

HoTT comments on draft Kirklees Local Plan

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HoTT
HOLMFIRTH TRANSITION TOWN





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Introduction

Kirklees Metropolitan Council (the council) has drafted a **Local Plan (the Plan)** to set out their long term strategy on managing development across the district over the next 15 years. They are consulting on this draft Local Plan, available for download at www.kirklees.gov.uk/localplan, with comments due back by 1st February 2016.

This document sets out comments by **Holmfirth Transition Town (HoTT)** on this draft Local Plan, for submission to the Council, with our contact being Janet Williams, Chair of HoTT, 77 Totties, Scholes, Holmfirth HD9 1UJ, West Yorkshire.

HoTT, a community group based in the upper Holme Valley, south of Huddersfield, West Yorkshire, UK, is part of the global Transition Town movement which promotes the building of resilient and sustainable local communities, a key part of which is encouraging self-sufficiency and a low carbon lifestyle. There are over 450 officially recognised transition initiatives worldwide in 34 countries. A transition initiative is run independently and is not affiliated to any faith group or political party. HoTT started up in 2010 and has over 200 members.



Transition:
It's like change, only better.

HoTT as organisation has a specific purpose: to combat the effects of climate change through action, education and lobbying, to build a sustainable low-carbon community within the Holme Valley area. Our comments therefore reflect this purpose, and also, our location within the district.

HoTT General Comments on draft Local Plan

Our belief is that tackling climate change needs to be woven into every aspect of this Local Plan. HoTT have therefore started with comments on the general strategy and then looked at specific policies.

(1) Strengthening the strategic approach to tackling climate change

HoTT welcomes the recognition given in the Plan to climate change as both a local as well as global issue that needs to shape future planning for Kirklees as set out as Issue 9 in **Chapter 2.11** 'To help tackle climate change Kirklees should plan positively to deliver renewable and low carbon technology developments'. Whilst flooding is a local and immediate issue associated with climate change, the Plan should also be noting that tackling climate change is also needed to mitigate other longer term issues e.g. increased migration, changing agriculture etc., which could have even more serious impacts on Kirklees and the rest of the UK.

The Plan also states in **Chapter 4.2** that 'achievement of sustainable development is a golden thread running through the local plan'. This is to be welcomed.

Given the commitments above, HoTT considers the over-arching statement in the vision for Kirklees in **Chapter 3.2** should be qualified by **adding a third important factor** for making Kirklees a better place in the future. The paragraph could read:

*"We consider that there are **three** major factors that are important in making Kirklees a better place in the future:*

- *healthy people enjoying quality of life; and*
- *a strong and growing economy.*
- ***a sustainable low-carbon future, leading to Zero Carbon Kirklees by 2030."***

This would strengthen the importance of **Chapter 3.3** Strategic Objective 3.6 (7) 'Promote development that helps to mitigate climate change, and development which is adapted so that the potential impact from climate change is reduced', amongst the other strategic objectives, when influencing the spatial development



strategies and policies that follow from the vision e.g. **Policy DLP1** Presumption of Sustainable Development, **Chapter 4** Environment role of the planning system in mitigating and adapting to climate change including moving to a low carbon economy.

The inclusion of this third factor also reinforces the commitments given at the recent conference in November 2015 'Towards a Low Carbon Kirklees' where council leaders and officers spoke about the importance of a sustainable low carbon future within the district.

HoTT would like to see these commitments translated in a practical way in strategy, policy and site specific proposals.

Another example of how the strategic commitment to climate change can be strengthened appears in the background Sustainability Assessment. Table 2.2 sets out the Sustainability Assessment Framework, and includes the Objective to '*Reduce the contribution that the District makes to climate change*'. This would be strengthened by references to the essential action to bring this about in other objectives. For example, Objective 9 could read '*Ensure all people are able to live in decent homes that meet their needs in a sustainable way, reducing the reliance on carbon based energy*'.

(2) Achieving sustainability in our rural communities

The following comments refer specifically to our experiences in the Holme Valley. HoTT accept and welcome the identification of Place Shaping as set out in Chapter 5 of the Plan - the identification of a rural 'place' sub-area within Kirklees is a sensible one and the challenges faced by such rural communities (as expressed in Chapter 5.4) are real! These are added to by the dysfunctional population profile within the Holme Valley with fewer of our younger working generation able to live and work in the area. These challenges to growth will have a marked impact on the longer term sustainability of our Holme Valley community, if not mitigated by the Plan.

HoTT are concerned about the imbalance in the Plan between housing and employment as far as new build is concerned. Both need attention, along with infrastructure, in order to secure a sustainable future for the Kirklees rural areas. Affordable housing and employment opportunities for the young are required to be able to keep them in the Holme Valley. Sufficient smaller housing units are required for the elderly, for both independent and assisted living needs. The Plan should be more ambitious in prescribing targets and requirements for these needs for our community to be sustainable in the longer term e.g. in **Policy DLP11** a higher percentage of affordable/social housing than 20% should be prescribed in those areas of the district where needed to ensure sufficient homes for the young, elderly and vulnerable within our community.

HoTT welcome the commitment (in **Policy DLP3**) to ensure infrastructure is in place to meet the needs generated by development, but consider this should emphasise the particular issues faced by rural communities, where incremental development of small sites can place difficult demands on schools and health facilities. All developments should be contributing to their local communities and we are pleased to see a higher charge being levied on smaller developments in the rural areas. We would like to see developers in the rural areas contributing to high speed broadband as well as those utilities set out in the Preliminary draft CIL.

In addition, minor roads in rural areas can be tortuous and without any means to improve. We would favour the inclusion of a policy which recognises the need to restrict development near well-known difficult roads, rather than just taking congestion as the only road factor to be considered.

Given the complexity of developing in rural areas with small schools, difficult roads and scattered health provision, we would like to see the principles of site based masterplanning (as set out in **Policy DLP4**) applying to all rural sites over one hectare.



HoTT Comments on individual Sections of the draft Plan

HoTT comment on particular chapters (in bold), policies (in bold) and clauses (in brackets) in the Plan as follows:

6 Economy ...p45

HoTT are disappointed that there is no reference in **Chapter 6**, Economy, to the potential growth of small scale industry especially that needed to combat climate change, such as the green business sector. Whilst it may not be appropriate to reserve specific sites, a policy encouraging growth in this sector would be a welcome addition.

The Plan in **Chapter 4** acknowledges the shortage of employment land in the Holme Valley area, and highlights this as one of the 8 challenges to growth for Kirklees Rural sub-area. Hence, the Plan should recognise the need to retain current level of businesses and should include a policy to encourage the provision of affordable office / workshop accommodation space for start-ups and SMEs. The Plan should also designate new employment sites within the Holme Valley area to stimulate local business and employment opportunities

HoTT are therefore disappointed to see Bridge Mills in Holmfirth designated as a housing site (H50), as this is one of the few employment sites offering locations for SMEs – currently over 40 small businesses. If we plan to be more sustainable and reduce reliance on commuting by car, then employment possibilities close to our communities will need to be protected. HoTT would therefore prefer to see this as a protected employment site, with **Policy DLP8** applying.

HoTT would welcome inclusion of a specific policy encouraging the growth of community / social enterprises within our local economy e.g. locally owned community businesses such as the Fair Trader co-operative in Holmfirth, the HoTTWind@Longley community benefit society near Hade Edge. HoTT consider that the council should support the provision of low cost office / workshop accommodation / business facilities / sites for such community enterprises, particularly where the council has access to public sector assets (e.g. land, buildings, etc.) which could be utilised by such community groups (**6.12**). Supported by access to cheaper council loan finance, these assets could be used by community groups for developing local schemes where the council is unable or unwilling to do so. HoTT would like to see to specific policy and guidance included in the Plan on this matter, as there appears to be **no specific policy or guidance on the beneficial use of council assets in the Plan**.

7.2 Homes ... p59

HoTT wishes to see the encouragement and support by the Council for affordable homes strengthened in **Policy DLP11**. There is a great need for affordable housing suitable for young people and key workers in the Holme Valley, with its distorted population age profile of fewer younger working age people and more elderly. There is also a demand for new housing suitable for older people such as 1 or 2 bedroomed independent living and assisted living housing units. Providing suitable housing for the elderly already living locally, will release family size housing onto the market. HoTT welcomes the recognition of the different housing needs in Chapter 7 but suggests that the Plan should be much more prescriptive in setting minimum percentages in the housing, particularly for affordable homes and housing for older people. HoTT consider that the Plan should be more ambitious in setting the minimum at 20% for affordable housing in **Policy DLP11**; other local authorities have set higher figures in the range 35% to 50%. In the Holme Valley where private housing stock is already unaffordable to many younger people, a higher minimum of say 35% is justifiable as the additional burden will be absorbed by developers due to the market conditions in such areas where people can afford large, higher priced housing. In this regard, the Plan should give greater flexibility for the Council to set different minimum affordable housing percentages (above 20%) in the different areas of the district. For this reason, **Option DLP11 7.2.7** would be supported by HoTT



HoTT wish to see that all new housing is built to a carbon-neutral standard and would welcome this inclusion in **Policy DLP11**

HoTT would welcome the inclusion of a specific policy in **Policy DLP11** which encourages and gives higher preference to releasing sites for those self-build dwellings which will be 'carbon-neutral'.

8 Retailing and town centres ... p71

HoTT would welcome inclusion of a specific policy encouraging the establishment of community / social enterprises within our town centres and retail economy e.g. locally owned community businesses such as the Fair Trader co-operative in Holmfirth and the HoTTWind@Longley community benefit society near Hade Edge. The Council should support the provision of low cost shop / office / workshop accommodation for such community enterprises.

9 Transport ... p91

HoTT welcomes the council's commitment to supporting public transport and the uptake of sustainable modes of travel (9.2)

HoTT welcomes the West Yorkshire Local Transport Plan (WYLTP) (2011-2026) commitment to make substantial progress towards a low carbon, sustainable transport system for West Yorkshire, while recognising transport's contribution to national carbon reduction plans (9.3). HoTT would like to see this commitment extended into the core principles of the new West Yorkshire transport plan (STP 2016-2036), where there is no mention of low carbon or sustainable transport objectives (9.6).

9.1 Strategic Transport Infrastructure ... p92

HoTT would wish to see mitigation of climate change by carbon reduction emphasised in all transport developments.

9.2 Sustainable Travel ... p96

The inclusion of Policy DLP20 is welcome by HoTT and we support the council's intention to

- support development proposals that can be served by alternative modes of transport including public transport, cycling and walking
- locate new residential developments close to local facilities;
- discourage single occupancy car travel in new developments, and suggest this should be encouraged generally across the district;
- the use of low emission vehicles particularly to improve low levels of air quality in areas with poor quality air, as well as generally across the district;
- the intention to give priority to buses over private cars provided that the buses are low carbon vehicles

HoTT are pleased to see that the council is committed to ensuring that the overarching objectives of sustainability, road safety and personal safety are achieved but suggest that this will be difficult if not/impossible in the case of some large developments in rural areas.

One example in the Holme Valley is the potential 96 housing scheme for Scholes (H38). Here existing roads, especially that through Scholes village centre, are already too narrow to allow cars and especially buses and refuse lorries, to pass without causing delays, and pedestrians currently do not have the continuous protection of pavements.

It can be anticipated that the houses in this development will all have at least one car and that some (say half) will have two, resulting in a likely total of 144 additional cars expecting to use a road which is already congested.



Using the route through Scholes village centre drivers wishing to travel east are likely to pass along Totties Lane, down Greenhill Bank Road and towards Wakefield through New Mill Square which also suffers from congestion. Detailed examination, in connection with Tesco's planning application for Holmfirth, ascertained that there is no satisfactory answer to alleviating this problem.

Similar problems will affect drivers wishing to travel north from this new housing development (H38) taking Dunford Rd which is permanently obstructed by residents' cars in the absence of adequate off-road parking. In this case the additional cars will also add to the chronic congestion in the centre of Holmfirth caused by delays at the traffic lights at the Victoria St/Huddersfield Rd junction.

It is hard to see how an effective travel plan to make these journeys feasible will be found (9.31). We are therefore pleased to see that "the council is committed to ensure that new developments do not materially add to existing highway problems or undermine the safety of all users of the network" (9.47).

9.3 Highways and Access ... p98

In Policy DLP21, HoTT are pleased to see that a new development will not be allowed if vehicular access to it "materially adds to highway safety problems or in the case of development which will generate a substantial amount of trip generation that cannot be served by the existing highway network" (9.3 DLP 21).

For all road improvement schemes, whether major or minor, HoTT consider that appropriate and segregated provision for cyclists should be considered early in the design process, rather than as an afterthought at or towards the end of the design stage (9.41, 9.42, 9.43, 9.46, 9.47).

In addition to the provision of electric charging points within new developments to encourage the use of electric or hybrid vehicles (9.43), HoTT would also like to see dedicated parking spaces for such vehicles, similar to parking spaces for disabled persons.

HoTT wish to see improvements to pedestrian access at the existing Honley railway station. Access to the platform is currently up a steep flight of stairs which is open to the elements and is therefore particularly hazardous in wet and icy weather. Honley is the only Penistone line station without step free access. The adjacent bus depot is allocated for housing in the Plan; as and when development takes place, HoTT suggest that land should be reserved to provide step free access, as well as additional station parking.

9.4 Parking ... p102

HoTT would welcome inclusion of a specific policy in **Policy DLP22** encouraging and incentivising the use of low carbon vehicles such as all electric or hybrid cars, by supporting dedicated parking provision for such vehicles. This should apply for new developments, in addition to the provision of electric car charging points (9.43). HoTT note that in their recent experience, where electric vehicle charging points have been provided in Holmfirth, the 1 or 2 parking spaces associated with the electric charging points are often taken over by ordinary vehicles, shutting out electric vehicles. HoTT suggest that a policy of dedicated spaces for low carbon vehicle parking could equally be applied to existing public car parks and parking schemes (9.56, 9.57).

HoTT wishes to see improvements to parking at existing railway stations as follows:

- Brockholes – additional parking should be provided on unused land adjacent to Ridings Fields.
- Honley – the adjacent bus depot is allocated for housing in the Plan; as and when development takes place, HoTT suggest that land should be reserved to provide additional station parking.

9.6 Core Walking and Cycling network ... p107

In HoTT welcomes the development and protection of a core walking and cycling network as set out in **Policy DLP24** for its potential to reduce carbon emissions, improve health and contribute to leisure opportunities and tourism. However we note that proposals on the Policies Map for the Holme Valley are only of an indicative



nature. HoTT Transport Group has looked in detail at the potential for a dedicated cycle route to promote commuting between Holmbridge/Holmfirth/Honley and Huddersfield. HoTT would like to see the proposals for this connection upgraded from indicative to proposed before the Local Plan is finalised. Details of our plans and proposals for the walking and cycling network are outlined below.

The core walking and cycling network is intended to ensure an integrated system of cycle routes, public footpaths and bridleways that provides opportunity for alternative sustainable means of travel. HoTT would expect to see that land is effectively safeguarded so as to enable the full development of the dedicated cycle and walking routes in the Holme Valley along the River Holme, as currently being planned.

HoTT regret the fact that house building was ever allowed on the former railway line linking the Penistone line with Holmfirth and urge the council to refuse such applications in the future, so as to be compatible with the statement on protecting disused lines in **Policy DLP24**.

HoTT proposals for walking and cycling network in the Holme Valley

The HoTT walking and cycling network, developed in collaboration with River 2015, is a particularly positive proposal, given the importance the Plan attaches to walking and cycling and their priority above other transport modes (9.35), the need to reduce greenhouse gas emissions, and the ultimate desirability of a carbon-neutral Kirklees.

However, the network as shown on the Policies Map should be regarded as a starting point. It is not yet sufficiently comprehensive across the district nor within the Holme Valley; there are number of missing links, and it is not always well related to proposed developments.

HoTT are proposing a network of routes which both interlink the main Holme Valley settlements and provide a direct link to Huddersfield town centre and the University. As far as possible they are off-road and follow river valleys so that they are safe, direct and attractive in order to encourage a significant modal shift to cycling and walking. Short road sections link off-road routes where there is no opportunity for a continuous off-road route. The proposed routes include both existing rights of way and proposed new rights of way.

The routes and links within the Holme Valley which HoTT propose should be added to the network and shown on the Policies Maps are as follows:

Existing paths

- Sands Recreation ground path from Bridge lane to Huddersfield Road (part of Holme Valley riverside Way)
- Path from New Mill Road opposite Banks Lane to Berry Bank Lane
- Hassocks Lane Honley to Knowle Lane, Meltham Mills through Honley Old Wood
- Path from Upper Hagg Road to Woodhead Road opposite Lancaster Lane
- Luke Lane Brockholes to Stoney Bank Lane
- Roundway to Field End lane Honley
- Honley Riverside Path from Eastgate to Magdale
- Dean Brook Road Armitage Bridge to Meltham Road (part shown)
- Hill Lane Upperthong
- Hade Edge to Scholes – Longley Edge Road and High Lane
- Scholes to Totties – Sike Lane
- Sycamore Lane and Tenterhill Road, Holmfirth
- Hepworth – New Mill

Proposed paths

- Miry Lane Thongsbridge to Luke Lane (riverside path)



- Magdale to Armitage Road (riverside path)
- Woodhead Road to Stockwell Vale
- Holmfirth Road opposite Bill Lane through Holmfirth High School site to Springwood Road and Heys Road
- St Marys Mews Honley to riverside path
- Marsh Platt Lane Honley through Neilley Playing Fields to New Mill Road
- Kirkbridge Lane New Mill to Stoney Bank Lane (riverside path)
- Holme valley Riverside Way south of Holmfirth.
- Sands Recreation Ground to Woodchurch View/Miry Lane Thongsbridge

HoTT suggest there should be an additional policy in **Policy DLP24** related to the walking and cycling network, along the lines of:

“The Council will make Creation Orders for new public rights of way where necessary to facilitate the development of new walking and cycle paths as part of a comprehensive walking and cycling network within the district.”

10 Design ... p110

HoTT welcome the inclusion of **Policy DLP25** with its forward looking proposals for good design. However, HoTT consider the Plan should be much more ambitious with respect to setting zero-carbon or carbon-neutral design standards for new developments. To ensure the sustainable design of our future housing stock, HoTT would welcome the council supporting the use of carbon-neutral design codes in new developments, covering both private and public sector housing and buildings (10.5). Whilst the UK government has dropped its requirement for all new build housing from 2016 to be zero carbon, HoTT would warmly welcome a commitment from the Council to aspire to this goal within our district and that specific policies are included in the Plan to address this matter.

HoTT support the proposals in **Policy DLP25** for ensuring high levels of sustainability in design and note:

- ii. Use of innovative construction materials and techniques, including low carbon or carbon-free materials, as well as reclaimed and recycled materials.
- iii. Adopting zero-carbon construction techniques thereby reducing net energy losses that will lead to lower whole-life housing costs as well as a more sustainable low carbon future.
- iv. Installation of dedicated parking spaces for electric or hybrid cars, as well as charging points, would help to persuade people to buy an electric or hybrid vehicle.
- v. Installing recycling facilities in new developments to make recycling easy could also have a beneficial effect on behaviours.
- vi. Flooding risk - in the light of the recent flooding incidents, HoTT suggest that builders of houses in risk areas should be required to install secondary flood defences such as custom made flood barriers, flood doors, anti-flood airbricks, sewage protection, flood fencing and tanking, to increase their resilience.
- vii. Designing housing that are adaptable and able to respond to the changing needs of residents during their life cycle, so that families with children, single adults, disabled and older people can be suitably accommodated without unnecessary need to move.

HoTT note that our local Holme Valley area is ideal for the use of open loop and closed loop ground source heating due to the large water reservoirs in the Millstone Grit sandstone beneath the ground. HoTT would like to see the council requiring a higher percentage of renewables in new build (**10.6**) as we are very lucky to have this natural resource and its use should be maximised whenever possible to reduce the use of fossil fuel and carbon emissions in our area.



HoTT suggest that consideration should also be given to the use of trees **(10.11)** as flood prevention in rural areas where hillsides are covered only with ungrazed grass, to arrest the flow of water at an early stage following heavy rainfall, and promote the soaking up of water at a high level so as to prevent the loss of top soil.

11 Climate change ... p117

HoTT welcome the intention to address climate change as one of the core planning principles underpinning the Plan **(11.2)**. In light of the recent UN Climate Change Conference agreements in Paris, with its deadline for agreed action to be set out by 2030, HoTT expect to see that proactive measures to mitigate and adapt to climate change, especially carbon reduction, will be emphasised throughout the Plan.

11.1 Renewable and low carbon energy ... p117

HoTT warmly welcome the council's intention to support the development of a variety of renewable energy in the district, and suggest that those technologies which generate the greatest quantity of energy are particularly encouraged **(11.8)**. HoTT would like to see builders actively encouraged to incorporate renewable and low carbon technologies into building design as required in Local Plan Design policy.

HoTT note that our local Holme Valley area is ideal for the use of open loop and closed loop ground source heating due to the large water reservoirs in the Millstone Grit sandstone beneath the ground. HoTT would like to see the council requiring a higher percentage of such renewables in new build **(11.10)** as we are very lucky to have this natural resource and its use should be maximised whenever possible to reduce the use of fossil fuel and carbon emissions in our area.

HoTT also would encourage the council to be more ambitious with respect to requiring the use of renewables and in setting zero-carbon or carbon-neutral design standards for new developments within the district **(11.10)** e.g. to a Passivhaus standard. Bearing in mind that net heat losses from buildings are one of the main sources of carbon emissions, as well as an economic loss for which the occupiers are obliged to pay, HoTT urge the Council to ensure that Building Regulations concerned with incorporation of carbon reduction through design and construction methods, be enforced as firmly as possible in both new housing and new business developments.

HoTT commends the statement in the Plan that local community groups and businesses should have the opportunity to develop their own renewable energy and low carbon schemes **(11.11)**. Where local community groups are sponsoring or submitting a planning application for a new development, HoTT would welcome a policy statement in the Plan giving greater weight to such community-led applications by creating a 'presumption for approval'.

As a local community group sponsoring community funded renewable energy schemes, e.g. the HoTTWind@Longley 225kW wind turbine community benefit society, HoTT would also like the council to take positive steps in encouraging and supporting such community -led ventures **(11.11)**. HoTT note the council has access to public sector assets (e.g. land, buildings, etc.) which could be utilised by such community groups. With access to cheaper council loan finance, these assets could be used by community groups for developing local schemes where the council are unable or unwilling to do so. HoTT would like to see to specific policy and guidance included in **Policy DLP27** in the Plan on this matter.

On community support for wind turbines, HoTT are concerned that the government's recent Ministerial Written Statement (HCWS42) of 18th June 2015 creates a 'presumption for refusal' of new wind turbines planning applications, unless "following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing". Given that schemes sponsored by community groups or businesses clearly have local community



support, HoTT suggest that the Plan includes a statement to give greater weight to community-led planning applications such as:

“Renewable energy development sites sponsored by community groups or business shall be deemed to have local community backing, providing that consultations have been held and the planning impacts arising are being substantially addressed.”

HoTT welcome the approach taken by the Council towards the siting of new wind turbines (**11.13, 11.15**). HoTT would like to see the methodology of assessing the impact of different scales of wind turbine size on the different landscape types, developed into a rational methodology for assessing planning applications for new wind turbine sites within the district. This would provide an objective and rational basis for selecting new sites and give clearer guidance on likely outcomes for any new wind turbine proposals. However, HoTT are concerned about overweighting of ‘landscape setting’ impacts in the planning determinations of wind turbine developments, at a time where there is growing concern both locally and globally about the impacts of climate change and the need for more renewable energy generation. A balanced assessment is needed, reflecting all impacts on our community.

HoTT note that whilst all renewable energy developments will have some impact on the existing landscape, the wider benefits of renewables as part of the council’s sustainability strategy need to be clearly recognised in the council’s determinations as to whether such a development is reasonable and planning permission can be granted i.e. is ‘suitable’ in terms of the governments statement of 18th June 2015 and ‘acceptable’ in terms of the Policy DLP27 criteria.

HoTT are also concerned that the government’s recent Ministerial Written Statement (HCWS42) of 18th June 2015 creates a ‘presumption for refusal’ of new wind turbines planning applications, unless “the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan” i.e. is sited on a designated wind turbine site or area within the Plan. The government’s written statement also says “In applying these new considerations, suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines, or similar, will not be sufficient”.

So that new planning applications for wind turbine sites are not automatically precluded by virtue of (1) having a perceived adverse landscape impact and (2) not being located on a designated site in the Plan and (2), HoTT suggest that the Plan includes a statement in **Policy DLP 27** to the effect that:

“Renewable energy development sites shall be deemed to be suitable for wind energy development if their siting and sizing (1) follows a rational methodology generally consistent with the evidence base available within the district and (2) takes into account the wider benefits mitigating any adverse landscape impacts arising from this methodical assessment”

HoTT would welcome further guidance included in the Plan to give greater clarity as to how the council will determine what is ‘acceptable’ development and what is not. Without this, the Plan will create even more uncertainty about future renewables development in the district, at a time when the council should be committed to a sustainable low carbon future of which renewables are an important part.

Comments by Holmfirth Transition Town (HoTT)

Date: **1st February 2016**



HoTT – Holmfirth Transition Town
Comments on draft Kirklees Local Plan

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