

Holme Valley Draft Neighbourhood Development Plan – Regulation 14 Consultation Responses 2019

15th July to 15th September 2019

Table 2 Peak District National Park Authority Comments

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

					<p>neighbourhood area</p> <p>☒ Constant reference to the 'rural area' which is undefined and 'green belt policy' which doesn't apply to the national park</p> <p>☒ Undermining of strategic policies by lack of reference or badly worded replication</p> <p>☒ Lack of understanding of housing policy inside the national park</p> <p>The other major area of concern is that many of the policies are not 'clearly written and unambiguous' as required by para 16d of the NPPF.</p>		
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Detailed Comments from PDNP

Abbreviations:

PDNPA Peak District National Park Authority

PDNP Peak District National Park

CS Core Strategy Part 1 Local Plan

DMP Development Management Policies Part 2 Local Plan

HVNP Holme Valley Neighbourhood Plan

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

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

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

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

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								<u>PDNPA"</u>
11.	13	timeline	Parish Council approve Regulation 15 NDP and submit to Kirklees Council	It must also be submitted to PDNPA			Accepted.	<u>Amend NDP</u> Insert: <u>" and PDNPA"</u>
12.	13	timeline	Kirklees Council check and approve publication of Regulation 16 NDP	PDNPA must also check and approve publication of Regulation 16			Accepted.	<u>Amend NDP</u> Insert: <u>" and PDNPA"</u>
13.	13	timeline	Kirklees Council submit NDP to appointed Examiner	Kirklees MBC, Qualifying Body and PDNPA must jointly agree appointment of examiner			Accepted.	<u>Amend NDP</u> Insert: <u>" and PDNPA"</u>
14.	18	2.4	and the Peak District Local Plan 2001 'Saved'	The Peak District National Park development plan comprises the			Accepted.	<u>Amend NDP.</u> Update to:

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			<p>Policies 4. Part 2 of the Local Plan for the Peak District National Park, the Development Management Policies document and includes a Policies Map, will guide and manage development across the National Park alongside the adopted Core Strategy up to 2026 and will replace the remaining policies in the Local Plan adopted in 2001. The published version of the</p>	<p>Core Strategy (2011) and the Local Plan Part 2: Development Management Policies (May 2019)</p>				<p>"and The Peak District National Park development plan which comprises the Core Strategy (2011) and the Local Plan Part 2: Development Management Policies (May 2019)"</p>

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			Development Management Policies Document and Policies Map, along with an addendum of modifications, was submitted to the Secretary of State on 19 February 2018.					
15.	18	Planning Context		An important part of the planning context that is missing from this assessment is that the strategic planning policies of the Peak District National Park Authority must meet the purposes and duty of a national park as set out in the 1995 Environment Act. These are: <ul style="list-style-type: none"> • to conserve and 			Accepted.	<u>Amend NDP.</u> Amend first sentence of 2.5 to: " Holme Valley is a large civil parish. The part of the <u>Parish to the north and east is located in the Metropolitan Borough of Kirklees in West Yorkshire, and the part of the Parish to the south and east lies within the Peak District National Park,</u>

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

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

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

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

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

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

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				PDNPA natural environment policies				Refer to PDNPA natural environment policies CS L1 and L2
29.	4.2.16							
30.	Policy 1	40		Rural areas are not precisely defined. 'Rural areas' inside the PDNP are not green belt.	CS GSP2C CS GSP3 CS L1 DMP DMC1 DMP DMC2 DMP DMC3 DMP DME1 DMP DMC5 DMP DME2	Not in general conformity with PDNPA strategic policies. LCA1 and LCA2 are within the natural zone of the national park where no development is permitted. Neighbourhood policy is confusing as it is a mix of spatial strategy & design code and does not have sufficient clarity to meet NPPF test (para 16d)	Noted. The Policy has been amended taking into account comments from Kirklees Council. Amend Policy as suggested.	Amend NDP Delete <ul style="list-style-type: none"> ● LCA 1: Wessenden Moors ● LCA 2: Holme Moorland Fringe From bullet points. Add to policy: " Note: Wessenden Moors (CA 1) and Holme Moorland Fringe (CA 2) are in the Natural Zone of the Peak District National Park where other than in exceptional circumstances, proposals for development will not

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						Neighbourhood Policy replicates and undermines existing strategic policy (para 16f).		be permitted. Refer in each relevant policy section to the PDNPA policies.
	Policy 1 Section 2				CS DS1	CS DS1 would permit development in or on the edge of a settlement but the Authority would need to be sure of capacity with regard to character and setting (DMS 1 E)	Criterion 2 has been deleted.	No further change.
	Policy 1 Section 2				CSL1	There is no green belt in the national park.	Criterion 2 has been deleted.	No further change.

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	Policy 1 Section 3			Where are the significant views? For this policy to work you would need much more detail. Fails NPPF para 16d.			Noted. See amended Policy following comments from Kirklees Council. The policy refers to the views identified in the Heritage and Character Assessment report. As explained in the supporting text the Steering Group considers that there are very many important views in the NDP area and it would be too difficult to pick out further individual views as significant.	No further change.

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

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

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

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			reasonable distances between and around them so that users can enjoy privacy in which to enjoy their amenity space. If new housing development proposals fail to achieve these dimensions, unless they are of special design such as single aspect dwellings, then it will be concluded that privacy and amenity standards will be inadequate.	<p>locally characteristic buildings.”</p> <p>What is a reasonable distance?</p> <p>‘Locally characteristic buildings’ often do not have ‘reasonable distances’ (or in fact any distance!) between and around them.</p> <p>this policy is saying that either houses should be ‘individual dwellings with reasonable distances between and around them’ or ‘single aspect’ ie with windows only on one side.</p>			comments.	

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				<p>Is this really what is meant?</p> <p>Possible conflict with NPPF 16d that requires 'policies that are clearly written and unambiguous'.</p>				
	Policy 2 (11)		Planting around the external boundaries should include an appropriate mix of native trees, hedgerows and new woodland areas (although not in Pennine Fringes),	What is the justification for excluding Pennine Fringe?			<p>Noted.</p> <p>This has been reworded following consideration of Kirklees' comments and does not now exclude the Pennine Fringe.</p>	No further change.
	Policy 2 (11)		Planting should be seen as an integral part of the overall master plan	repetition of first sentence of clause 11			<p>Noted.</p> <p>This has been reworded following consideration of</p>	No further change.

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

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

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

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

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

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

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

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

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

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

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

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

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

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			access Holmfirth town centre or festivals / events in the valley will be supported provided they comply with Green Belt policy and mitigate any detrimental impact on the	characteristics of the area.			PDNPA area and Kirklees Council area.	Neighbourhood Area proposals to develop 'park and walk' or 'park and ride' facilities to access Holmfirth town centre or festivals / events in the valley will be supported provided they comply with Green Belt policy other relevant policies and mitigate any detrimental impact on the landscape through appropriate surfacing and screening as necessary. Park and ride would not be appropriate in the Peak District National Park part of the Neighbourhood Area as it would harm the valued characteristics of the area."

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	Policy 12	123		<p>the policy is constructed in a confusing way. The first part is a requirement for a sustainability statement for major development, but the associated list could be applied to – and reads as though it should be applied to – any development.</p> <p>If the whole policy <i>is</i> constructed around a requirement for a sustainability statement then the policy does not offer any guidance as to whether the items listed will be given planning permission and in</p>			<p>Noted.</p> <p>See detailed changes below.</p>	Refer in each policy section to the PDNPA policies.

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				<p>what circumstances.</p> <p>Some of the elements, while obviously important, are not a planning matter eg 'increase the use of local shops', 'urban gardening', 'planting of trees on hillsides'. They should be included as a 'parish action' instead.</p> <p>Possible conflict with NPPF 16d that requires 'policies that are clearly written and unambiguous'.</p>				
	Policy 12 Promoting	123	1. Proposals for individual and		CS L1 CS CC2	Conflict with CS L1, CC2 and	Noted.	<u>Amend NDP</u>

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

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			as defined by AECOM, will be supported where they do not conflict with Green Belt policy, provided potential harmful impacts are avoided and the required consultation with the local community is undertaken.			give sufficient protection as the PDNP does not have any Green Belt.		energy generation will be permitted only where valued character is not compromised and proposals for anaerobic digestion must be related to individual farms or those in close proximity."