

Core Documents		
Section One – Section 247 Application Form		
CD1.1	Application Form	
CD1.2	Covering Letter	
CD1.3	Statement of Reasons with NTCT note	
CD1.4.1.1	Appendix 1	
CD1.4.1.2	Appendix 2	
CD1.4.1.3	Appendix 3	
CD1.4.1.4	Appendix 4	
CD1.4.1.5	Appendix 5	
CD1.4.1.6	Appendix 6	
CD1.4.1.7	Appendix 7	
CD1.4.1.8	Appendix 8	
CD1.4.1.9	Appendix 9	
CD1.4.1.10	Appendix 10	
CD1.4.1.11	Appendix 11	
CD1.4.2	Appendix B – Plan Footpath Diversion Plan	
CD1.4.3	Appendix C – Holmfirth Footpath 60 Committee Report	
CD1.4.4	Appendix D – Highways Survey – Paragon Highways October 2019	
CD1.5	Highways Survey – Wolfstones Heights– Paragon Highways – dated November 2020	placed on website on 27/7/21
CD1.5.1	Letter from Paragon Highways – dated 6 July 2021	placed on website on 27/7/21
Section Two – Planning Decision Notices		
CD2.1.1	Decision 2014/62/92814/W	
CD2.1.2	Plan 2014/62/92814/W	
CD2.2.1	Decision 2017/92374/W	
CD2.2.2	Plan 2017/92374/W	
CD2.3.1	NMA Decision 2018/93302	
CD2.3.2	Plan 2018/93302	
CD2.4.1	NMA Decision Notice 2018.93277	
CD2.4.2	Plan 2018.93277	
Section Three – Draft Order		
CD3.1.1	The Draft Order	
CD3.1.2	The Draft Plan	
CD3.1.3	The Draft Notice	
Section Four – Press Notices		
CD4.1.1	Huddersfield Examiner Press Notice	
CD4.1.2	The London Gazette Press Notice	
Section Five – Certificate of Posting		
CD5	Certificate of posting	
Section Six – Objectors		
CD6.1	Objection and response – D Hall	
CD6.2	Objection received from Mr Greenwood	
CD6.3	Objection received from Mr Jepson	
CD6.4	Objection received from Holme Valley Civic Society	
CD6.5	Objection received from Mr Kersey	
CD6.6	Objection received from Mr Kay	

CD6.7	Objection received from Dr A Smith	
CD6.8	Objection received from Mrs McLean	
CD6.9	Objection received from Anon (referred to as Objector No.10) and response from Mr Scanlon	
CD6.10	Objection from Holmfirth Walkers are welcome and response from Mr Scanlon	
CD6.11	Objection - Mr and Mrs Lawson & response from Mr Scanlon	
CD6.12	Objection - Mrs Pollard and response from Mr Scanlon	
CD6.13	Objection received from Anon (referred to as Objector No.14) and response from Mr Scanlon	
CD6.14	Objection received from Mr and Mrs Rostron	
CD6.15	Objection received from C Nuttall	
CD6.16	Objection received from Mr Hill	
CD6.17	Objection - Mrs Illingworth & response to Mr Scanlon	
CD6.18	Objection received from Holme Valley Parish Council	
CD6.19	Objection received from Mrs Hollingworth	
CD6.20	Objection received from Mr Queening	
CD6.21	Objection received from NCOM Walking Group	
CD6.22	Objection received from Mr Sykes	
CD6.23	Objection received from Mrs Clew	
CD6.24	Objection received from Mrs Rowland	
CD6.24.1	Further correspondence received from Mrs Rowland & Mr Scanlon	
CD6.25	Objection received from Mr and Mrs Doherty	
CD6.26	Objection received from Holmfirth Harriers	
CD6.27	Objection received from Mrs Ripley	
CD6.28	Objection received from Peak and Northern Footpath Society (PNFS)	
CD6.28.1	Further correspondence regarding objection CD6.28	
CD6.28.2	Confirmation that objection for PNFS still stands	
CD6.29	Objection received from Mrs Smith	
CD6.30	Correspondence between Mr Rooks & Mr Scanlon	
CD6.31	Objection received from Mrs Woolfe	
CD6.32	Objection received from Mr Bob Smith	
CD6.33	Objection received from Mr Payne	
CD6.34	Objection received from Huddersfield Ramblers	
CD6.34.1	Scanlon Consultancy Supporting Statement	<i>CD6.34.1 and CD6.34.2 are in the wrong section but to avoid confusion they will remain here</i>
CD6.34.2	Appendix 2 – Paragon Highways Survey	
CD6.35	Objection and related correspondence – Kirklees received from Kirklees Council	
CD6.36	Objection received from C Nuttall	August 2021
CD6.37	Objection received from Stephen Cook	17 August 2021
Section Seven – Supporters		
CD7.1	Mr Greenwood	
CD7.2	Mr Paxman and Mr Bamforth	
CD7.3	Mr Walker	

CD7.4	Mrs Waldrom	
CD7.5	Mr McGregor	
CD7.6	S & J Cronie	
CD7.7	Mrs Hunter	
CD7.8	Mr Woods	
CD7.9	Mrs Archard	
CD7.10	Sally Bale	
CD7.11	Thomas	
CD7.12	Ms Butterfield	
CD7.13	Mr and Mrs Braithwaite	
CD7.14	Squadron Leader Dyson	
CD7.15	Mr Crosland	
CD7.16	Mr Taylor	
CD7.17	Mr and Mrs Formisano	
CD7.18	Mrs McGregor	
CD7.19	Mr Abdelfatah	
CD7.20	Mrs Lees	
CD7.21	Mr Wimpenny	
CD7.22	Mrs Haywood	
CD7.23	Mr Day	
CD7.24	Mr Croft	
CD7.25	Mr Hall	
CD7.26	Mrs Mace	
CD7.27	Mr Adshead	
CD7.28	Mr Webster	
CD7.29	Mrs Gledhill	
CD7.30	Mrs Webster	
CD7.31	Ms Shaw	
CD7.32	Mrs Adshead	
CD7.33	Mr Adshead	
CD7.34	Mrs Anthony	
CD7.35	Mrs Wimpenny	
CD7.36	Mr Wimpenny	
CD7.37	Mr Rook	
CD7.38	Mr Johnson	
CD7.39	Mrs Jebson	
CD7.40	Mr J Greenwood	
CD7.41	Mrs Jane	
CD7.42	Mrs Anderson	
CD7.43	Mr Bridges	
CD7.44	Mr Wood	
CD7.45	Mr Rowan	
CD7.46	Prof Leslie	
CD7.47	Mr and Mrs Scacchetti	
CD7.48	Mr and Mrs Earnshaw	
CD7.49	Mr and Mrs Bullas	
CD7.50	Mr Willans	
CD7.51	Mrs Dacey	
CD7.52	Mr Askew	
CD7.53	A Leslie	

CD7.54	Mr D Buck	
CD7.55	Mr and Mrs Iredale	
CD7.56	Mr Armitage	
CD7.57	Mr Earnshaw	
CD7.58	Mr Haigh	
CD7.59	Mrs Haigh	
CD7.60	Mrs Fleming	
CD7.61	Mr Shaw	
CD7.62	Mr Branson	
CD7.63	Mr Croft	
CD7.64	Mr Joyce	
CD7.65	Mr and Mrs Goodall	
CD7.66	Mr and Mrs Pearson	
CD7.67	Mr Barber	
CD7.68	Mr Brown	
CD7.69	Mr Clark	
CD7.70	Mr Reid	
CD7.71	Mr Megson	
CD7.72	Mr Birtles	
CD7.73	Mr Cropper	
CD7.74	Mr J Cunliffe	
CD7.75	Mr A Dyson	
	Mrs Wooding	
Additional Information (Sections 8-13)		
CD8	Notice of intention to hold Public Inquiry (draft format)	
CD9.1	Report to the planning committee requesting decision on a previous S257Application for this footpath	
CD9.2	Decision of planning sub-committee dated 30 January 2020 (refusal)	
CD10	Notification from Kirklees Council of DMMO - Application for this footpath Copy of DMMO Application and plan	
CD11	Letter from Kirklees dated 13 July 2021	placed on website on 13 July 2021
CD11.1	Response email from PNFS to CD11	placed on website on 22 July 2021
CD11.2	Response dated 2 August 2021 from Mr Scanlon to KMBC dated 13 July 2021	placed on website on 4 August 2021
CD12	Pre-Inquiry Agenda (PIM) Updated version	placed on website on 19 July 2021
CD13	Notes of Pre-Inquiry Meeting	5 August 2021
CD13.1	Additional PIM note	18 August 2021
CD13.2	Inspector Note 1	1 September 2021
CD13.3	Letter from Mr Scanlon regarding Closing submissions	placed on website on 17 December 2021
CD13.4	Inspector Note 2	placed on website on 17 December 2021

Statements/Proofs of Evidence/written submissions (sections 14 – 18) submitted 3 August 2021		
CD13.5	Email from Mr Earnshaw with explanation regarding the 'Scale' for the Plan at the Inquiry	28 December 2021
CD13.6	Closing submissions on behalf of Mr Butterfield	31 December 2021 – on website 5 January
CD13.7	Closing submissions on behalf of Kirklees Council	31 December 2021 – on website 5 January
CD13.8	Letter from KMBC regarding the submission from Mr Earnshaw (CD13.5)	5 January 2022
CD13.9	Letter from KMBC regarding the submission from Mr Earnshaw (CD13.5)	10 January 2022
CD14.1	Statement of Case from Kirklees Council	
CD14.2.1	Appendix KC1 -	
CD14.2.2	Appendix KC2 – Summary Report Wolfstones DfT draft s247 Order	
CD14.2.3.1	Appendix KC3 – 1952 relevant date copy extract DM as published NTS	
CD14.2.3.2	Appendix KC3 – Hol 60 definitive statement extract	
CD14.2.4.1	Appendix KC4 – Sealed Order	
CD14.2.4.2	Appendix KC4 – DMMO Site Notice	
CD14.2.5.1	Appendix KC5 – Photo One – 4 October looking West	
CD14.2.5.2	Appendix KC5 – Photo Two& Three – September 2020 and later photo with fencing erected	
CD14.2.6	Appendix KC6 – Kersey - s257 Objection July 2019	
CD14.2.7	Appendix KC7 – s257 Committee report 9.3.7 App D consultation comments	
CD14.2.8	Appendix KC8 – Planning Officer note for SoC	
CD14.2.9	Appendix KC9 – HVLC 14/11/16 Action Plan approved by Trustee	
CD14.2.10.1	Appendix KC10 – Email to DfT 7 May 2021	
CD14.2.10.2	Appendix KC10 – Letter to DfT 13 July 2021	
CD14.2.11	Appendix KC11 – ROWIP Executive Summary	
CD14.2.12	Combined Appendices (KC1-11)	
CD14.3	Rebuttal Proof of Evidence from KMBC	Placed on website 18/8/21
CD14.4.1	Appendix KC12 – Introduction to Manual for Streets	Placed on website 18/8/21
CD14.4.2	Appendix KC13 - Photos Wolfstones Road C to A showing verge 2019	Placed on website 18/8/21
CD14.4.3	Appendix KC14 – Photos of verge January 2020	Placed on website 18/8/21
CD14.4.4	Appendix KC15 - Mock up visual of footway provided by Mr Butterfield	Placed on website 18/8/21
CD15.1	Schedule of witnesses and information	
CD15.1.1	Summary Proof of Evidence from Mr Earnshaw (BUT1.1) Architect	
CD15.1.2	Proof of Evidence from Mr Earnshaw (BUT1.2) Architect	

CD15.1.3	Exhibit 1 - Schedule of Applications & Planning permissions	
CD15.1.4	Exhibit 2 – Consultation response of Giles Cheetham 2014/92814	
CD15.1.5	Exhibit 3 - Consultation response of Giles Cheetham 2015/93937	
CD15.2.1	(BUT2.1) - Summary Proof of Evidence from Mr Eric Appleton	
CD15.2.2	(BUT2.2) - Proof of Evidence from Mr Eric Appleton	
CD15.2.3	(BUT2.3) - Appendices to the Proof of Evidence from Mr Eric Appleton	
CD15.3.1	(BUT3-1) - Summary Proof of Evidence from Mr Cropper	
CD15.3.2	(BUT3-2) - Proof of Evidence from Mr Cropper	
CD15.3.3	Exhibit 1 to Exhibit JGC1 – screen shot linking to Thongs and Wolfstones Heights Walk	
CD15.3.4	Exhibit 2 to Exhibit JGC2 – Viewranger Thongs & Wolfstones Heights Walk (from link pages Exhibit JGC1)	
CD15.3.5	Exhibit 3 to Exhibit JGC3 – path-watch.com ‘Path Politics’ extract	
CD15.3.6	Exhibit 4 to Exhibit JGC4 – J. Cunliffe Proof of Evidence July 2021 (also listed at BUT.7.1)	
CD15.4	(BUT4-1) - Proof of Evidence from Joanna Cronie – Local walker/runner	
CD15.5	(BUT5-1) - Proof of Evidence from Richard Paxman - walker	
CD15.6	(BUT6-1) - Proof of Evidence from Susan Wimpenny - walker	
CD15.7	(BUT7-1) - Written submission from Mr Cunliffe - Highways	
CD15.8	(BUT8-1) - Written submission from Mr Butterfield - Landowner	
CD15.8.1	Supplementary Written Statement from Mr Butterfield	18/8/21
CD15.8.2	Email to the Inspector from Mr Butterfield	18/8/21
CD15.8.3	Letter to Programme Officer regarding Rebuttal Evidence	18/8/21
CD15.8.4	Letter to C Moody of DfT – 27 January 2020	18/8/21
CD15.8.5	Exhibit RHB1 – Correspondence with G Cheetham	18/8/21
CD15.8.6	Exhibit RHB2 – Text Message	18/8/21
CD15.8.7	Exhibit RHB3 – Statutory Declaration of Noel Scanlon	18/8/21
CD15.9	Supplementary supporting statement and statement of Case	
CD16.1	Statement from Peak & Northern Footpaths Society (PNFS)	
CD16.2.1	Appendix PNFS 1 – Example walks using Holmfirth footpath 60 as direct link to Wolfstone Heights westwards	
CD16.2.2	Appendix PNFS 2 – Holme Valley Land Charity	

CD16.2.3	Appendix PNFS 3 – Statement of Reasons	
CD16.2.4	Appendix PNFS 4 – 13072D-122-P06	
CD16.2.5	Appendix PNFS 5 – 13072D-122-P06 – Site Plan as proposed	
CD16.2.6	Appendix PNFS 6 – Item 12 – 9.3.1 Plan 1 diversion proposal	
CD16.2.7	Appendix PNFS 7 – 1985 DM copy extract	
CD16.2.8	Appendix PNFS 8 – Kirklees Council (Holmfirth 60 – Wolfstones Road to Brown Hill – definitive Map Modification	
CD16.2.9	Appendix PNFS -	
CD16.2.10	Appendix PNFS 10 – Discussion of Evidence	
CD16.2.11	Appendix PNFS 11 – ROWIP Document	
CD16.2.12	Appendix PNFS 12 – Walking & Cycling framework	
CD16.2.13	Appendix PNFS 13 – Climate Emergency Booklet 3/2/20	
CD16.2.14	Appendix PNFS 14 – Letter from Noel Scanlon 22 June 2021	
CD16.2.15	Appendix PNFS 15 – Letter from Noel Scanlon 11 February 2019	
CD16.2.16	Combined appendices from PNFS	
CD17.1	Proof of Evidence from Holmfirth Harriers	
CD18.1	Proof of Evidence from Holmfirth Walkers are welcome	
CD19.1	Email from PO on behalf of Inspector and PIM note CD13.1	18 August
CD19.2	Letter & Email from Noel Scanlon to the Inspector	19 August
CD19.3	Inspector’s reply to the above	19 August