persimmon Homes (West Yorkshire) Ltd	Principle 4	Somewhere within this section, net developable density should be more clearly defined. Can established constraints justify lower densities?		No change. Paragraph 7.1 identifies areas of the site that should not be included in the site density. Paragraph 7.6 sets out where low densities may be necessary.
SPD_HB130	Holme Valley Vision Network	Principle 4	There is a failure to grasp the opportunity of influencing thinking and behaviour about car ownership. Even though we consider every house should be able to charge an electric vehicle, we also consider that more should be done to actively discourage private vehicle ownership by making car journeys unnecessary and alternative modes of travel easy		No change. Design advice set out in Principle 10-12 seeks to minimise the impact of the private car and support the use of active travel and public travel.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>Reference is made to the importance of public transport. The reduction in private car use will in part be dependent on the availability of better and different modes of transport. It is accepted that this is outwith the scope of the Housebuilders Design Guide but at least some reference should be made about how better public transport provision will be secured.</p> <p>Defensible space is important and external space is used as a means of achieving this but its provision comes after on-site car parking. In addition, the Housebuilders Design Guide says “External space should be able to accommodate activities such as playing, drying clothes, cycle, waste and recycling storage.” Though gardens are mentioned there is no reference to gardening. Allotments and community food growing attracts three lines in the Open Spaces Guide.</p>		
SPD_HB150	Redrow	Principle 4	This principle reflects the requirement for a minimum net density of 35dph within Local Plan Policy LP7. The guidance should also however state that, whilst this density should be sought where practicable, density is ultimately an outcome of the design process which in many local contexts would not justify this minimum DPH.		<p>No change.</p> <p>Paragraph 7.4 sets out circumstances where lower densities may be necessary.</p>
SPD_HB99	Persimmon Homes (West Yorkshire) Ltd	7.1	The definition of what is not part of the net developable site areas should be broadened to include ground conditions, particularly in coal mining high risk areas where there may be known or discovered mine shafts that have to be avoided. It should also include infrastructure, existing flood routes and existing services that have to be avoided. Essentially this principle should be complicit with section 6. Setting Design Parameters		<p>Proposed change.</p> <p>Amend paragraph 7.1:</p> <p>“The Site Framework should be used to establish and clearly identify the developable area of the site as well as areas unable to form part of the net</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p>developable area; and in the case of mixed use allocations those areas of the site that are designated for other uses. The net developable site area should not include areas that: are at high risk of flooding <i>and existing flood routes and drainage infrastructure</i>; are priority habitats; contain protected and important trees; are unable to be developed because of <i>ground conditions and</i> land stability issues; and affect the setting of heritage assets. Areas of open space provided in accordance with LP63, streets and car parking are within the net area of the site. Detailed site analysis will provide more in-depth information to inform the net developable area.”</p>
SPD_HB91	Historic England	7.1	<p>We would suggest that excluding areas that affect the setting of heritage assets may not always be appropriate as development may offer the opportunity to enhance the setting. We would instead suggest that additional wording is provided within Section 7 that requires applicants to ensure that the density new development positively responds to the local context and conserves and enhances heritage assets and their setting.</p>	<p>Suggest new paragraph</p> <p>“Density should positively respond to the scale, form and massing of the surrounding locality. It will be important that new development ensures the conservation and where possible enhancement of heritage assets and their settings. In conservation areas, conservation area appraisals can provide useful guidance”</p>	<p>Proposed change.</p> <p>Amend Paragraph 7.1 to read:</p> <p>“The Site Framework should be used to establish and clearly identify the developable area of the site as well as areas unable to form part of the net developable area; and in the case of mixed use allocations those areas of the site that are designated for other uses. The net developable site area should not include areas that: are at high risk of flooding; are priority habitats; contain protected and</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					important trees; <i>and</i> are unable to be developed because of land stability issues.; and affect the setting of heritage assets” New paragraph underneath: <i>“Density should positively respond to the scale, form and massing of the surrounding locality. It will be important that new development ensures the conservation and where possible enhancement of heritage assets and their settings. In conservation areas, conservation area appraisals can provide useful guidance”</i>
SPD_HB123	Environment Agency	7.1	Paragraph 7.1 – Net developable Area We welcome and support the exclusion of areas that are at high risk of flooding from the net developable area identified in paragraph 7.1.		No change. Support welcomed.
SPD_HB43	Upper Dearne Valley Environmental Trust (UDVET)	7.3	We would like to put forward the following suggestions for change:- Section 7.3 – should be specifically stating front of house parking, ‘must be avoided’ and front gardens/green areas included to promote ‘greening’ of any development. We need to avoid at all costs, street scenes looking like a car dealer’s forecourt as is happening at present.		No change. Parking arrangements are covered in Principle 12, which states that car parking should not dominate street frontages. Principles 7 and 11 also require greener street scenes.
SPD_HB124	Environment Agency	7.4	Section 7.4 – Green Infrastructure and open space We welcome and support the recognition of the active		Proposed change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>part that green infrastructure and open spaces provide in delivering multi-functional environmental benefits. Where sites include watercourses within/on the edge of sites we would welcome the consideration of an undeveloped buffer zone to be included to allow space for water and wildlife and provide a connection into the wider green infrastructure network, as advocated in paragraph 7.22. For those sites around main rivers, an Environmental Permit will be required from the Environment Agency under certain circumstances, in addition to planning permission.</p>		<p>Amend paragraph 6.7:</p> <p>“Appropriateness of new development to the setting and consideration of impact on the landscape should be demonstrated. Consideration of the character of the site, features being retained and concepts behind design, space and planting for protecting, preserving and enhancing trees, vegetation, wildlife habitats, boundary treatments and historic landscape. <i>Where sites include watercourses within/on the edge of sites, an undeveloped buffer zone to be included to allow space for water and wildlife and provide a connection into the wider green infrastructure would be appropriate.</i>”</p> <p>Amend paragraph 6.6:</p> <p>“The relationship of the site with neighbouring buildings and the suitability of different parts of the site for different uses in the case of mixed use allocations can determine its layout. This may include heritage assets, employment uses or other sensitive uses that may require buffer zones, stand-off distances and for development to respect the neighbouring buildings privacy and amenity. <i>Where a proposal is adjacent to a canal or river,</i></p>

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					<p><i>consideration should be given to how the development will integrate with them and, where appropriate, provide a safe access. For those sites around main rivers, an Environmental Permit will be required from the Environment Agency under certain circumstances, this should be identified in early discussions with the Environment Agency as advised in paragraph 4.1."</i></p>
SPD_HB151	Redrow	7.4	<p>Para. 7.4 suggests that detached homes may not be "appropriate" to secure efficient land use.</p> <p>Detached homes should form part of a balanced mix of housing and there is nowhere in national policy or guidance that says detached homes are not an efficient use of land. We consider reference to detached houses in this context should be removed.</p>		<p>Proposed change.</p> <p>Amend paragraph 7.4 to read: "Developers may need to demonstrate flexibility when considering standard house types particularly detached houses, on a site layout as these may not be appropriate to secure the efficient use of land, <u>the location of larger detached houses should be considered within the overall housing mix of the site, against density requirements and their appropriate location within the site."</u></p>
SPD_HB44	Upper Dearne Valley Environmental Trust (UDVET)	7.6	<p>We would like to put forward the following suggestions for change:-</p> <p>Section 7.6 – we agree with this section but, again, feel the wording should be more strongly/affirmatively stated i.e. lower densities 'will be expected to ensure...'</p>		<p>No change.</p> <p>Local Plan Policy LP7 aims to secure net development densities at over 35 per hectare. The SPD at paragraph 7.6 recognises circumstances where a lower density may be appropriate.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB152	Redrow	7.6	Para. 7.6 outlines where lower densities may be necessary or beneficial. We also suggest that lower densities should also be supported where they provide flexibility with housing typologies and help to facilitate character areas within larger or strategic schemes. A single high density character across a large scheme such as this would not be appropriate.		Proposed change. Add new paragraph after paragraph 7.6: <i><u>“On larger sites, it may be appropriate to identify character areas where different development densities can be provided. This can take account of the local character and site context and help sites make a transition from urban to rural. This can also ensure that new development creates character and identity and help to create a memorable sense of place.”</u></i>
SPD_HB83	West Yorkshire Combined Authority	7.7	Section 7 – There is duplication between section 7.7 and 7.8 – these could be combined or the duplication reduced		Proposed change. Amend paragraph 7.7: “Following the identification of a site framework (as set out in Principle 3) and considering the type of housing required and the appropriate density; the site layout should be established which takes into account the following factors <u>the remaining Principles in this section.</u> ”
SPD_HB153	Redrow	7.8	Para. 7.8 states that ‘garages and car parking spaces should play a secondary role or not occupying site		Proposed change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			frontage at all'. Delivering practical and functional places to live where car parking is most conveniently and securely located close to the front door is an important factor to most homebuyers. Attractive landscaping can effectively mitigate impact of cars in the street scene.		Amend paragraph 7.8: <ul style="list-style-type: none"> • <u>“careful consideration is given to accommodating garages and car parking spaces playing a secondary role or not occupying the site frontage at all within the development to ensure they are not visually dominant”.</u>
SPD_HB154	Redrow	7.9	Para. 7.9 – The text and diagram examples shown are all urban settings. In lower density suburban areas a softer building line will be appropriate whilst the principle of clear fronts and backs is still applicable. A strong urban block design for example will not be appropriate in Garden Village type developments or similar semi-rural locations.		Proposed change. Amend paragraph 7.9: <p>“Regard should be had to the traditional built form of the area, with many earlier rural houses facing south and presenting gable ends to the street. <u>In lower density suburban areas, a softer building line may be appropriate having regard to the wider character of the surrounding area.</u>”</p>
SPD_HB30	Upper Dearne Valley Environmental Trust (UDVET)	7.11	We are pleased to see this type of document after, like many other community groups, years of pointing out problems associated with housing planning applications relating to quality and design. It is a source of great sorrow that this document has taken so long to produce after the Local Plan was approved, resulting in many developments in the Borough, and particularly the Dearne Valley, being approved which clearly fail to meet these new guidelines.		No change. Support noted.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>We feel there are many things in this document to be welcomed, particularly:-</p> <ul style="list-style-type: none"> • The ‘softening’ of estate boundary edges by the use of boundary roads, green verges and trees. 		
SPD_HB60	Trans Pennine Trail	7.11	Boundaries – responsibility of maintenance of public space to be determined at outset.	Boundaries – responsibility of maintenance of public space to be determined at outset.	<p>Proposed change.</p> <p>Amend paragraph 7.11: “The location and type of planting within the site and its maintenance should be considered early in <u>at the outset of</u> the design process.”</p>
SPD_HB45	Upper Dearne Valley Environmental Trust (UDVET)	7.11	<p>We would like to put forward the following suggestions for change:-</p> <p>Section 7.11 – We feel there is scope to promote stone/dry stone walling and vegetation, particularly in rural areas i.e. traditional boundary treatments. Too many developments are being allowed to use high, cheap rough-hewn wooden fences as boundary treatments. They are ugly, offensive and unlikely to withstand the Pennine climate for any length of time.</p>		<p>No change.</p> <p>The SPD recognises in paragraph 7.11 that “Boundary treatments can comprise railings, walls and hedges and the choice of treatment and material used should reflect the site context and location”.</p>
SPD_HB68	Huddersfield Civic Society	7.14	There appears to be some disconnect between orientation of buildings in Section 7 Site Layout and potential provision for renewable energy. Solar Photovoltaic panels work optimally south facing at 30° elevation. Therefore, cl 8.3 Rooflines should have strong		<p>Proposed change.</p> <p>Amend paragraph 7.14:</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			consideration, to not only green roofs and dormer windows, but also the ability to generate electricity or heat hot water (Solar Thermal systems). Solar Photovoltaic systems, combined with battery storage or Vehicle-2-Grid, provide reduced demand on the distribution network but require early consideration in site planning. Orientation is not only important to solar gain in terms of overheating and cooling, it is also important in terms of onsite energy generation.		“The direction of prevailing winds and sunlight influence the microclimate of outdoor spaces, the amount of light homes received, the capacity of homes to be optimised for solar gain and the capability of a site to deal with extreme weather events. <i>Further guidance on orientation of buildings for energy efficiency are detailed in principle 18.</i> ”
SPD_HB100	Persimmon Homes (West Yorkshire) Ltd	Design and Access Statement Prompts	Do all the streets terminate with interesting views? This statement is subjective and the requirements for all streets to terminate with interesting views seems excessive.	Perhaps add the word 'key' prior to streets or delete entirely.	Proposed change. Amend the 6 th design and access prompt: <i>“Do all the streets terminate with interesting views? <u>Has the termination of streets been fully considered, with particular regard given to ensuring key streets in the site terminate with interesting views?</u>”</i>
SPD_HB101	Persimmon Homes (West Yorkshire) Ltd	7.16	This lacks details of appropriate separations distances for the following relationships: <ul style="list-style-type: none"> elevation with a habitable room (rear) to an elevation with a non-habitable room (side); Elevation with a non habitable room to an elevation with a non habitable room (side to side) Or any information for taller or shorter dwellings		Proposed change. Amend paragraph 7.16: <i>“Assessing the space around buildings should have regard to local character and context. The space between buildings can help maximise residential amenity in terms of maintaining privacy, reducing overlooking and ensuring natural light is</i>

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					<p>able to penetrate buildings. <u>Car parking located at the sides of houses helps use this space effectively and reduces car dominated frontages. Normally new build developments should seek appropriate separation distances for servicing, accommodating future adaptations and creating attractive street scenes.</u></p> <p>For two storey houses typical advisory separation distances are:</p> <ul style="list-style-type: none"> ● 21 metres between habitable rooms at the backs of dwellings, and ● 10.5 metres between a habitable room window and the boundary of adjacent undeveloped land. <p>Insert new paragraph after paragraph 7.16:</p> <p><u>For two storey houses typical minimum separation distances are advised:</u></p> <table border="1" data-bbox="1574 1190 2045 1364"> <thead> <tr> <th data-bbox="1574 1190 1827 1257">Standard</th> <th data-bbox="1827 1190 2045 1257">Distance (metres)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1574 1257 1827 1364">Distance between facing windows of habitable rooms</td> <td data-bbox="1827 1257 2045 1364">21m</td> </tr> </tbody> </table>	Standard	Distance (metres)	Distance between facing windows of habitable rooms	21m
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					<table border="1"> <tr> <td data-bbox="1581 296 1823 459"><i>Distance between facing windows of habitable rooms and non-habitable rooms</i></td> <td data-bbox="1830 296 2033 459">12m</td> </tr> <tr> <td data-bbox="1581 464 1823 627"><i>Distance between a habitable room and the boundary of adjacent undeveloped land</i></td> <td data-bbox="1830 464 2033 627">10.5m</td> </tr> <tr> <td data-bbox="1581 632 1823 922"><i>Distance between a two storey (or above) dwelling side wall and the boundary of adjacent undeveloped land</i></td> <td data-bbox="1830 632 2033 922">2m 4m*</td> </tr> <tr> <td data-bbox="1581 927 1823 1082"><i>Distance between a two storey (or above) side walls of adjacent dwellings</i></td> <td data-bbox="1830 927 2033 1082"></td> </tr> </table> <p data-bbox="1570 1086 2045 1257"><i>*normally comprising 2 metres distance from the side wall of each new dwelling to the shared boundary</i></p>	<i>Distance between facing windows of habitable rooms and non-habitable rooms</i>	12m	<i>Distance between a habitable room and the boundary of adjacent undeveloped land</i>	10.5m	<i>Distance between a two storey (or above) dwelling side wall and the boundary of adjacent undeveloped land</i>	2m 4m*	<i>Distance between a two storey (or above) side walls of adjacent dwellings</i>	
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SPD_HB141	Holme Valley Parish Council	7.18	The Parish Council welcomes a number of elements within the proposal.		No change.								

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			– Consideration of the visual impact on long distance views.		Support welcomed.
SPD_HB102	Persimmon Homes (West Yorkshire) Ltd	7.19	Lack of consideration of layouts that have off-street parking or driveways to the front of plots. Does set back apply to edge of road or footpath?		Proposed change. Amend paragraph 7.19: “A setback from the street <u>back of pavement</u> of 2 – 4 metres is normally appropriate on minor residential streets to provide usable, defensible space at the front of the dwelling and to help foster social interaction with the street. This will, however, depends on local character. A larger set back is likely to be more appropriate on busier roads, <u>and where car parking is carefully incorporated into the curtilage of the dwelling</u> , and a smaller set back could be appropriate on traffic-free streets / within car-free developments. On busier roads, designed in accordance with the Highway Design Guide SPD, verges and street trees will help provide further enclosure.
SPD_HB61	Trans Pennine Trail	Principle 7	Include ‘Accessible’ Open Space, particularly for recreation...	Include ‘Accessible’ Open Space, particularly for recreation...	Proposed change. Amend principle 7: “The integration of green infrastructure and <u>accessible</u> open space should <u>must</u> be considered early in the design process by assessing...”

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB155	Redrow	Principle 7	<p>We support the approach set out within this Principle. We also consider that, within para. 7.23 recognition should be given to the role of wildflower planting and other species rich planting in achieving diversity of landscape design and biodiversity gains.</p>		<p>No change.</p> <p>Support welcomed.</p>
SPD_HB15	Natural England	7.20	<p>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should</p> <p>‘take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure’. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p>		<p>No change.</p> <p>Comment noted.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within The Town and Country Planning Association’s "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p>		
SPD_HB114	Barratt and David Wilson Homes Yorkshire West	7.24	<p>Whilst we do not disagree to para 7.24 stating that "Green roofs can help support green infrastructure and ecological networks and help reduce the amount of surface water run-off." These can only be both effective and feasible on larger commercial buildings with flat roofs, as opposed to individual dwellings with smaller pitched roofs.</p>		<p>Proposed change.</p> <p>Amend paragraph 7.24:</p> <p><u>“These features can be integrated with rain gardens to provide rainwater management solutions. <i>The inclusion of green and blue roofs should have regard to Principle 15, as they will require flat or shallow pitched roofs and consideration will need to be given to how these fit into the wider design.</i>”</u></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB28	Upper Dearne Valley Environmental Trust (UDVET)	7.25	<p>We are pleased to see this type of document after, like many other community groups, years of pointing out problems associated with housing planning applications relating to quality and design. It is a source of great sorrow that this document has taken so long to produce after the Local Plan was approved, resulting in many developments in the Borough, and particularly the Dearne Valley, being approved which clearly fail to meet these new guidelines.</p> <p>We feel there are many things in this document to be welcomed, particularly:-</p> <ul style="list-style-type: none"> • The greening of streets and roofs, particularly the use of street trees and pedestrianised streets. 		<p>No change.</p> <p>Support noted.</p>
SPD_HB32	Upper Dearne Valley Environmental Trust (UDVET)	7.26	<p>We are pleased to see this type of document after, like many other community groups, years of pointing out problems associated with housing planning applications relating to quality and design. It is a source of great sorrow that this document has taken so long to produce after the Local Plan was approved, resulting in many developments in the Borough, and particularly the Dearne Valley, being approved which clearly fail to meet these new guidelines.</p> <p>We feel there are many things in this document to be welcomed, particularly:-</p>		<p>No change.</p> <p>Support noted.</p>

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			<ul style="list-style-type: none"> • The location of Open Space, particularly for recreation in the heart of sites. 		
SPD_HB50	West Yorkshire Ecology Service	7.27	Care needs to be taken to prevent the open space becoming additional car parking space. This is likely to be a particular problem in high density developments. Areas which are not overlooked are also vulnerable to fly tipping.	The use of tree planting, railings and posts is to be encouraged along open spaces to reduce the likelihood of use for car parking or fly tipping.	<p>Proposed change.</p> <p>Amend paragraph 7.27:</p> <p>“Where a site has a boundary on to open countryside or open space, or adjoins a major road, hard edges dominated by rear fences, gable ends, and outbuildings should be avoided. Houses should front on to such edges of the site; to minimise the risk of crime arising from the exposure of vulnerable areas such as rear gardens to open land. Service roads can form the edge of the site to help create a gentler transition to the edge of the development; with appropriate planting used to soften the edge. <i>Where open space and landscaping are adjacent to service roads on the site edges, well-designed measures should be put in place to ensure the spaces are not used for car parking.</i> Links to the Public Right of Way network at the edges of the site should be provided in context with the local setting.”</p>
SPD_HB115	Barratt and David Wilson Homes Yorkshire West	Principle 9	We would support Principle 9 as currently worded.		Comment noted.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB116	Barratt and David Wilson Homes Yorkshire West	Principle 9	We would support Principle 9 as currently worded.		Comment noted.
SPD_HB125	Environment Agency	Principle 9	<p>Section 7.6 – Biodiversity</p> <p>We agree with all points made in Section 7.6, Principle 9 – Biodiversity, however, we are surprised that ‘Conserving and enhancing the water environment’ is not included in here (or anywhere else in the document) and welcome it being included. Ideas of how to incorporate this could include facilitating suitably sized natural buffers to waterbodies, de-culverting where feasible (as outlined in Policy LP27), undertaking river restoration and aiding fish passage through removal of redundant weirs or provision of fish passes etc.</p>		<p>Add additional text to paragraph 7.33:</p> <p>“The assessment of a site’s context should have regard to the natural environment and <u>blue-green</u> infrastructure corridors and...”</p> <p>Add additional bullet points to section 7.6:</p> <ul style="list-style-type: none"> • <u>“Protecting watercourses or other water environments adjacent to or within sites by incorporating measures including suitably sized natural buffers and controlling surface run-off during and post construction.</u> <p><u>Improving the quality of aquatic habitats and blue-green infrastructure connectivity by incorporating measures such as invasive species control, river restoration, removal of redundant weirs or provision of fish passes and de-culverting where feasible.”</u></p>
SPD_HB16	Natural England	7.32	This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for		No change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.		The SPD recognises at paragraph 7.36 that a range of measures can be incorporated into designs.
SPD_HB31	Upper Dearne Valley Environmental Trust (UDVET)	7.32	<p>We are pleased to see this type of document after, like many other community groups, years of pointing out problems associated with housing planning applications relating to quality and design. It is a source of great sorrow that this document has taken so long to produce after the Local Plan was approved, resulting in many developments in the Borough, and particularly the Dearne Valley, being approved which clearly fail to meet these new guidelines.</p> <p>We feel there are many things in this document to be welcomed, particularly:-</p> <ul style="list-style-type: none"> The need for ‘net biodiversity gain’ and strategies for preserving and enhancing existing vegetation/habitats so the site’s ecological function post-development is maintained. 		<p>No change.</p> <p>Support noted.</p>
SPD_HB53	West Yorkshire Ecology Service	7.35	Please can this refer to both constraints and opportunities. Developments can rebuild biodiversity habitat networks in a degraded landscape.	See above	<p>Proposed change.</p> <p>Amend paragraph 7.35 to read: “An ecological consultant should be engaged at the earliest opportunity, prior to the design phase of the development, this will ensure advice on likely constraints</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<i>and opportunities</i> can be sought at the pre-app and the necessary constraint surveys can be undertaken.”
SPD_HB117	Barratt and David Wilson Homes Yorkshire West	7.35	It is important that both this document and the draft technical advice note on BNG currently out for consultation ensures that it is in accordance with both local plan policy LP30 and national legislation/guidance.		No change. Comment noted.
SPD_HB51	West Yorkshire Ecology Service	7.36	The adverse impact of lighting needs to be drawn out more. Where lighting must be used it should follow the ILP Guidance note 8 Bats and Artificial Lighting. This has good guidance on the use of warm white LED lighting with temperature <2700K, not blue white light with higher temperature. As well as being detrimental to bats the blue white lighting also has more impact on people's sleep patterns.		Proposed change. Add bullet point to paragraph 7.36 to highlight impacts of unsuitable lighting: <ul style="list-style-type: none"> • <u>“External lighting should be minimised to reduce impact on bats, birds and other wildlife. It should use warm white LED lighting with temperature <2700K unless specifically required for essential security cameras. Lights should be directed downwards and away from wildlife habitats.”</u>
SPD_HB52	West Yorkshire Ecology Service	7.36	The adverse impact of lighting needs to be drawn out more. Where lighting must be used it should follow the ILP Guidance note 8 Bats and Artificial Lighting. This has good guidance on the use of warm white LED lighting with temperature <2700K, not blue white light with higher temperature. As well as being detrimental to bats the blue white lighting also has more impact on people's sleep patterns.	External lighting should be minimised to reduce impact on bats, birds and other wildlife. It should use warm white LED lighting with temperature <2700K unless specifically required for essential security cameras. Lights should be directed downwards and away from wildlife habitats.	Proposed change. Add bullet point to paragraph 7.36 to highlight impacts of unsuitable lighting: <ul style="list-style-type: none"> • <u>“External lighting should be minimised to reduce impact on bats, birds and other wildlife. It should use warm white LED lighting with temperature <2700K unless specifically required for</u>

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			Lighting would be best covered by a separate bullet point and should NOT use the term "wildlife friendly lighting" as it never is!		<i><u>essential security cameras. Lights should be directed downwards and away from wildlife habitats."</u></i>
SPD_HB142	Holme Valley Parish Council	7.36	The Parish Council welcomes a number of elements within the proposal. → The whole section on Steps to enhance biodiversity, including wildlife friendly lighting		No change. Support noted.
SPD_HB3	Canal & River Trust	Principle 10	The Trust welcome the content of Principle 10, which could help to improve access to and along our towpath network from new development. It is important to recognise that significant new developments in the vicinity of the canal network place extra liabilities and burdens upon the waterway infrastructure, particularly as a result of the use of the waterway and towpath as a form of open space and as a sustainable transport route. In addition, there is often an increased burden in terms of ongoing maintenance costs for maintaining an attractive 'waterway setting', for example the removal of litter from the water and maintenance of the towpath. The Trust currently operates a 'steady state programme' whereby we ensure that the waterway network remains safe and operational and basic maintenance is carried out. In addition to the General Works Programme of maintenance and vegetation management we carry out reactive repairs and have a rolling programme to replace lock gates and other operational structures. However, we	We suggest that additional text should be included to consider the potential need for off-site improvements to address any additional demand from new residents. Suggested text is below: "Consideration should be given to the need for off-site improvements to existing walking and cycling routes to accommodate the needs of the new development".	No change. This is beyond the scope of the SPD. Local Plan policies LP20 (Sustainable Travel) and LP23 (Core Walking and Cycling Network) could be used to secure such improvements.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			are unable at present to fund large scale enhancement/improvement projects. As a result, the repercussions of nearby development can have a significant impact on the ability to improve our towpath in line with any additional use and it is essential that appropriate contributions are secured from developers in order to maintain and improve the condition of the infrastructure.		
SPD_HB62	Trans Pennine Trail	Principle 10	Including 'accessible' walking and cycling infrastructure adds weight to Kirklees' commitment to provide sustainable transport routes that are fully accessible.	Including 'accessible' walking and cycling infrastructure adds weight to Kirklees' commitment to provide sustainable transport routes that are fully accessible.	Proposed change. Amend Principle 10: "The site layout should make effective connections to existing walking and cycling links and take opportunities to create new connections. Site access should recognise the different needs of people walking, cycling and using cars and prioritise the needs of people walking and cycling. In order to contribute towards more people using sustainable modes of travel walking and cycling links should be safe, convenient and direct <i>and accessible</i> ; and residential development may provide opportunities to improve connections via the Kirklees Core Walking and Cycling Network."
SPD_HB103	Persimmon Homes (West Yorkshire) Ltd	7.37	It is not clear on the diagrams which example is which, or what the red arrows are. Are they vehicular or pedestrian only links?		Proposed change. Amend caption:

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p>“A good and a bad example of considering connections through a site, <u>with the red lines indicating routes for walking and cycling.</u></p>
SPD_HB156	Redrow	7.38	<p>Para. 7.38 – states “it may be appropriate to keep cars at the perimeter of developments and place dwellings facing traffic-free streets”. This is not practicable for many if not most people. This approach is not as secure as on-plot parking and also difficult to provide car charging points etc. In our view this is not a commercial or viable option for new housing developments.</p>		<p>Proposed change.</p> <p>Amend paragraph 7.38:</p> <p>“The layout of the site should show walking and cycling connectivity both within the site and to the surrounding area. Site layouts should ensure that access to nearby facilities can be achieved by safe and convenient routes for people on foot or on bicycles. It be appropriate to keep cars at the perimeter of developments and place dwellings facing <u>Secure car parking can be sited to support</u> traffic free streets. The needs of people walking, people on bicycles and people using cars are all different and require different design approaches, appropriate for each site. Careful consideration of proposed gateways and entry points into the developments to highlight a sense of arrival. Green Streets[®] and an avenue of trees on the estate road and approach can support this.”</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB104	Persimmon Homes (West Yorkshire) Ltd	7.39	The design of the layout can only to an extent influence the distances to local amenities. Site allocation plays a major part		No change. Comment noted.
SPD_HB105	Persimmon Homes (West Yorkshire) Ltd	7.40	Third bullet point does not seem to be relevant to the overarching principle.		Proposed change. "Keep access to the rear and side of dwelling to an absolute minimum, particularly shared rear access to dwellings. <u>Where these are provided access to them should be controlled to residents, with such access points being well-overlooked.</u> "
SPD_HB106	Persimmon Homes (West Yorkshire) Ltd	Design and Access Statement Prompts	It is not clear if the second bullet point is referring to the design of the main vehicular site access(es) or access to the site in general terms.		No change. Amend Design and Access Statement prompt under paragraph 7.40: "Does access to <u>and within</u> the site, <u>including main vehicular access</u> , prioritise people on foot or <u>and</u> on bicycles?"
SPD_HB158	Redrow	Principle 11	Principle 11 Street Design. Principle 11 talks of inclusive spaces and landscaping but also the need to agree highway design to an adoptable standard prior to approval in accordance with the Highway Design Guide SPD. Whilst para. 7.44 seeks to avoid over engineered highway layouts, there is the potential for this to occur if any conflict with the Highway		Proposed change. Amend Principle 11 to read: "An agreement of the design of highways to an adoptable standard, in accordance with the Highway Design Guide SPD, should be reached prior to approval <u>at the earliest</u>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			Design Guide is not resolved. A clearer approach to priorities on this point is needed within the SPD.		<u>stage of design following advice in paragraph 7.44.</u> "
SPD_HB107	Persimmon Homes (West Yorkshire) Ltd	7.42	An explanation of the term 'dementia-friendly-design' should be provided		Proposed change. Insert footnote at paragraph 7.42: "Long, straight, uniform streets, complicated junctions and cul-de-sacs should be avoided to help support dementia-friendly design.*" <u>"* The Royal Town Planning Institute published advice on planning and dementia in 2020 including "What does a place designed for people living with dementia look like?"</u>
SPD_HB159	Redrow	7.42	Para. 7.42 – In this paragraph cul-de-sacs are dismissed but they actually provide very safe and popular places to live. Cul-de-sacs and longer straight streets all have their place within good design if used effectively and appropriately mitigated. For example through the use of way-finders in longer streets to facilitate legibility. Secured by Design 2019 states that as long as they are not excessively long and linked at the end by footpaths they provide very safe environments in which residents benefit from lower crime. This is not to dismiss the need to provide permeable and legible		Proposed change. Amend paragraph 7.42: "Proposals should consider the role that streets have for social interaction and informal play and be designed in a way that facilitates this. Developments should be set around linked streets <u>following a clear hierarchy of street types</u> , avoiding cul-de-sacs and discouraging through traffic using residential streets as a shortcut. As part of a perimeter / block layout, mews courts within blocks can help

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			developments to enable movement, but to dismiss cul-de-sacs entirely is in our view excessive.		increase the density of the site but still maintain pedestrian permeability. Long, straight, uniform streets, <u>streets that do not allow pedestrian permeability and complicated junctions and cul-de-sacs</u> should be avoided to help support dementia-friendly design. Where a cul-de-sac layout is unavoidable due to site constraints, care must be taken to ensure that they are not designed to be vulnerable to crime and anti-social behaviour, <u>and that refuse collection vehicles can service the site without the need for turning and reversing.</u> Further information is available in Secured by Design Homes 2019 guidance.”
SPD_HB157	Redrow	7.44	Principle 11 Street Design. Principle 11 talks of inclusive spaces and landscaping but also the need to agree highway design to an adoptable standard prior to approval in accordance with the Highway Design Guide SPD. Whilst para. 7.44 seeks to avoid over engineered highway layouts, there is the potential for this to occur if any conflict with the Highway Design Guide is not resolved. A clearer approach to priorities on this point is needed within the SPD.		Proposed change. Amend Principle 11 to read: “An agreement of the design of highways to an adoptable standard, in accordance with the Highway Design Guide SPD, should be reached prior to approval <u>at the earliest stage of design following advice in paragraph 7.44.</u> ”
SPD_HB160	Redrow	7.44	Para 7.44 indicates that layouts should not be dominated by over engineered highway layouts. Often however such an approach is a requirement of the Highway Authority. It		No change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			is therefore difficult to meet the planner's aspirations and gain the support of the highway authority. More clarity is therefore needed on the approach and priorities in layout design.		This repeats advice set out in the Highway Design Guide SPD which states the importance of agreeing highway design details well in advance of the scheme being finalised.
SPD_HB109	Persimmon Homes (West Yorkshire) Ltd	7.46	Clarity sought on whether the Council are encouraging development-wide communal bin stores or smaller storage/collection points for a lesser number of dwellings served from private drives etc.		No change. The approach taken to bin storage and bin presentation points will be considered on a site-by-site basis, in accordance with Principle 19 of this SPD.
SPD_HB108	Persimmon Homes (West Yorkshire) Ltd	7.47	It would be helpful if confirmation that Highways adoption officers will be involved in the statutory consultation process for planning applications.		No change. The Highway Design Guide SPD states the importance of agreeing highway design details well in advance of the scheme being finalised.
SPD_HB46	Upper Dearne Valley Environmental Trust (UDVET)	Principle 12	We would like to put forward the following suggestions for change:- Why not set out minimum sizes for both single and double garages which include space not only driving 'a large family car' into the garage but getting out of it once in the garage? Again, this section needs to be more directive.		Proposed change. Amend principle 12: "Ensure that any garages are set back from the front door of the house or are carefully designed in terms of materials so that they are not the dominant feature; any garage must be large enough to accommodate a

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					large family car, <i>following guidance set out in the Highway Design Guide SPD.</i>
SPD_HB143	Holme Valley Parish Council	Principle 12	The Parish Council welcomes a number of elements within the proposal. → Design to discourage anti-social parking		No change. Support noted
SPD_HB29	Upper Dearne Valley Environmental Trust (UDVET)	7.50	We are pleased to see this type of document after, like many other community groups, years of pointing out problems associated with housing planning applications relating to quality and design. It is a source of great sorrow that this document has taken so long to produce after the Local Plan was approved, resulting in many developments in the Borough, and particularly the Dearne Valley, being approved which clearly fail to meet these new guidelines. We feel there are many things in this document to be welcomed, particularly:- <ul style="list-style-type: none"> • The discouragement of front of home parking aprons and the use of secure residential parking areas and under croft parking. However the wording could be tightened up considerably (See 7.3 below) • Garages to play a secondary role in building frontage design with the avoidance of dominant integral garages. 		No change. Support noted

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB110	Persimmon Homes (West Yorkshire) Ltd	7.50	<p>Consider restricting car parking to the edge of the site so that street spaces can be prioritised for people creating more attractive places to live.</p> <p>The above bullet point should be more prescriptive. It would not be a suitable solution for the majority of residential developments.</p>		<p>Proposed change.</p> <p>Amend paragraph 7.50:</p> <ul style="list-style-type: none"> Car parking within the streetscape <u>and within the plot at the front of dwellings</u> should form part of a well-landscaped streetscape so its visual effect is minimised, such as screening with low hedgerows, <u>avoiding the creation of bland streetscapes that are dominated by car parking</u>. Consider restricting car parking to the edge of the site so that street spaces can be prioritised for people creating more attractive places to live. <u>Support the creation of traffic-free and low-traffic streets by carefully considering the location of secure car parking within the site.</u>
SPD_HB161	Redrow	7.50	<p>Within para. 7.50, the guide sets out a number of suggestions as to how parking can be successfully included within a housing layout. We also feel that utilising landscaping to mitigate against on-plot parking is an important consideration. Applied consistently the parking aspirations within the guide do not align with the density requirements set out elsewhere. In many cases, especially where the inclusion of smaller units (often terraced) is necessary from a</p>		<p>Proposed change.</p> <p>Amend paragraph 7.50:</p> <ul style="list-style-type: none"> On-plot car parking at the front of a property resulting in bland streetscapes should be avoided.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			housing mix perspective, parking will necessarily need to be at the front of dwellings. How this can be most successfully achieved should be an important part of this element of the guide.		<ul style="list-style-type: none"> Car parking within the streetscape <u>and within the plot at the front of dwellings</u> should form part of a well-landscaped streetscape so its visual effect is minimised, such as screening with low hedgerows, <u>avoiding the creation of bland streetscapes that are dominated by car parking</u>. Consider restricting car parking to the edge of the site so that street spaces can be prioritised for people creating more attractive places to live. <u>Support the creation of traffic-free and low-traffic streets by carefully considering the location of secure car parking within the site.</u>
SPD_HB11	Private Individual	Design and Access Statement Prompts	Gated parking as shown can be divisive and magnetic to thieves and vandals.		<p>Proposed change.</p> <p>Amend 4th bullet point of Principle 12:</p> <ul style="list-style-type: none"> “Where car parking is accommodated <u>outside the curtilage of dwellings on the street</u>, it should be well-integrated into the street scene with landscaping; discouraging anti-social parking and within the view of properties” <p>Amend 6th bullet point of para 7.50:</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<ul style="list-style-type: none"> • “Where rear parking courtyards are provided discouraged because they are less likely to be <u>they should be</u> within sight of active windows of dwellings, or well-lit; however, where these are provided <u>with</u> access should be protected by a gate, in accordance with Secured by Design guidance.”
SPD_HB84	West Yorkshire Combined Authority	Principle 13	Section 8 - In principle 13, the phrase ‘solar performance’ will not be widely understood – ‘thermal performance’ incorporates this so suggest removing the reference.		<p>Proposed change.</p> <p>Amend principle 13 to read: “... transportation and thermal and solar performance should be a prime consideration in the development process.”</p>
SPD_HB47	Upper Dearne Valley Environmental Trust (UDVET)	8.1	<p>We would like to put forward the following suggestions for change:-</p> <p>Section 8.1 – We do not agree with 8.1 – the heritage and character of many areas in Kirklees needs to be supported to match materials and architecture of an area. ‘Contrast’ is likely to be aesthetically jarring. We believe the whole section needs to say more about preserving the traditional character of the Pennines vis a vis materials and architectural design to enhance and complement existing communities. In Kirklees Rural there is a strong economic case to ensure this happens given the economic benefits arising for the Borough from media/filming activities and tourism.</p>		<p>No change.</p> <p>Principle 13 recognises that applicants should take account of local materials and the character of the area.</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB12	Private Individual	8.2	Materials should be sound, soar gain materials essential, pre-constructed housing a preference and cables, water and electricity, as well as antennae, integrated within the dwelling.		No change. Comment noted.
SPD_HB25	West Yorkshire Archaeology Advisory Service	8.2	Would suggest adding "and other designated heritage assets" after "in the setting of of listed buildings buildings and conservation areas" (This would include for instance Scheduled Monuments and Registered Historic Parks and Gardens, whose settings should also be respected and enhanced by good design).		Proposed change. Amend paragraph 8.1: "The use of high quality contemporary materials is considered on the merits of the proposal and its location, with particular attention given to proposals in the setting of listed buildings, and conservation areas <u>and other designated heritage assets</u> "
SPD_HB118	Barratt and David Wilson Homes Yorkshire West	Picture 1	We support the reference to the use of recycled and reclaimed materials which is not only very sustainable but it can also be very effective from an energy efficiency perspective. Such as the use of recycled reconstituted stone, which is often more energy efficient than natural stone.		No change, Comments noted and support welcomed.
SPD_HB162	Redrow	8.6	Para. 8.6 – 8.7 – In our view this element of the guidance is far too prescriptive for a district-wide design guide – e.g. windows should usually provide a strong vertical alignment. Much of this level of detail should be addressed on a site by site basis within the Design and Access Statement. The SPD need only reflect the wording within the Principle, and stress the importance of getting these details "right" within the individual development.		Proposed change. Amend paragraph 8.7: <ul style="list-style-type: none"> • "Openings should have a coherent pattern and should usually form a strong vertical alignment <u>their design should have regard to the local character and with the design of</u>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<u>windows through a site being an important part in generating a sense of identity."</u>
SPD_HB163	Redrow	8.7	Para. 8.6 – 8.7 – In our view this element of the guidance is far too prescriptive for a district-wide design guide – e.g. windows should usually provide a strong vertical alignment. Much of this level of detail should be addressed on a site by site basis within the Design and Access Statement. The SPD need only reflect the wording within the Principle, and stress the importance of getting these details “right” within the individual development.		Proposed change. Amend paragraph 8.7: “Openings should have a coherent pattern and should usually form a strong vertical alignment <u>their design should have regard to the local character and with the design of windows through a site being an important part in generating a sense of identity."</u>
SPD_HB111	Persimmon Homes (West Yorkshire) Ltd	8.12	2.5 storey (room in the roof) dwellings should be permissible in terms of having a steeper roof pitch		No change. Paragraph 8.12 sets out considerations for the pitches of roofs and is addressed in paragraph 8.13.
SPD_HB164	Redrow	8.14	Para. 8.14 advocates the inclusion of chimneys, even when they are not required for their traditional purpose. We do not agree this is needed as a general requirement, since within many areas or new urban extensions chimneys are becoming increasingly less prevalent. In our view this statement is unnecessary or could be more reasonably worded to clarify that this would apply in locations where chimneys are a key characteristic of an		Proposed change. Amend paragraph 8.14: “Chimneys have traditionally been an important part of the roofscape, particularly in providing punctuation to long ridgelines. Whilst traditional chimneys may not be necessary, combined service

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			area. This would be identified as part of the contextual analysis in the Design and Access Statement.		cores for gas flues and natural ventilation hoods can be incorporated into the roofscape, <i>where chimneys are a key characteristic of an area.</i> "
SPD_HB85	West Yorkshire Combined Authority	Principle 16	Section 9 – Is it necessary to reiterate requirements of Building Regulations M4(2) within this document? The assertion that the Council will encourage developers ‘consider the use of the nationally described space standards’ should be supported – how will it encourage this? By being more likely to approve a planning application? By ‘fast-tracking’ the process? Words like ‘encourage to consider’ do not usually yield results with housing developers. Section 9.3 ‘Energy Efficiency’ would be better with a different heading, as it also talks about renewable energy and so is about carbon emissions rather than just energy efficiency.		<p>Proposed change.</p> <p>Amend Principle 16:</p> <p><i>“All new homes will be expected to be compliant with the government’s technical housing standards for <u>should aim to be accessible and adaptable homes to meet the changing needs of occupants over time as set out in part M4 (2) of the in accordance with</u> Building Regulations. <u>The provision of homes that meet these standards should be considered within the housing mix of the wider site in line with Local Plan policy LP11 (Housing Mix and Affordable Housing).</u>”</i></p> <p><i>The council will encourage the use of the Nationally Described Space Standards to ensure new dwellings <u>All new build dwellings should have sufficient internal floor space to meet basic lifestyle needs and provide high standards of amenity for future occupiers have sufficient internal floor space to meet basic lifestyle needs. Although the government has set out Nationally Described Space Standards,</u></i></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p><u>these are not currently adopted in the Kirklees Local Plan. The council will seek to adopt such a policy in the future in accordance with evidence and in the meantime will seek to ensure high quality living environments through the application of Local Plan policy LP24 (Design)."</u></p> <p>Amend paragraph 9.1:</p> <p><u>"Occupants must have sufficient space within their homes to be able to carry out day to day activities, and where homes are accessible and adaptable they are able to meet the changing needs of occupants over time. The government's Nationally Described Space Standards deals with internal space within new dwellings across all tenures. The standards as shown in the table below set out minimum requirements for internal gross floor area of new dwellings at a certain level of occupancy along with floor areas and dimensions for key parts of the home particularly bedrooms, storage and floor to ceiling heights. These space standards are not currently compulsory. From April 2021, the National Described Space Standards will be required for new homes delivered through Permitted Development Rights. However, The Council encourages developers to</u></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					consider the use of recognises the nationally described space standards as best practice <u>to ensure that new homes are able to meet basic lifestyle needs and provide high standards of amenity for future occupiers.</u> "
SPD_HB112	Persimmon Homes (West Yorkshire) Ltd	Principle 16	<p>The reference to compliance with the government's technical housing standards set out in M4(2) of Building Regulations should be expanded upon in the remainder of the section.</p> <p>The requirement for all new homes to meet M4(2) standards seems excessive. Leeds City Council's adopted policy requires 30% of new dwellings to meet the standard.</p>		<p>Proposed change.</p> <p>Principle 16 and para 9.1 have been amended, please see SPD_HB85.</p>
SPD_HB119	Barratt and David Wilson Homes Yorkshire West	Principle 16	<p>We object to the first paragraph of principle 16 as it is trying to bring a new planning policy requirement via an SPD, which can only legally be introduced via a local plan. Should the Council wish to take up the Government's offer of introducing accessible and adaptable homes, then it needs to follow the guidance set out in the Government's technical housing standards.</p> <p>We support the second paragraph of principle 16, which recognises that the Council can only encourage the use of the National Described Space Standards, in the absence of a local plan policy requirement.</p>	To amend the wording of Principle 16 to ensure that there is no confusion on what the Council can insist on, verses what they can seek to encourage.	<p>Proposed change.</p> <p>Principle 16 and para 9.1 have been amended, please see SPD_HB85.</p>
SPD_HB48	Upper Dearne Valley	9.1	We would like to put forward the following suggestions for change:-		Proposed change.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
	Environmental Trust (UDVET)		<p>Section 9.1 – Use of Nationally Described Space Standards should be compulsory and this section and Policy LP24 need to be rewritten to this effect. It is a really bad reflection on Planning/the Council/Cabinet in Kirklees for these standards not to be adopted as in other Boroughs in West Yorkshire. Any rubbish is not acceptable in Kirklees. Indeed only the best developers should be allowed to build and everyone involved in the development process be completely uncompromising on quality. The stance taken in this Section is a huge disappointment and marks the major failure of the whole document.</p>		Principle 16 and para 9.1 have been amended, please see SPD_HB85.
SPD_HB13	Private Individual	9.3	There should be an absolute minimum rear garden requirement for a house irrespective of size. suggest 10m		No change. Comment noted.
SPD_HB128	Holme Valley Vision Network	9.6	<p>CLIMATE CHANGE</p> <p>Climate change should be at the start not the end of the Housebuilders Design Guide. The production of this document should be used as the opportunity to make a significant impact on developers' practice.</p> <p>While there is mention of some actions needed to respond to the climate change emergency, these are standard and are lacking in the ambition and forward thinking seen in other documents such as the Holme Valley Parish Council's climate change emergency action plan. For example, there is no reference to the use of permeable surfaces and greater efforts to mitigate the flood risk should be made.</p> <p>There appears to be no consideration about how efforts</p>		No change. Comment noted. Climate change is covered at the beginning of the document and is linked to many of the Design Principles throughout the document.

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
			<p>could be made to encourage less waste production or more recycling. Perhaps there should be less provision for the storage of waste but, maybe, as quoted in 'Living with Beauty' "New places are designed by the wheelie bin operators".</p> <p>More consideration needs to be given to the effects of light pollution especially in rural areas.</p> <p>There should be greater encouragement for the use of green building materials and learning new green building methods. There is a contradiction between the use of local materials and concern about increasing the amount of quarrying in the area,</p> <p>Greater emphasis should be placed on the use of alternative sources of power.</p> <p>Every house should have an electric charging point for a private vehicle and provision for excellent broad band connectivity. These should be seen in the same way as sewers.</p> <p>Planting should be done with the use of native and locally relevant species.</p>		
SPD_HB113	Persimmon Homes (West Yorkshire) Ltd	Design and Access Statement Prompts	This prompt should include details of how this should be demonstrated/how it would be assessed.		<p>Proposed change.</p> <p>Amend Principle 17:</p> <p>"All new dwelling <i>houses</i> should have adequate access to <i>private</i> outdoor space that is functional and proportionate to the</p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<p>size of the dwelling <u>and the character and context of the site. The provision of outdoor space should be considered in the context of the site layout and seek to maximise direct sunlight received in outdoor spaces. Apartment development can provide outdoor spaces through balconies, though communal terraces and gardens may be more appropriate.</u></p> <p>Amend paragraph 9.4:</p> <p><u>“The provision of outdoor space should take account of the access to sunlight, with at least part of open spaces within the site able to receive direct sunlight for part of the day all times of the year, and do not have to be uniform across the site. Where appropriate, outdoor space should be provided in line with a perimeter-block approach as set out in Principle 5 and have regard to residential amenity as set out in Principle 6.”</u></p> <p>Amend Design and Access Statement Prompt:</p> <p><u>“Is there Do all dwellings have access to useable outdoor space for all dwellings, with and has consideration been given to how the outdoor space can maximise the</u></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
					<i>amount of sunlight that it receives</i> for at least part of the day?"
SPD_HB36	Upper Dearne Valley Environmental Trust (UDVET)	Principle 18	<p>We are pleased to see this type of document after, like many other community groups, years of pointing out problems associated with housing planning applications relating to quality and design. It is a source of great sorrow that this document has taken so long to produce after the Local Plan was approved, resulting in many developments in the Borough, and particularly the Dearne Valley, being approved which clearly fail to meet these new guidelines.</p> <p>We feel there are many things in this document to be welcomed, particularly:-</p> <ul style="list-style-type: none"> Reduction of reliance on non-renewal energy and use of ground source heat pumps, water source heat pumps and gas combined heat and power. 		<p>No change.</p> <p>Support noted.</p>
SPD_HB69	Huddersfield Civic Society	9.7	<p>It is important to note that heat pumps are an effective heating and cooling source in well insulated buildings, however, developers need to ensure that the harmonics of the grid are not affected by large developments, all installing heat pumps. Also, noise from heat pumps can cause issues for some. Each of these need to be considered by developers prior to development, even if the developer does not intend to install such systems themselves.</p>		<p>No change.</p> <p>Sources of renewable energy generation are identified in paragraph 9.9.</p> <p>Proposed change.</p> <p>Amend Principle 18:</p>

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			<p>For large developments, developers need to consider alternative forms of localized energy generation, such as small-scale district heat networks.</p> <p>We would therefore expect to see some requirements to consider how any such properties are to contribute to energy demand reduction over the life of the property. Given the Kirklees Climate Emergency Motion report and targets for Net-Zero Carbon by 2038, it should be incumbent on the Council to ensure such developments are not providing an overall negative effect. Developers should be expected to demonstrate how their sites would contribute to reductions, or increases, in emissions during the development and life of the properties. Some basic metrics could be used against a basic house of today's standard build using national values. With the national trajectory being a reduction of greenhouse gas emissions by 68% by 2030 and to Net-Zero by 2050, it is anticipated that more stringent requirements will be placed on Councils and developers over the coming 5 years.</p>		<p><u>"New proposals should contribute to <i>the Council's ambition to have net zero carbon emissions by 2038, with high levels of improving the environmental sustainability of the development</i>, by ensuring the fabric and siting of homes, <i>and their energy sources</i> reduce their reliance on sources of non-renewable energy. <i>Proposals should seek to design water retention into proposals.</i>"</u></p> <p>Add text to paragraph 9.6: <u>"Well-designed places respond to the impacts of climate change by conserving natural resources. <i>40% of UK emissions come from households* with a significant proportion coming from how they are heated and how electricity is provided.</i>"</u></p> <p><u>* Source: The UK Committee on Climate Change www.theccc.org.uk</u></p> <p>Insert new paragraph after paragraph 9.11: <u>"The design of homes should look to include measures which increase the retention of water, and are efficient in their use of water by considering elements such as rainwater harvesting, greywater recycling, the use of water butts"</u></p>

ID	Organisation	Document Section / Page	Comment	Change(s) Required.	Council Response & Proposed Changes to the SPD
SPD_HB67	Huddersfield Civic Society	9.9	We agree that a 'fabric first' approach needs to be considered for energy conservation and we would like to see clear provisions of specific requirements on Council owned land and Council built properties.		No change. Comment noted.
SPD_HB120	Barratt and David Wilson Homes Yorkshire West	9.9	We strongly support the fabric first approach.		No change. Support noted.

Appendix 4: List of Minor Changes (Changes from internal comments not listed in Appendix 3)

Paragraph	Change
7.13	Amend paragraph 7.13: Boundary treatments should be used to clearly distinguish between public and private space, helping to minimise the risk of crime whilst performing an important role in breaking up the dominance of on-plot car parking. Boundary treatments can comprise railings, walls and hedges and the choice of treatment and material used should reflect the site context and location. At the front of plots, any boundary treatments should be kept low so that dwellings are kept open to view. <u>Where access to rear gardens is taken from the front of dwellings, this should offer high gated access close to the front building line to avoid deep recesses between buildings.</u> Low quality and intrusive boundary treatments can have a negative visual impact on the public realm; particularly high fences where rear gardens face on to the street. Consideration should be given to how the built form can be designed to enhance natural surveillance and reduce fear of crime, ensuring views not being obscured by vegetation, high walls and fencing. The location and type of planting within the site and its maintenance should be considered at the outset of the design process.
7.15	Amend paragraph 7.15: Within some sites, it may be appropriate to accommodate car parking <u>outside of the curtilage of the dwellings provided that this is well-lit and within sight of active rooms</u> at the edge of development or locate it in under-croft car parks; a strong building line and delineation of public and private space is still a key consideration in such developments.
7.28	Add text at end of paragraph 7.28: <u>The type of planting that is used can also be utilised for providing additional boundary security.</u>
7.29	Add to end of paragraph 7.29: <u>with the risk of poorly maintained planting creating opportunities for concealment and pinch points</u>
7.47	Add to end of paragraph 7.47: <u>“require lighting to adoptable standards and have a maintenance and management programme in perpetuity”.</u>
Principle 15	Add text to end of Principle 15: <u>and ensuring that the design of roofs does not allow for easy climbing access to upper floor windows.”</u>
9.10 - Diagram	Amend diagram: Add “and winter”
9.14	Amend paragraph 9.13: It is important to limit the visual impact on the street scene. Bespoke well designed enclosures to the front of dwellings may be required, enclosures may form part of a dwellings defensible space. Storage areas should not be located in areas where they cause obstruction to pedestrian or vehicles. <u>For bin collection, presentation points should be provided in accordance with advice set out in the Highway Design Guide SPD.</u>
9.15	Amend para 9.15: Developments including apartments and sheltered accommodation the provision of communal waste and recycling areas may be a more practical solution. Any communal bin collection should be well-designed,

	<p>well-screened and fit into the streetscape; potentially utilising design features such as green roofs <i>and provide controls to prohibit unauthorised access</i>. Further advice is in the NHBC document 'NF60 Avoiding Rubbish Design'. The location of bin storage should be in line with guidance in the HDG, the Council's Waste Collection Guidance <i>Waste Management Design Guide for New Developments</i> and Building Regulations 2010, part H. <i>The siting of bin storage and communal bin storage areas must be away from dwellings to prevent climbing access to upper floors.</i></p>
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