

Kirklees Local Plan and CIL Examination

Response from Kirklees Council to Initial note from the Inspector to the Council (Part 2)

16 June 2017

Thank you for providing the opportunity for the Council to provide clarification on a number of your initial questions. In preparing this response the Council has tried to provide clarification in relation to each of the points as requested, rather than a full justification which we might be expected to provide when responding to the MIQ's in due course. Should the Inspector require any further information on any of the points raised at this point we would of course be happy to assist.

This note (Part 2) is the Council's response to the remaining matters set out in the Initial note from the Inspector to the Council:

Copies of Policies Map in different format

In response to paragraph 5 of the Initial note, the Council have produced an A1 map showing all the detail of the Local Plan for the whole district. The Council have also produced an A1 map showing just housing, employment, mixed use, safeguarded land and green belt, together with green belt release sites marked.

Two copies of each of these plans have been sent to the Programme Officer. We can of course provide digital copies of these plans if required but due to their file size these would need to be provided by disk. It will be, however, possible to add these plans to the Council's website as part of the examination library when the Programme Officer is ready to do so.

Housing Land Delivery

In response to paragraphs 8, 10, 11 (and paragraph 14) of the Initial Note and in recognition of the Inspector's suggestion contained in paragraph 6 of the 'Preliminary Note 2 from the Inspector to the Council (7 June 2017) the Council now intends to produce a revised 'Housing Supply Topic Paper' by **Friday 7 July 2017** (prior to the release of the MIQs) incorporating:

- Update of housing figures to 2015/16 and commentary on what it means for the housing supply figures
- Breakdown of housing windfall by site size
- Planning application progress on housing site phasing and revision to Appendix 3 of the Local Plan – Strategy and Policies document
- Progress schedule for sites phased to commence 2016/17 and 2017/18
- Breakdown of housing supply by sub-area including source of supply

In response to paragraph 12 of the Initial Note, the Council has produced four tables showing housing and mixed use allocations by sub-areas as requested. These tables are attached to this note. These tables can be added to the Council's website as part of the examination library when the Programme Officer is ready to do so.

Employment Land Delivery

In response to paragraph 9 of the Initial Note, the Council have produced an update of the Local Plan employment figures to 2015/16 and commentary on what it means for the employment supply figures:

Table 3 from the Strategies and Policies document (SD1) has been updated to reflect the 2015/16 employment data.

Meeting the Employment Land Requirement	Hectares
Employment land requirement (based on REIU work)	175
Completions – employment land take-up (since 1 st April 2013)	-24
Commitments – on land not allocated for employment or mixed use	-18
Supply from previous permissions – on land not allocated for employment or mixed use	-7
10% flexibility allowance	+13
Supply from PEAs (Windfall allowance)	-48
Amount of additional employment land required	91
Amount of land allocated (net)	167

Analysis of the 2015/16 completions data concludes that an additional 9 hectares of land has been developed for employment use – none of which has been delivered on land allocated for employment in the Local Plan - and an extra 3 hectares is now subject to full planning permission. The potential supply from expired permissions within the last 5 years (01/04/2011 and 31/03/2016) has increased by 4 hectares.

The implications of the updated figures, when compared to the PDLP, results in a 1 hectare reduction in the 10% flexibility allowance and a 17 hectare reduction in the amount of employment land needed to meet the calculated 175 hectares required for employment land. Consequently the amount of land allocated for employment is now 76 hectares more than the initial employment land requirement of 175 hectares.

Spatial Development Strategy

In response to paragraph 14 of the Initial Note, the Council suggests that due to its relationship with the requested updated information on housing supply to 2015/16 this information is best set out in the revised 'Housing Supply Topic Paper' by **Friday 7 July 2017**. However, the Council have prepared this information and it can be supplied a separate response should it be required.

In response to paragraph 15 of the Initial Note, the Council have provided a breakdown of employment supply by sub-area/settlement including source of supply. This information is attached to this note and can be added to the Council's website as part of the examination library when the Programme Officer is ready to do so.

In response to paragraph 16 of the Initial Note, the Council can confirm the assessment of Priority Employment Areas (PEA's) took into account all use class operations including B1 (a, b and c). The methodology used when assessing the PEA's has been applied consistently across all use classes. This methodology is outlined in 'Methodology Paper: Priority Employment Areas' (BP8). Appendix 3 of this document includes the site assessments and scoring for all the employment areas assessed, this justifies our selection of PEA's and includes a number of employment sites that were not taken forward as a PEA designation. A PEA designation was based on location, suitability for modern day operational needs, occupancy rate, the scarcity of employment land in the area and the

importance of the business to meeting local jobs needs and the economic objectives for Kirklees – precision engineering and manufacturing. The use classes within the site were all assessed equally, therefore PEA's were accepted based on the criteria applied during assessment rather than the uses within.

Table 4, page 54 in the Strategy and Policies document (SD1) breaks down all the PEA's by use class, including all the B1 use classes. PEA Ref HUD3 is an example of a PEA which is made up of the B1 use class.

Site allocation process and Green Belt releases

In response to paragraph 19 of the Initial Note, the Council has produced a report called '*Site pro-formas for each green belt release showing accepted site information, outputs from SA and site maps*'. A copy of this document is attached and two hard copies of this document have been sent in the first class post today to the Programme Officer in order to be sent on to the Inspector. This report can be added to the Council's website as part of the examination library when the Programme Officer is ready to do so.

Safeguarded Land

In response to paragraph 21 of the Initial Note, the Council has produced a report called '*Schedule of safeguarded land sites showing their constraints and assessment of future delivery*'. A copy of this document is attached and two hard copies of this document have been sent in the first class post today to the Programme Officer in order to be sent on to the Inspector. This report can be added to the Council's website as part of the examination library when the Programme Officer is ready to do so.

Together with part 1 of the Council's response (dated 2 June 2017), this note concludes the Council's response to the Initial note from the Inspector to the Council. The Council's response to 'Preliminary Note 2 from the Inspector to the Council (7 June 2017)' will be provided under separate cover.