Strategic Environmental Assessment of the Kirklees Local Plan Scoping Report

Scoping Report - Emerging local Plan

Kirklees Council

Final report
Prepared by LUC
August 2026

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Chapter 1
Introduction

1.1 Kirklees Council commissioned LUC in October 2024 to carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of its Local Plan update. The commission also incorporated an Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA).

1.2 It should be noted that an SA Scoping Report for the Local Plan update was originally prepared by LUC between December 2024 and March 2025.

1.3 The original SA Scoping Report was subject to consultation with the three statutory consultees (Natural England, Environment Agency and Historic England) and the local authorities surrounding Kirklees from spring 2025. This scoping report was produced in line with SA requirements set out in the Planning and Compulsory Purchase Act 2004 under the legacy plan-making system. In March 2026 Kirklees Council's cabinet made the decision to progress a Local Plan under the new plan-making system established by the Town and Country Planning (Local Planning) (England) Regulations 2026. The introduction of the new plan making system in 2026 has removed the requirement for local plans to be subject to SA but the legal requirement for SEA remains in the Environmental Assessment of Plans and Programmes Regulations (or 'SEA Regulations').

1.4 Therefore, this SEA Scoping Report has been produced to reflect the change in legislation. The report fully reflects the requirements for SEA scoping, which includes reviewed and updated information formally outlined in the SA Scoping Report. Updates have also been undertaken to ensure the policy context (Chapter 2), baseline information (Chapter 3) and key environmental and sustainability issues and their likely evolution without the new Local Plan (Chapter 4) are up to date. The scoping consultation responses have also been considered as part of the review and updates made to the report where necessary.

1.5 Although not legally required, given the benefits that they will likely provide for policy development, the EqIA and HIA will continue to be addressed through the SEA process. For simplicity in this report, we refer to the SEA of the Kirklees Local Plan, which should be taken as incorporating EqIA and HIA.

1.6 SEA is an assessment process designed to consider and report upon the significant sustainability issues and effects of emerging plans and policies,

including their reasonable alternatives. SEA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.

1.7 The SEA process comprises a number of stages that need to be undertaken alongside the Local Plan preparation:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope of the environmental assessment.
- Stage B: Developing and refining options and assessing effects.
- Stage C: Preparing the Environmental Report.
- Stage D: Consulting on the Local Plan and the Environmental Report.
- Stage E: Monitoring the significant environmental effects of implementing the Local Plan.

1.8 Scoping is the first stage in the SEA process. The purpose of this Scoping Report is to provide the context for, and determine the scope of, the SEA of the new Local Plan and to set out the framework for undertaking the later stages of the SEA.

1.9 This report is in an 'Accessible format', which means it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018), as set out in the Web Content Accessibility Guidelines (WCAG 2.1). This means it must have larger font, larger spacing between lines and headings, less information presented in tables, 'alt text' provided for all figures and it is able to be read by screen-reading software.

The Local Plan area

1.10 Kirklees is located in the south of West Yorkshire and is close to the larger urban centres of Bradford, Leeds, Manchester and Sheffield (shown in Error! Reference source not found.).Kirklees, together with Bradford, Calderdale, Leeds and Wakefield as well as the City of York Council area, comprises the West Yorkshire Combined Authority (WYCA). The Combined Authority brings together key decision-making powers into a single body.

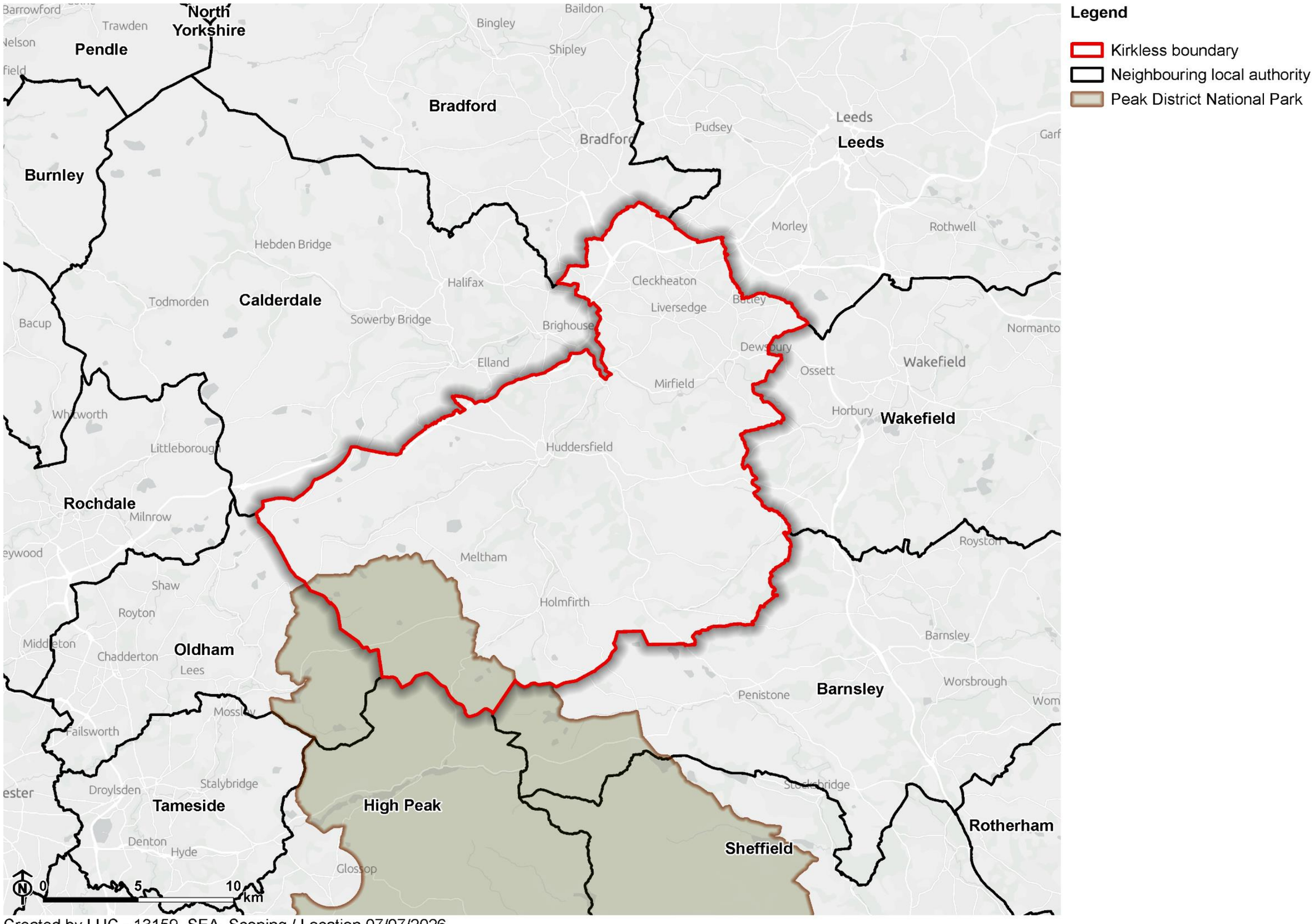
1.11 Kirklees includes the two major centres of Huddersfield and Dewsbury as well as the smaller towns of Batley, Cleckheaton, Heckmondwike and Holmfirth.

There are also a number of district centres, namely Almondbury, Birstall, Denby Dale, Honley, Kirkburton, Lindley, Marsden, Marsh, Meltham, Milnsbridge, Mirfield, Moldgreen, Ravensthorpe, Skelmanthorpe and Slaithwaite. It is the most populated local authority area in England that is not classed as a city. The Peak District National Park forms part of the backdrop for the southern part of Kirklees with land to the south of Marsden, Meltham and Holmfirth falling within the park's boundaries. The district's character is also influenced by the presence of the South Pennine Moors, an area of broad moorland and flat-topped hills which takes in land to the south west. Some of this land is designated as a Special Areas of Conservation (SAC) and Special Protection Areas (SPA).

1.12 Beyond the developed areas towards Huddersfield and Dewsbury, part of the district is rural in character and in all it covers some 409 km^2. The 2021 Census reported the district as having a population of 433,200 people **[See reference 1]**. Kirklees is bordered by the local authorities of Oldham to the west, Calderdale to the north west, Bradford to the north, Leeds to the north east, Wakefield to the east, Barnsley to the south east and High Peak to the south.

1.13 The district has relatively strong commuting links to areas beyond its boundaries. Residents travel beyond Kirklees to Bradford, Halifax, Wakefield, Barnsley, Sheffield and Manchester for work and education. The plan area has motorway access to the north at the M62 which provides links to Leeds and Manchester and access to the M606 towards Bradford. Other important road links in Kirklees include the A62, A629 and A642. These routes connect the smaller villages to the south west and south east to Huddersfield. The A638 and A644 allow for travel from the district towards Wakefield. Kirklees lies along the core Huddersfield line of the TransPennine Express network, with services calling at Huddersfield and Dewsbury. Several other settlements in the district lie on the Penistone line and benefit from local rail services.

Figure 1.1: Location of Kirklees



Created by LUC - 13159_SEA_Scoping / Location 07/07/2026

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Kirklees Local Plan

1.14 The Kirklees Development Plan consists of the Kirklees Local Plan and, in applicable areas, the Holme Valley Neighbourhood Development Plan.

1.15 The Kirklees Local Plan was adopted in February 2019. It comprises the strategy and policies document, allocations and designations document and associated policies map.

1.16 A review of the Local Plan was completed in October 2023 and found the plan to be out-of-date in several areas, including housing and employment supply and delivery, and in relation to planning policies to support the council's climate change emergency. The decision to begin a full update of the Local Plan was made at Full Council in November 2023. As outlined above, a decision was made in March 2026 to progress a Local Plan under the new plan-making system. Key plan-making stages are outlined in the council's Local Plan Timetable.

1.17 The Council is at an early stage in the development of the new Local Plan. A Call for Sites has been open since February 2020 to help identify potential sites that may be able to help meet the district's development needs in the future. Evidence collection for the Local Plan is currently underway.

Strategic Environmental Assessment

1.18 A new version of the NPPF was published in December 2024. Consultation on a revised version of the NPPF and other changes to the planning system was undertaken by the Government from December 2025 to March 2026.

1.19 The Government subsequently introduced the new structured gateway process for the plan-making system under the Town and Country Planning (Local Planning) (England) Regulations 2026. The Councils will prepare their new Local Plan under this new system. Under the new system, plans must be prepared and adopted within 30 months.

1.20 For new Local Plans it is necessary to conduct an environmental assessment in accordance with the requirements of the SEA Directive (European Directive 2001/42/EC), as transposed into law in England by the SEA Regulations **[See reference 2]** and which remains in force despite the UK exiting the European Union in January 2020.

1.21 The Levelling-up and Regeneration Act (2023) outlines a number of reforms to the planning system, including the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report (EOR). Consultation took place in 2023 on the proposals for EORs and the Government published its response in March 2026 along with a roadmap for the introduction of the new system, which is expected to be in place by the end of 2027. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however, at present the requirement for SEA remains as set out in existing legislation. Any changes to the legal framework for carrying out SEA will be addressed as appropriate as the Local Plan is prepared. The potential change to EORs has been considered as far as possible during the preparation of this report, for example the baseline information has been presented in terms of quantifiable indicators where possible. At the time of writing, Government guidance on the new plan-making system continues to refer to the requirement for SEA, noting that "your plan will need to carry out SEA if it meets criteria set out in regulation 5 of The Environmental Assessment of Plans and Programmes Regulations 2004. We expect that all local plans will need to carry out SEA."

1.22 Local Plans being prepared under the new system are no longer required to be subject to SA, as was previously required under the Planning and Compulsory Purchase Act 2004 for Local Plans prepared under the previous system.

Health Impact Assessment

1.23 Although not a statutory requirement, HIA aims to ensure that health-related issues are integrated into the plan-making process. A separate HIA appendix will be included in the SEA Report to consider the potential effects of Local Plan in relation to relevant health related topic areas.

1.24 Furthermore, the SEA framework will include SEA objectives that draw on the more detailed findings of the appendix allowing for the integration of the HIA findings in the SEA process. Recommendations will be made in relation to how the health-related impacts of the Local Plan can be optimised as the policies and site allocations are selected and developed.

Equality Impact Assessment

1.25 The requirement to undertake formal EqIA of development plans was introduced in the Equality Act 2010, but was abolished in 2012. Despite this,

authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions. In fulfilling this duty, many authorities still find it useful to produce a written record of equality issues having been specifically considered.

1.26 Therefore, a separate EqIA appendix will be included in the SEA Report, setting out how various elements of the Local Plan are likely to be compatible or incompatible with the duties that Kirklees Council must perform under the Equality Act 2010. As with the HIA, the SEA framework will include SEA objectives that draw on the more detailed findings of the EqIA, so that the EqIA findings can be integrated into the SEA process.

Habitats Regulations Assessment

1.27 The requirement to undertake Habitats Regulations Assessment (HRA) of land-use plans is set out in The Conservation of Habitats and Species Regulations 2017, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 **[See reference 3]** (hereafter referred to as the "Habitats Regulations"). When preparing a land-use plan, the competent authority (in this case Kirklees Council) is therefore required by law to carry out an HRA. The competent authority can commission consultants to undertake HRA work on its behalf which is then reported to and considered by the competent authority.

1.28 The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of designated nature conservation sites (such as SACs, SPAs and Ramsar wetlands) and to ascertain whether it would adversely affect the integrity of that site. The competent authority will consider the HRA and may only progress the land-use plan if it considers that it will not adversely affect the integrity of any SAC, SPA or Ramsar site or have a significant effect on qualifying habitats or species for which the sites are designated, or if Imperative Reasons of Overriding Public Interest (IROPI) are identified.

1.29 The HRA will be undertaken and reported on separately, but the findings, once available, will be considered in the SEA where relevant, for example to inform judgements about the likely effects of potential development locations on biodiversity.

Approach to SEA Scoping

1.30 This Scoping Report sets out the intended scope and level of detail of the SEA of the Local Plan for consultation with the relevant environmental authorities. It provides the foundations for assessment of the likely effects of constituent parts of the Local Plan, as plan-making progresses.

1.31 This SEA Scoping Report follows key legislation, policy and guidance including:

- Directive 2001/42/EC on the assessment of the effects of certain plans, and programmes on the environment i.e. the SEA Directive **[See reference 4]**;
- The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) **[See reference 5]**;
- A Practical Guide to the Strategic Environmental Assessment Directive **[See reference 6]**;
- Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment **[See reference 7]**;
- Guidance on Strategic Environmental Assessment / Sustainability Appraisal and the Historic Environment **[See reference 8]**;
- Strategic Environmental Assessment: Improving the effectiveness and efficiency of Strategic Environmental Assessment / Sustainability Appraisal for land use plans **[See reference 9]**;
- Draft Guidance on Assessing Health Impacts in Strategic Environmental Assessment **[See reference 10]**; and
- Health Impact Assessment in spatial planning: A guide for local authority public health and planning teams **[See reference 11]**.

1.32 New government guidance on the SEA process for the new 30 month Local Plan system is expected soon, and this will be referred to and reflected in any subsequent stages of the SEA as necessary.

Meeting the requirements of the SEA Regulations

1.33 The section below signposts the relevant sections of the Scoping Report that are considered to meet the SEA Regulations requirements (the remainder will be met during subsequent stages of the SEA of the Kirklees Local Plan). This section will be included in the full SEA Report at each stage of the plan making process to show how the requirements of the SEA Regulations have been met throughout the SEA process. Note that the SEA Regulations refer to the 'Environmental report' as the output of the SEA process; in this case we refer to the output as an 'SEA report'.

SEA Regulations' requirements

Environmental report

- Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:
  - implementing the plan or programme; and
  - reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.
- (Regulation 12(1) and (2) and Schedule 2).
  - The full SEA Report produced to accompany the Kirklees Local Plan will constitute the 'environmental report' as well and will be produced at a later stage in the SEA process.
- An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.
  - Addressed in Chapter 2 in this SEA Scoping Report.
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
  - Addressed in Chapters 3 and 4 in this SEA Scoping Report.
- The environmental characteristics of areas likely to be significantly affected.
  - Addressed in Chapter 3 in this SEA Scoping Report.

- Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.
  - Addressed in Chapter 4 in this SEA Scoping Report.
- The environmental protection, objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.
  - Addressed in Chapter 2 and Appendix A in this SEA Scoping Report.
- The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as:

  (a) biodiversity;

  (b) population;

  (c) human health;

  (d) fauna;

  (e) flora;

  (f) soil;

  (g) water;

  (h) air;

  (i) climatic factors;

  (j) material assets;

  (k) cultural heritage, including architectural and archaeological heritage;

  (l) landscape; and

  (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).
  - Requirement will be met at a later stage in the SEA process. Chapter 5 of this SEA Scoping Report describes the method by which significant effects will be identified.

- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.
  - Requirement will be met at a later stage in the SEA process.
- An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.
  - Requirement will be met at a later stage in the SEA process.
- A description of the measures envisaged concerning monitoring in accordance with regulation 17.
  - Requirement will be met at a later stage in the SEA process.
- A non-technical summary of the information provided under paragraphs 1 to 9.
  - Requirement will be met at a later stage in the SEA process.

Consultation

- When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies.

  (Regulation 12(5))
  - This SEA Scoping Report will be published for consultation with the three statutory bodies (the Environment Agency, Historic England and Natural England) and surrounding local authorities. Consultation comments provided by these consultees on the March 2025 SA Scoping Report and the SEA team's response to each are set out in **Appendix D**. Further information on consultation on this SEA Scoping Report is set out in Chapter 6.
- Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.

  As soon as reasonably practical after the preparation of the relevant documents, the responsible authority shall:
  - send a copy of those documents to each consultation body;

- take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental Assessment of Plans and Programmes Directive ("the public consultees");
- inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.

The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.

(Regulation 13 (1), (2), and (3))

- Public consultation on the Kirklees Local Plan and accompanying SEA Reports will take place as the Local Plan develops.

- Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonably practicable after forming that opinion:
  - notify the Secretary of State of its opinion and of the reasons for it; and
  - supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.

  (Regulation 14 (1))
  - Unlikely to be relevant to the Local Plan, as there will be no effects beyond the UK.

Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)

- As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:
  - make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge.

(Regulation 16(1))

- Requirement will be met at a later stage in the SEA process.

- As soon as reasonably practicable after the adoption of a plan or programme the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of State, the Secretary of State,
  - that the plan or programme has been adopted, and a statement containing the following particulars:
  - how environmental considerations have been integrated into the plan or programme;
  - how the environmental report has been taken into account;
  - how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
  - how the results of any consultations entered into under regulation 14(4) have been taken into account;
  - the reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with; and
  - the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.
  - Requirement will be met at a later stage in the SEA process.

Monitoring

- The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.

  (Regulation 17(1))

  - Requirement will be met after adoption of the Local Plan.

Structure of the Scoping Report

1.34 This chapter provides a brief introduction to Kirklees and the Local Plan, and explains the requirement to undertake SEA and other assessment

processes. The remainder of this Scoping Report is structured into the following sections:

- **Chapter 2** describes the relationship between the new Kirklees Local Plan and other relevant national, county, local and neighbourhood plans, and summarises the international and national plans and programmes that are relevant to the Local Plan and the SEA.
- **Chapter 3** sets out the baseline information and is structured around the SEA topics listed in Schedule 2 of the SEA Regulations. Given the cross-cutting nature of some of the SEA topics, including those relating to population, human health, material assets and climatic factors, the Scoping Report draws out the full range of environmental and sustainability issues facing Kirklees and the Local Plan's influence on them. The topics addressed in Chapter 3 are:
  - Population, health and wellbeing;
  - Economy and employment;
  - Transport and accessibility;
  - Air, land and water quality;
  - Climate change mitigation and adaptation;
  - Biodiversity and geodiversity;
  - Historic environment; and
  - Landscape and townscape.
- **Chapter 4** identifies the key environmental and sustainability issues in Kirklees of relevance to the Local Plan and considers the likely evolution of those issues without its implementation.
- **Chapter 5** then sets out the SEA framework and the proposed method for carrying out the SEA. The key environmental and sustainability issues and opportunities have been reflected in the SEA framework, which the Local Plan will be assessed against.
- **Chapter 6** summarises the consultation questions on the SEA Scoping Report and sets out next steps.
- **Appendix A** presents a summary of the objectives of relevant international, national, sub-regional plans and programmes that are relevant to the Local Plan and the SEA.
- **Appendix B** presents the HIA framework that will be used to guide the HIA work for the Local Plan.

- **Appendix C** presents the site assessment criteria that will be used to guide the assessment of site options considered for the Local Plan.
- **Appendix D** presents a summary of the comments received from the statutory consultees following consultation undertaken on the March 2025 SA Scoping Report and the SEA team's response to each of these.

Chapter 2
Relevant plans and programmes

Introduction

2.1 This chapter addresses Schedule 2 of the SEA Regulations, which requires the SEA Report to provide:

- an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes; and
- the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.

2.2 In order to establish a clear scope for the SEA it is necessary to review and develop an understanding of the environmental objectives (including some social and economic objectives relevant to the SEA topics) contained within international and national policies, plans and strategies that are of relevance to the Kirklees Local Plan. Given the SEA Regulations requirements above, it is also necessary to consider the relationship between the Local Plan and other relevant plans, policies and programmes.

2.3 This chapter first summarises the relationship of the Local Plan to the relevant policies, plans and programmes which should be taken into consideration during preparation of the plan and its SEA. It then summarises the key environmental and sustainability objectives within the international and national plans and programmes as well as some of those at the County level. **Appendix A** provides more detail on the main environmental and sustainability objectives of international, national, regional and sub-regional plans and programmes which are of most relevance for the Local Plan and the SEA.

2.4 The objectives of these plans and programmes have been taken into account when drafting the SEA framework in **Chapter 5**. An outline of the content and main objectives of the Local Plan will be described in subsequent SEA reports, as this emerges through the plan-making process.

Relationship of Kirklees Local Plan with other relevant plans and programmes

2.5 The Kirklees Local Plan is not prepared in isolation and must be in conformity with a range of international and national plans and programmes.

2.6 Once the new Local Plan is adopted, the development plan for Kirklees will comprise the adopted plan as well as the 'made' Neighbourhood Plans within the local authority area. National policy set out in the NPPF, with guidance provided for its application in the Planning Practice Guidance (PPG), sets the foundation for preparation of the local development plan. The NPPF is also a material consideration for planning decisions.

2.7 Furthermore, the Planning and Infrastructure Act 2025 has introduced the system of strategic planning in England via Spatial Development Strategies. These will be prepared by strategic authorities (West Yorkshire Combined Authority in the case of Kirklees) and will sit above and help shape Local Plans once adopted. The primary purpose of Spatial Development Strategies will be to guide sustainable growth and address key cross-boundary spatial issues.

2.8 The development plan for Kirklees is supported by other documents such as the Statement of Community Involvement, Local Plan Timetable, Authority Monitoring Report and Supplementary Planning Documents. Note that under planning reforms set out in the Levelling-up and Regeneration Act 2023, Supplementary Planning Documents are being phased out and replaced by Supplementary Plans. Supplementary Planning Documents will remain in force until planning authorities adopt a local plan under the new plan making system.

The implications of Brexit

2.9 As of the end of January 2020 the UK has left the EU. Principally, the UK's environmental law is derived from EU law or was directly effective EU law. As a result of Brexit, the European Union (Withdrawal) Act 2018 converts existing EU law which applied directly in the UK's legal system (such as EU Regulations and EU Decisions) into UK law and preserves laws made in the UK to implement EU obligations (e.g. the laws which implement EU Directive). This body of law is known as retained EU law and could be subject to future, post-Brexit amendments.

2.10 As set out in the Explanatory Memorandum accompanying the Brexit amendments **[See reference 12]**, the purpose of the Brexit amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the EU. No substantive changes are made by this instrument to the way the SEA regime operates.

2.11 Relevant international plans and programmes (including those at the EU level) are transposed into national plans, policy and legislation and these have been considered in this chapter and in **Appendix A**.

International

2.12 At the international level, there is a wide range of plans and programmes which act to inform and shape national level legislation. Planning policy in England at a national and local level (i.e. the NPPF and Local Plan) should be aware of and in conformity with the relevant legislation. The main environmental and sustainability objectives of international plans and programmes which are of most relevance for the Local Plan and the SEA are provided in Error! Reference source not found.

National

2.13 There is an extensive range of national policies, plans and programmes that are relevant to the Local Plan and the SEA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national policies, plans and programmes, focusing on those that are of most relevance. A summary of the main objectives of the National Planning Policy Framework and Planning Practice Guidance of relevance to the Local Plan and the SEA is provided below. In addition, the main environmental and

sustainability objectives of other national plans and programmes which are of most relevance to the Local Plan and SEA are provided in **Appendix A**.

2.14 It should be noted that the new Local Plan is being prepared in a period of transition towards the new plan-making system that the Government is introducing.

2.15 Recent legislation and policy updates have set out how Local Plans will be prepared and managed differently in the coming years:

- The Levelling Up and Regeneration Act **[See reference** 13**]** introduced the statutory framework for many of the planned reforms. Not all plan-making provisions are in force, however, the Act sets the legal basis for the new system.
- The Government response to the Plan-Making Reforms consultation (July–October 2023) was published in February 2025 **[See reference** 14**]** as well as the recent Chief Planner newsletter which sets out advice for plan-makers **[See reference** 15**]**.
- The Government has also published guidance and resources for local planning authorities (LPAs) preparing a local plan under the new plan-making system **[See reference** 16**]**.

2.16 The government has said the new system will be “simpler, faster to prepare and more accessible”. The changes include:

- 30-Month Local Plan Timetable: Councils will need to prepare Local Plans within 30 months – roughly half the time most plans currently take.
- This process will include a period of early engagement followed by two rounds of public consultation and three Gateway Assessments. The second and third gateway assessments are led by the Planning Inspectorate where key issues are considered early and to determine whether the plan can proceed to examination.
- Plan examination is expected to occur within the 30 months, ideally lasting no more than six months.

The National Planning Policy Framework and Planning Practice Guidance

2.17 The National Planning Policy Framework (NPPF) **[See reference** 17**]** is the overarching planning framework which provides national planning policy and

principles for the planning system in England. The NPPF was originally published in March 2012 and has since been updated and revised several times. The most recent published update to the NPPF was in December 2024 (although there were some very minor amendments made to cross-references and one paragraph in February 2025) **[See reference 18]**.

2.18 In December 2025, the Government published a consultation on proposed updates to the NPPF **[See reference** 19**]**. This version of NPPF was subject to consultation until March 2026 and may be subject to change in response to comments received. However, the Local Plan is likely to need to reflect the new NPPF and as such a summary of the December 2025 consultation draft NPPF is set out later in this chapter, in addition to the summary of the adopted NPPF.

Adopted NPPF

2.19 The three overarching objectives of the planning system are set out in paragraph 8 of the NPPF, which should be pursued in mutually supportive ways so that net gains are achieved across each of the different objectives:

- "an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

2.20 The Local Plan must be consistent with the requirements of the NPPF, which states:

"Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

2.21 A local planning authority is also required to have regard to national policies and advice contained in guidance issued by the Secretary of State when preparing a Local Plan **[See reference** 20**]**.

2.22 Paragraph 20 of the NPPF states the need for strategic policies in plan making, which set out the overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), making sufficient provision for:

- "a) homes (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."

2.23 The National Planning Practice Guidance (PPG) **[See reference** 21**]** provides guidance for how the Government's planning policies for England are expected to be applied. Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis for the benefit of planning practitioners.

2.24 The overarching nature of the NPPF means that its implications for the SEA relate to multiple topics which this report seeks to address. Considering the importance of the NPPF to the English planning system, the relevance of the Framework and its implications for the plan making process and the SEA is provided in more detail below. Sustainability topics are separated under environmental, social and economic below. Consideration of issues often cut across topics. This is reflected in the grouping of environmental and social issues together under one heading. The summary provided below is not

absolutely comprehensive and the NPPF is intended to be read and applied as a whole during plan making.

Environmental and social considerations

Climate change

2.25 Climate change adaption and mitigation, energy efficiency and waste minimisation measures for new development including through the promotion of renewable energy schemes are supported through the NPPF. One of the core planning principles is to "support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change"". Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures.

2.26 Although Local Plans can no longer require levels of the Code for Sustainable Homes, they can promote the Home Quality Mark **[See reference 22]** to support residents in understanding the quality and performance of new build homes and can also set targets for developers to provide for a given percentage of energy used by a new development to come from on-site renewable or low carbon technologies. Revisions were made to the Building Regulations 2022 **[See reference 23]**, setting minimum energy efficiency standards which are increasing the performance values of properties. From 15th June 2022, all new build homes are required to produce at least 31% less carbon emissions. Local Plan policies can further support the development of renewable energy technologies where appropriate, in line with climate change mitigation strategies and targets. The UK Green Building Council has produced a resource pack which is designed to help local authorities improve the sustainability of new homes.

2.27 The New Homes Policy Playbook **[See reference 24]** sets out minimum requirements for sustainability in new homes that local authorities should introduce, as well as proposed stretching requirements should local authorities wish to go further. For non-residential uses BREEAM assessments can be used by local authorities to ensure buildings meet sustainability objectives. Policies in the Local Plan can also support design choices that achieve development that is better adapted to the effects of climate change including through the incorporation of green infrastructure. The SEA can consider the contribution the

alternatives make in terms of climate change mitigation as well as climate change adaptation.

Population and health and wellbeing

2.28 In relation to health and wellbeing, healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles are supported through the Framework. The Framework highlights that the Building for a Healthy Life design toolkit **[See reference 25]** can be used by local authorities to assist in the creation of places that are better for people and nature.

2.29 One of the core planning principles is to "take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community". It is identified in the document that "a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities". Furthermore, the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship is supported. Importantly, Local Plans should also "contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible". Additionally, larger scale developments such as new settlements or significant extensions to existing villages and towns are required by the NPPF to be guided by policies set within a vision that looks at least 30 years ahead **[See reference 26]**. The need for policies to be reflective of this longer time period is to take account of the likely timescale for delivery.

2.30 The delivery of new housing is considered to support local communities by meeting housing needs and addressing shortages. The new Kirklees Local Plan can have a significant influence on addressing inequalities including those relating to health and will need to consider the appropriate siting of new development, particularly large development sites that are likely to include new service and facility provisions. The Local Plan can ensure that new development is located in areas which can improve accessibility for existing as well as new residents and ensure that future development does not exacerbate existing inequalities. The SEA process can support the identification and refinement of options that can contribute to reducing inequalities and support the development of policy approaches that cumulatively improve the wellbeing of local communities.

Biodiversity

2.31 The NPPF sets out the approach Local Plans should have in relation to biodiversity and states that plans should "identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation". Plans should also promote conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. A strategic approach to maintaining and enhancing networks of habitats and green infrastructure is to be supported through planning policies, in addition to the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

2.32 The Kirklees Local Plan should seek to maximise any opportunities arising for local economies, communities and health as well as biodiversity. This should be inclusive of approaches which are supportive of enhancing the connectivity of green infrastructure and promoting the achievement of biodiversity net gain. The SEA process should support the identification and maximisation of potential benefits through the consideration of alternatives and assessment of both negative and positive significant effects.

Landscape

2.33 In relation to landscape, the NPPF sets the planning principles of recognising the intrinsic character and beauty of the countryside as well as protecting and enhancing valued landscapes. Reference is included with regards to this purpose at National Parks, The Broads and National Landscapes (formerly referred to as Areas of Outstanding Natural Beauty or AONBs) **[See reference 27]**.

2.34 The Local Plan should be supportive of an approach to development which would protect the landscape character of Kirklees and its surrounds. Where appropriate it should also seek to protect the identity of Kirklees's settlements. The SEA should identify those alternatives which contribute positively to landscape and townscape character.

Historic environment

2.35 The NPPF states that in relation to the historic environment plans should "set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats". Where appropriate, plans should seek to sustain and enhance the significance of heritage assets and local character and distinctiveness, while viable uses of assets should be considered. Plans should take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. They should also consider the contribution the historic environment can make to the character and distinctiveness of a place.

2.36 The Local Plan can offer enhanced protection for designated and non-designated heritage assets and their settings, including any potential archaeological finds in line with heritage protection and enhancement plans. The SEA has a role to play by identifying which alternatives could offer opportunities to secure the protection and enhancement of assets as well as those which might have significant impacts in terms of their appropriate use and setting.

Pollution and flooding and water use

2.37 The NPPF states that new and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, pollutions including soil, air, water or noise pollution, or land instability. Inappropriate development in areas at risk of flooding should be avoided according to the 'Flood risk vulnerability and flood zone 'incompatibility'' table from planning practice guidance relating to 'flood risk and coastal change' **[See reference** 28**]**. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account implications for water supply. Furthermore, strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision of infrastructure for water supply and wastewater. The Council is revising the Strategic Flood Risk Assessment, which will provide an updated evaluation of flood risk in the district.

2.38 The new Kirklees Local Plan presents an opportunity to consider incorporating targets for water efficiency and the level of water consumption and grey water recycling in any new development. The Local Plan also can ensure that development is sited away from areas of adverse air quality (including AQMAs), high flood probability and that appropriate water drainage is in place in

line with flood risk strategies. The SEA process should seek to identify and address potential negative effects on air quality, flooding and the water environment, including implications relating to wastewater.

Soils and minerals

2.39 The NPPF states that the planning system should protect and enhance soils in a manner commensurate with their statutory status or identified quality in the development plan, while also encouraging the reuse of previously developed land. Furthermore, planning policies should provide for the extraction of mineral resources of local and national importance.

2.40 The Local Plan can seek to ensure the appropriate protection of soil quality, including best and most versatile agricultural land. Further to this the Local Plan should ensure that new development does not conflict with current mineral operations, as well as long-term mineral resource plans. The SEA process should inform the development of the Local Plan by helping to identify alternatives which would avoid areas of highest soil quality and best and most versatile agricultural land (in so far as this is relevant to Kirklees), as well as those which would promote the use of brownfield land.

Economic considerations

Economic growth

2.41 The NPPF sets out that in terms of economic growth the role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure. Furthermore, planning policies should address the specific locational requirements of different sectors.

2.42 Local planning authorities should incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”. Local Plans are required to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration” **[See reference 29]**.

2.43 The Local Plan should seek to maximise the potential benefits of nearby strategic growth, while at the same time ensuring the vitality and viability of smaller localised economies. Ensuring that services and facilities within the district's centres are maintained and enhanced is also important and will also provide support for local communities. The SEA process can support the development of the Local Plan to ensure that its policies are considerate of impacts on the economy in Kirklees. The process can also be used to demonstrate that impacts on the viability of the district's settlements have been considered.

Transport

2.44 The NPPF encourages local planning authorities to consider transport issues from the earliest stages of plan making, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This will help ensure that opportunities to promote sustainable transport are identified and pursued, the environmental impacts of traffic and transport infrastructure can be identified and assessed, and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The Framework also states that the planning system should actively manage growth patterns in support of these objectives.

2.45 Growth will inevitably increase traffic on the roads which also has implications for air quality, and the Local Plan and SEA process can seek to minimise effects of this nature through appropriately siting new development, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development. The Local Plan, as supported by the SEA, should seek to identify opportunities to maximise the potential for alternative modes of transport to the car and reduce the need to travel, thereby reducing emissions through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure.

Consultation draft NPPF (December 2025)

2.46 The initial chapters of the consultation draft NPPF **[See reference** 30**]** introduce general procedural policies for plan-making and decision-making. The subsequent chapters contain policies on thematic issues, separated in each case into policies for plan-making and those for decision-making.

2.47 The purpose of the plan-making policies is proposed to create a system which is genuinely plan-led, through plan-making authorities. Policy PM2: Local plans carries forward this approach requiring that "Local Plans should set out a positive vision and spatial strategy, which supports the delivery of the spatial development strategy for their area, and should set out specific proposals for accommodating development needs and improving the environment at a local level." This policy acknowledges the new sub-regional tier of strategic plans that will sit above Local Plans (i.e. the Spatial Development Strategy) and identifies that the preparation of joint local plans should be considered where it would enable local planning matters to be dealt with most effectively.

2.48 The overarching approach to plan making is set out through Policies PM6: General principles for plan-making which states that plans should "only address matters, and include policies, that are necessary and relevant to the plan being prepared, and which avoid unnecessary duplication of other parts of the development plan". Furthermore, this policy states that policies should not duplicate national decision-making policies and should be informed by environmental assessment.

2.49 The requirement for plans to be appropriately evidenced is set out through Policy PM8: Evidence for plan-making. This policy requires that plans are supported by the preparation of a baseline understanding of the needs, opportunities, constraints and wider context of the area to which the plan relates. Furthermore, evidence should be proportionate and not unnecessarily exhaustive.

2.50 The approach to how sustainable development should be met through the plan making system is set out through Policy S1: Positive plan-making. This policy requires that plans should seek to meet the development needs of their area as a minimum. New development should be provided in such a way as to promote a sustainable pattern of growth and mitigate climate change and adapt to its effects.

2.51 The consultation draft NPPF also includes several theme specific policies that set out the approach Local Plans should adopt in relation to:

- Housing growth (Policies HO1: Assessing the need for homes, HO2: Setting requirement figures for homes, HO3: Providing land for homes, HO4: Land for large scale residential and mixed-use development, HO5: Meeting the needs of different groups and HO6: Planning for a diverse mix of sites).

- Economic growth (Policy E1: Providing the conditions for long term economic growth).
- Town centres (Policy TC1: Planning for town centres).
- Clean water and energy (Policies W1: Planning for energy and water and W2: Securing renewable and low carbon energy, and electricity network infrastructure).
- Promoting the effective use of land (Policy L1: Planning for an effective use of land).
- Green Belt (Policies GB1: Establishing new Green Belts, GB2: Assessing existing Green Belt land, GB3: Altering existing Green Belt boundaries, GB4: Defining Green Belt boundaries and GB5: Beneficial uses of Green Belt Land).
- Well-designed places (Policies DP1: A strategy for design and DP2: Local Design Guides, Local Design Codes and Masterplans).
- Sustainable transport (Policies TR1: Vision-led approach to planning for transport and TR2: Local parking standards).
- Healthy communities (Policies HC1: Planning for healthy communities and HC2: Local Green Space).
- Pollution, public protection and security (Policy P1: Planning for clean and safe places).
- Flood risk and coastal change (Policies F1: Assessing flood risk for plan-making, F2: Planning for effective flood risk management and F3: Managing coastal change).
- The natural environment (Policy N1: Identifying environmental opportunities and safeguards)
- The historic environment HE1: Planning for the historic environment HE2: Conservation Areas and World Heritage Sites and HE3: Historic Environment Records).

Other national policies, plans and programmes

2.52 Numerous other policies, plans and programmes (PPPs) at a national level are of relevance to the preparation of the Kirklees Local Plan and the SEA. Unlike the NPPF, most of the documents are focussed on a specific topic area which the SEA will consider. There will be some overlap between SEA topics

covered by these plans and programmes where those documents contain more overarching objectives. However, the plans and programmes considered of most relevance to the SEA have been grouped by the topics they most directly seek to address, and the sections below each topic heading summarise the implications of the national PPPs for the Local Plan and the SEA.

Climate change adaption and mitigation, energy efficiency and waste minimisation

2.53 The relevant national PPPs under this topic are:

- Warm Homes Plan (2026)
- Clean Energy Industries Sector Plan (2025)
- Seventh Carbon Budget (2025)
- The Environment Improvement Plan (2025)
- Hydrogen Update to the Market (2025)
- Onshore Wind Strategy (2025)
- Carbon Budget and Growth Delivery Plan (2025)
- Clean Power 2030 Action Plan: A New Era of Clean Electricity (2024)
- Powering Up Britain (2023)
- Biomass Strategy (2023)
- Energy Security Plan (2023)
- Defence Operational Energy Strategy (2023)
- Net zero government emissions: UK roadmap (2023)
- UK Climate Change Risk Assessment (2022)
- Waste prevention programme for England: Maximising Resources, Minimising Waste (2023)
- Sustainability and Climate Change Strategy (2022)
- National Flood and Coastal Erosion Risk Management Strategy for England (2022)
- UK Hydrogen Strategy (2021)
- Environment Act (2021)

- Net Zero Strategy: Build Back Greener (2021)
- Industrial Decarbonisation Strategy (2021)
- Energy Performance of Buildings Regulations (2021)
- Waste Management Plan for England (2021)
- Energy White Paper: Powering Our Net Zero Future (2020)
- Flood and Coastal Erosion Risk Management: Policy Statement (2020)
- Waste (Circular Economy) (Amendment) Regulations (2020)
- Net Zero – The UK's Contribution to Stopping Global Warming (2019)
- Flood and Water Management Act 2010 and The Flood and Water Regulations (2019)
- Climate Change Act (2008) and Climate Change Act 2009 (2050 Target Amendment) Order (2019)
- Our Waste, Our Resources: A Strategy for England (2018)
- Clean Growth Strategy (2017)
- National Planning Policy for Waste (NPPW) (2014)
- Planning and Energy Act (2008)

Implications for the Local Plan and SEA

2.54 The Local Plan should consider setting out policies to achieve climate change and adaptation while also encouraging development that would help to minimise carbon emissions.

2.55 The Local Plan should help to ensure that new development is energy efficient and promotes the use of sustainable construction methods and materials, as well as reduce their carbon emissions. The Local Plan should also ensure that risk from all sources of flooding as a result of climate change is managed effectively and should ensure that development is resilient to future flooding. This should include the Local Plan setting out approaches to encourage the appropriate use of Sustainable Drainage Systems (SuDS) to minimise flood risk. The Local Plan should also consider the handling of waste in line with the waste hierarchy.

2.56 In addition, the Local Plan should seek to allocate development in areas where sustainable transport patterns can be best achieved and encourage

development to make use of more sustainable sources of energy, potentially through the allocation of sites that would support infrastructure for renewable energy generation

2.57 The SEA is able to respond to this through the inclusion of SEA objectives relating to the mitigation of climate change and adaptation to climate change, sustainable construction, waste management, flooding and sustainable transport.

Health and wellbeing

2.58 The relevant national PPPs under this topic are:

- Building for a Healthy Life (2026)
- UK Health Security Agency strategic plan (2026)
- Fit for the Future: The 10-Year Health Plan for England (2025)
- Planning and Infrastructure Act (2025)
- Healthy Homes — a foundation for healthier and resilient communities (2025)
- Planning Policy for Traveller Sites (2024)
- Policy Statement on New Towns (2024)
- Levelling Up and Regeneration Act (2023)
- Anti-Social Behaviour Action Plan (2023)
- Homes England Strategic Plan 2023 to 2028 (2023)
- Green Infrastructure Framework (2023)
- White Paper Levelling Up the United Kingdom (2022)
- A Fairer Private Rented Sector White Paper (2022)
- Health and Care Act (2022)
- National Design Guide (2021)
- National Model Design Code (2021)
- Environment Act (2021)
- State of the Environment: Health, People and the Environment (2021)
- Build Back Better: Our Plan for Health and Social Care (2021)

- COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)
- Using the Planning System to Promote Healthy Weight Environments (2020) Addendum (2021)
- The Charter for Social Housing Residents: Social Housing White Paper (2020)
- Marmot Review 10 Years On (2020)
- Technical Housing Standards – Nationally Described Space Standard (2015)
- Select Committee on Public Service and Demographic Change Report Ready for Ageing? (2013)
- Equality Act (2010)
- Environmental Noise Regulations (2006)

Implications for the Local Plan and SEA

2.59 The Local Plan needs to consider the requirements for infrastructure as this has the potential to have a significant impact on the environment, and it should be prepared to ensure that the population has access to sustainable low carbon infrastructure and services and facilities and that there is sufficient capacity within them to serve the increased population. This should include healthcare, education and open space.

2.60 Local Plans offer the opportunity to maximise the wellbeing benefits of well designed local green spaces. The Local Plan should help to ensure that the provision of open space and green infrastructure is of sufficient quality as well as being sufficient in quantity to meet the needs of the plan area. Incorporated in the plan area in an appropriate manner these types of provisions will encourage healthy and active lifestyles, create fairer, safer and more inclusive communities, and improve the sustainable transport network including active travel networks.

2.61 The provision of an appropriate level of housing over the plan period will help address issues of disparity in terms of access to decent housing. The provision of new housing should be considerate of local needs with regards to housing size, tenure and type, including the needs of Gypsies, Travellers and Travelling Showpeople.

2.62 The SEA is able to respond to this through the inclusion of SEA objectives relating to health and wellbeing, social inclusion, housing and sustainable transport.

Environment (biodiversity/geodiversity, landscape and soils)

2.63 The relevant national PPPs under this topic are:

- Environment Improvement Plan (2025)
- Green Infrastructure Framework and associated 15 GI Principles (2023)
- Working with Nature (2022)
- Establishing the Best Available Techniques for the UK (UK BAT) (2022)
- Environment Act (2021)
- Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019)
- An Approach to Landscape Sensitivity Assessment (June 2019)
- Environmental Damage (Prevention and Remediation) Regulations (2015)
- National Pollinator Strategy (2014)
- Defra Right of Way Circular (01/09) (2011)
- The Eel (England and Wales) Regulations 2009
- Safeguarding our Soils – A Strategy for England (2009)
- Natural Environment and Rural Communities Act (2006)
- Countryside and Rights of Way Act (2000)
- Wildlife and Countryside Act (1981) (as amended)
- National Parks and Access to the Countryside Act (1949)

Implications for the Local Plan and SEA

2.64 The Local Plan should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes (including those that are designated) and higher value soils. The Local Plan should help to ensure that ecological features and biodiversity are managed in an appropriate manner, protected and enhanced and that opportunities for habitat restoration or creation are encouraged. The Local Plan should also help

to ensure that environmental pollution is minimised in order to protect land and soils and ensure the efficient extraction of minerals. The Local Plan should also help to ensure that designated and valued landscapes are protected and enhanced, and that development should be sympathetic to local character and history including the surrounding built environment and landscape setting.

2.65 The plan should also take into account non-designated landscapes identified as particularly sensitive to development and non-designated habitats which form part of wider ecological network. The Local Plan also presents opportunities to promote the achievement of net gain in biodiversity.

2.66 In terms of the location of development, the Local Plan can encourage the re-use of brownfield land **[See reference** 31**]** and protect more valuable agricultural soils from development. The allocation of new sites for development and updated planning policy can also be used to achieve better habitat connectivity through the provision of new green infrastructure and the requirement for biodiversity net gain.

2.67 The SEA is able to respond to this through the inclusion of SEA objectives relating to the protection and enhancement of biodiversity, character of landscapes and townscapes, green infrastructure and contaminated land.

Historic environment

2.68 The relevant national PPPs under this topic are:

- Historic England Strategic Plan 2026-2031 (2026)
- Heritage Statement (2017)
- Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016)
- Planning (Listed Buildings and Conservation Areas) Act (1990)
- Ancient Monuments and Archaeological Areas Act (1979)
- Historic Buildings and Ancient Monuments Act (1953)

Implications for the Local Plan and SEA

2.69 The potential impact of new development on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings, should inform the preparation of the Local

Plan. The Local Plan should set out a positive strategy for conserving, enhancing and enjoying heritage assets and their settings, including wider historic townscapes and landscapes. The Local Plan can help to realise the wider benefits of historic environment enhancements which include contributions to wellbeing and the economy. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk' (both at the national and local levels). Local planning authorities should consider setting out approaches in their Local Plans to address these issues and site options should be considered with regard for related issues.

2.70 The SEA is able to respond to this through the inclusion of SEA objectives relating to the historic environment and the character of landscapes and townscapes.

Water and air

2.71 The relevant national PPPs under this topic are:

- National Framework for Water Resources 2025: Water for Growth, Nature and a Resilient Future (2025)
- Environmental Improvement Plan (2025)
- National Assessment of Flood and Coastal Erosion Risk in England (2025)
- Air Quality Strategy for England (2023)
- Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023)
- Establishing the Best Available Techniques (UK BAT) (2022)
- National Flood and Coastal Erosion Risk Management Strategy (2022)
- Industrial Decarbonisation Strategy (2021)
- Environment Act (2021)
- National Chalk Streams Strategy (2021)
- Flood and Coastal Erosion Risk Management: Policy Statement (2020)
- Environment Agency's Land Contamination Risk Management (LCRM) guidance (2020)
- Clean Air Strategy (2019)
- Environment Agency's approach to groundwater protection (2018)

- Environmental Noise (Amendment) Regulations (2018)
- Water Supply (Water Quality) Regulations 2018
- Water Environment (Water Framework Directive) (England and Wales) Regulations (2017)
- UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)
- Drought Response: Our Framework for England (Environment Agency, 2017)
- Groundwater Protection Policy (2017)
- Managing Water Abstraction (2016)
- Environmental Permitting Regulations (2016)
- Air Quality Standards (Amendment) Regulations (2016)
- Nitrate Pollution Prevention Regulations (2015)
- National Policy Statement for Waste Water (2012)
- Flood and Water Management Act (2010)
- Groundwater (England and Wales) Regulations (2009)
- Flood Risk Regulations (2009)
- Future Water: The Government's Water Strategy for England (2008)
- Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
- Urban Waste Water Treatment Regulations (2003)
- Environmental Protection Act (1990)

Implications for the Local Plan and SEA

2.72 Local planning authorities should consider setting out approaches in their Local Plans to promote the efficient use of water and limit all types of pollution including water and air pollution. They should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The allocation of sites for development should take account of areas which are of highest sensitivity in relation to these issues, including Source Protection Zones (SPZs) and Air Quality Management Areas (AQMAs). To limit the potential for air quality issues to be intensified as development is delivered over the plan period, local planning authorities should consider setting out approaches in their Local

Plan to factor in the contribution that specific site options can make to achieving modal shift and limiting the need for residents to travel.

2.73 The SEA is able to respond to this through the inclusion of SEA objectives relating to air pollution, water quality and waste management.

Economic growth

2.74 The relevant national PPPs under this topic are:

- Planning and Infrastructure Act (2025)
- UK Infrastructure: A 10 Year Strategy (2025)
- The UK's Modern Industrial Strategy (2025)
- Plan for Change (2024)
- Kickstarting Economic Growth: Milestone: Raising Living Standards in Every Part of the United Kingdom (2024) and Rebuilding Britain (2024)
- Agricultural Transition Plan 2021 to 2024 (2024)
- UK Invest 2035: The Modern Industrial Strategy (2024)
- The Growth Plan (2022)
- Agriculture Act (2020)

Implications for the Local Plan and SEA

2.75 The Local Plan should allocate land to support the projected level of economic growth required over the plan period. Furthermore, the Local Plan should set out policies to promote sustainable economic and employment growth to benefit all members of the community and reduce disparity in the plan area. This should include support for the infrastructure required for the economy to function successfully. Policies should also be included in the Local Plan to promote the viability of town centres as well as local centres. Employment sites should be located to enable local people to be able to access the new employment opportunities.

2.76 The SEA is able to respond to this through the inclusion of SEA objectives relating to economic growth and employment.

Transport

2.77 The relevant national PPPs under this topic are:

- Better Connected: a strategy for integrated transport (2026)
- UK Infrastructure: A 10 Year Strategy (2025)
- Future of Transport: supporting rural transport innovation (2023)
- National Highways Environmental Sustainability Strategy (2023)
- Future of Freight Plan (2022)
- Decarbonising Transport: A Better, Greener Britain (2021)
- The Road to Zero (2018)
- Highways England Sustainable Development Strategy and Action Plan (2017)
- Door to Door: A strategy for improving sustainable transport integration (2013)

Implications for the Local Plan and SEA

2.78 The potential for reducing the need to travel, limiting congestion and associated benefits for air quality and climate change as well as public health should inform the preparation of the policies for the Local Plan and its site allocations. The Local Plan should also encourage walking and cycling as alternative modes of transport by providing safe and attractive walking and cycling infrastructure, as well as recognise the multiple benefits they bring in terms of physical and mental health, reducing carbon emissions and reducing air pollution. Furthermore, the selection of site options for development should be informed by issues such as the potential for access to new and existing public transport nodes and active transport routes as well as specific highways capacity issues. The selection of individual site options should also be informed by their proximity to essential services and facilities and jobs which is likely to influence the need for residents to regularly travel long distances.

2.79 The SEA is able to respond to this through the inclusion of SEA objectives relating to the mitigation of climate change, improving air quality, public health and wellbeing, and the provision of sustainable transport.

Sub-national

2.80 Below the national level there are further plans and programmes which are relevant to the Local Plan and the SEA process. These plans and programmes sit mostly at the sub-regional level with further details provided in **Appendix A**:

- Aire and Calder Abstraction Licensing Strategy (2026)
- West Yorkshire Local Nature Recovery Strategy (2026)
- West Yorkshire Local Transport Plan (2025)
- West Yorkshire Climate and Environment Plan (2025)
- West Yorkshire Local Growth Plan (2024)
- West Yorkshire Housing Strategy 2040 (2024)
- West Yorkshire Rail Strategy (2024)
- West Yorkshire Police and Crime Plan 2024–28 (2024)
- West Yorkshire Vision Zero Strategy 2024-2027 (2024)
- West Yorkshire Bus Service Improvement Plan (2024)
- HealthTech Strategy 2022-2027 (2022)
- West Yorkshire Employment and Skills Framework (2021)
- Draft West Yorkshire Mass Transit Vision 2040 (2021)
- West Yorkshire Investment Strategy 2021-2024 (2021)
- Leeds City Region Innovation Framework: Innovation for Everyone (2021)
- Draft West Yorkshire Connectivity Infrastructure Plan (2021)
- Draft Leeds City Region Local Industrial Strategy (2019)
- Leeds City Region Green and Blue Infrastructure Strategy (2018)
- West Yorkshire Plan 2040 (2017)
- West Yorkshire Bus Strategy 2040 (2017)
- River Calder: Catchment flood management plan (2009)

Local

2.81 There are further plans and programmes that sit at the local level that are also of relevance to the Local Plan and the SEA process. These include:

- Kirklees Council 'Our Council Plan' 2026/27 to 2028/29 (2026)
- Kirklees Inclusive Economy Strategy (2025 2030)
- A Heritage Strategy for Kirklees (2024)
- Kirklees Environment Strategy (2024)
- Kirklees Social Value Policy (2022)
- Kirklees Health and Wellbeing Strategy 2022-2027 (2022)
- Kirklees Climate Change Action Plan (2022)

Implications for the Local Plan

2.82 The new Local Plan needs to consider the above sub national plans and evidence for the West Yorkshire and Kirklees.

2.83 The Local Plan should support the aim to transition towards net zero and support adaptation to climate change. The Local Plan should meet the commitment that the Council made to achieve a 'Net Zero and Climate Ready Kirklees by 2038', following their declaration of a climate emergency in 2019.

2.84 The Local Plan provides the opportunity to maximise the well-being benefits of well-designed open spaces and areas for recreation. The Local Plan should help to ensure that the provision of open space and areas of recreation is of sufficient quantity and quality to meet the needs of the plan area, encouraging healthy and active lifestyles. The Local Plan should also consider opportunities for biodiversity enhancement within open spaces and across Kirklees.

2.85 The provision of an appropriate level of housing will help address issues of inequality in relation to housing in the plan area and support economic growth. The provision of new housing should be considerate of local needs, including the needs of Gypsies, Travellers and Travelling Showpeople. The Local Plan should support economic growth within Kirklees, including supporting the rural economy and infrastructure requirements.

2.86 The Local Plan should encourage the use of sustainable forms of transport such as walking and cycling and public transport. It should also support the

infrastructure required to enhance and decarbonise transport within the district. Transport plans for the WYCA have been produced and should be taken into consideration.

Surrounding Development Plans

2.87 Development in Kirklees will not be delivered in isolation from those areas around it. Given the interconnection between the district and the surrounding areas there is potential for cross-boundary and in-combination effects where development is proposed through development plans in neighbouring authorities.

2.88 As the SEA progresses, consideration will be given to the extent to which the content of plans in the neighbouring authority areas (i.e. Oldham, Calderdale, Bradford, Leeds, Wakefield, Barnsley and High Peak) could lead to in-combination effects with the Kirklees Local Plan, for example as a result of any large-scale new development being proposed in close proximity to the district's boundaries.

Neighbourhood Development Plans

2.89 Neighbourhood Development Plans, once adopted, form part of the development plan for a local authority area. There are currently six designated neighbourhood areas in Kirklees:

- Holme Valley;
- Kirkheaton;
- Mirfield;
- Lepton;
- Netherton and South Crosland; and
- Newsome.

2.90 There is currently only one 'made' (adopted) Neighbourhood Development Plan in Kirklees with a further two plans in progress:

- Holme Valley Neighbourhood Development Plan (made);
- Kirkheaton Neighbourhood Development Plan (plan in progress); and
- Mirfield Neighbourhood Development Plan (plan in progress).

2.91 Progress is currently paused on the preparation of the Lepton Neighbourhood Development Plan. The Neighbourhood Development Plan designations for Netherton and South Crosland and Newsome have been withdrawn and expired, respectively.

Chapter 3
Baseline information

3.1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.

3.2 Schedule 2 of the SEA Regulations requires information to be provided on:

- the relevant aspects of the current state of the environment;
- the environmental characteristics of areas likely to be significantly affected;
- any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive'].

3.3 This section presents the relevant baseline information for Kirklees. Data referred to have been chosen primarily for regularity and consistency of collection, to enable trends in the baseline situation to be established, and also to enable subsequent monitoring of potential sustainability effects.

Population, health and wellbeing

3.4 This section sets out the baseline for the plan area's population, health and well-being. The SEA will consider how the Local Plan can deliver sustainable places that support healthy, inclusive communities by ensuring housing, services, open space and access to healthcare keep pace with population change.

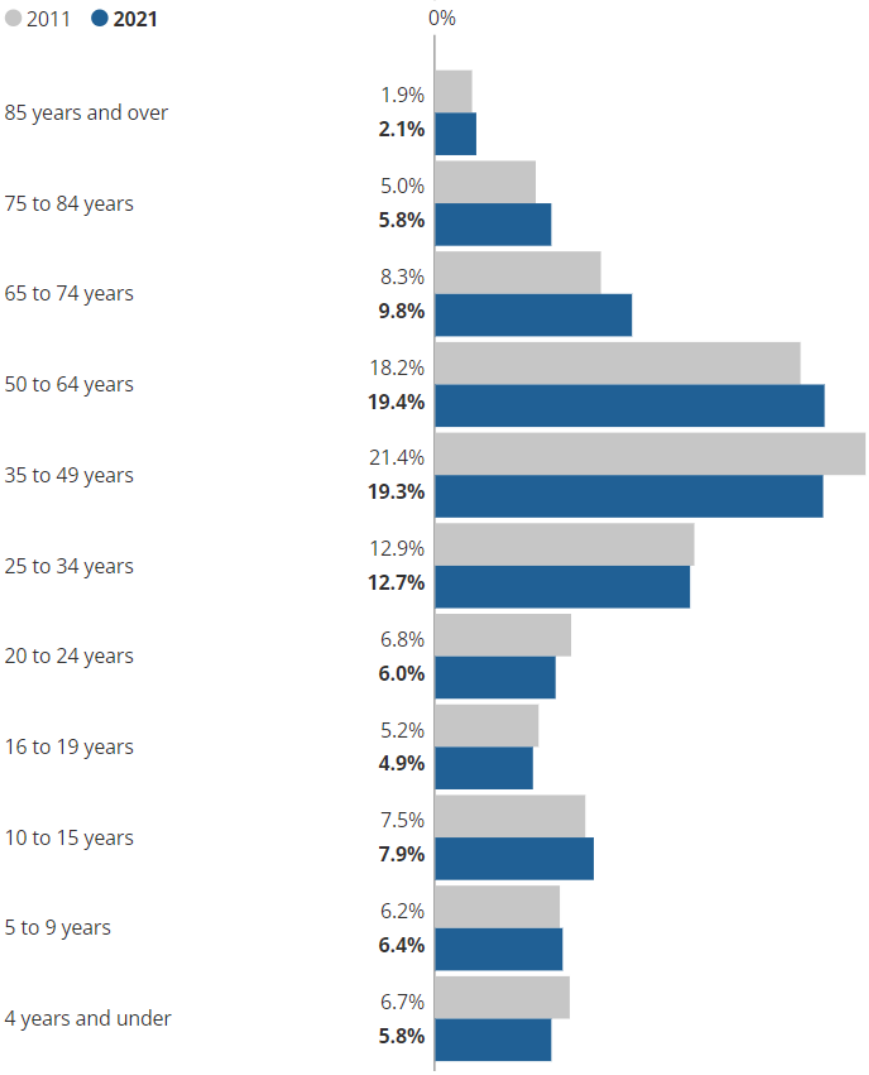
Population

3.5 The population of Kirklees was 433,500 in 2021, reflecting a 2.5% increase from 422,500 in 2011. This is lower than the overall increase for England (6.6%) and for Yorkshire and The Humber region (3.7%). Regionally the largest population increase during this period was in Selby (10.2%) and Wakefield (8.4%) and the lowest was in Calderdale (1.4%) **[See reference** 32**]**. The 2021

Census reported that the area was among the top 45% most densely populated English local authority areas **[See reference** 33**]**.

3.6 The population split, male to female in Kirklees, aligns with the national split (51% to 49%). The population of the district is ageing, with the highest proportion of people being between the ages of 35 to 49 and 50-64, with a comparatively low amount of young people as illustrated by **Figure 3.1**. The figure also shows that the proportion of those in age ranges 65 years and over have all increased between from the Census held in 2011 and that held in 2021.

Figure 3.1: Population by age in Kirklees from Census 2011 to Census 2021 [See reference **34**]



3.7 According to the 2021 Census **[See reference** 35**]**, the largest ethnic group in Kirklees is White: English, Welsh, Scottish, Northern Irish or British, with 73.6% of residents identifying as such. This represents a 5.5% decrease from

2011. In 2021, 19.4% of Kirklees residents identified as 'Asian, Asian British or Asian Welsh', which is a 3.4% increase from 2011. This change was the largest increase among high-level ethnic groups in Kirklees in 2021. During the same reporting period, 3.1% of Kirklees residents identified their ethnic group within the "Mixed or Multiple" category, up from 2.3% in 2011. **Table 3.1** below shows the breakdown of Kirklees population by ethnic group.

Table 3.1: Breakdown of population in Kirklees by ethnic group [See reference **36**]

Ethnic group	% of population
Asian, Asian British or Asian Welsh	19.4
Black, Black British, Black Welsh, Caribbean or African	2.3
Mixed or Multiple ethnic groups	3.1
White	73.6
Other ethnic groups	1.5

3.8 In 2021 there was a total of 177,992 households present in the district **[See reference** 37**]**. Between 2011 and 2021, the percentage of households in Kirklees including a couple with dependent children fell from 20.7% to 20.0%. During the same period, the percentage of households including a couple without children in Kirklees fell from 18.3% to 16.5%, while the percentage of households including a couple with only non-dependent children decreased from 6.1% to 6.3% **[See reference** 38**]**.

3.9 The population in Kirklees is spread across 24 wards. Armitage with Dewsbury East has the highest population of the 24 wards, with 21,688 residents. Greenhead displays the highest population increase between 2011 and 2021, with an increase of 1,899 people. **Table 3.2** below presents the population change between 2011 and 2021 by ward in Kirklees **[See reference** 39**]**.

Table 3.2: Population by ward in Kirklees

Ward	Population in 2011	Population in 2021	Population Change
Almondbury	18,346	17,657	-689
Ashbrow	19,664	20,373	+709
Batley East	19,189	18,904	+285
Batley West	19,384	20,109	+725
Birstall and Birkenshaw	16,298	16,917	+619
Cleckheaton	16,622	17,187	+565
Colne Valley	17,396	17,579	+183
Crosland Moor and Netherton	18,723	19,786	+1063
Dalton	17,537	17,429	+108
Denby Dale	16,365	16,632	+267
Dewsbury East	18,841	20,086	+1,245
Dewsbury South	18,793	19,261	+468
Dewsbury West	20,021	21,688	+1,667
Golcar	18,033	18,736	+703
Greenhead	19,912	21,811	+1,899
Heckmondwike	16,986	18,153	+1,167
Holme Valley North	16,748	16,802	+54

Ward	Population in 2011	Population in 2021	Population Change
Holme Valley South	18,932	19,503	+571
Kirkburton	16,601	16,310	-291
Lindley	19,274	20,430	+1,156
Liversedge and Gomersal	19,420	19,418	-2
Mirfield	19,563	19,771	+208
Newsome	19,837	18,669	-1,168

Housing

House prices and rent

3.10 The average house price in Kirklees was £206,000 in April 2026 (provisional), up 4.0% from April 2025. This was lower than the rise in Yorkshire and The Humber (7.2%) over the same period. Across Yorkshire and The Humber, the average house price in April 2026 was £208,000, which was more than a year earlier (£194,000) **[See reference** 40**]**.

3.11 Across the UK, a home sold for an average of £270,000 in April 2026, which was up from the April 2025 average of £260,000 **[See reference** 41**]**. The 2025 house affordability **[See reference** 42**]** ratio for Kirklees was reported as 6.25 with the regional figure being 6.03. The 2025 affordability ratio for England (7.60) is the lowest since 2015 **[See reference** 43**]**. However, between 2016 and 2023, Kirklees saw the highest increase in house price change (46%) of the local authorities in West Yorkshire **[See reference** 44**]**.

3.12 Kirklees saw the third highest rate of house sales in West Yorkshire for the 12 month period up to March 2023 at 29,660, behind Leeds (45,365) and Bradford (35,991), followed by Wakefield (24,842) and Calderdale (16,949) **[See reference** 45**]**.

3.13 In 2021, 19.1% of Kirklees households rented privately, up from 15.5% in 2011. Meanwhile, 14.8% lived in socially rented housing, slightly down from 15.3% in 2011. Homeownership (outright or with a mortgage) fell from 67.1% to 65.5%. The increase in the percentage of privately-rented homes in Kirklees was similar to the increase across Yorkshire and The Humber (3.5 percentage points, from 15.9% to 19.4%). Across England, the percentage increased by 3.6 percentage points, from 16.8% to 20.5% **[See reference** 46**]**.

3.14 Private rents in Kirklees rose to an average of £775 in May 2026, an annual increase of 12.3% from £690 in May 2025. This was higher than the rise in Yorkshire and The Humber (4.5%) over the year **[See reference** 47**]**.

Housing completions

3.15 According to the Kirklees Authority Monitoring Report (2024/25) **[See reference** 48**]**, 1050 houses were built in 2024/25. This is less than the previous year, when 1,276 houses were built. The majority of houses built during from 2024 to 2025 were detached (34.5%), semi-detached (29.7%) and flats (25.1 %). Only a small proportion of properties built were bungalows (1.9%). 32.4% of the homes completed were 3 bedroom properties and 25.0% were 4 bedroom properties.

3.16 The gross number of affordable housing units completions fell in Kirklees between 2023/24 to 2024/25 from 256 to 223. In 2024/25 the largest proportion of completions of affordable homes comprised shared ownership units (21), social rented units (13) and affordable rented units (19) **[See reference** 49**]**.

Gypsies, Travellers and Travelling Showpeople

3.17 The 2021 Census reported that 0.3% of Kirklees' residents described themselves as White: Gypsy or Irish Traveller and White: Roma **[See reference** 50**]**.

3.18 A Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) **[See reference** 51**]** for Kirklees Council was completed in 2015 to provide information and data regarding the needs and requirements of the Gypsy, Traveller and Travelling communities, between the period 2012-2028. The study identified a residential need for 12 Gypsy and Traveller pitches over the period from 2015 to 2020 (or two if assumptions regarding bricks and mortar households are not included). The Kirklees Authority Monitoring Report indicates that in 2024/25, no pitches or schemes were permitted **[See**

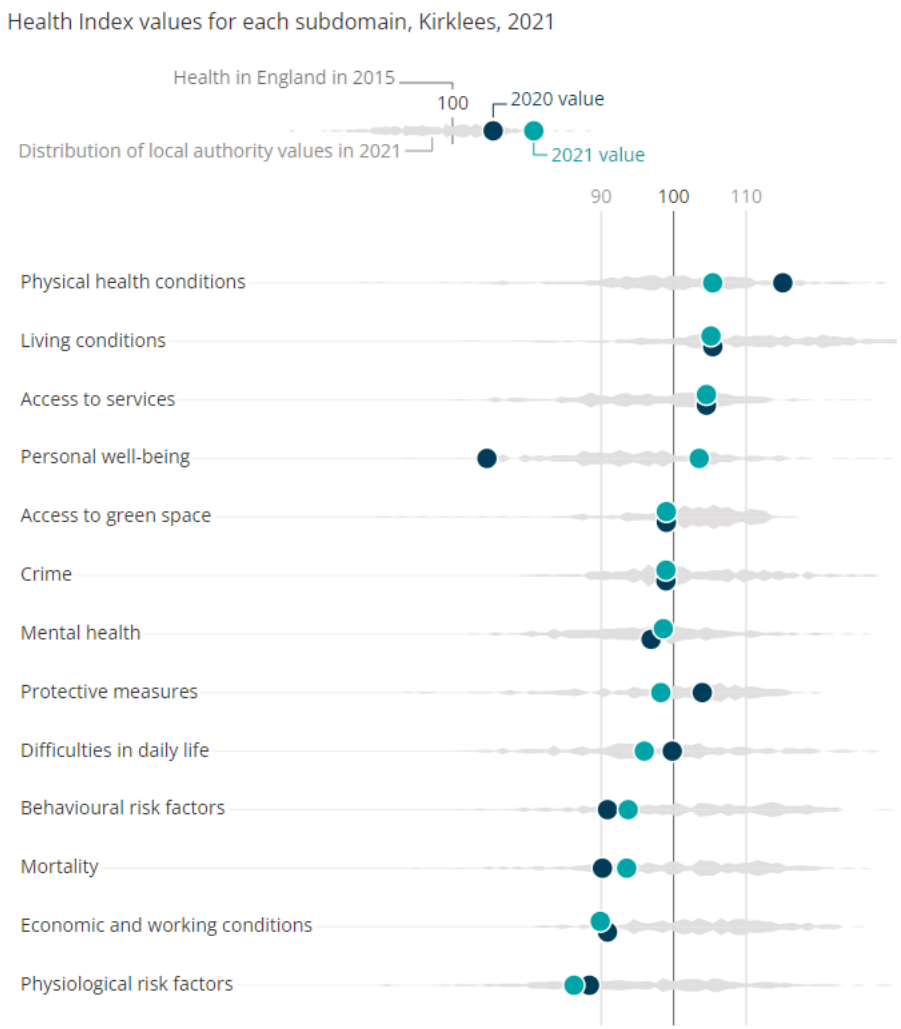
reference 52**]**. An updated Traveller Accommodation Needs Assessment is currently being prepared.

Health

3.19 The Health Index for England is a new measure of the health of the nation. It uses a broad definition of health to provide a single value for the health of each local authority area that can be broken down into various measures within three broad domains: health outcomes; health-related behaviours and personal circumstances; and wider drivers of health that relate to the places where people live. In 2021, Kirklees was reported to have an overall Health Index of 97.1 which is up 1.6 points compared with the previous reporting year. Kirklees ranked around average among local authority areas in England for health for this period **[See reference** 53**]**.

3.20 Life expectancy for males and female at birth for the period 2023-25 is lower in Kirklees (78.4 for males and 82.3 for females) which is lower than the regional (78.5 for males and 82.5 for females) and national (79.7 for males and 83.5 for females) figures **[See reference** 54**]**.

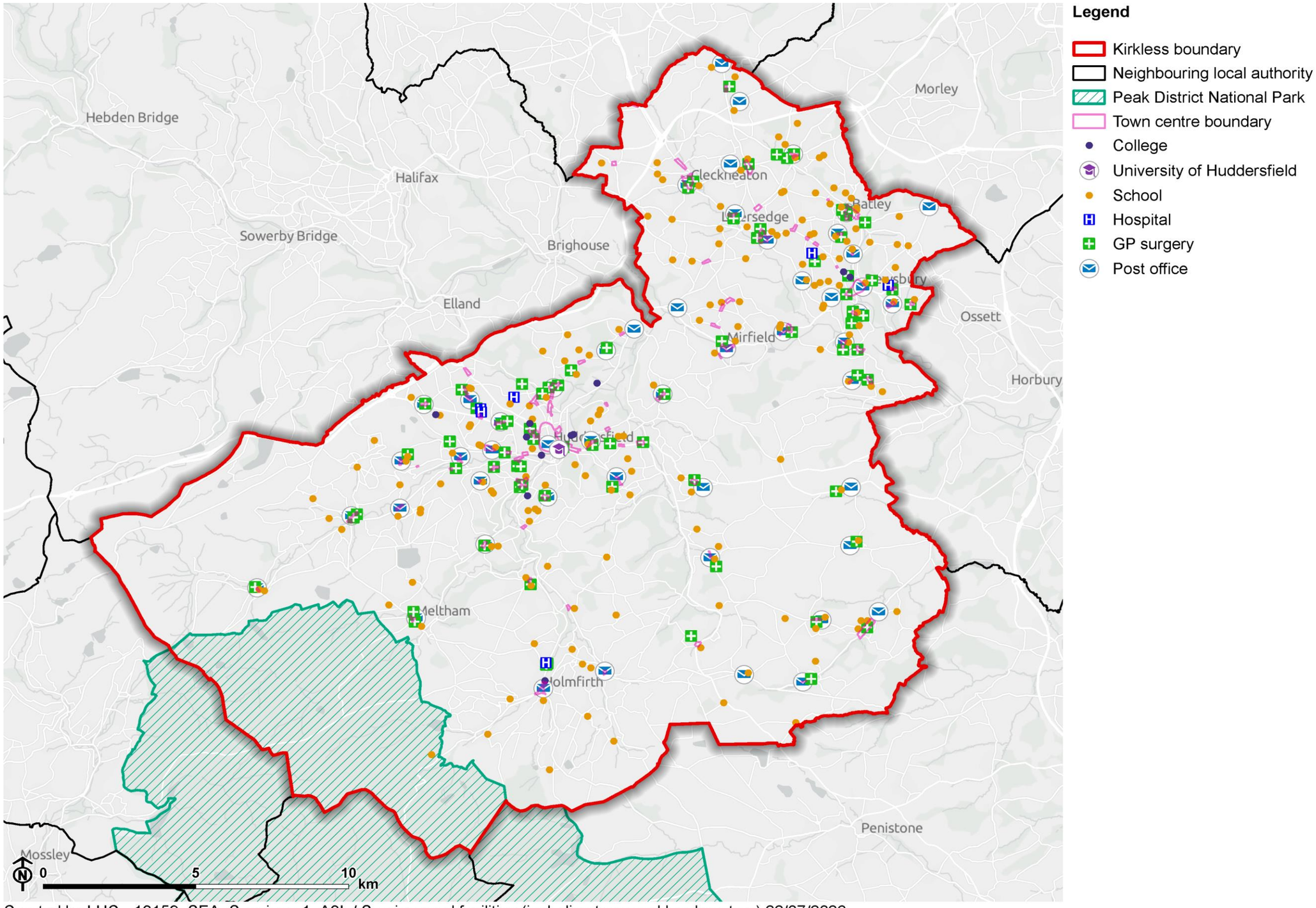
Figure 3.2: Health index values for Kirklees



Access to services and facilities

3.21 In the Health Index, Kirklees received a relatively high score of 104.5 for "access to services". This is higher than the regional score of 100.5 and national average of 100.3. This figure considers distance to GP services, distance to pharmacies, distance to sports or leisure facilities, internet access, and patients offered acceptable GP practice appointments. The highest scoring indicator considered as part of the overall score for access to services in Kirklees was internet access, with an index value of 107.1. The lowest scoring indicator was distance to pharmacies, which has an index value of 102 **[See reference** 55**]**. The location of services and facilities in Kirklees is shown in Error! Reference source not found..

Figure 3.3: Location of services and facilities in Kirklees (including town, district and local centres)



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Open space, sports and recreation

3.22 Kirklees Council's 2016 Open Space Assessment Report **[See reference 56]** explored the quality of open spaces in the district. The audit of open spaces identifies the following total areas of green spaces in Kirklees:

- 388.66 hectares of parks and recreation grounds;
- 124.09 hectares of amenity greenspace;
- 876 hectares of natural and semi-natural greenspace;
- 124.09 hectares of amenity greenspace;
- 76.83 hectares of allotments and community food growing spaces;
- 133.56 hectares of cemeteries; and
- 22.51 hectares of open space provision for children and young children in Kirklees.

3.23 Compared to the benchmark standard of 0.3 hectares per 1,000 population, the Open Space Assessment reports that provision of amenity greenspace in the Batley and Spen and Dewsbury and Mirfield areas is above the standard. The majority of the wards within these areas are relatively well provided for in terms of amenity greenspace, except the Cleckheaton ward where provision is significantly below the standard. The most notable deficiencies in the provision of amenity greenspace are in the Huddersfield and Kirklees Rural areas. The greatest deficiencies are in the Holme Valley North and Holme Valley South wards with only 0.01 and 0.05 hectares of amenity greenspace per 1,000 population. However, other types of open space, such playing fields, parks and recreation grounds also play an important role both in terms of their physical and aesthetic value and thereby providing important amenity benefits for residents in the district.

3.24 In relation to parks and recreation grounds, compared against the benchmark standard of 0.8 hectares per 1,000 population, the main deficiencies in the provision of parks and recreation grounds are in the Kirklees Rural and Huddersfield areas. All wards within the Kirklees Rural area fall short of the minimum benchmark standard. Within Huddersfield, there is a shortfall of provision in the Almondbury, Ashbrow and Newsome wards. The overall provision of parks and recreation grounds in the Batley and Spen area is above the standard, largely due to Oakwell Hall Country Park. However, provision in the Batley East ward is significantly below the minimum benchmark standard

and has the greatest deficiency in parks and recreation grounds of all wards in Kirklees with a standard of only 0.29 hectares per 1,000 population.

3.25 A summary of main open space deficiencies that have been identified in the sub areas across Kirklees is set out in the tables below. These are subject to change, as a new Open Space Study is currently being developed.

Table 3.3: Summary of the main open space deficiencies in Batley and Spen by ward

Type of Open Space	Quantity Deficiencies	Accessibility Deficiencies
Parks and Recreation Grounds	Batley East ward Cleckheaton ward Heckmondwike ward	No major gaps
Natural and Semi-Natural Space	Batley East ward Batley West ward Birstall and Birkenshaw ward Heckmondwike ward Liversedge and Gomersal ward	Birkenshaw Gomersal Roberttown
Amenity Greenspace	Batley West ward Cleckheaton ward	Birstall Heckmondwike Cleckheaton
Allotments	All wards	Cleckheaton Liversedge Heckmondwike Gomersal

Type of Open Space	Quantity Deficiencies	Accessibility Deficiencies
		Roberttown
Provision for Children and Young People	Not applicable	Major skate parks in Batley, Birstall and Birkenshaw

Table 3.4: Summary of the main open space deficiencies in Dewsbury and Mirfield by ward

Type of Open Space	Quantity Deficiencies	Accessibility Deficiencies
Parks and Recreation Grounds	Dewsbury West ward Mirfield ward	No major gaps
Natural and Semi-natural Greenspace	Dewsbury East ward Dewsbury South ward Mirfield ward	Mirfield
Amenity Greenspace	Dewsbury South ward Dewsbury West ward	Thornhill
Allotments	Dewsbury East ward Mirfield ward	Dewsbury Mirfield Ravensthorpe
Provision for Children and Young People	Not applicable	Major skate parks in Dewsbury

Table 3.5: Summary of the main open space deficiencies in Huddersfield by ward

Type of Open Space	Quantity Deficiencies	Accessibility Deficiencies
Parks and Recreation Grounds	Almondbury ward Ashbrow ward Newsome ward	No major gaps
Natural and Semi natural Greenspace	Crosland Moor and Netherton ward Lindley ward	West Huddersfield (site 20 ha or above) North Huddersfield (site 20 ha or above) Kirkheaton (site 20 ha or above)
Amenity Greenspace	Almondbury ward Crosland Moor ward Netherton ward Dalton ward Greenhead ward Lindley ward	Birkby
Allotments	Dalton ward	No major groups
Provision for Children and Young People	Not applicable	Major skate parks in North Huddersfield

Table 3.6: Summary of Open Space Deficiencies in the Kirklees Rural area

Type of Open Space	Quantity Deficiencies	Accessibility Deficiencies
Parks and Recreation Grounds	All wards	
Natural and Semi-natural Greenspace	Colne Valley ward Golcar ward Holme Valley North ward Holme Valley South ward	Skelmanthorpe (sites below and above 20 ha) Grange Moor (20 ha or above) Flockton (20 ha or above) Colne Valley (20 ha or above) Golcar (20 ha or above)
Amenity Greenspace	Colne Valley ward Denby Dale ward Golcar ward Holme Valley North ward Holme Valley South ward	Brockholes Clayton West Emley Honley Holmfirth
Allotments	Denby Dale ward Golcar ward Holme Valley North ward Holme Valley South ward	Denby Dale Emley Honley Holmfirth
Provision for Children and	Not applicable	Major skate parks and MUGAs in the Kirkburton area, Golcar, Slaithwaite, Linthwaite.

Type of Open Space	Quantity Deficiencies	Accessibility Deficiencies
Young People		

Crime

3.26 The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and wellbeing.

3.27 Kirklees has an annual crime rate of approximately 102 crimes per 1,000 resident population, which places it at a medium (5/10) crime level compared to other local authority districts in England and Wales. For the most recent reporting period (March 2025 to February 2026), the highest recorded category of crime was violence and sexual offences, with a rate of 44.6 incidents per 1,000 population. Other crime categories are recorded at notably lower levels, including anti-social behaviour at 9.87 incidents per 1,000 population and public order offences at 9.03 incidents per 1,000 population **[See reference** 57**]**.

Education

3.28 Of Kirklees's population, 24.5% are of students, which is higher than the regional average of 23.9% but lower than the national average of 26.1% **[See reference** 58**]**.

3.29 Almost half (44.0%) of Kirklees's population (aged 16 to 64 years) have Regulated Qualifications Framework (RQF) Level 4 qualifications and above. 66.5% have RQF Level 3 qualifications and above, 87.8% have RQF Level 2 and above and 90.0% have RQF Level 1 and above. In Kirklees, the percentage of people with RQF Level 4 as their highest qualification (44.0%) is lower compared to the national average of 48.6%, but is the higher than the regional average 41.1% **[See reference** 59**]**.

3.30 Kirklees has 171 mainstream schools and, after significant growth until 2015/16, pupil numbers have been declining across both the primary and secondary sectors, with no areas currently showing sustained growth. While the recent reduction in secondary-age populations may ease pressure on school places in the short term, continued school age population decline, particularly in primary schools, will require close monitoring **[See reference** 60**]**.

Deprivation

3.31 The Index of Multiple Deprivation (IMD) uses Lower Layer Super Output Areas (LSOA) to measure deprivation at local authority and county level. The seven standalone indexes of deprivation (Income; Employment; Health Deprivation and Disability: Education and Skills Training; Crime: Barriers to Housing and Services: and Living Environment) which when weighted and combined from the IMD 2025 have been mapped for the district (see Error! Reference source not found.**)**.

3.32 Kirklees is ranked 85th out of 296 local authorities (where 1 is the most deprived) in terms of average rank in the IMD 2025. This measure summarises the average level of deprivation across an area, based on the population weighted ranks of all the neighbourhoods within it. For example, all LSOAs in a local authority, whether highly deprived or not so deprived, contribute to this summary measure. Overall, highly deprived areas and less-deprived areas will tend to average out in the overall rank, so an area that is more uniformly deprived will tend to rank higher on this measure compared to other summary measures.

3.33 Kirklees is ranked 70th out of 296 local authorities in terms of average score. This measure summarises the average level of deprivation across an area, based on the scores of all the neighbourhoods contained within that area. Scores are calculated by taking the population weighted average of the combined scores for the neighbourhoods in a larger area. This measure also covers the whole area including both deprived and less-deprived neighbourhoods. The main difference from the average rank measure is that more deprived neighbourhoods tend to have more ‘extreme’ scores than ranks, so highly deprived areas will not tend to average out in the same way as when using ranks. With scores, highly polarised Local Authority Districts (LADs)will tend to score higher on the average score measure than on the average rank.

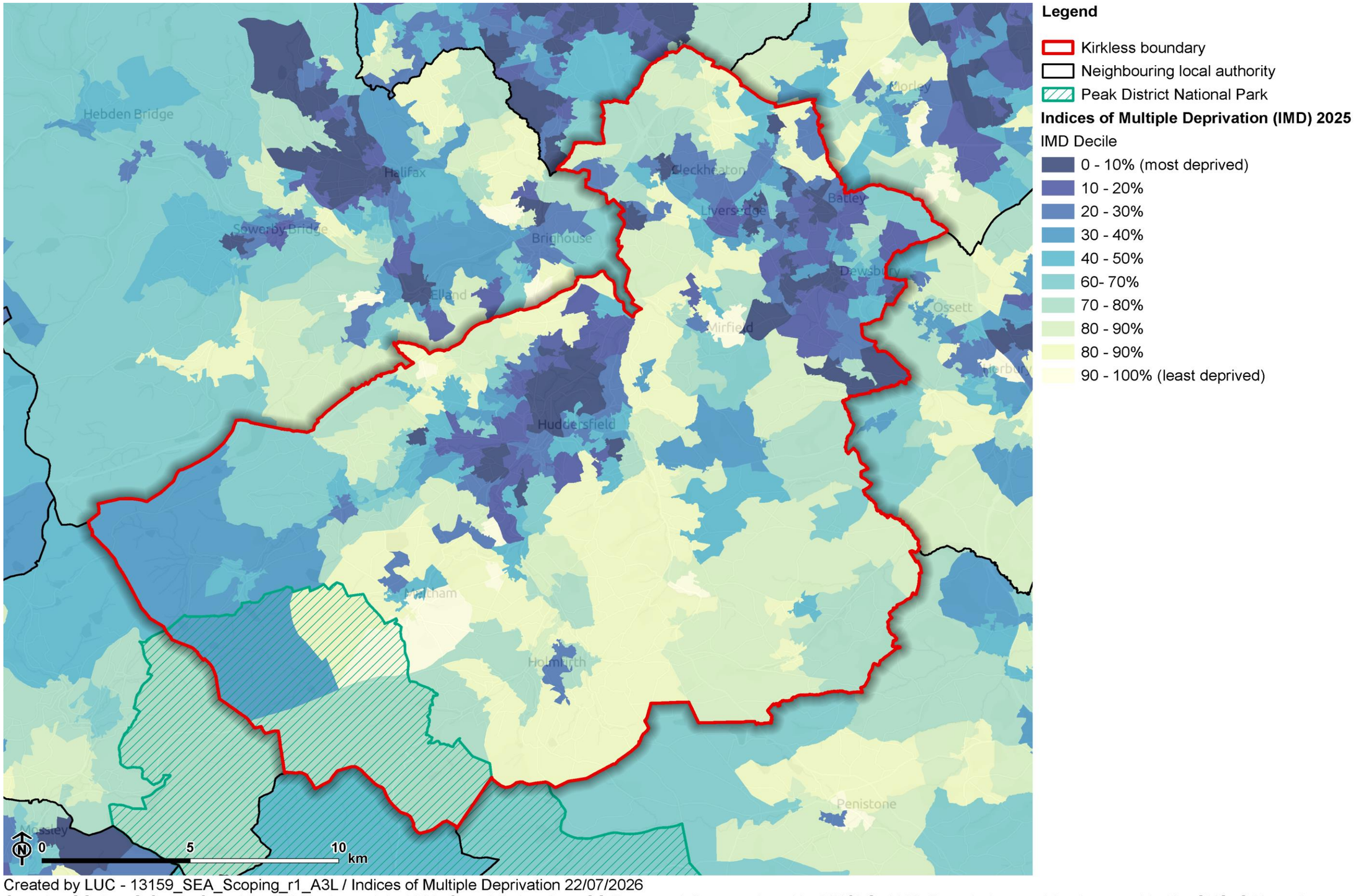
3.34 Kirklees is ranked 61st out of 296 local authorities in terms of proportion of LSOAs in most deprived 10% nationally. This measure summarises the proportion of neighbourhoods in a larger area that are in the most deprived 10% of neighbourhoods in the country. As such, this measure is only focused on illustrating the number of neighbourhoods within a larger area which are the most deprived in England. However, neighbourhoods just outside the 10% most deprived are not included as part of this measure, so large areas, may not appear to be so deprived relative to others if they contain zero or few of the most deprived neighbourhoods in the country **[See reference** 61**]**.

3.35 Kirklees ranks as amongst the most deprived local authorities in England in terms of income scale (15th most deprived) and employment scale (10th most deprived). This shows that the district performs relatively poorly in terms of the scale, or number, of people who are income- and employment-deprived **[See reference** 62**]**.

3.36 14% of the population in Kirklees are within LSOAs that are amongst the 10% most deprived in England. This is more favourable than West Yorkshire where 22% of the population lie within LSOAs that are amongst the 10% most deprived in England. It is also more favourable in this regard compared ot all other local authorities in West Yorkshire: Bradford (39%), Calderdale (20%), Leeds (18%) and Wakefield (17%). 18% of the Kirklees' population are within LSOAs that are amongst the 10-20% most deprived in England **[See reference** 63**]**.

3.37 The number of LSOAs within the 10% most deprived in England in Kirklees rose from 31 to 35 from 2019 to 2025 (it should be noted that number of LSOAs reported on in England rose from 32,844 in 2019 to 33,755 in 2025) **[See reference** 64**]**. Many of these LSOAs are located within Huddersfield, Dewsbury and Batley. In Huddersfield there is a notable linear pattern of deprivation along the Leeds Road corridor and similarly along the A629 North of Halifax. Generally, rural deprivation is more dispersed and can be under-recognised when need is spread thinly across large areas **[See reference** 65**]**. However, there are notable areas of relative deprivation (30-40% most deprived) reported to the south west of the district in the rural area to the west of Meltham.

Figure 3.4: Indices of Multiple Depravation



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Economy and employment

3.38 This section sets out the baseline for plan area's economy and employment opportunities. The SEA will consider how the Local Plan can support a strong and diverse local economy by providing jobs, investment and regeneration, which can help reduce deprivation and improve health and well-being.

3.39 Kirklees is strategically located at the centre of the Leeds, Manchester and Sheffield City Region triangle - a pivotal central location within the UK's £339 billion Northern Powerhouse. It benefits from access to the M62, M1 and A1 and direct rail links to Manchester and Leeds within 30 minutes and through to London within 2 hours. Manchester and Leeds Bradford Airports are located within 45 minutes, and there is also a direct train line to Manchester Airport. Seaports at Liverpool, Hull, Immingham and Teesport are all within 2 hour of the district.

3.40 It is estimated that the Kirklees economy generated Gross Value Added (GVA) of some £8.5bn in 2022 - representing a 31% increase over 2015 levels and in line with GVA growth for England as a whole over the same period. The plan area has some 15,000 local businesses. Whilst individual measures of productivity have seen significant improvement in recent years - GVA per hour worked in Kirklees has risen from £22.20 in 2012 to £30.70 in 2022, or 77% of the UK average. This plan area is therefore still significantly behind the UK average in this regard. Factors affecting productivity include workforce skills, workforce participation, access to capital, diffusion and adoption of innovation and 'market dynamism' - the gradual movement of capital and labour from less productive to more productive firms. West Yorkshire has seen lower investment as a share of GVA than the already low national average. Performance has particularly diverged since 2013 at which point the region's productivity also diverges from the national average.

3.41 Commercial property rents in the district are up to 15% cheaper than competitor destinations. The workforce totals 275,000 and is diverse and skilled. Key industries in the plan area include manufacturing, advanced precision engineering, creative industries, textiles and health innovation **[See reference** 66**]**.

3.42 The UK Government has introduced a new policy framework through the UK's Modern Industrial Strategy (2025), which sets out a 10-year plan to boost productivity, increase investment, and support regional growth **[See reference**

67**]**. The strategy prioritises high-growth sectors, aims to improve the business environment (including planning, skills and infrastructure), and places a stronger emphasis on supporting city regions and reducing regional disparities.

3.43 Professional services and technology industries are set to be among the fastest growing sectors for GVA and employment between 2024 and 2027 in England. Professional services are expected to see annual GVA growth of 2.1% and annual employment growth of 1.9%, while information and communication is forecast to see annual GVA growth of 3% and annual employment growth of 1.6%. However, these high-growth sectors are set to remain concentrated in the south of England, with just 10% of sectors located in Yorkshire and the Humberside **[See reference** 68**]**. I

3.44 Kirklees has a relatively diverse economic profile, with several key sectors making significant contributions to local employment, see **Table 3.7**. Wholesale and retail trade (including repair of motor vehicles) continues to comprise the largest share of employee jobs at 17.9%, followed by manufacturing (15.4%) and human health and social work activities (13.6%). Together, these sectors reflect both the area's strong industrial base and the importance of public services and local consumer-facing employment. Overall, the data highlights that while the service sector dominates employment, Kirklees retains a higher-than-average concentration in manufacturing compared with both the regional and national economies.**[See reference** 69**]**.

Table 3.7: Employee jobs in Kirklees by industry (2024)

Employee Jobs by Industry	Kirklees (%)	Yorkshire and the Humber (%)	Great Britain (%)
Mining and Quarrying	0.1	0.1	0.2
Manufacturing	15.4	10.4	7.3
Electricity, gas, steam and air conditioning	0.1	0.3	0.
Water supply; sewerage, waste management and remediation activities	0.6	0.9	0.7

Employee Jobs by Industry	Kirklees (%)	Yorkshire and the Humber (%)	Great Britain (%)
Construction	5.6	5.4	5.0
Wholesale and retail trade; repair of motor vehicles and motorcycles	17.9	14.6	13.7
Transportation and storage	4.3	5.4	5.0
Accommodation and food service activities	6.2	7.3	7.8
Information and communication	1.5	2.5	4.5
Financial and insurance activities	1.1	2.7	3.4
Real estate activities	1.5	1.4	1.9
Professional, scientific and technical, activities	5.6	7.6	9.3
Administrative and support service activities	8.0	8.5	8.6
Public administration and defence; compulsory social security	3.7	5.0	4.9
Education	9.9	9.0	8.6
Human health and social work activities	13.6	14.8	14.2
Arts, entertainment and recreation	2.5	2.4	2.5

Employee Jobs by Industry	Kirklees (%)	Yorkshire and the Humber (%)	Great Britain (%)
Other service activities	1.9	1.8	1.9

3.45 In 2024, 72.7% of total employees were in employment in Kirklees, while 5.6% were unemployed. Employment rates are lower than both the regional average (73.7%) and the national average (75.5%). The unemployment rates are higher than the regional average (4.6%) and the national average (4.5%) **[See reference** 70**]**.

3.46 In 2025, gross weekly pay in Kirklees was around £700.40, which is lower than the average for the Yorkshire and the Humber (£711.60) and the national average (£766.60).

3.47 As of 2025, there were 15,450 enterprises and 17,450 businesses based in Kirklees. The majority of enterprises (88.5%) and businesses (84.3%) were classified as 'micro' with up to nine employees. This is roughly in line with the figures for the Yorkshire and Humber region at 88.3% and 82.6%, respectively **[See reference** 71**]**.

Transport and accessibility

3.48 This section sets out the baseline for the plan area's transport connections and travel habits of its population. The SEA will consider how the Local Plan can encourage sustainable transport networks that improve access to jobs, services and education while reducing car dependency and emissions, with clear benefits for health, air quality, climate change and social inclusion.

Road network

3.49 Kirklees benefits from good connectivity to the national transport network, including the M62 motorway which runs east to west in the north of the district providing onwards connections towards Leeds and Manchester and the M606 towards Bradford. It also allows for access to the M1 and M6 motorways and the A1. The main A-roads in the district include the A62 which runs through Huddersfield and to Leeds in the north east and Oldham in the south west. The A629 connects the towns of Huddersfield, Keighley and Halifax and the A644 intersects with the A62 and M62, connecting Dewsbury, Mirfield and Cooper

Bridge. The A638 and A644 allow for travel from the district towards Wakefield. These routes enhance the district's appeal to employers and support economic growth in key employment hubs, as well as connecting the district's outlying communities to essential local services and products. The district also benefits from nearby access three major airports (Leeds, Manchester and Liverpool) and the Humber ports.

3.50 The West Yorkshire Transport Fund **[See reference** 72**]** is a £1 billion 20 year funding commitment to the Leeds City Region **[See reference** 73**]** to accelerate growth and create jobs in the region. A number of schemes relating to road improvements and general accessibility in Kirklees have been brought forward from this funding, including **[See reference** 74**]**:

- A62 Cooper Bridge - The scheme is intended to address current and future vehicular demand in the area including reducing travel times, easing current congestion issues and improving air quality.
- Mirfield to Dewsbury to Leeds (M2D2L) - Reduce congestion, reduce travel times, improve air quality and enhance public realm.
- Holmfirth Town Access Plan- Reduce congestion, reduce travel times, improve air quality and enhance public realm.
- Huddersfield Southern Corridors(HSG) - Reduce congestion, reduce travel times, improve air quality and enhance public realm.
- A629 Halifax to Huddersfield (Phase 4 and 5) - Ease congestion, reduce travel times, create extra highway capacity.
- A641 Improvement Scheme - Ease congestion, reduce travel times, create extra highway capacity.

3.51 The Transforming Cities Programme (TCF) is part of the devolved transport investment programme funded through WYCA with some Kirklees Council matched funding. This is part of the CRSTS (City Regional Sustainable Transport Settlement) which ends in March 2027. The schemes are primarily walking and cycling improvement schemes and bus station refurbishment/new build schemes. They are part of the Kirklees Ambition for accessible and healthier green transport and connecting communities through sustainable travel corridors. Scheme details:

- A638 Dewsbury - Cleckheaton Sustainable Travel Corridor - Walking and cycling scheme from Dewsbury to Cleckheaton via Heckmondwike Town Centre with both on and off-site highway works

- Dewsbury Town Centre Walking and Cycling Improvement Scheme - Walking and cycling scheme on outskirts of Dewsbury Town Centre with some elements within the Town Centre.
- Dewsbury-Batley-Chidswell Sustainable Travel Corridor - Walking and cycling scheme from Dewsbury Town Centre to Chidswell Estate in Batley running on major highways in Dewsbury and Batley.
- Heckmondwike Bus Station - New bus station to replace existing hub in Heckmondwike Town Centre.
- Huddersfield Bus Station - New canopy and public realm improvement works to Huddersfield Bus Station running in conjunction with refurbishment works within the Bus Station which is being managed separately by WYCA.
- Huddersfield Rail Station Connections - Walking and cycling scheme from St. John's Road and Trinity Street in Huddersfield to Huddersfield Rail Station.
- A629 Wakefield Road - Walking and cycling scheme from Waterloo junction on A629 to Shorehead roundabout within Huddersfield Town Centre.

Rail

3.52 Transpennine Express and Northern Rail are the primary rail operators in Kirklees. The Huddersfield line of the Transpennine Express network provides trains between Leeds and Manchester, via Huddersfield and Dewsbury, while Northern services provide local services to Huddersfield, Penistone and Caldervale lines. There are direct services to London Kings Cross via Mirfield station, located between Huddersfield and Dewsbury.

3.53 The Transpennine Route Upgrade (TRU) is a multi-billion-pound project transforming rail travel across the Transpennine route between Manchester, Huddersfield, Leeds and York. As of July 2026, the following upgrades relevant to stations in Kirklees are planned **[See reference** 75**]**:

- Lengthening of platform, extension of canopies and waiting areas at customer facilities and strengthening of pedestrian footbridge in Dewsbury.
- Lengthening of platform and installation of a new pedestrian footbridge in Batley.

- Redesigned of railway lines and platforms, overhead electrification, a new pedestrian footbridge, restoration of the ‘Euston-style’ roof, upgrade of tearoom and improved lighting, seating and signage in Huddersfield.

3.54 Under the West Yorkshire Transport Fund **[See reference** 76**]**, a number of upgrades are being planned for Huddersfield Railway Station to regenerate the area around the town's railway station. In January 2026 a masterplan was approved for the Huddersfield Station Gateway which sets out a framework for regeneration. The vision proposes redevelopment of the west side, near Fitzwilliam Street where practical access remains a priority with a new station entrance, mobility hub, parking, and enhanced public realm **[See reference** 77**]**.

Bus services

3.55 Bus services in Kirklees are primarily operated by First West Yorkshire and Arriva Yorkshire, providing services within the district and other parts of Yorkshire. Huddersfield Bus Station provides a number of local services to surrounding areas of the town as well as other towns/ cities in West Yorkshire such as Leeds and Wakefield. Dewsbury Bus Station provides services to the northern part of the district, including Batley, Cleckheaton, Dewsbury, Heckmondwike and Mirfield **[See reference** 78**]**. Dewsbury, Heckmondwike and Huddersfield bus stations are set to be upgraded as part of investment to improve public transport facilities in West Yorkshire **[See reference** 79**] [See reference** 80**] [See reference** 81**]**.

3.56 The transport network in West Yorkshire is to be integrated to form the new Weaver Network. It will join up buses, trains, walking, wheeling and cycling under one name, making it easier to travel across the region. Branding will to start appear at bus stops and stations from 2026 and buses will start running under public control from Spring 2027. The goal is a fully publicly controlled West Yorkshire bus network by the end of 2028 **[See reference** 82**]**.

Cycle network

3.57 Kirklees Council is improving active travel infrastructure and encouraging behaviour change to help make walking, wheeling and cycling become the most attractive travel choice for short journeys. Kirklees aims to provide more high-quality cycling routes and address barriers and gaps in the urban and rural networks, to connect communities and enable sustainable travel choices and sustainable development.

3.58 Kirklees benefits from access to numerous traffic free cycle routes. These **[See reference** 83**]**, **[See reference** 84**]** include:

- Birkby Bradley Greenway – This runs from Birkby towards Bradley and the Calder Valley Greenway.
- Spen Valley Greenway – This connects Dewsbury to Oakenshaw.
- Spen Ringway – This runs from Royds Park at Rawfolds (near Spen Valley Leisure Centre) southwards to Heckmondwike.
- Calder Valley Greenway – Huddersfield to Dewsbury. This extends upstream from Brighouse to Hebden Bridge and beyond, much of it on the towpath of the Calder and Hebble Navigation.
- Dewsbury to Ossett Greenway – This extends at Dewsbury to the Spen Valley Greenway.
- Huddersfield Broad Canal – Extends through urban areas in Huddersfield.
- Huddersfield Narrow Canal – Extends through the Pennines.
- Meltham Greenway - Runs from Station Street, Meltham and passes alongside Morrisons supermarket out on the former rail corridor to Huddersfield Road at Meltham Mills.
- Oakwell Hall mountain bike trail – Extends through Oakwell Hall and Country Park
- Wilton Park Greenway – Extends through Batley Park
- Dewsbury to Oakenshaw – Extends through Dewsbury to Oakenshaw

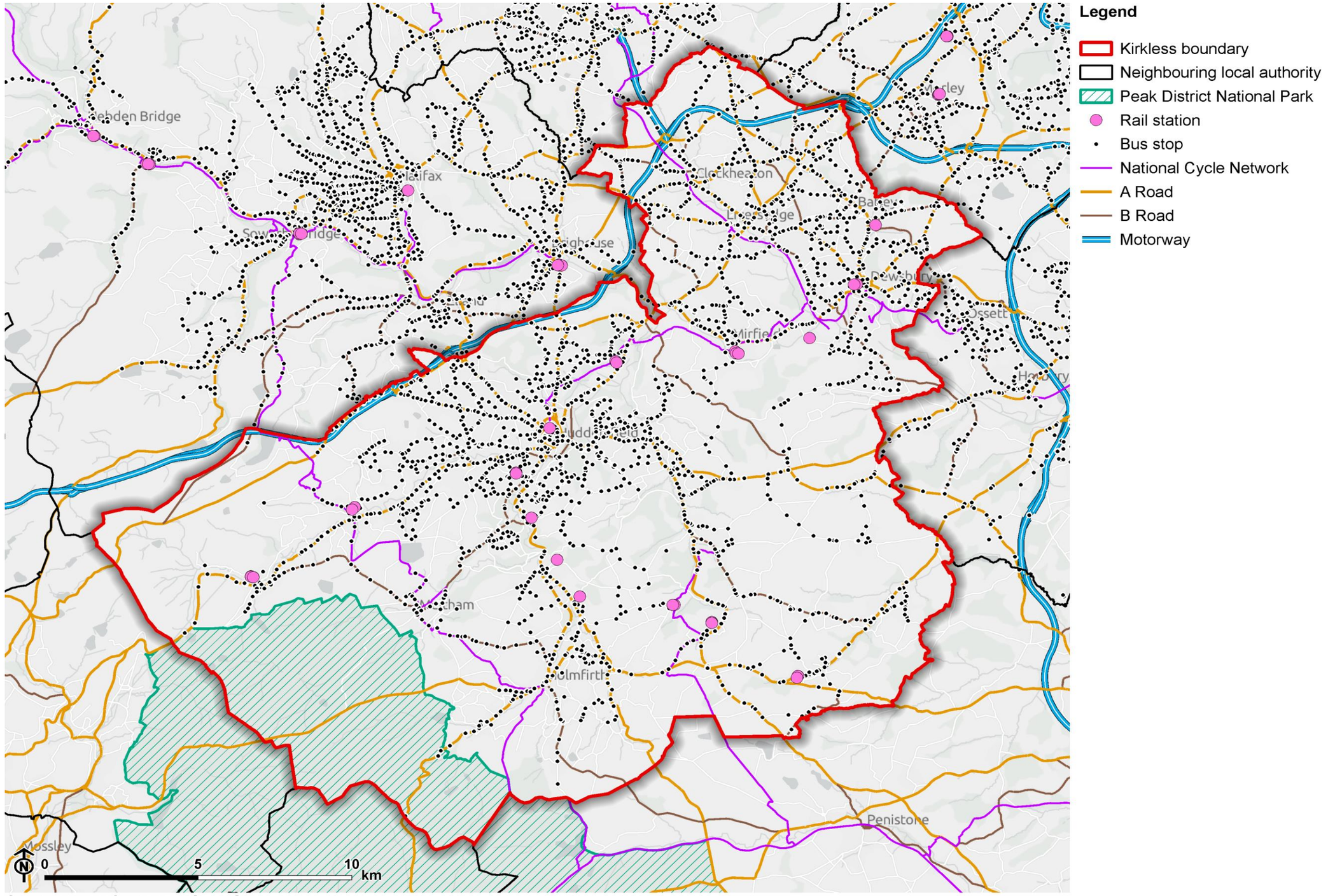
3.59 Kirklees has begun developing and delivering more on-highway active travel schemes, providing new cycling infrastructure and improved pedestrian facilities in places including Huddersfield (A62 Leeds Road scheme) and Dewsbury. This major transport programme includes Transforming Cities Fund (TCF), West Yorkshire Plus Transport Fund (WY+TF), City Region Sustainable Transport Settlement (CRSTS), and Active Travel Fund (ATF) schemes. Active travel improvements are also delivered through highways and road safety schemes, plus town and local centre programmes. Subject to securing the necessary resources, Kirklees intends to continue to grow and expand its cycling network, improve the quality of walking routes in the district, and improve the streetscapes. The Public Rights of Way (PROW) network plays an important role in this.

3.60 The district also benefits from access to Walk Wheel and Cycle Trust's National Cycle Network **[See reference** 85**]**, some of which is on traffic-free greenways, with routes 68, 627 and 689 serving the south and south west of the district. The settlements of Huddersfield and Dewsbury to the north are served by routes 66, 69 and 699 **[See reference** 86**]**.

3.61 As of April 2022 in Kirklees, the Council reported that 99.1% of the residential dwellings across the district are within a 500m radius of public transport options. 97.5% of residents are within 500m radius of routes with one or more bus per hour. The district also benefits from 2,129km of local access footways, around 44km of cycle lanes and around 52km of cycle routes **[See reference** 87**]**.

3.62 Transport links in Kirklees are shown in Error! Reference source not found..

Figure 3.5: Transport Network in Kirklees



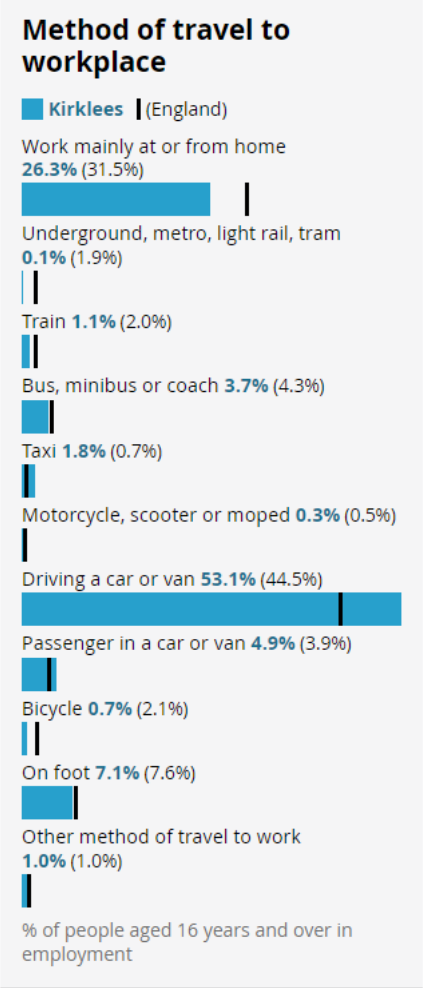
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3.63 No recent data is available about the breakdown of all journeys made in Kirklees in terms of the modes used (this was last recorded in the 2011 Census). However, the travel to work data available is considered to be representative of the situation for trips made in the district. The high rate of commuting to work by car (53.1% in Kirklees compared to 44.5% nationally), demonstrates a relatively high level of reliance on private vehicles for journeys made in Kirklees and partly reflects the more rural nature of parts of the district. Many residents in these locations will be dependent on higher order centres for access to jobs and services and facilities.

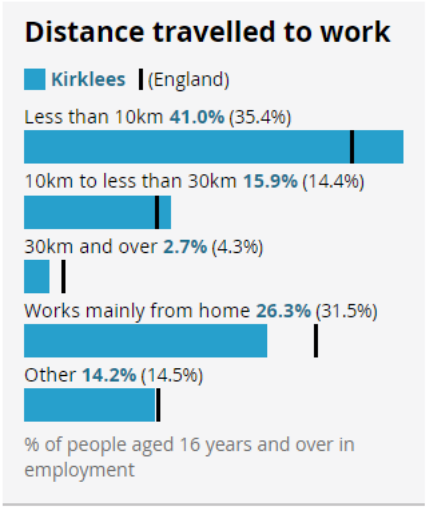
3.64 Travel to work data taken from the 2021 Census (**Figure 3.6**) **[See reference** 88**]** indicates that 3.7% of the resident population of Kirklees travel to work by bus, which is lower than the national average of 4.3%. Just 0.7% cycle to work, which is again lower than the national average of 2.1%. These points considered, the Council reported that between 2021 to 2022, there was an 8% increase in commuters choosing a more sustainable mode of transport over private car or van **[See reference** 89**]**.

Figure 3.6: Method of travel to workplace in Kirklees (Census 2021)



Source: Office for National Statistics - Census 2021

Figure 3.7: Distance travelled to work in Kirklees (Census 2021)



3.65 The commuting figures for the district (**Figure 3.7**) show that 41.0% of residents travel less than 10km for their regular commute (higher than the national figure of 35.4%) for work. There has also been a noticeable shift towards working from home during in the district in line with the trend at the national level in the aftermath of the COVID-19 pandemic. 26.3% of the resident population in employment in Kirklees work mainly from home, although this is lower than the national average of 31.6%.

3.66 Relatively low house prices, an impressive urban/rural environment on the edge of the South Pennines and its proximity to the largest metropolitan areas in the North of England (Manchester, Sheffield and Leeds/Bradford) contribute to the view of Kirklees as a suitable commuter base for many residents. The district has the highest levels of out-commuting in West Yorkshire **[See reference** 90**]**. The 2021 Census reported that in Kirklees around 148,000 people live and work in the district, while another 26,000 travel to the area for work. The largest movement into Kirklees is around 6,000 people from Calderdale, followed by Leeds (around 5,000 people) and Wakefield (around 5,000 people). Around 42,000 people travel from Kirklees to other areas for work. The largest movement of people out of Kirklees was around 12,000 people to Leeds, followed by Calderdale (around 8,000 people) and Wakefield (around 7,000 people) **[See reference** 91**]**.

Air, land and water

3.67 This section sets out the baseline for the plan area's air, land and water quality. The SEA will consider how the Local Plan can help to ensure good air,

soil and water quality, which are essential to environmental and human health, and are influenced by transport, development patterns, climate resilience, biodiversity and the way land is managed.

Air

3.68 Kirklees has seven Air Quality Management Areas (AQMAs) **[See reference** 92**]**. All of these have been declared due to exceedances of the annual mean NO_2 objective. The relevant AQMAs are listed below and their locations are shown in Error! Reference source not found.:

- Kirklees AQMA 3: The designated area incorporates Halifax Road (A629), Lindley Moor Road Bradley Road (A643), Warren House Lane and Stirling Wood Close, which is in close proximity to the Ainley Top Roundabout at Birchencliffe.
- Kirklees AQMA 5: The designated area incorporates Leeds Road (A653), Dewsbury Ring Road (A638), Wakefield Road (A638), Highgate Road, Highgate Terrace, Bank Street and Old Bank Road, which is in close proximity to Dewsbury Town Centre.
- Kirklees AQMA 6: The designated area incorporates Edgerton Road (A629) and Blacker Road, which is in close proximity to Huddersfield Town Centre.
- Kirklees AQMA 7: The designated area incorporates Huddersfield Road (A62), Bradford Road (A638), Wakefield Road (A638), Wormald Street and Well Street, which is in Liversedge.
- Kirklees AQMA 8: The designated area incorporates New Hey Road and Round Ings Road, which is in close proximity to the M62 at Outlane
- Kirklees AQMA 9: The designated area incorporates Roads bordering and within the Huddersfield Ring Road.
- AQMA 10: The AQMA area shown on the attached map outlined in Black is a designated area incorporating Manchester Road (A62), Birkhouse Lane and Thornton Lodge Road, which is in close proximity to Huddersfield Town Centre.

3.69 From analysis of 2024 air quality data, Kirklees Council concluded that the annual mean NO2 air quality objective was exceeded at three locations representative of relevant exposure within one of the AQMAs declared: AQMA 9. Outside of this area, monitoring indicates that the rest of Kirklees complied with the air quality objectives. Real-time data for NO2, PM10 and PM2.5 for

2024, indicated compliance with the objectives at the one real-time monitoring location in the district **[See reference** 93**]**.

3.70 In an effort to address air quality exceedances in Kirklees Council, an Air Quality Action Plan **[See reference** 94**]** was published in 2019, which developed actions to improve air quality in the district, and specifically the district's AQMAs. These included:

- Kirklees Council - workplace active travel.
- Kirklees Sustainable Travel to School Strategy.
- Bike-ability training provided to school children.
- Green parking permit allowing free parking for ULEV Vehicles within Council owned car parks.

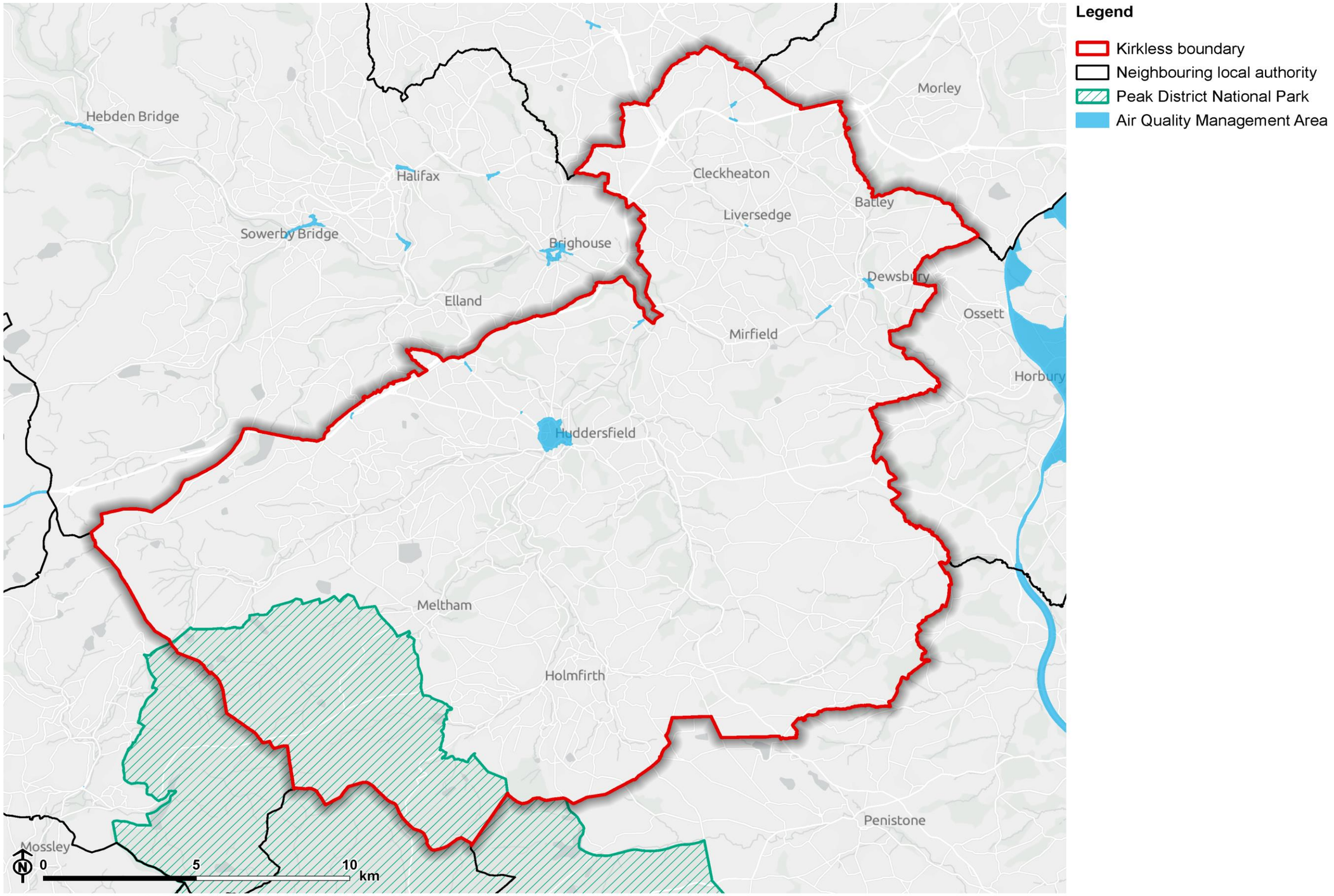
3.71 From March 2026 Kirklees Council consulted on a revised 2026 Air Quality Action Plan to bring together existing and new measures to reduce emissions, improve air quality in the AQMAs, and maintain compliance once achieved. The new action plan will cover the period from 2026 to 2031 **[See reference** 95**]**.

3.72 AQMAs are also present in the neighbouring authorities to Kirklees **[See reference** 96**]**:

- Wakefield Metropolitan District Council (Wakefield City AQMA)
  - This area encompasses most of the Wakefield Urban Area to the east of the M1.

3.73 It is recognised that air quality does not respect administrative or political boundaries and that there is potential for the occurrence of cross boundary impacts on neighbouring AQMAs. Development in Kirklees is likely to impact the AQMAs present in neighbouring authorities as a result of traffic growth, particularly the ones located within close proximity to Kirklees such as the Wakefield City AQMA which has been designated as a result of NO_2 levels.

Figure 3.8: AQMAs in Kirklees



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Geology and minerals

3.74 Kirklees Council acts as the Mineral Planning Authority (MPA) for the plan area. As the MPA, Kirklees Council is responsible for planning for the provision of minerals within the district in order to maintain an adequate supply for its needs. Kirklees Council is currently in the process of updating its minerals evidence base.

3.75 The Kirklees Local Plan Minerals Technical Paper **[See reference** 97**]** provides an overview of the minerals found in Kirklees and the process used to plan for their efficient use over the period of the adopted Local Plan. In Kirklees, there is a rough split between sandstone deposits in the west and surface coal measures and clay shale deposits in the east of the district. Sand and gravel are present along the river corridors of the Calder and to a lesser extent the Colne. The Local Plan (2019) allocated 34 sites for minerals operations, which include Extraction Sites, Preferred Areas and Areas of Search. At present, Kirklees has 13 permitted operational minerals sites. Sandstone, sand andgravel, and clay and shale are currently worked within Kirklees. Error! Reference source not found. shows minerals locations in Kirklees, including Minerals Preferred Areas, Minerals Infrastructure Sites, Minerals Areas of Search and Minerals Extraction Sites.

3.76 According to the Authority Monitoring Report (2024/25) **[See reference** 98**]**, there are approximately 7.5 years of permitted reserves (landbank) for sand and gravel in West Yorkshire, and approximately 30.7 years for crushed rock reserves. This indicates that while crushed rock reserves remain well above the minimum landbank required by the NPPF, the sand and gravel landbank is closer to, but still meets, the minimum requirement of 7 years. This is significantly above the minimum landbank required by the NPPF **[See reference** 99**]**. However, this data is sourced from the West Yorkshire Local Aggregates Assessment and so covers the whole of West Yorkshire, not just Kirklees. Data specific to Kirklees may be provided in forthcoming minerals evidence. For the year 2023/24 there were 1,137,000 tonnes of crushed rock produced in West Yorkshire. Crushed rock aggregate reserve levels within West Yorkshire appear to be resuming a slightly increasing trend reflecting the gradual, discernible, upwards trend since the recession low of 2010/ 2011. Estimated reserves are now tracking just below pre-recession level **[See reference** 100**]**. For reasons of commercial confidentiality, sand and gravel sales in West Yorkshire are not available.

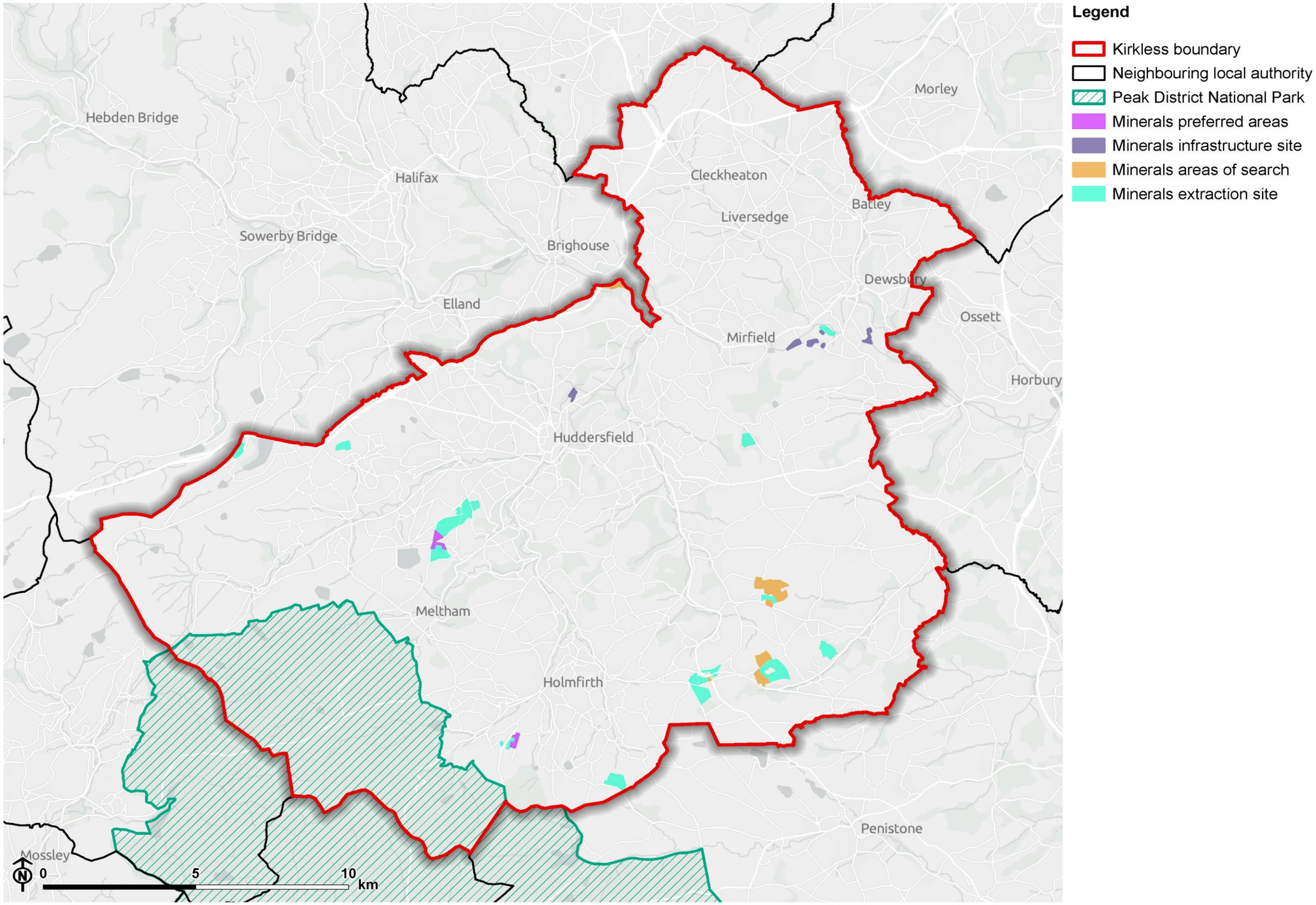
3.77 There are 19 Local Geological Sites found in Kirklees **[See reference 101]**. These are listed **Table 3.8** below.

Table 3.8: Local Geological Sites in Kirklees

Site name	Ward
LGS1	Caulms Wood, Dewsbury
LGS2	Castle Hill
LGS3	Lepton Great Wood
LGS4	Beaumont Park, Huddersfield
LGS5	Johnson Wellfield Quarries
LGS6	Old Lindley Mood, Huddersfield
LGS7	Butterley Cutting, Marsden (mostly in the Peak Park)
LGS8	Pule Hill, Marsden
LGS9	March Haigh and Buckstones
LGS10	Clough Quarry, Slaithwaite
LGS11	Cliffe Woods Park Quarry, Clayton West
LGS12	Longwood Edge Quarry, Huddersfield
LGS13	Brockholes and Round Wood, Brockholes
LGS14	Folly Dolly Mills, Meltham
LGS15	Digley Quarries, Holmbridge
LGS16	Scar Hole Quarry, Jackson Bridge

Site name	Ward
LGS17	Burton Dene Quarry, Kirkburton
LGS18	Hartley Bank Quarry
LGS19	Upper and Lower Stone Wood, Stocksmoor

Figure 3.9: Minerals locations in Kirklees



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Soil

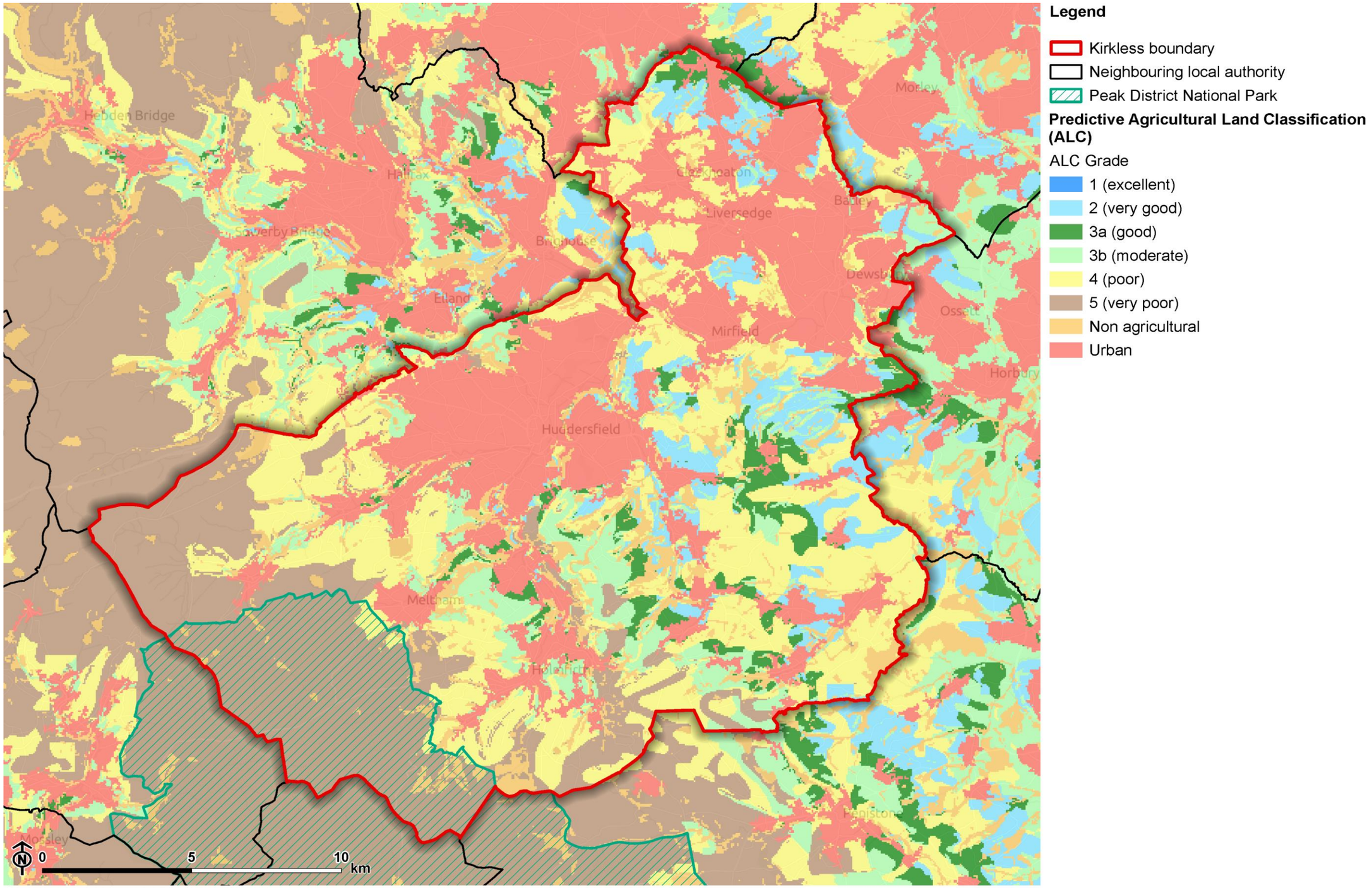
3.78 Soil provides a multitude of important functions and ecosystem services for society, including climate change mitigation (e.g. carbon retention) and adaptation (e.g. reducing flood risk) opportunities, food production and supporting biodiversity. However, soil is very often damaged, compacted and disposed of during construction and urban development.

3.79 Peatland is a characteristic of the district, covering approximately 7,900ha. Kirklees has 4,231ha of deep peat and 3,711ha of wet peat. Wet peat is classified as being in good condition, whereas all the deep peats (otherwise known as blanket bogs) are degraded to some degree. When in good condition, peatland provides a number of benefits including carbon storage, improvement of water quality, reduction of flooding and supporting a rich variety of plants and animals **[See reference** 102**]**.

3.80 The Agricultural Land Classification (ALC) system **[See reference 103]** provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The principal factors influencing agricultural production are soil wetness, drought and erosion. These factors, together with interactions between them, form the basis for classifying land use into one of five Grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a and 3b, although this requires further local surveys and therefore such data is only available for small areas. Grades 1, 2 and 3a are considered to be the best and most versatile agricultural land.

3.81 The breakdown of the district in relation to its soil classification is shown in Error! Reference source not found.. Much of the land in the district is classified as 'land predominantly in urban use' around Huddersfield and Dewsbury. A large proportion of the land away from these areas is Grade 3 (good to moderate quality) or 4 (poor quality) agricultural land with pockets of Grade 2 (very good quality) interspersed. There are areas of Grade 5 land (very poor quality) to the west towards the South Pennines.

Figure 3.10: Agricultural Land Classification



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Contaminated land

3.82 For a site to meet the definition of contaminated land, a pollutant linkage must be established. A pollutant linkage consists of three parts: a source of contamination in, on or under the ground; a pathway by which the contaminant is causing significant harm or harm (or which presents a significant possibility of such harm being caused); and a receptor of a type specified in the regulations.

3.83 Kirklees Council is required to maintain a Public Register of Contaminated Land under the Environmental Protection Act 1990. There are over 4,000 potentially contaminated land sites in Kirklees. Due to the previous uses of the land, many of these sites will contain substances in, on, or under the ground, which have the potential to cause harm **[See reference** 104**]**.

Waste

3.84 The duties and responsibilities for each authority with regards to the collection and disposal of waste are set out within the Environmental Protection Act 1990. Kirklees Council is responsible for the management of municipal waste in the district and acts as both the waste collection authority and the waste disposal authority.

3.85 For the period 2024/25 Kirklees had the lowest reported rate of household recycling in the Yorkshire and Humber region at 27.0% **[See reference** 105**]**. This compares to a recycling rate of 61.0% in East Riding of Yorkshire Council which has the highest reported rate of recycling in the region. The Kirklees Resources and Waste Strategy 2021-2030 aims to achieve recycling rates of at least 70% at household waste and recycling centres and increase municipal recycling rates to 55% by 2025. **[See reference** 106**]**.

3.86 In the reporting year 2024-25 a total of 181,963 tonnes of waste including 159,839 tonnes of household waste were collected in Kirklees. Household waste collected in Kirklees is categorised in **Table 3.9** below. **[See reference** 107**]**

Table 3.9: Household waste collected in Kirklees (2024-25)

Category of waste	Amount in tonnes
Household - waste sent for recycling-composting-reuse	43,222
Household dry recycling-reuse	24,745
Household green recycling-reuse	18,477
Household - waste not sent for recycling	116,617
Household - regular collection (not recycled)	83,445
Household - civic amenity sites (not recycled)	17,883
Household - other sources (not recycled)	9,167
Household - estimated rejects	6,122

3.87 The following waste disposal infrastructure is present in the district:

- Four Household Waste Recycling Centres.
- An Energy from Waste (EfW) facility in Huddersfield.
- 110 ‘bring sites’ where residents can deposit items such as glass and textiles.
- A Materials Recycling Facility (MRF) in Huddersfield (at this location the sorting technology is limited compared to modern standards).
- Two Waste Transfer Stations in Huddersfield and Dewsbury.
- Composting facilities in Huddersfield.
- Two closed landfill sites at Hollins Hey and Honley Wood.

Water

3.88 Kirklees is located within the Humber River Basin district which covers an area of 26,100 km^2. The main rivers in Kirklees are the River Calder, River Colne, River Dearne, River Holme and River Ribble. These are shown in Error! Reference source not found..

3.89 The Humber River Basin district consists of eighteen management catchments. Kirklees falls within the Colne and Holme Operational Catchment which contains 21 water bodies. Under the Water Framework Directive water quality must not deteriorate and should aim to be of at least 'good' quality.

3.90 As outlined in **Table 3.10**, the latest reporting shows that all water bodies in the district are heavily modified and are of moderate ecological status and fail their chemical status. Please note that from the 2019 assessment of chemical status, the method of assessment and evidence base were amended. Due to these changes, all water bodies now fail chemical status and the assessment is not comparable to previous years assessments.

Table 3.10: Hydromorphological designation, ecological and chemical status of waterbodies within the Colne and Holme operational catchment [See reference 108**]**

Water Body	**Hydromorphological designation**	**Ecological status**		**Chemical status**	
		2019	**2022**	**2019**	**2022**
Bilberry Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment
Blackmoorfoot Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment
Blakeley Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment

Water Body	Hydromorphological designation	Ecological status		Chemical status	
		2019	2022	2019	2022
Brownhill Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment
Butterfly Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment
Colne from the River Holme to River Calder	Heavily modified	Moderate	Moderate	Fail	Does not require assessment
Colne from Source to Wessenden Brook	Heavily modified	Moderate	Moderate	Fail	Does not require assessment
Deer Hill Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment
Digley Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment
Fenay Beck from	Heavily modified	Moderate	Moderate	Fail	Does not require

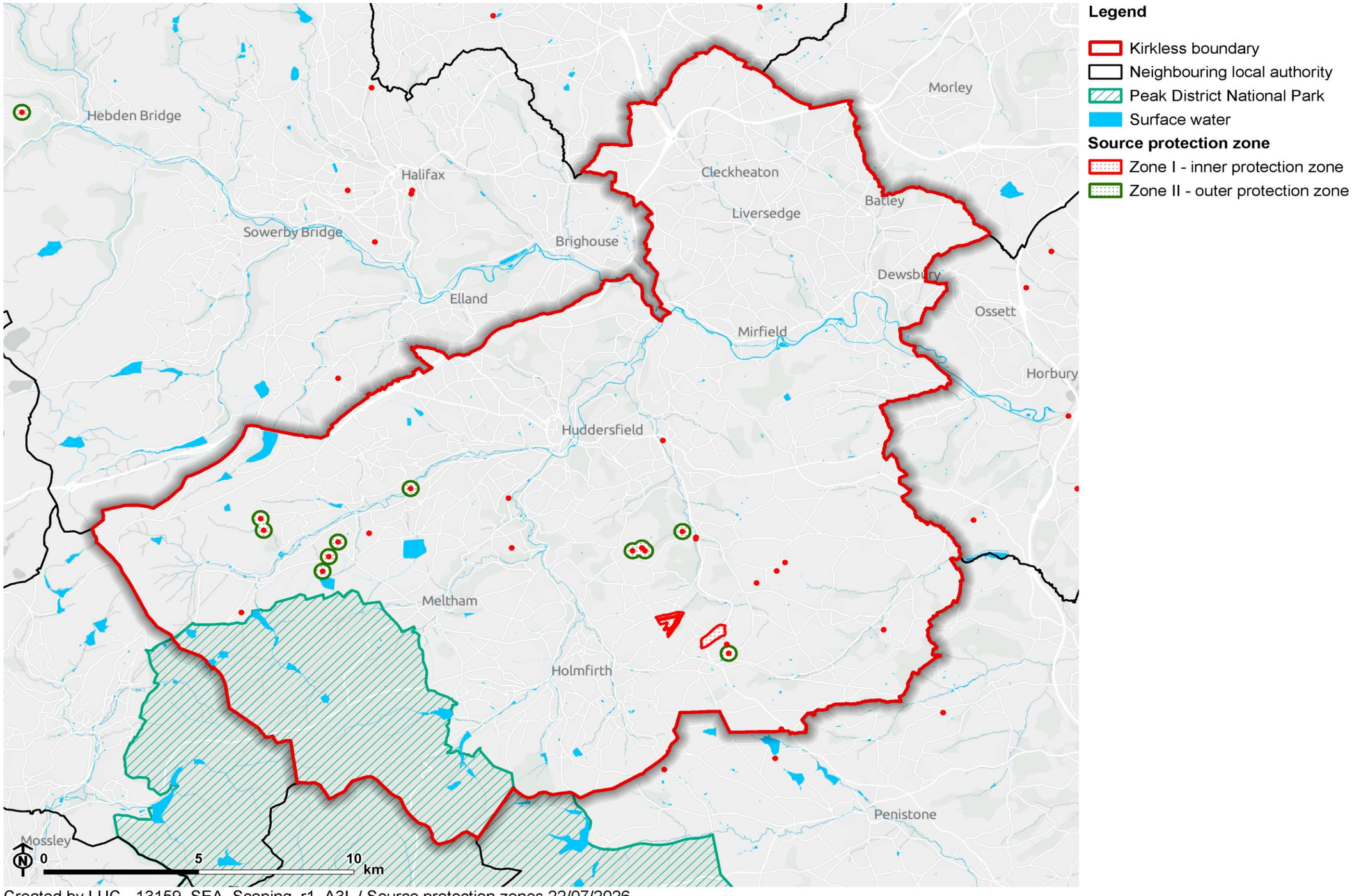
Water Body	Hydromorphological designation	Ecological status		Chemical status	
		2019	2022	2019	2022
Source to River Colne					assessment
Holme from New Hill Dike to R Colne	Heavily modified	Moderate	Moderate	Fail	Does not require assessment
Holme from Source to New Mill Dike Water Body	Heavily modified	Moderate	Moderate	Fail	Does not require assessmen n
Mag Brook from Source to River Holme	Heavily modified	Moderate	Moderate	Fail	Does not require assessment
New Mill Dike from Source to River Holme	Heavily modified	Moderate	Moderate	Fail	Does not require assessment
Ramsden Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment

Water Body	Hydromorphological designation	Ecological status		Chemical status	
		2019	2022	2019	2022
Riding Wood Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment
Wessenden Bk from Butterly Resr to River Coln	Heavily modified	Moderate	Not reported	Fail	Does not require assessment
Wessenden Head Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment
Wessenden Resevoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment
Yateholme Reservoir	Heavily modified	Moderate	Not reported	Fail	Does not require assessment

3.91 Source Protection Zones are defined around large and public potable groundwater abstraction sites, and they provide additional protection to safeguard drinking water quality by constraining the proximity of an activity that can impact the quality of drinking water. Most of the district falls outside of Source Protection Zones with only small areas towards Marsden and Slaithwaite and Stocksmoor and Shepley falling within Zones I and II. The

location of Source Protection Zones in Kirklees is also shown in Error! Reference source not found.

Figure 3.11: Waterbodies and Sources Protection Zones in Kirklees and surroundings



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3.92 Water supply in the district is maintained by Yorkshire Water. Yorkshire Waters' 2025 outturn forecast was 124.9 litres per head per day (l/h/d), which is significantly lower than the industry average of 145 l/h/d. The current per capita consumption target for Yorkshire Water is 120.5 l/h/d on a 3-year rolling basis **[See reference** 109**]**.

3.93 Water Resources Management Plan 2024 **[See reference** 110**]** has been prepared as a key component of the long-term, strategic planning framework for maintaining a safe and reliable water supply to customers over the long term. The Resource Management Plan has identified some significant risks to the future supply-demand balance. These risks include the impacts of climate change, population growth, reductions in supply to protect the environment and the loss of a water transfer currently received from a neighbouring water company. The plan shows, if no action is taken, these risks could create a supply-demand deficit.

3.94 The plan to mitigate the deficit includes a twin track approach to demand reduction and an increase in supply options. Demand options include leakage reduction, smart metering, and water efficiency. In respect of supply options, from 2025 to 2030, Yorkshire Water will deliver four supply schemes, providing an additional 21 million litres per day in total. These schemes include new infrastructure, an abstraction variation and a new groundwater borehole. Between now and 2035, Yorkshire Water will be planning and constructing a water treatment works and connecting pipeline from York to South Yorkshire to provide 50 million litres per day of needed supply and offset the loss of the import from Severn Trent Water. To meet its environmental destination and the likely reduction on the River Derwent abstraction licence, between now and 2040 Yorkshire Water will be planning and implementing a new transfer scheme to import water from Northumbrian Water, supported by Kielder Water. By 2073 projections show a new river abstraction to support an existing water treatment works will be needed and by 2082 additional river water storage capacity will be needed too.

Flood risk

3.95 Kirklees has a history of flooding in many different locations from fluvial, surface water and sewer sources.

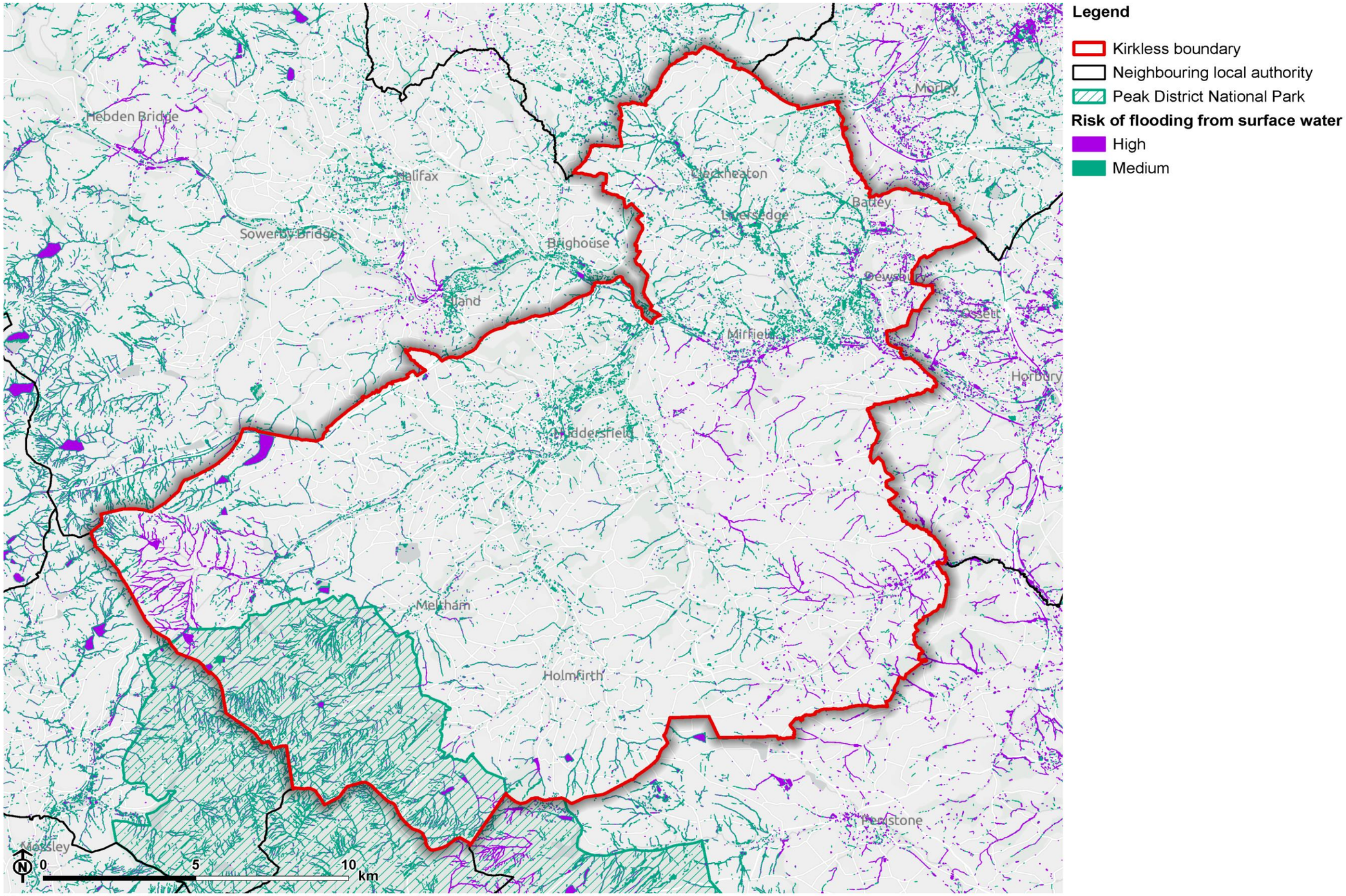
3.96 Error! Reference source not found.**a** and **3.12b** shows the areas which are at risk of surface water and fluvial flooding in Kirklees. There are areas of

significant flood risk of flooding in urban areas of Huddersfield, Dewsbury and Batley to the north of the district.

3.97 Kirklees has experienced numerous historical surface water flooding events, primarily reported by Local Authority sources. Notable recorded historic flood incidents which had a significant impact on properties and local infrastructure include: Storm Dudley, Eunice and Franklin (February 2022), Storm Ciara and Storm Dennis (February 2020) and the channel capacity being exceeded in River Calder upstream of Sands (December 2015). furthermore, in June 2007 an estimated 500 properties were flooded from surface water in Ravensthorpe, Liversedge, Cleckheaton, Chickenley, Mirfield, Milnsbridge, Brockholes, New Mill, Denby Dale, Scissett and Clayton West **[See reference** 111**]**.

3.98 Kirklees Council is currently in the process of updating their Strategic Flood Risk Assessment. As information from this assessment emerges it will be used to inform the SEA process.

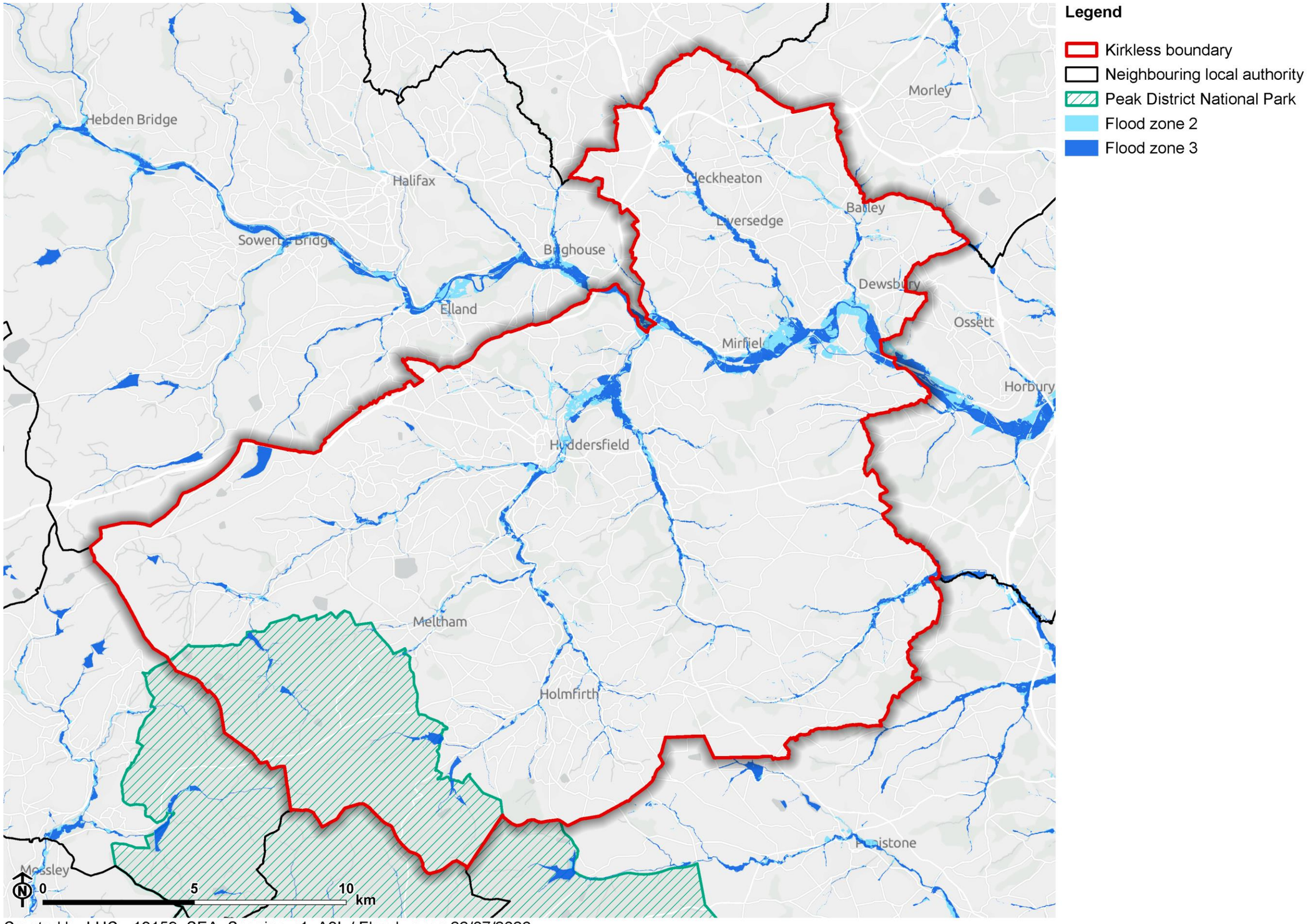
Figure 3.12a: Areas of surface water flood risk in Kirklees



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Figure 3.13: Areas of fluvial flood risk in Kirklees



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Climate change mitigation and adaptation

3.99 This section sets out the baseline for climate change mitigation and adaptation. The SEA will consider how the Local Plan can help to reduce carbon emissions and promote resilience to climate change, which greatly influence the environment and human health, and are closely linked to transport, renewable energy, development patterns, and the design of development.

3.100 Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within Kirklees across numerous receptors. A key challenge in protecting the environment is to tackle the causes and consequences of climate change. The consequences include predictions of warmer, drier summers and wetter winters with more severe weather events all year as well resulting in higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate action can be taken to help species and habitats adapt and to enable the agricultural sector to continue to deliver diverse, affordable and good quality produce.

3.101 There has been a general trend towards warmer average temperatures in recent years with the most recent decade (2012–2021) being on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than 1961–1990. All the top ten warmest years for the UK in the series from 1884 have occurred this century **[See reference 112]**.

3.102 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990 whilst winters have been 10% to 26% wetter **[See reference 113]**.

3.103 2025 was recorded as the warmest year on record for the UK. Recording a mean temperature of 10.09°C, 2025 joins 2022 and 2023 in the top three warmest years since 1884. 2025 is also only the second year in this series where the UK's annual mean temperature has exceeded 10.0°C. 2025 was also the sunniest year since the series began in 1910, recording 1648.5 hours of sunshine across the UK – 61.4 hours more than the previous record set in 2003. However, 2025 was notable for rainfall, or lack thereof at times during the year, with the UK experiencing its driest spring since 1974. This shortfall was eased by above average rainfall in the later months of the year, with the UK's

annual total levelling out at 1041.2mm (90% of the average annual rainfall) **[See reference 114]**.

3.104 The IPCC AR6 Synthesis Report (2023) highlights that greenhouse gas (GHG) emissions are predicted to continue into 2030 making it likely that global warming will exceed 1.5°C, which in turn means that GHG emissions will become harder to maintain below 2°C. As a result of this, increased global warming will occur and elicit climate hazards such as increased incidences of heatwaves, droughts, increased global monsoon precipitation, tropical storms, very wet and very dry weather. Our natural land and ocean carbon sinks will become less effective, sea levels will rise, become more acidic and experience deoxygenation amongst other climate events **[See reference 115]**. The Paris Agreement is a legally binding international treaty involving 196 Parties **[See reference** 116**]**. The overarching goal of this agreement is to limit global warming increasing to 1.5°C by the end of the century. Achieving this goal still requires a lot of action but since 2016 when the agreement was established, low – carbon solutions and new markets for climate resilience have been sparked.

3.105 Kirklees Council declared a Climate Emergency in 2019, with the vision for a "net Zero and Climate Ready Kirklees by 2038". The Council has prepared a net zero assessment **[See reference** 117**]** to enable them to identify the areas for focus, inform decision-making and further embed climate change within policies of their organisations. The Council has also adopted a Climate Change Action Plan **[See reference** 118**]** which sets out the ambitions for the area of Kirklees in reaching the aim of becoming net zero and climate ready. The Climate Change Action Plan identifies 206 actions, 14 of which specifically relate to the Local Plan:

- Building sector actions:
  - B2.1 – Consider revisions to Kirklees local planning policy at the next Local Plan to require the highest energy efficiency standards, where proposal are assessed through the planning process. This relates to new-build and retrofit developments; domestic, industrial, commercial, and public buildings.
  - B2.2 – Consider revisions to local planning policy at the next Local Plan to promote climate change measures and energy efficiency improvements in listed buildings without loss of significance.
  - B2.3 – Consider revisions to local planning policy at the next Local Plan to seek to strengthen approaches to encouraging the re-use of buildings and previously developed land.

- Energy sector actions:
  - E1.1 – Explore opportunities for renewable generation are identified in future iterations of the Kirklees Local Plan and Our Council Plan.
  - E1.2 – Consider revisions to Kirklees local planning policy at the next Local Plan about a potential requirement for new developments within Kirklees to complete an options assessment for renewable energy (heat and power) generation and storage.
  - E1.3 – Consider revisions to Kirklees local planning policies at the next Local Plan to encourage the development of renewable generation, aligning with the findings of a Local Area Energy Plan.
- Natural environment and biodiversity sector actions:
  - NEB4.1 – Consider revisions to Kirklees local planning policy at the next Local Plan to seek to ensure that new developments in Kirklees, including any public realm and supporting infrastructure, shall achieve the highest standards of design for the natural environment and local biodiversity, seeking to ensure that the development enhances Kirklees natural capital and provides ecosystem services through green infrastructure and nature-based solutions.
  - NEB4.3 – Continue to develop and map out a strategic green infrastructure network for Kirklees, considering options how the protection of its function could be strengthened within the network in a future Local Plan, including considering how new developments and land-use change respect, coordinate with, and enhance the network.
- Sustainable food and agriculture sector actions:
  - SA5.2 – Strive to ensure the local planning policy, at the next Local Plan, allow/facilitate farmers to be able to adapt to future challenges through diversification in land-use and practices.
- Transport sector actions:
  - T1.3 – Consider revisions to Kirklees local planning policy at the next Local Plan to aim to ensure sites for new housing and commercial developments that can be served by quality public transport links and active travel (walking and cycling). Explore the concept of low traffic or car-free development.
  - T1.4 – Review the Kirklees local planning policy to ensure new transport infrastructure is designed to align with the Net Zero and Climate ready by 2038 goal.

- Waste sector actions:
  - WAS1.2 – Refine Kirklees local planning policy to require all new development, including any public realm and supporting infrastructure, to incorporate circular economy measures into all aspects of the design, construction, and operation process. These will be reported via a Circular Economy Statement.
- Water sector actions:
  - WAT3.1 – Consider revisions to Kirklees local planning policy at the next Local Plan in relation to a potential water efficiency standard in new-build and retrofit developments; domestic industrial commercial and public buildings through the planning applications process.
  - WAT3.2 – Consider revisions to Kirklees local planning policy at the next Local Plan to explore the latest approaches to Sustainable Urban Drainage Systems (SuDs) and Water Sensitive Urban Design (WSUD).

Carbon dioxide emissions

3.106 The Government regularly publishes Local Authority and regional greenhouse gas emissions national statistics **[See reference** 119**]**. Carbon dioxide emissions for Kirklees between 2005 and 2024 fell from approximately 7.9 tonnes per capita to around 3.8 tonnes per capita. Per capita emissions in the plan area have generally declined year-on-year, although there have been periodic small increases, including in 2010 and 2021.This is shown in **Table 3.11**.

Table 3.11: Carbon dioxide emissions per capita in Kirklees between 2005-2022

Year	Total Emissions (kt)	Per Capita Emissions (t)
2005	3,171.0	7.9
2006	3,105.5	7.7
2007	3,007.0	7.4
2008	2,976.3	7.2

Year	Total Emissions (kt)	Per Capita Emissions (t)
2009	2,726.0	6.6
2010	2,849.4	6.8
2011	2,660.2	6.3
2012	2,661.9	6.3
2013	2,655.4	6.2
2014	2,479.5	5.8
2015	2,404.4	5.6
2016	2,294.6	5.3
2017	2,200.6	5.1
2018	2,166.9	5.0
2019	2,085.5	4.8
2020	1,879.6	4.3
2021	1,981.3	4.6
2022	1,820.4	4.2
2023	1,708.3	3.8
2024	1,687.8	3.8

3.107 In Kirklees, the main contributors to emissions are domestic (519.7kt in 2024) and transport (597.0kt in 2024) sources. However, between 2005 and 2024, emissions from these sources have fallen significantly for the district. Domestic emissions have reduced by over 50% from 2005 to 2024, while transport emissions have declined by approximately 18% over the same period, albeit with more limited and less consistent reductions compared to other sectors. This is shown in **Table 3.12**.

Table 3.12: Changes in carbon dioxide emissions by sector for Kirklees Council between 2005 and 2022

Source of emissions	2005	2024
Industry	637.1	219.3
Commercial	426.5	136.0
Public Sector	123.8	45.0
Domestic	1,064.2	519.7
Transport	740.3	597.0
Land Use, Land-Use Change and Forestry [See reference 120]	-10.0	-20.4
Agriculture	111.3	87.1
Waste	77.7	104.2
Grand Total	**3,171.0**	**1,687.8**

Overall energy consumption

3.108 The Department for Business, Energy and Industrial Strategy **[See reference** 121**]** produced the following consumption figures for Kirklees in 2023. These figures are presented as Ktoe (kilotonnes of oil equivalent):

- All fuels – A total of 661.8 Ktoe across domestic, transport and industrial and commercial use.
- Coal – A total of 3.1 Ktoe predominantly through industrial and domestic use.
- Manufactured fuels – A total of 2.7 Ktoe through domestic and industrial use.
- Petroleum – A total of 228.2 Ktoe predominantly from road transport.
- Gas – A total of 285.4 Ktoe predominantly through domestic use.

- Electricity – A total of 108.7 Ktoe through domestic and industrial and commercial use.
- Bioenergy and wastes – A total of 31.6 Ktoe predominantly from road transport, industrial and commercial.

3.109 Table 3.13 below highlights the energy consumption for Kirklees between 2005 to 2023 by type. With the exception of energy from biomass and wastes, the consumption of energy in Kirklees from all sources fell between 2005 and 2023.

Table 3.13: Energy Consumption in Kirklees by Type

Energy Type	Energy Consumption in Ktoe (2005)	Energy Consumption in Ktoe (2023)
All fuels	912.9	661.8
Coal	9.2	3.1
Manufactured Fuels	3.6	2.7
Petroleum	280.7	228.2
Gas	453.9	285.4
Electricity	158.8	108.7
Bioenergy and Waste	6.6	31.6

Renewable energy

3.110 Renewable energy is recognised as an important contributor to reducing reliance on fossil fuels and adapting to climate change. In 2024, there were 9,096 renewable energy installations in Kirklees, with the majority being solar photovoltaics (9,002), alongside a small number of onshore wind (89(hydroelectric (1), anaerobic digestion (2), municipal solid waste (1) and plant biomass (1) installations. This represents an increase from 2023, when there were 8,315 installations in total. As in 2024, photovoltaics comprised the largest category in 2023 (8,221), with hydroelectric (1), onshore wind (89), anaerobic digestion (2), municipal solid waste (1) and plant biomass (1)

comprising a much smaller proportion of installations. In 2024, installed capacity in the district was 49.1 MW, primarily from solar photovoltaics (35.2 MW) and municipal solid waste (10.0 MW).

3.111 At a wider spatial scale, renewable energy generation in the UK increased by 5.1% from 136.8 TWh in 2023 to 143.7 TWh in 2024. This was primarily a result of increased wind and plant biomass generation. Generation in England was up 4.4% during the same period. Yorkshire and the Humber is the region with the highest capacity in England at 8,044 MW (39% from offshore wind), indicating that Kirklees forms part of a broader regional and national transition toward low-carbon energy sources **[See reference** 122**]**, **[See reference** 123**]**.

Green and blue infrastructure

3.112 Green and blue infrastructure has a range of benefits, including promoting environments where healthier living might be supported, and improving air quality and water quality. In particular, it can help with climate change mitigation and adaptation by storing carbon, improving biodiversity and ecological resilience to climate change and lessening the impacts of climate change such as flooding, extreme heat and drought. A Strategic Green Infrastructure Network is identified in the current Local Plan.

3.113 In relation to parks and recreation grounds, key deficiencies are found in the Kirklees Rural area and the Huddersfield area, particularly Dewsbury and Mirfield and Batley and Spen. This information is subject to change, as Kirklees Council is currently working on a new Open Space Study.

3.114 Kirklees has six parks that have achieved Green Flag standard **[See reference** 124**]**:

- Beaumont Park, Huddersfield
- Castle Hill, Huddersfield
- Crow Nest Park, Dewsbury;
- Wilton Park, Batley;
- Greenhead Park, Huddersfield; and
- Oakwell Hall Country Park, Birstall.

3.115 The 2016 Open Space Study **[See reference** 125**]** finds that that there are deficiencies in the provision of the following open space categories:

- Parks and recreation spaces in the Kirklees Rural and Huddersfield areas.
- Natural and semi-natural greenspace in the Kirklees Rural area. The exception to this is the Denby Dale ward which has the highest level of natural and semi-natural greenspace of all wards across Kirklees (7.2 hectares per 1,000 population) due to the presence large woodland areas.
- The most notable deficiencies in the provision of amenity greenspace are in the Huddersfield and Kirklees Rural areas. The greatest deficiencies are in the Holme Valley North and Holme Valley South wards with only 0.01 and 0.05 hectares of amenity greenspace per 1,000 population
- The provision of allotments falls short of the standard in all wards in the Batley and Spen area and most wards in the Kirklees Rural area, except for Colne Valley and Kirkburton wards.
- Cemeteries at Cleckheaton, Earlsheaton, Almondbury, Edgerton and Kirkheaton are all closed to burials, whilst cemeteries at Slaithwaite and Lockwood each have less than 5 years' worth of capacity.
- The Kirklees Rural area lacks play provision that caters for older children and teenagers in particular, especially in the Holmfirth area.

3.116 The Open Space Study is currently being updated as part of the evidence for the new Local Plan. The deficiencies identified above reflect the findings of the 2016 study and may be subject to revision following publication of the updated study.

Biodiversity

3.117 This section sets out the baseline for biodiversity in the plan area. The SEA will consider how the Local Plan can help to protect and enhance biodiversity, as it supports resilient ecosystems and healthy places, while also contributing to climate adaptation, landscape quality, water management and people's physical and mental well-being.

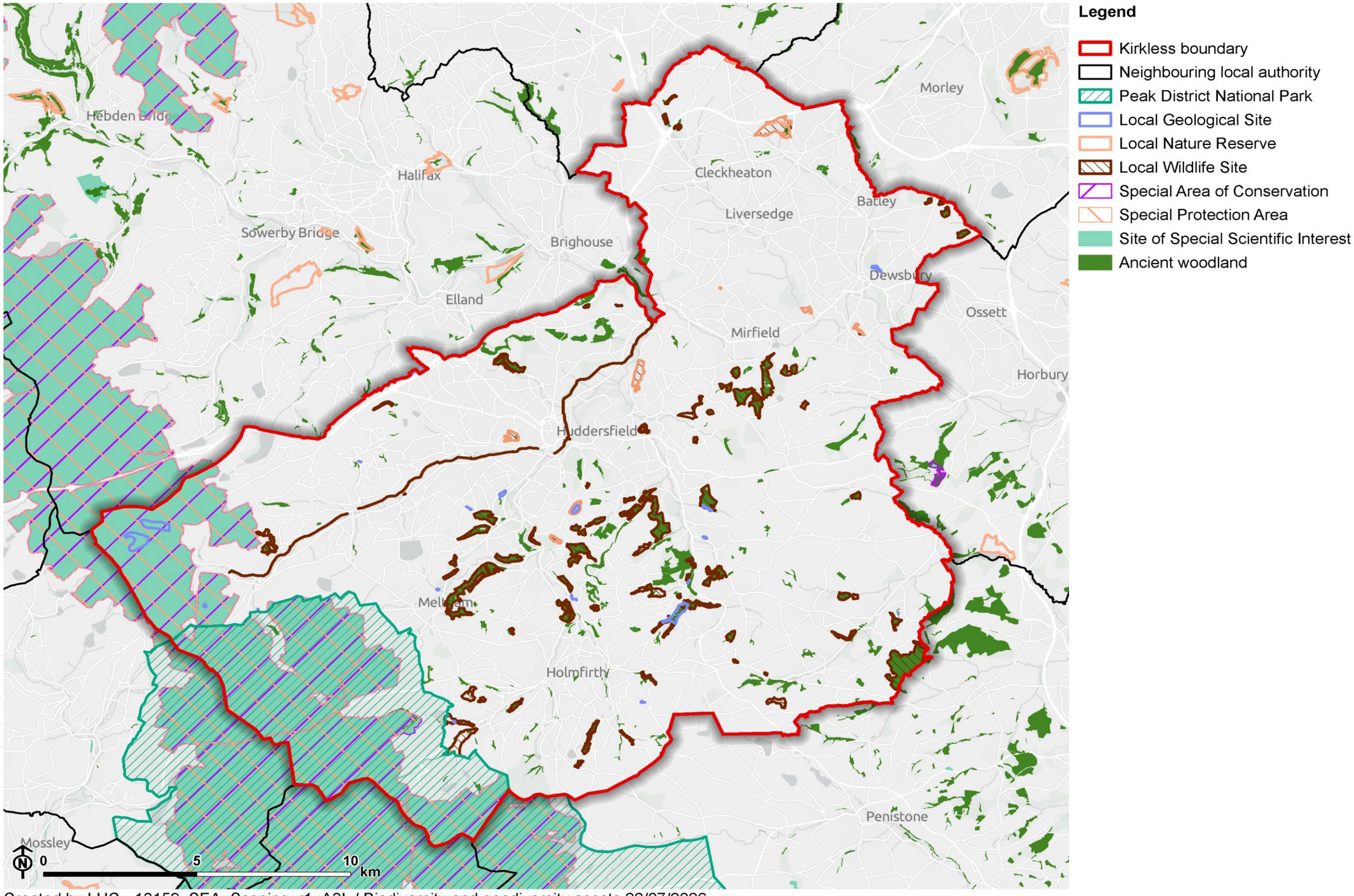
3.118 Kirklees is renowned for the quality and diversity of its natural environment, with many of its assets protected by local, national, and international designations. There is a need to maintain and develop Kirklees' network of high-quality habitats. The location of Kirklees' designated biodiversity and geodiversity assets is presented in Error! Reference source not found..

3.119 At the international level, the South Pennine Moors Special Protection Area and Special Area of Conservation has been designated as it covers

extensive tracts of semi-natural moorland habitats, including upland heath and blanket mire. The diverse mosaic of habitats contributes greatly to the ornithological interests, which comprises birds of prey and waders.

3.120 There are five designated Special Sites of Scientific Interest (SSSI) (totalling 4,845ha), two of which are entirely classed as being in “favourable” condition (Rake Dike SSSI and Park Clough SSSI) and one of which is entirely classed as being in "unfavourable" (Honley Station Cutting SSSI) condition. The condition of most of the remaining two SSSIs (Dark Peak SSSI and South Pennine Moors) is unrecorded but for what has been recorded, both sites are mainly in "favourable" condition but contain some features that are in "unfavourable" condition **[See reference** 126**]**. The district also benefits from 1,188ha of Local Wildlife Sites, 83ha of Local Geological Sites and 1,083ha of Ancient Woodland **[See reference** 127**]**.

Figure 3.14: Biodiversity assets in Kirklees



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3.121 The Kirklees Biodiversity Action Plan identifies the local habitats and species of principal importance in Kirklees or those that are of sub-regional importance. These habitats and species have individual action plans that enable the council to prioritise biodiversity work in the district. The Kirklees Biodiversity Strategy **[See reference** 128**]** outlines the approach to meeting the targets for Habitats and Species of Principal Importance as set out in the Kirklees Biodiversity Action Plan **[See reference** 129**]**.

3.122 The West Yorkshire Local Nature Recovery Strategy (LNRS) is a statutory strategy introduced under the Environment Act 2021 and forms part of a national network of 48 strategies. The LNRS was approved and adopted by the WYCA in March 2026. The LNRS sets out a long-term vision to reverse biodiversity decline, restore and enhance habitats, and contribute to national targets, including halting species decline by 2030 and supporting the '30 by 30' commitment. The strategy takes a spatial and priority-led approach, identifying where action for nature recovery will have the greatest impact. It comprises a statement of biodiversity priorities and a Local Habitat Map, which together highlight areas of existing ecological importance and opportunities for habitat creation, restoration and improved connectivity. Across West Yorkshire, the LNRS establishes a range of habitat and thematic priorities, including improvements to the built environment, farmland, grasslands, woodlands, uplands and water environments, alongside cross-cutting actions such as improving soil health, reducing disturbance and managing invasive species. A key overarching theme is the role of water as a 'big blue thread', emphasising natural flood management, wetland restoration and re-connecting river systems. Within Kirklees the Local Habitat Map identifies extensive areas of irreplaceable blanket hob habitat to the south west within the areas covered by the South Pennine Moors SAC, South Pennine Moors Phase 1 SPA and South Pennine Moors Phase 2 SPA. The plan area also includes interspersed pockets of irreplaceable ancient woodland habitat **[See reference** 130**]**, **[See reference** 131**]**.

Historic environment

3.123 This section sets out the baseline for the plan area's historic environment. The SEA will consider how the Local Plan can help to conserve and enhance the historic environment by reinforcing local identity, sense of place and cultural value, in turn contributing to regeneration, tourism, improving deprivation and community well-being.

3.124 Kirklees has a range of unique assets that contribute to the character and distinctiveness of the area. These assets include:

- Conservation Areas
- Historic Parks and Gardens
- Listed buildings
- Scheduled Monuments

3.125 Some heritage assets, non-designated heritage assets, archaeological sites, historic buildings, parks, formal gardens or battlefields, are considered to be of national importance. Non-designated heritage assets are identified through the planning process.

3.126 Kirklees has 2,980 Listings, 59 Conservation Areas, six Historic Parks and Gardens, 22 Scheduled Monuments and one Registered Battlefield **[See reference** 132**]**.

3.127 Of the Conservation Areas in Kirklees, the following have Conservation Area Appraisals:

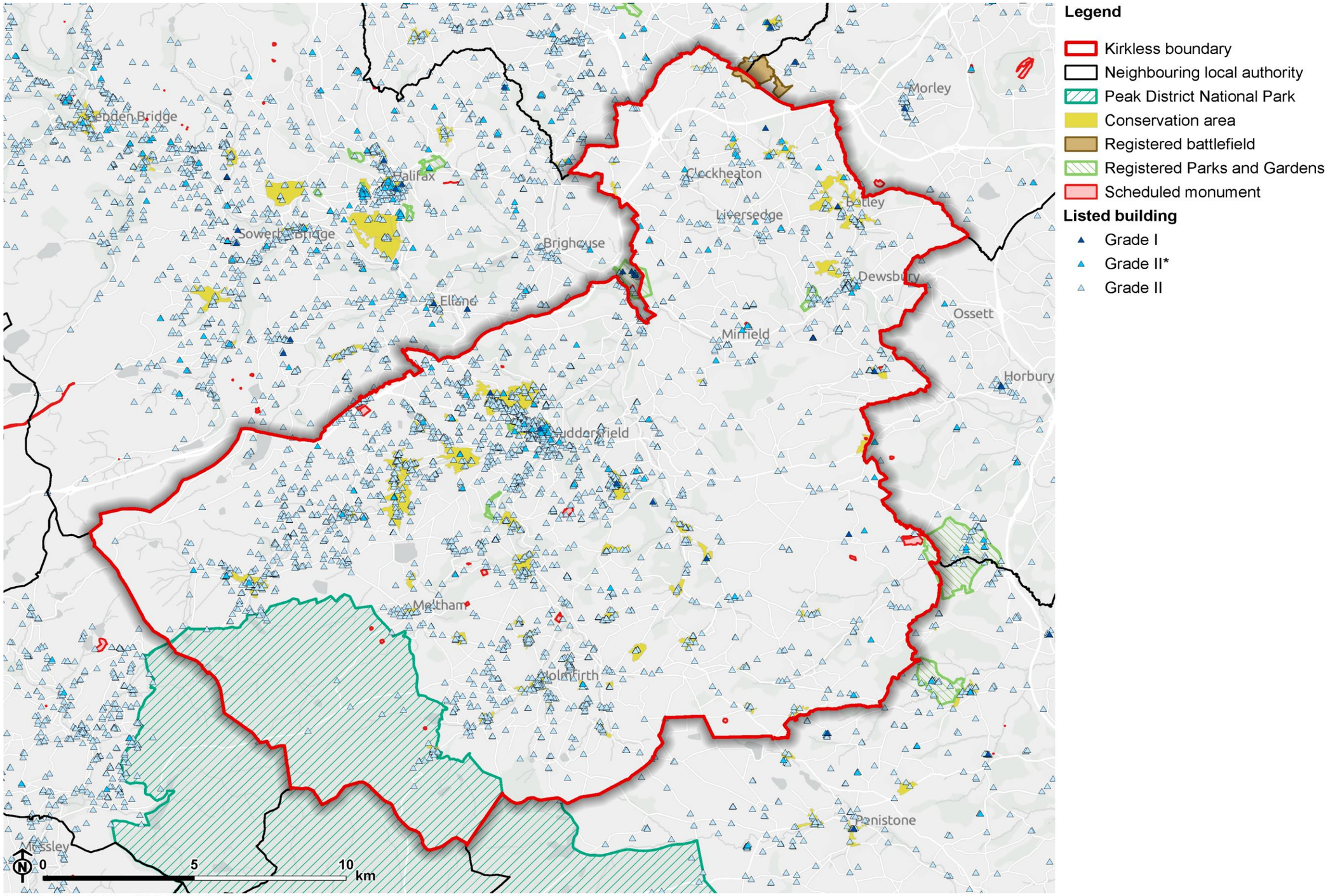
- Batley Market Place
- Golcar
- Marsden
- Helme
- Edgerton
- Upper Batley
- Wilshaw
- Dewsbury Town Centre
- East Bierley
- High Flatts
- Upper Cumberworth
- Upper Denby
- Wellhouse
- Holme
- Station Road, Batley

- Birstall
- , MarsdenLinthwaite
- Milnsbridge
- Cross Bank Batley

3.128 The Appraisals for Birstall, Holme, Wellhouse, Upper Denby, Upper Cutherworth, High Flatts, East Bierley, Dewsbury, Wilshaw, Edgerton, Oldfield and Helme all include a Management Plan or Management Recommendations **[See reference** 133**]**.

3.129 The location of heritage assets in Kirklees is shown in Error! Reference source not found..

Figure 3.15: Heritage assets in Kirklees



Created by LUC - 13159_SEA_Scoping_r1_A3L / Heritage assets 22/07/2026

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3.130 According to Historic England's Heritage at Risk Register **[See reference** 134**]**, there are 23 heritage assets at risk in Kirklees:

- Battle of Adwalton Moor, Drighlington
  - Type: Registered Battlefield
  - Condition: Generally satisfactory but with significant localised problems
- Double aisled barn to north west of Kirklees Priory Gatehouse, Kirklees Park, Brighouse – Calderdale
  - Type: Listed Building grade I
  - Condition: Fair
- North Range at Westwood Mills, Lowestwood Lane, Linthwaite, Huddersfield – Kirklees
  - Type: Listed Building grade II*
  - Condition: Very bad
- Mill Dam at Westwood Mills, Lowestwood Lane, Linthwaite, Huddersfield – Kirklees
  - Type: Listed Building grade II*
  - Condition: Poor
- Former Huddersfield Infirmary – Kirklees
  - Type: Listed Building grade II*
  - Condition: Poor
- New House Hall, Newhouse Road – Kirklees
  - Type: Listed Building grade II*
  - Condition: Fair
- Birkby, Huddersfield – Kirklees
  - Type: Conservation Area
  - Condition: Very bad
- Dewsbury – Kirklees
  - Type: Conservation Area
  - Condition: Very bad
- Huddersfield, Huddersfield – Kirklees

- Type: Conservation Area
- Condition: Very bad

- Station Road - Batley, Batley – Kirklees
  - Type: Conservation Area
  - Condition: Very bad
- Church of St Thomas, Manchester Road, Huddersfield – Kirklees
  - Type: Listed Building grade II*
  - Condition: Fair
- Church of St Stephen, Lidget Street, Huddersfield – Kirklees
  - Type: Listed Building grade II
  - Condition: Fair
- Church of St John, St John's Road, Huddersfield – Kirklees
  - Type: Listed Building grade II*
  - Condition: Fair
- West Block at Westwood Mills, Lowestwood Lane, Linthwaite, Huddersfield – Kirklees
  - Type: Listed Building grade II*
  - Condition: Very bad
- Offices and workshop ranges at Westwood Mills, Lowestwood Lane, Linthwaite, Huddersfield – Kirklees
  - Type: Listed Building grade II*
  - Condition: Very bad
- Boiler house, engine house, rope race, water tower and powerhouse at Westwood Mills, Lowestwood Lane, Linthwaite, Huddersfield – Kirklees
  - Type: Listed Building grade II*
  - Condition: Very bad
- Church of Emmanuel, Huddersfield Road, Kirkburton – Kirklees
  - Type: Listed Building grade II
  - Condition: Poor
- Church of St Mark, St Marks Road, Huddersfield – Kirklees

  - Type: Listed Building grade II
  - Condition: Poor
- Christ Church, Woodhouse Hill, Huddersfield – Kirklees
  - Type: Listed Building grade II
  - Condition: Poor
- Christ Church, Church Lane, Batley and Liversedge – Kirklees
  - Type: Listed Building grade II
  - Condition: Fair
- Church of St John, Hopton Hall Lane, Mirfield – Kirklees
  - Type: Listed Building grade II
  - Condition: Poor
- Emley Day Holes, 200 metres east of Churchill Farm, Denby Dale – Kirklees
  - Type: Scheduled Monument
  - Condition: Generally unsatisfactory with major localised problems
- Crosland Lower Hall moated site, Meltham – Kirklees
  - Type: Scheduled Monument
  - Condition: Generally satisfactory but with significant localised problems
- Medieval ironstone pits south of Bentley Grange, Denby Dale – Kirklees
  - Type: Scheduled Monument
  - Condition: Generally satisfactory but with significant localised problems

3.131 While the current number of heritage assets at risk has declined from 2019 when the number was 25, ongoing risk remains.

Landscape and townscape

3.132 This section sets out the baseline for the plan area's landscape and townscape. The SEA will consider how the Local Plan can help to protect and enhance high-quality landscapes and townscapes by shaping distinct and attractive places, which can help to enhance biodiversity and climate resilience, improve quality of life, recreation opportunities and the setting of heritage assets.

3.133 Kirklees covers an area of around 40,720ha. Around 10% of the district is in the Peak District National Park. Kirklees comprises the main towns of Huddersfield and Dewsbury, followed by Batley, Cleckheaton, Holmfirth and Heckmondwike. There are also a number of District Centres, namely Almondbury, Birstall, Denby Dale, Honley, Kirkburton, Lindley, Marsden, Marsh, Meltham, Milnsbridge, Mirfield, Moldgreen, Ravensthorpe, Skelmanthorpe and Slaithwaite. As the largest settlement in Kirklees, Huddersfield is the administrative centre. **[See reference** 135**]** **[See reference** 136**]**.

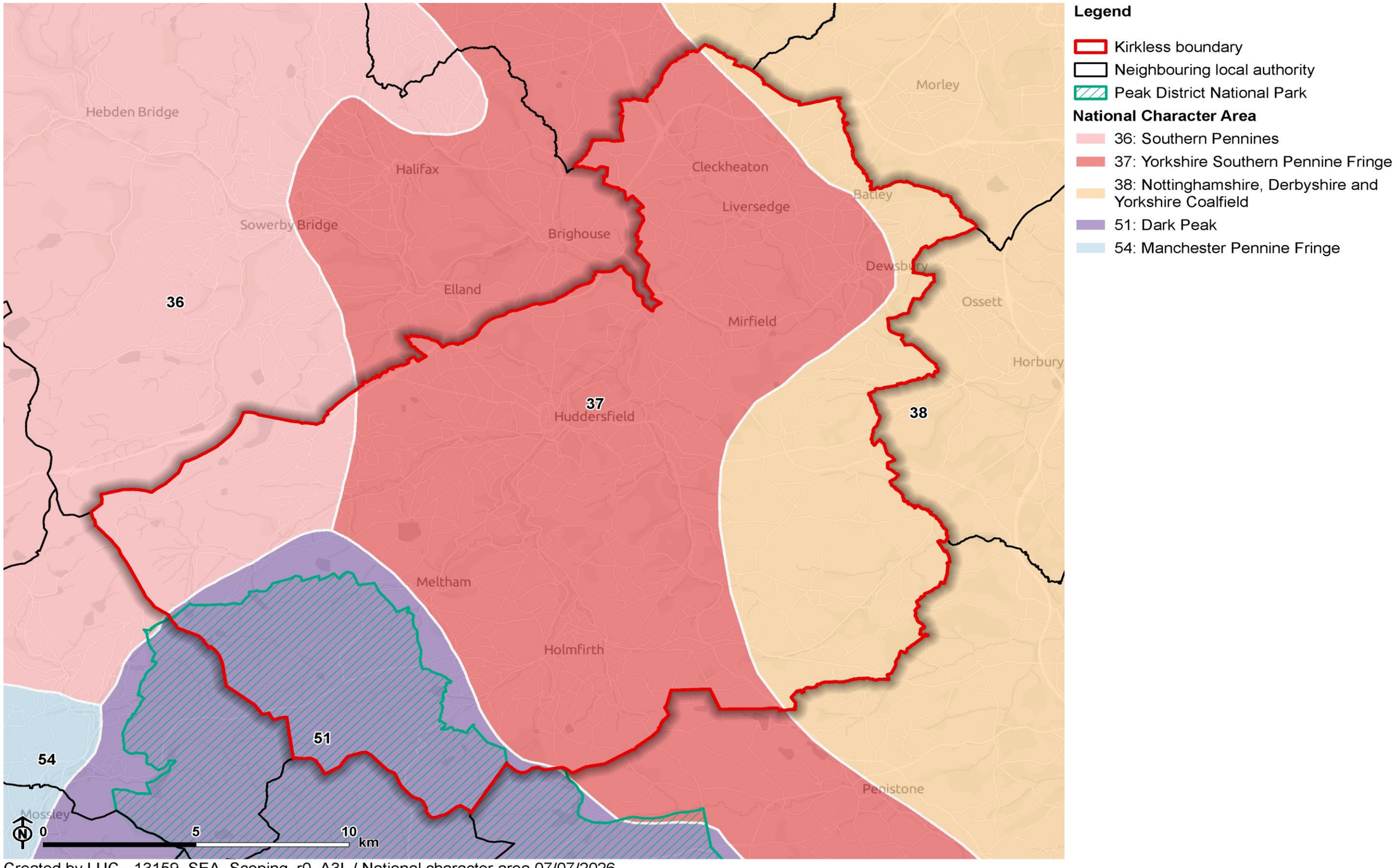
3.134 Many of the settlements in Kirklees have their roots in historic mill towns and mining heritage, mainly in the east of the district. Areas of the landscape are scattered with evidence of pits and workings and rail and water transport routes used to support the coal and textile industries **[See reference** 137**]**.

3.135 Most agricultural activity within the district relates to cattle and sheep rearing with some milk production and intensive poultry rearing. There is no significant arable production. As a result, the agricultural landscape is one of intensive grassland within fields that contain few natural field boundaries.

3.136 Kirklees falls within four National Character Areas (NCAs), as shown in Error! Reference source not found. **[See reference** 138**]**. These are:

- 36: South Pennines; an exposed, remote, upland moorland plateau located to the far west of the district
- 37: Yorkshire Southern Pennine Fringe,
- 38: Nottinghamshire, Derbyshire and Yorkshire Coalfields
- 51: Dark Peak.

Figure 3.16: National Character Areas in Kirklees



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3.137 The NCA profiles indicate the drivers for change as well as opportunities for environmental improvement. Typical drivers of change include development pressure, noise and light pollution, recreational pressure, changes in farming practices and intensive agriculture, mineral extraction, declines in biodiversity, loss or neglect of historic features, pressure on the water environment, and climate change.

3.138 The Peak District National Park spans 1,438km^2 across Derbyshire, Cheshire, Staffordshire, Yorkshire and Greater Manchester. It extends into Meltham and Holme in the south western part of Kirklees. The landscape is characterised by gritstone edges (Dark Peak), steep limestone dales (White Peak) and rolling hills and farmland (South West) **[See reference** 139**]**. Land cover has stayed relatively stable since the 1980s; the largest cover change has been an overall increase in coniferous forest cover (approximately 10 km²) and a decline in walls and hedges primarily around the White Peak. The National Park hosts a diverse mosaic of habitats which support a rich range of wildlife; from Jacob's ladder to lapwing, from dipper to mountain hare. Levels of tranquillity have decreased by approximately 4% since the 1960s due to increased levels of light pollution in the Park **[See reference** 140**]**.

3.139 The Peak District National Park Management Plan **[See reference** 141**]** outlines the strategic vision and priorities for the Park over the next five years. It includes a number of objectives to help achieve the vision:

- Aim One: The Peak District National Park is more resilient and net-zero by 2040 through its exemplary response to climate change.
- Aim Two: The Peak District National Park is a resilient landscape in which nature, beauty, and cultural heritage are significantly enhanced.
- Aim Three: The Peak District is a welcoming place where all are inspired to enjoy, care for and connect to its special qualities.
- Aim Four: Peak District National Park communities are thriving and sustainable places where all generations can live healthy and fulfilled lives.

Chapter 4
Environmental and sustainability issues and likely evolution without the Local Plan

4.1 Analysis of the baseline information in **Chapter 3** has enabled a number of key environmental and sustainability issues facing Kirklees to be identified. Identification of the key environmental and sustainability issues and consideration of how these issues might develop over time if the new Local Plan is not adopted help to meet Schedule 2 of the SEA Regulations which requires information to be provided on:

- "the relevant aspects of the current state of the environment *[baseline information presented in Chapter 3]* and the likely evolution thereof without implementation of the plan" *[summarised in this chapter]*
- "any existing environmental problems which are relevant to the plan" *[interpreted as 'key sustainability issues' and summarised in this chapter]*

4.2 Key environmental and sustainability issues for Kirklees were previously identified through the SA for the current Local Plan that was adopted in 2019. These issues were considered as a starting point for the SA work undertaken for the Local Plan update up to March 2025. That work involved a full review and update of the issues in light of the updated policy review and baseline information.

4.3 The preparation of this SEA Scoping Report for the new Local Plan has involved a further review of the environmental and sustainability issues to reflect the latest policy context and available baseline information. The current set of key environmental and sustainability issues for Kirklees is presented below.

4.4 The requirement of the SEA Regulations for consideration to be given to the likely evolution of the environment in the plan area (i.e. Kirklees) if the new Local Plan was not to be adopted, is also presented in relation to each of the environmental and sustainability issues.

4.5 In general, the current trends in relation to the various environmental and sustainability issues affecting Kirklees would be more likely to continue without the implementation of the new Local Plan, although the policies in the adopted Kirklees Local Plan would still go some way towards addressing many of the

issues. In most cases, the Local Plan provides opportunities to directly and strongly affect existing trends in a positive way, through an up-to-date plan which reflects the requirements of the NPPF.

4.6 Key environmental and sustainability issues in Kirklees are set out below:

- Hotter, drier summers and wetter winters are expected as a result of ongoing and **accelerating climate change**, which have the potential for adverse effects on human health and the natural environment. The Local Plan provides an opportunity to update the district's approach to mitigating and adapting to climate change and its impacts and associated weather events. The plan can support the delivery of infrastructure for renewable energy generation and sustainable travel and more energy efficient buildings. It can also support designs that are more resilient to the effects of climate change, including through the promotion of green blue infrastructure. Without the new Local Plan, these issues are likely to be less well addressed.
- Kirklees has **an ageing population**, with the proportion of people 65 years and over increasing between the 2011 Census and 2021 Census. This may result in **pressure on the capacity of local services and facilities**, such as GP surgeries and hospitals. The district has a relatively high score of 104.5 in relation to the 2021 "Access to services" subdomain in relation to the Health Index. This score could worsen in the future as the population ages, which would result in greater difficulties for residents reaching essential services such as employment centres, schools, healthcare providers, and retail centres via public transport or walking. The Local Plan offers an opportunity to improve access to and increase availability of such services and facilities. Without the new Local Plan there is likely to be an increasing strain on services and facilities which do not meet local demand.
- While **life expectancy in Kirklees is slightly lower than the regional and national averages**, the district is reported to perform around the national average in relation to its Health Index score. Furthermore, the district's score for the Health Index and other indicators such as **the proportion of residents reportedly limited by a disability and reportedly in very good health showed improvements** between the censuses in 2011 and 2021. The Local Plan can support continued improvements in health in the plan area by supporting the delivery of essential services and facilities, including healthcare. It can also help to encourage the uptake of healthier lifestyle choices among the population through the provision of open spaces, recreation facilities and spaces for

healthy food growing as well as by encouraging travel by active modes. Without the adoption of the new Local Plan, it is less likely that adequate service provision will be secured and developments may be located in areas with more limited access to services and facilities and entrench the use of less active travel modes.

- **Weekly pay** by place of work in Kirklees **is lower than the regional and national averages.** The district displays **relatively low growth in GVA and levels productivity compared to national levels** in recent years. Furthermore, while its strong links to the largest metropolitan areas in the North of England support the desirability of Kirklees as an extremely liveable area, these links contribute to the high levels of out-commuting from the district. The Local Plan provides the opportunity to attract higher-paying employers to the area, improving local job opportunities, increasing weekly pay and potentially reduce out-commuting from Kirklees. Without the new Local Plan, these improvements are less likely to occur, and the trend of high numbers of workers out-commuting for better-paying jobs is more likely to continue.
- While house prices in Kirklees are lower than the median values at the national and sub-regional levels, residents are expected to need 6.25 times their annual earnings to buy a home. Furthermore, house prices in Kirklees increased by 4.0% in the most recent reporting period from April 2025 to April 2026. To meet the needs of a growing population, **an adequate supply of housing, including affordable homes is required**. The need to deliver affordable homes is strengthened by average earnings in Kirklees being lower than the regional and national averages. The Local Plan provides an opportunity to facilitate and expedite the delivery of homes in the plan area, including affordable housing. It can also support the provision of a more appropriate mix of new homes to meet local needs. Without the new Local Plan, house prices in Kirklees may become more unaffordable and there is increased potential for the housing stock to become mismatched to local needs.
- The percentage of people who have a RQF Level 4 qualification (Degree, Higher Degree, NWQ Level 4-5, Higher National Certificate and Higher National Diploma) and above is lower than the national average. The Local Plan presents the opportunity to improve the accessibility and provision of high-quality education and training facilities in the district. Without the new Local Plan, these educational and training improvements may not be realised, potentially perpetuating the **lower than average levels of educational attainment** in Kirklees.

- Reported **levels of deprivation increased** up to 2025 in Kirklees from 2019, with 35 LSOAs falling in the worst 10% IMD combined index. This represents an increase in Kirklees of four LSOAs within the 10% worst performing in England. The Local Plan provides an opportunity to reduce the level of deprivation and disparities in the district through appropriately planned growth and regeneration. Without the new Local Plan, growth may be less appropriately distributed and deprivation is less likely to be effectively tackled.
- Many **residents in the district are dependent on the private car** to access jobs as well as services and facilities. This is particularly the case for residents in the more rural parts of the district. The Local Plan presents an opportunity to address the issue of car dependency by promoting sustainable development locations, including prioritising areas that are well-connected by public transport and active travel infrastructure. It can also support the delivery of infrastructure needed over the plan period to further promote travel by sustainable modes. Without the new Local Plan, development is more likely to come forward at less well connected locations and locations where there is limited potential to support improvements for sustainable transport.
- There are a number of areas within Kirklees which are at **risk of flooding**. Furthermore, the district has been affected by numerous historical surface water flooding events. Without the new Local Plan, flood risk will continue to affect the district. Climate change is likely to increase the frequency and magnitude of flooding events. The Local Plan provides an opportunity to plan strategically to locate new development in areas at lower risk from flooding, therefore reducing the number of properties and economic assets at risk from flooding.
- **All waterbodies in Kirklees are heavily modified and are of moderate ecological status and fail their chemical status**. The Local Plan provides the opportunity to support improvements to water quality within these waterbodies through requiring sustainable drainage solutions and green blue infrastructure within new developments. Without the new Local Plan there is increased potential for development to come forward at locations where construction and run off from new developments could lead to increased pollution within waterbodies.
- **There are seven AQMAs present in Kirklees that have been declared as a result of exceeding national objectives relating to NO2 levels**. Recent reporting indicates that NO2 levels in Kirklees are compliant in all but one of the AQMAs. This suggests that air quality in the district is

improving. The Local Plan provides the opportunity to support this trend by promoting sustainable travel and ensuring that the potential air quality impacts associated with new development are assessed and managed accordingly.

- **Kirklees achieves relatively low rates of waste being recycled** when compared to the regional and national averages. **Extraction of primary minerals needs to be managed taking into account existing permitted reserves** and the need for additional supply. The new Local Plan provides some opportunity to adopt up to date policies seeking to minimise waste, increase re-use and recycling. This might include policies that address the provision of space at new developments for the storage of waste and recycling. The Local Plan can also ensure the protection of Mineral Safeguarded Areas and minerals infrastructure to help ensure that an adequate supply of aggregates can be maintained.
- The majority of Kirklees is **comprised of urban land within its larger settlements with areas of Grade 3 and 4 agricultural land occupying much of the rest of the district**. Without the new Local Plan, there is a risk that more valuable agricultural lands in the district will be developed, limiting the potential for agricultural activities and food production. This could have implications for long-term food security. The Local Plan provides an opportunity to protect higher value soils from development, including by directing development to areas of more limited agricultural value. This may include the promotion of development on existing urban land and brownfield sites.
- Kirklees **contains and is in close proximity to a number of both designated and non-designated natural habitats and biodiversity**. This includes those designated for their national (SSSIs) and international importance (the South Pennines Moors is designated as both an SPA and SAC). Not all SSSIs in the district are in favourable condition. The new Local Plan provides an opportunity for new development to come forward at the most appropriate locations in order to avoid detrimental impacts on biodiversity assets, and in some cases enhance biodiversity through retention and creation of greenspaces within developments. The Local Plan can also support the achievement of biodiversity net gain, in line with the national mandatory requirement.
- Kirklees has numerous heritage assets (including Listed Buildings, Scheduled Monuments and Registered Parks and Gardens) and **23 assets are currently on the Heritage at Risk Register**. While the number of heritage assets on the register have decreased in recent years,

risk to heritage assets remains. The Local Plan provides an opportunity to draw on the most up to date evidence to ensure that new development is sited and designed so as to conserve and enhance the historic environment. The plan can also encourage enjoyment of heritage assets as well as improving the accessibility and interpretation of these features. Without the new Local Plan, the historic environment is less likely to be protected and enhanced and the condition of assets may worsen.

- Kirklees falls within **four National Character Areas (NCAs) and parts of the south-west of the district falls within the Peak District National Park.** The Local Plan provides an opportunity to take into account the most recent landscape-related evidence and to ensure that sensitive landscapes and townscapes are protected and enhanced. Development should be located and designed to take account of the variation in character and sensitivity across the district. Without the new Local Plan, this issue is less likely to be addressed as it is more likely that piecemeal and ad-hoc developments would come forward.

Chapter 5
SEA framework and method

5.1 The development of a set of SEA objectives (known as the SEA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.

5.2 The proposed SEA framework for the Local Plan is presented below. The SEA framework comprises a series of SEA objectives against which the environmental and sustainability effects of the Local Plan will be appraised. The assessment of the Local Plan options, policies and site allocations against these SEA objectives will be guided in part by the assessment questions accompanying each objective. The questions included in the framework are not exhaustive, and some may be more relevant to certain elements of the plan than others.

5.3 All of the topics specifically required by the SEA Regulations (set out in Schedule 2 of the SEA Regulations) are clearly addressed by the headline SEA objectives, as listed under each SEA objective below.

5.4 The SA framework for the adopted Kirklees Local Plan was used as a starting point to inform the preparation of this SEA framework, although it has been amended and updated to take into account the analysis of international, national, sub-national and local plans and policy objectives, the baseline information, and the current key environmental and sustainability issues identified for Kirklees.

5.5 The framework set out below was originally presented in the SA Scoping Report prepared by LUC up to March 2025 and subject to consultation with the three statutory consultees and surrounding local authorities in spring 2026.

5.6 No changes are proposed to the framework in light of the review of the relevant policy context and baseline information undertaken as part of the update work for this report. However, a small number of changes have been made to the framework and supporting assessment questions in response to the consultation comments received from the statutory consultees and surrounding local authorities. Where changes have been made, they are shown with underlined text.

SEA framework

SEA objective 1: Contribute positively to delivering climate change mitigation measures

Assessment questions

- Will it [i.e. the Local Plan policies, including site allocation policies] reduce greenhouse gas emissions from domestic, commercial and industrial sources?
- Will it promote new development that is low carbon / carbon neutral and support improved levels of energy efficiency in new buildings?
- Will it support the transition to renewable and low carbon energy sources?
- Will it promote the use of nature-based solutions (e.g. woodland creation and peatland restoration) to contribute towards climate change mitigation?
- Will it limit the level of embodied carbon associated with new developments?

  (Note that although the promotion of transport by more sustainable modes will reduce the district's contribution to climate change this issue is address separately through SEA objective 6: transport, below.)

Relevant SEA topics covered

- Climatic factors

SEA objective 2: Support increased resilience to the effects of climate change

Assessment questions

- Will it support the delivery of climate adaptation measures, including incorporation of green and blue infrastructure?
- Will it support the delivery of developments that are resilient to the changing climate and can withstand extreme weather events (e.g. heatwaves, drought, intense storms)?

- Will it promote the use of nature-based solutions (e.g. wetland restoration, rain gardens) to contribute towards climate change adaptation?

Relevant SEA topics covered

- Climatic factors

SEA objective 3: Ensure the delivery of well-designed homes that meet local needs, including affordable housing

Assessment questions

- Will it provide sufficient housing to meet existing and future housing need?
- Will it provide a suitable mix of homes in terms of size, type and tenure?
- Will it increase the range and affordability of housing for all social groups?
- Will it help to reduce the proportion of the housing stock that falls below acceptable standards?
- Will it reduce the number of households waiting for accommodation and help reduce homelessness?
- Will it meet the needs of different groups in the community, including those from the travelling community and older and disabled people who may require care?

Relevant SEA topics covered

- Population
- Human health

SEA objective 4: Support improved levels of public health and wellbeing and help to address health inequalities

Assessment questions

- Will it improve the delivery of adequate healthcare facilities and ensure good accessibility to these provision for new and existing residents?

- Will it support healthy lifestyle choices including opportunities for recreational/physical activity and growing of healthy food?
- Will it ensure residents have access to a variety of high quality open spaces?
- Will it help to protect residential amenity, including in relation to noise and light pollution as well as dust and odour?

Relevant SEA topics covered

- Human Health

SEA objective 5: Address poverty and inequality and encourage increased levels of social inclusion

Assessment questions

- Will it promote diversity and increased levels of social tolerance?
- Will it address identified issues of deprivation in Kirklees?
- Will it integrate new neighbourhoods with existing neighbourhoods?

Relevant SEA topics covered

- Population

SEA objective 6: Support increased active and sustainable transport

Assessment questions

- Will it help to promote the transition from private car to more sustainable modes?
- Will it deliver development in areas that are within close proximity to jobs and services so as to reduce travel distances?
- Will it support the delivery of infrastructure needed for public transport and cycling and walking?

- Will it help to reduce congestion?
- Will it reduce the overall impact on areas that are currently subject to high volumes of traffic?

Relevant SEA topics covered

- Climatic factors
- Air
- Human health

SEA objective 7: Support increased economic growth and prosperity

Assessment questions

- Will it encourage higher skilled and better paid economic sectors in the Kirklees?
- Will it promote and support a resilient economy?
- Will it promote the upskilling of the local workforce?
- Will it support the job creation in sustainable, long term growth areas that match local skill sets?
- Will it encourage growth of existing businesses?
- Will it encourage rural diversification?
- Will it help reduce the trend for out commuting from the Kirklees?

Relevant SEA topics covered

- Population
- Material assets

SEA objective 8: Enhance the regeneration of town, district and local centres

Assessment questions

- Will it improve existing and support the delivery of new services and facilities within town, district and local centres?
- Will it support appropriate rural service provision to meet the needs of those in more rural locations?
- Will it support the appropriate use of vacant units in town centre locations?
- Will it support the vitality of town centres by allowing for appropriate complementary uses in shopping areas?
- Will it support the regeneration of town and district centres e.g. through blueprints or masterplans?

Relevant SEA topics covered

- Population
- Human health
- Material assets

SEA objective 9: Opportunities to improve levels of skills and education

Assessment questions

- Will it ensure that development is supported by the required amount of education facilities and that existing facilities are not overburdened as new development occurs?
- Will it ensure that developments are within a suitable distance of facilities for education, training and lifelong learning?
- Will it reduce the number of working age residents who have no, or only lower level qualifications?
- Will it improve skills and employability within the working age population through training and apprenticeships?

Relevant SEA topics covered

- Population
- Material assets

SEA objective 10: Reduce air pollution and help to ensure that air quality objectives are met

Assessment questions

- Will it reduce the emission of key pollutants?
- Will it help to improve air quality?
- Will it help to achieve the objectives of the district's AQMAs?
- Will it limit the potential for development with or development that increases the level of traffic within AQMAs?

Relevant SEA topics covered

- Air
- Human health

SEA objective 11: Promote the reuse of land and protect and enhance soils

Assessment questions

- Will it prioritise and promote the reuse of brownfield/previously developed land?
- Will it support development on lower value agricultural soils or urban/non-agricultural land?
- Will it support higher density development at an appropriate location and/or a mix of uses?
- Will it encourage the re-use of existing buildings?
- Will it reduce the amount of derelict, degraded and underused land within the Kirklees?

- Will it ensure contaminated land is remediated where appropriate?

Relevant SEA topics covered

- Soil

SEA objective 12: Protect and enhance water quality and help to ensure the achievement of water efficiency targets

Assessment questions

- Will it help to prevent water pollution and improve ecological and chemical conditions in the waterbodies in Kirklees?
- Will it ensure there is sufficient wastewater treatment capacity to accommodate the new development?
- Will it limit the potential for contaminated runoff from development?
- Will it limit inappropriate development in Source Protection Zones?
- Will it encourage the adoption of more stringent water efficiency standards in developments?
- Will it ensure that there is sufficient water resource available to support new development?
- Will it support deculverting of the watercourses in Kirklees, where appropriate?
- Will it help to reduce water demand and per capita water consumption in light of expected demand from new housing and economic growth in the plan area?
- Will it promote the achievement of the drainage hierarchy to protect the environment for wildlife and human health?
- Will it help to prevent water pollution, improve ecological and chemical conditions in waterbodies and support the protection and enhancement of rivers in and around Kirkless in accordance with the Water Framework Directive (WFD)?
- Will it help to achieve the deculverting of the watercourses in Kirklees?

- Will it help to ensure the adoption of more stringent water efficiency standards in developments such as the incorporation of efficiency measures such as greywater capture and SuDS?
- Will it help to ensure the incorporation of the mandatory national water efficiency standard for housing set out in the Building Regulations of 125 litres/person/day?

Relevant SEA topics covered

- Water

SEA objective 13: Limit the effects of flooding on people and property

Assessment questions

- Will it limit the amount of development in areas of high flood risk and areas which may increase flood risk elsewhere, taking into account the impacts of climate change?
- Will it promote the use of SuDS and other flood resilient design?
- Will it ensure that development does not expose people and property to risk of flooding, taking into account the impacts of climate change?

Relevant SEA topics covered

- Water
- Climatic features

SEA objective 14: Support more efficient use of natural resources

Assessment questions

- Will it help to reduce all types of waste (including household, commercial, construction, excavation, demolition and hazardous)?

- Will it maximise the recovery, re-use and recycling of waste and reduce the proportion of waste sent to landfill?
- Will it encourage the prudent use of mineral resources?
- Will it reduce the consumption of materials and resources and safeguard these for future generations?

Relevant SEA topics covered

- Material assets
- Climatic factors

SEA objective 15: Protect and enhance biodiversity and geodiversity

Assessment questions

- Will it safeguard protected / priority species?
- Will it help to ensure the achievement of biodiversity net gain of 10% or more in developments in line with the Environment Act?
- Will it protect and enhance internationally, nationally and locally designated sites of nature conservation and/or geological importance?
- Will it encourage the development of new biodiversity assets and ecological linkages to existing habitats within/alongside development including the delivery of Local Nature Recovery Strategies?
- Will it provide appropriate opportunities for people to come into contact with wildlife?
- Will it help to prevent water pollution, improve ecological and chemical conditions in waterbodies and support the protection and enhancement of rivers in and around Kirklees in accordance with the Water Framework Directive (WFD)?

Relevant SEA topics covered

- Biodiversity
- Geodiversity

- Flora and Fauna

SEA objective 16: Conserve and enhance the historic environment, including heritage assets and their settings

Assessment questions

- Will it conserve and enhance buildings, structures, conservation areas and their settings and other features that contribute to the heritage of Kirklees?
- Will it safeguard sites of archaeological importance (scheduled or unscheduled) and their setting?
- Will it improve and broaden access to, and understanding of, local heritage, historic sites, areas and buildings?
- Will it offer opportunities to bring heritage assets back into active and appropriate types of use?
- Does it safeguard historic views and valuable skylines of settlements?

Relevant SEA topics covered

- Cultural heritage, including architectural and archaeological heritage

SEA objective 17: Protect and enhance landscapes of local value as well as the character and quality of townscapes

Assessment questions

- Will it safeguard and enhance the character of sensitive landscapes as well as local distinctiveness and identity?
- Will it help to strengthen the character and resilience of the National Character Areas?
- Will it ensure the protection of the landscapes and character of the Peak District National Park including in relation to dark skies and tranquillity?
- Will it protect diverse and locally distinctive settlements and townscape character?

Relevant SEA topics covered

- Landscape

Use of the SEA framework

5.7 The SEA will be undertaken in close collaboration with the Kirklees Council officers responsible for drafting the new Local Plan in order to fully integrate the SEA process with the production of the plan.

5.8 Strategic policies and site allocations, including the reasonable alternative options, will be assessed against the SEA objectives in the SEA framework, with symbols being attributed to each policy or site option to indicate their likely effects on each SEA objective. Where a potential positive or negative effect is uncertain, a question mark will be added to the relevant symbol (e.g. +? or -?) and the symbol will be colour coded in line with the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

5.9 The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The assessment will attempt to differentiate between the most significant effects and other more minor effects through the use of the symbols. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) will be used to distinguish significant effects from more minor effects (+ or -) this will be because the effect of an option or policy on the SEA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective.

5.10 The findings of the SEA will be presented using colour coded symbols showing the likely effect of each option against each of the SEA objectives along with a concise justification for the effect identified. It may be possible to group the appraisal of strategic and development management policies by theme. The key to the SEA symbols is shown in

5.11 Table 5.1 below.

Table 5.1: SEA framework symbols and colour coding

Symbol and colour code	Description
++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
++/--	Mixed significant positive and negative effects likely
+/-	Mixed minor positive and negative effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Uncertain effect

5.12 In relation to the appraisal of the site options, specific site assessment criteria have been developed for each SEA objective and will be applied during the next stage of the SEA (see Error! Reference source not found.). The criteria relate specifically to residential and employment site options. Once the full list of site options to be appraised is worked up, if other types of site options are identified it may be appropriate to develop assessment criteria for those site types. The site assessment criteria set out clear parameters within which certain SEA effects would be identified, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The criteria, where required, may be updated at future stages on the SEA to draw on the most recent evidence sources. The site assessment criteria can be applied through the use of Geographical Information Systems (GIS) data where appropriate.

5.13 In determining the significance of the effects of the options for potential inclusion in the new Local Plan it will be important to bear in mind the relationship of the Local Plan with the other documents in the planning system

such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant adverse effects.

Method for Health Impact Assessment and Equality Impact Assessment

5.14 As described in **Chapter 1** of this report, separate HIA and EqIA appendices will be included in the SEA Report to consider the potential effects of Local Plan in relation to relevant health and equalities related topic areas. As with the SEA framework for the Local Plan, the HIA work is informed by the development of a relevant HIA framework. The HIA framework and various supporting decision-making questions for the adopted Local Plan has been taken as the starting point for the framework to be used for the HIA of the new Local Plan. The framework has been reviewed in light of the updated baseline evidence and key sustainability issues for the district. The HIA framework is set out in **Appendix B**. The framework will be used to determine whether the Local Plan contributes positively to the achievement of each area of influence.

5.15 No formal framework has been developed for the EqIA process. Instead, the Local Plan will also be reviewed to consider the likely impacts of the policies on each of the nine protected characteristics included in the Equality Act 2010. The effects identified will range from positive to negative. In effect, the protected characteristics of the Act will provide the framework for the assessment work for the EqIA:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Reasonable alternatives

5.16 The SEA must appraise not only the preferred options for inclusion in the Local Plan but also 'reasonable alternatives' to these options. This implies that alternatives that are not reasonable do not need to be subject to assessment. Part (b) of Regulation 12(2) of the SEA Regulations notes that reasonable alternatives will take into account the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy, local objectives or are outside the plan area are unlikely to be reasonable.

5.17 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SEA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

5.18 The SEA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the SEA for each option, such that it is not possible to rank them based on environmental and sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account.

5.19 Future iterations of the SEA will describe how the appraisal of options has been taken into consideration when developing the Kirklees Local Plan.

Chapter 6
Consultation and next steps

6.1 In order to meet the requirements of the SEA Regulations, and the updated requirement for new Local Plans to only be subject to SEA and no longer SA, the views of the three statutory consultees (Environment Agency, Historic England and Natural England) and neighbouring authorities are being sought again in relation to the scope and level of detail to be included in this SEA Scoping Report.

6.2 Given the cross-cutting nature of many of the SEA topics, which cover not only environmental but social and economic issues as well, the SEA framework of objectives, the baseline information and key issues identified have only been subject to relatively minor changes from what was originally presented in the SA Scoping consultation undertaken from March 2025. In addition, the consultees' comments received in response to that consultation have been reviewed and addressed within this SEA Scoping Report.

6.3 Therefore, consultees are requested to consider the following points, and whether any advice they previously gave needs to be revised or added to:

- Whether the scope of the SEA is appropriate as set out considering the role of the Kirklees Local Plan to help meet and manage the district's needs.
- Whether there are any additional international or national plans, policies or programmes that are relevant to the SEA that should be included (see **Chapter 2** and **Appendix A**).
- Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SEA of the Local Plan (see **Chapter 3**).
- Whether there are any additional key environmental and sustainability issues in Kirklees relevant to the Local Plan that should be included (see **Chapter 4**).
- Whether the proposed method (including for the HIA and EqIA), SEA framework and detailed site assessment criteria (see **Chapter 5**, **Appendix B** and **Appendix C**) is appropriate, and includes a suitable set of objectives for assessing the environmental, economic and social (including health and equality) effects of the Local Plan as well as reasonable alternatives.

6.4 Responses from consultees will be reviewed and appropriate amendments made to the information contained in the SEA Scoping Report, including the baseline information, policy context and SEA framework where necessary. These amendments will be presented in the SEA report produced during the next stage of the SEA.

6.5 As the Local Plan is drafted, it will be subject to SEA (including HIA and EqIA) using the SEA method and framework presented in **Chapter 5** and **Appendices B** and **C**. A full SEA Report (incorporating the next stages of the SEA process) will then be produced and made available to other stakeholders and the general public for wider consultation alongside the emerging Local Plan. This will include any amendments to the scoping work arising from the consultation with statutory bodies on this report.

LUC

August 2026

Appendix A
Review of plans, policies and programmes

International plans and programmes of most relevance for the Local Plan

A.1 2022 Convention on Biological Diversity **[See reference 142]** – COP15 Kunming-Montreal adopted the "Kunming-Montreal Global Biodiversity Framework" (GBF), including four goals and 23 targets for achievement by 2030.

A.2 The Glasgow Pact (UN Framework Convention on Climate Change, 2021) - Nations adopted the Glasgow Climate Pact **[See reference 143]**. The package of decisions consists of a range of agreed items, including strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the necessary finance for both. Nations reaffirmed their duty to fulfil the pledge of providing $100 billion annually from developed to developing countries. They collectively agreed to work to reduce the gap between existing emission reduction plans and what is required to reduce emissions. They also agreed to phase down unabated coal power and inefficient subsidies for fossil fuels.

A.3 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021) **[See reference 144]** - An international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

A.4 The 2030 Agenda for Sustainable Development (2015) **[See reference 145]**, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all.

A.5 The United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998) **[See reference 146]** establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

A.6 The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) **[See reference 147]** - Sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

A.7 The United Nations Paris Climate Change Agreement (2015) **[See reference 148]** is an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

A.8 Waste Framework Directive (2008) **[See reference** 149**]** provides the foundational legal structure for waste prevention and management. It establishes basic waste definitions, enforces the "waste hierarchy" (prioritizing prevention, reuse, and recycling over disposal), and mandates measures to protect human health and the environment.

A.9 The International Convention on Wetlands (Ramsar Convention) (1976) **[See reference 150]** is an international agreement with the aim of conserving and managing the use of wetlands and their resources.

A.10 The European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) **[See reference 151]** aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

A.11 The International Convention on Biological Diversity (1992) **[See reference 152]** is an international commitment to biodiversity conservation through national strategies and action plans.

A.12 The European Habitats Directive (1992) **[See reference 153]**, together with the Birds Directive, sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

A.13 The European Birds Directive (2009) **[See reference 154]** requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

A.14 The United Nations Declaration on Forests (New York Declaration) (2014) **[See reference 155]** sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

A.15 The Valletta Treaty (1992) **[See reference 156]**, formerly the European Convention on the Protection of the Archaeological Heritage (Revisited), aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study".

A.16 The United Nations (UNESCO) World Heritage Convention (1972) **[See reference 157]** promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

A.17 The European Convention for the Protection of the Architectural Heritage of Europe (1985) **[See reference 158]** defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

A.18 The European Landscape Convention (2002) **[See reference 159]** promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National Plans and Programmes (beyond the NPPF) of most relevance for the Local Plan

Climate Change Adaptation and Mitigation

A.19 Warm Homes Plan (2026) **[See reference** 160**]** sets out the approach to cut bills, with an offer for every household, whether they own their home, rent privately, or live in social housing. It also sets out plans to help upgrade five million homes by 2030, through direct support for those on low incomes and in fuel poverty, grants and innovative low- and zero-interest finance available to all, and new rules to ensure that tenants in both the private and social rented sectors have lower bills and warmer, more comfortable homes.

A.20 The Seventh Carbon Budget report (2025) **[See reference 161]** provides advice to the UK Government on the level of the Carbon Budget for the period

2038 to 2042. A limit on the UK's greenhouse gas emissions over this five-year period is set as 535 MtCO2e, including emissions from international aviation and shipping.

A.21 Clean Energy Industries Sector Plan (2025) **[See reference** 162**]** is the UK government's strategic initiative, under the Modern Industrial Strategy, to position the nation as a global leader in frontier clean energy technologies by 2035. The plan sets out an ambition to double investment across key clean energy industries, such as wind (onshore, offshore, floating), nuclear fission, fusion, hydrogen, carbon capture, usage and storage (CCUS), greenhouse gas removals, and heat pumps, to over £30 billion per year, while continuing to support other vital technologies like solar, long-duration energy storage and bioenergy. It aims to catalyse private sector engagement by deploying targeted public investment, including more than £8.3 billion through Great British Energy and Great British Energy-Nuclear up to 2029 and a Clean Energy Supply Chain Fund, and by reducing barriers to investment, thereby providing industry certainty and encouraging deployment and innovation.

A.22 The Carbon Budget and Growth Delivery Plan (2025) **[See reference 163]** sets out how the government will meet its statutory carbon budgets and secure the benefits of this transition for people and businesses. The plan sets out a package of quantified and unquantified proposals and policies and associated timescales and delivery risks. This includes actions around energy security and lower bills, such as incentivising new clean electricity generating projects in Great Britain. The Carbon Budget and Growth Delivery Planet replaced the Zero Growth Plan 2023 which outlined how the UK will achieve its commitment to reach net zero emissions by 2050. The Carbon Budget and Growth Delivery Plan (2025) is now the principal statutory document explaining how the UK intends to meet its carbon budgets and net-zero obligations. The current government has also published a new Industrial Strategy (2025) (summarised elsewhere in this appendix) and has been developing a refreshed Industrial Decarbonisation Strategy, indicating that the 2021 document is under review.

A.23 The Hydrogen Update to the Market (2025) **[See reference** 164**]** provides a detailed overview of the UK's hydrogen policy progress UK's and outlines forthcoming opportunities as part of the government's Clean Energy Superpower and Growth Missions. Significant investment commitments include over £500 million allocated toward developing the first regional hydrogen transport and storage network, aiming for operation by 2031, supported by a forthcoming Hydrogen to Power Business Model in 2026. The report highlights plans to abolish Climate Change Levy charges on electricity used in hydrogen electrolysis, regulatory and sector development initiatives, including skills and

infrastructure planning, and signals the intent to publish a comprehensive UK Hydrogen Strategy in autumn 2025.

A.24 The Onshore Wind Strategy (2025) **[See reference** 165**]** presents the country's first dedicated strategy to accelerate onshore wind deployment as a key component of its Clean Power 2030 mission. The strategy sets a target of deploying 27-29 GW of onshore wind capacity across Great Britain by 2030, significantly increasing from existing capacity of over 16 GW, and backed by over 40 actions to tackle barriers such as planning delays, aviation and defence conflicts, grid access, and community engagement. New measures include the creation of an Onshore Wind Council to oversee implementation, potential expansion of the Clean Industry Bonus to support UK-based supply chains, workforce and skills development initiatives, and a programme to repower ageing turbines while smoothing the consenting and survey process for new projects. The strategy also outlines mechanisms to ensure community benefit through up to £70 million annually (£5,000 per MW) in local investment, while projecting creation of up to 45,000 direct and indirect jobs by 2030. The overarching aim is to deliver affordable, home-grown renewable energy, reduce reliance on volatile gas markets, and bolster energy security through rapid onshore wind expansion.

A.25 The Environment Improvement Plan 2025 **[See reference 166]** is a long-term delivery plan setting out 10 goals, commitments and actions in relation to the natural environment. The plan sets out how the government will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the plan is achieving "restored nature", including progress towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

A.26 The Clean Power 2030 Action Plan (2024) **[See reference** 167**]** sets out a pathway to a clean power system by 2030, outlining what the Government will do to support and accelerate delivery of the new infrastructure. It seeks to address the following challenges:

- To maintain a secure and affordable energy supply in an increasingly unstable world.
- To create new industries and investments around the country.
- To protect the environment we live in from the most damaging effects of climate change.

A.27 The Energy Security Plan (2023) **[See reference 168]** sets out the steps that the government is taking to improve the UK's energy system resilience, particularly in the current geopolitical context. Key commitments include:

- Looking at the role gas storage and other sources of flexibility can play in gas security.
- Delivery of energy efficiency upgrades through the Great British Insulation Scheme.
- Extension of the Boiler Upgrade Scheme to 2028.
- Setting up Great British Nuclear to lead delivery of the new nuclear programme.
- Launching a competitive process to select the best Small Modular Reactor technologies.
- Launching the Floating Offshore Wind Manufacturing Investment Scheme, to provide up to £160 million investment in port infrastructure projects.
- Publishing action plans on reducing the development time for transmission network projects and on accelerating electricity network connections.
- Announcing the Track-1 negotiation project list of carbon capture usage and storage (CCUS) projects; launching a process to expand Track-1 clusters; and establishing two further (Track-2) CCUS clusters.
- Announcing a shortlist of projects for the first electrolytic hydrogen production allocation round.
- Announcing successful applicants of the first competition window for Strands 1 and 2 of the Net Zero Hydrogen Fund (development and capital co-funding) and launching a second competition window.
- Consulting on revised energy National Policy Statements which underline the national need for new energy infrastructure with the intention of expediting planning processes.

A.28 Defence Operational Energy Strategy (DOES) (2023) **[See reference** 169**]** sets out how the Ministry of Defence (MOD) will respond to the global energy transition. The aims of the strategy are to adopt a new approach to managing fuel and energy, leading to a cultural shift in how the MOD makes its operational energy decisions. The DOES describes how the MOD will maximise operational advantage through its energy choices. Operational advantage will be achieved through three strategic outcomes:

- Advantage through energy.

- Advantage through coherence.
- Advantage through organisational agility.

A.29 UK Climate Change Risk Assessment 2022 **[See reference 170]** outlines the UK government and devolved administrations' position on the key climate change risks and opportunities that the UK faces today. The risk assessment considers sixty-one UK-wide climate risks and opportunities cutting across multiple sectors of the economy and prioritises the following eight risk areas for action in the next two years:

- risks to the viability and diversity of terrestrial and freshwater habitats and species from multiple hazards
- risks to soil health from increased flooding and drought
- risks to natural carbon stores and sequestration from multiple hazards
- risks to crops, livestock and commercial trees from multiple climate hazards
- risks to supply of food, goods and vital services due to climate-related collapse of supply chains and distribution networks
- risks to people and the economy from climate-related failure of the power system
- risks to human health, wellbeing and productivity from increased exposure to heat in homes and other buildings
- multiple risks to the UK from climate change impacts overseas

A.30 The UK Hydrogen Strategy (2021) **[See reference 171]** sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet an increased ambition for 10GW of low carbon hydrogen production capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy.

A.31 The Environment Act 2021 **[See reference 172]** sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.

- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

A.32 The Industrial Decarbonisation Strategy (2021) **[See reference 173]** aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy sets out the government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government's path to net zero by 2050. The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes - approximately 10% of their current emissions. Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions.
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass.
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors.
- To ensure the land planning regime is fit for building low carbon infrastructure.
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs.
- An expectation that at least 3 megatons of CO2 is captured within industry per year by 2030.
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

A.33 The Energy Performance of Buildings Regulations (2021) **[See reference 174]** seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

A.34 Energy White Paper: Powering Our Net Zero Future (2020) **[See reference** 175**]** addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth as the government delivers net-zero emissions by 2050.

A.35 Flood and Coastal Erosion Risk Management: Policy Statement (2020) **[See reference 176]** sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure;
- Managing the flow of water more effectively;
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits;
- Better preparing our communities; and
- Enabling more resilient places through a catchment-based approach.

A.36 Net Zero – The UK's Contribution to Stopping Global Warming (Climate Change Committee, 2019) **[See reference 177]** responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK's long-term emissions targets. The new emissions scenarios in the document draw on ten new research projects, three expert advisory groups, and reviews of the work of the IPCC and others. The report's key findings are that:

- The Committee on Climate Change recommends a new emissions target for the UK: net-zero greenhouse gases by 2050.
- In Scotland, we recommend a net-zero date of 2045, reflecting Scotland's greater relative capacity to remove emissions than the UK as a whole.
- In Wales, we recommend a 95% reduction in greenhouse gases by 2050.

A.37 The Promotion of the Use of Energy from Renewables Sources Regulations 2011 **[See reference 178]** required the government to ensure that renewable energy comprised 15% of the UK's total energy mix by 2020. The Renewable Energy Directive has now been superseded by Directive (EU) 2018/2001 (RED II). Although the UK has now been released from the renewable energy targets under RED II following Brexit, the UK-EU Trade and Cooperation Agreement includes a commitment to promote energy efficiency and the use of energy from renewable sources and reaffirmation of the EU's 2030 "targets" and the UK's 2030 "ambitions" for renewable energy and energy efficiency.

A.38 Our Waste, Our Resources: A Strategy for England (2018) **[See reference 179]** aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

A.39 The National Planning Policy for Waste (NPPW) (2014) **[See reference 180]** identifies key planning objectives, requiring planning Authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy;
- Ensure waste management is considered alongside other spatial planning concerns;
- Provide a framework in which communities take more responsibility for their own waste;
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment; and
- Ensure the design and layout of new development supports sustainable waste management.

A.40 The Waste Management Plan for England (2021) **[See reference 181]** sets out the measures for England to work towards a zero waste economy.

A.41 The Climate Change Act 2008 **[See reference 182]** sets targets for UK greenhouse gas emission reductions of at least 100% by 2050, against a 1990 baseline (this was previously 80% but was updated to a net zero target in June 2019).

A.42 The Planning and Energy Act (2008) **[See reference 183]** enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

A.43 The Waste (Circular Economy) (Amendment) Regulations 2020 **[See reference 184]** seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

A.44 The waste prevention programme for England: Maximising Resources, Minimising Waste (2023) **[See reference** 185**]** sets out government's priorities for managing resources and waste, in line with the resources and waste strategy for England.

A.45 The Biomass Strategy (2023) **[See reference** 186**]** builds on the 2021 Biomass policy statement and the Powering up Britain strategy which emphasised the important role that biomass will play in Britain's fully decarbonised power system by 2035, subject to security of supply. It sets out steps government intends to take to strengthen biomass sustainability and the opportunities for the use of sustainable biomass across multiple sectors of the economy in support of achieving the UK's net zero target. The government aims to focus on implementing a cross-sectoral common sustainability framework, which will be subject to consultation. It states it committed to monitoring the levels of biomass supply to ensure the UK can secure necessary levels for increased biomass use across the economy. It has also committed to ensuring that biomass supply – given its risks and uncertainties – is not hindered at any stage; however, biomass demand is expected to increase. The government also aims for a "priority use" of biomass based on guiding principles that address sustainability, air quality, the net-zero and circular economy, and resource efficiency. This encompasses the deployment of bioenergy with carbon capture and storage (BECCS), the engineered greenhouse-gas removal technology, which captures and stores CO2 from biomass while producing low-carbon energy.

A.46 Net zero government emissions: UK roadmap (2023) **[See reference** 187**]** as part of the Net Zero Government Initiative outlines the journey to central government net zero emissions. It covers the policies and interim targets around government buildings and transport, procurement and skills.

A.47 The National Flood and Coastal Erosion Risk Management Strategy for England (2022) **[See reference** 188**]** sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are:

- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the future in the face of climate change;
- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change;
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change and know their responsibilities and how to act.

A.48 Sustainability and climate change strategy (2022) **[See reference** 189**]** is the Department for Education's strategy for sustainability and climate change for the education and children's services systems. The strategy's vision is for the United Kingdom to be the world-leading education sector in sustainability and climate change by 2030. The strategy sets out four strategic aims for England:

- Excellence in education and skills for a changing world,
- Transition to net zero
- Resilience to climate change
- A better environment for future generations

Health and Well-being

A.49 The Green Infrastructure Framework (2023) **[See reference 190]** by Natural England will help increase the amount of green cover to 40% in urban residential areas. The Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to

support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. From parks to green roofs, and increased tree cover, the Green Infrastructure Framework will make a significant contribution to nature recovery by embedding nature into new developments. Increasing the extent and connectivity of nature-rich habitats will also help increase wildlife populations, build resilience to the impacts of climate change, and ensure our cities are habitable for the future

A.50 The White Paper Levelling Up the United Kingdom (2022) **[See reference 191]** sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.
- Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

A.51 A Fairer Private Rented Sector White Paper (2022) **[See reference 192]** aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

A.52 The State of the Environment: Health, People and the Environment (2021) **[See reference 193]** focuses on the relationship between human health and people's access to and connection with a clean, high quality natural environment. It presents information on England's environment, and people's exposure to environmental pollutants, flooding and climate change in relation to human health. It highlights environmental inequalities that contribute to differences in health outcomes for people in England.

A.53 The National Design Guide (2021) **[See reference 194]** sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

A.54 Build Back Better: Our Plan for Health and Social Care (2021) **[See reference 195]** sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the electives backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

A.55 The COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021) **[See reference 196]** sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

A.56 The Charter for Social Housing Residents: Social Housing White Paper (2020) **[See reference 197]** sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

A.57 Using the Planning System to Promote Healthy Weight Environments (2020), Addendum (2021) **[See reference 198]** provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates

on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

A.58 The Homes England Strategic Plan 2023 to 2028 (2023) **[See reference 199]** sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

A.59 The Environmental Noise (Amendment) Regulations 2018 **[See reference 200]** updated the UK's legal framework for managing noise that was originally set out in the 2006 Regulations. They implemented common noise assessment methods (CNOSSOS-EU) for strategic noise mapping, helping authorities evaluate and manage noise from roads, railways, and large urban areas.

A.60 The Housing White Paper 2017 (Fixing our broken housing market) **[See reference 201]** sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.
- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.
- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

A.61 The Planning Policy for Traveller Sites 2024 **[See reference 202]** sets out the Government’s planning policy for traveller sites. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

A.62 The Technical Housing Standards – Nationally Described Space Standard (2015) **[See reference 203]** sets out the Government’s new nationally described space standard. The standard deals with internal space within new

dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home.

A.63 Building for a Healthy Life (2026) **[See reference** 204**]** is a Design Code to help people improve the design of new and growing neighbourhoods. The code is organised around three headings to help those involved in new developments to think about the qualities of successful places and how these can be best applied to the individual characteristics of a site and its wider context:

- Integrated neighbourhoods
- Distinctive places

A.64 The UK Health Security Agency (UKHSA) strategic plan 2026 to 2029 (2026) **[See reference** 205**]** outlines UKHSA's goals and strategic priorities for the 3-year period to protect the nation's health from current and future threats.

A.65 Fit for the Future: The 10-Year Health Plan for England (2025) **[See reference** 206**]** is a strategic blueprint designed to modernise the NHS. The plan implements three shifts in focus for healthcare delivery: moving care from hospitals into communities, transitioning from analogue to digital, and focusing on sickness prevention.

A.66 The Planning and Infrastructure Act (2025) **[See reference** 207**]** sets out the Government's plan to support housing and economic growth. The Act aims to speed up and streamline the delivery of new homes and critical infrastructure, supporting delivery of the government's Plan for Change milestones of building 1.5 million safe and decent homes in England and fast-tracking 150 planning decisions on major economic infrastructure projects by the end of the current Parliament. It will also support delivery of the government's Clean Power 2030 target by ensuring that key clean energy projects are built as quickly as possible.

A.67 Renters' Rights Act (2025) **[See reference** 208**]** aims to improve renters' security and rights. The Act delivers the government's manifesto commitment to transform the experience of private renting, including by ending Section 21 'no fault' evictions. The Act will improve the current system for both the 11 million private renters and 2.3 million landlords in England. It will give renters much greater security and stability so they can stay in their homes for longer, build lives in their communities, and avoid the risk of homelessness.

A.68 Healthy Homes —a foundation for healthier and resilient communities (2025) **[See reference** 209**]** sets out core specification and good practice

guidance to help support the delivery of healthier living environments. The guidance also covers neurodiversity, and the adoption of an ‘age-friendly’ design approach that supports residents and households to live independently throughout the different stages of their life. Beyond individual wellbeing, Healthy Homes support sustainability and affordability, helping to lower energy costs and reduce carbon emissions.

A.69 The Policy Statement on New Towns (2024) **[See reference** 210**]** outlines a major program to build new generations of settlements across England, each delivering a minimum of 10,000 homes. The strategy requires that 40% of all housing be designated as affordable and mandates infrastructure-first, sustainable, and well-connected design.

A.70 The Levelling Up and Regeneration Act (2023) **[See reference** 211**]** sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as ‘Environmental Outcomes Reports’.

A.71 Anti-Social Behaviour Action Plan (2023) **[See reference** 212**]** sets out a new approach to working with local agencies to tackle anti-social behaviour across England and Wales. The plan intends to change laws and systems to take a zero-tolerance approach and give the police and other agencies the tools they need to discourage anti-social behaviour.

A.72 Health and Care Act (2022) **[See reference** 213**]** aimed at making England's health and social care system less bureaucratic and more integrated, focusing on joined-up services through new bodies called Integrated Care Systems (ICSs). It dismantled some structures from the 2012 Act, removes competition rules, and gives the Health Secretary greater power, while also introducing new training mandates, such as for learning disability and autism awareness. The National Model Design Code (2021) **[See reference** 214**]** provides detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government’s priorities and provides a common overarching framework for design. It sets out design considerations which local planning authorities will be

expected to take into account when developing local design codes and guides and when determining planning applications.

A.73 Marmot Review 10 Years On (2020) **[See reference** 215**]** revisits Fair Society, Healthy Lives. It found that, since 2010, life expectancy in England has stalled, which suggests society has stopped improving. In addition, there are marked regional differences in life expectancy – the more deprived the area, the shorter the life expectancy. Mortality rates are increasing in those aged 45-49, child poverty has increased and there is a housing crisis and rise in homelessness. It is set out in the review that homelessness and rough sleeping has risen significantly, by 165% between 2010 and 2017. Most people who are considered 'homeless' are accommodated in emergency or temporary accommodation and are not sleeping rough on the street. In 2018 there were 69% more children in homeless families living in temporary accommodation than in 2010.

A.74 The Equality Act (2010) **[See reference** 216**]** provides legal protection for people from discrimination in the workplace and in wider society. Protection is established in relation to on nine "protected characteristics": age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

A.75 Select Committee on Public Service and Demographic Change Report Ready for Ageing? (2013) **[See reference** 217**]** warns that society is underprepared for the ageing population. The report states "longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises". The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

Environment (biodiversity/geodiversity, landscape and soils)

A.76 The Environment Improvement Plan 2025 **[See reference 218]** is a long-term delivery plan made up of five inter-related chapters setting out 10 goals, commitments and actions in relation to the natural environment. The plan sets out how they will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the Plan is achieving "restored nature", including progress

towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

A.77 Green Infrastructure Framework and associated 15 GI Principles (2023) **[See reference** 219**]** The '15 minute neighbourhood' concept is encouraged as part of the new GI standards set out in the framework. Development should be designed to meet the 15 Green Infrastructure Principles. The GI Standards can be used to inform the quality, quantity and type of green infrastructure to be provided.

A.78 Working With Nature (2022) **[See reference 220]** discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England's habitats, wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

A.79 Establishing the Best Available Techniques for the UK (UK BAT) (2022) **[See reference 221]** sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

A.80 The Environment Act 2021 **[See reference 222]** sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.

- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

A.81 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 **[See reference 223]** protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

A.82 An Approach to Landscape Sensitivity Assessment (2019) **[See reference** 224**]** assists in informing judgements and decisions concerning the planning and management of change. It helps inform good practice, generates further continued discussion and encourages methods, techniques and skills relating to landscape sensitivity assessment.

A.83 Environmental Damage (Prevention and Remediation) Regulations 2015 **[See reference 225]** are wide-ranging government regulations that can potentially apply to many businesses. The regulations oblige those who create environmental damage, whether by water pollution, adversely affecting protected species or sites of special scientific interest (SSSIs), or by land pollution that causes risks to human health, to not only cease the damage, but also to implement a wide variety of remedial measures to restore affected areas.

A.84 National pollinator strategy (2014) **[See reference** 226**]** Strategy to protect pollinating insects which support our food production and the diversity of our environment.

A.85 Defra Right of Way Circular (1/09) (2011) **[See reference 227]** gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.

A.86 The Eels (England and Wales) Regulations 2009 **[See reference** 228**]** provide the Environment Agency and Natural Resources Wales with powers to protect critically endangered European eels. They mandate the installation of eel passes on dams, strict screening at water abstraction/discharge points, and regulate eel fishing and trade.

A.87 Flood Risk Regulations 2009 **[See reference** 229**]** transposed the EU Floods Directive 2007 into law across England and Wales (with minor elements extending to Scotland). They established a consistent framework for managing flood hazards across a mandatory six-year rolling cycle.

A.88 Safeguarding Our Soils – A Strategy for England (2009) **[See reference 230]** sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention on tackling degradation threats, including better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and dealing with contaminated land.

A.89 The Natural Environment and Rural Communities Act 2006 **[See reference 231]** places a duty on public bodies to conserve biodiversity.

A.90 The Countryside and Rights of Way Act 2000 **[See reference 232]** is an Act of Parliament to make new provision for public access to the countryside.

A.91 Wildlife and Countryside Act 1981 (as amended) **[See reference 233]** was enacted primarily to implement the Birds Directive and Bern Convention in Great Britain. The Act received royal assent on 30 October 1981 and was brought into force in incremental steps. It is supplemented by the Wildlife and Countryside (Service of Notices) Act 1985, which relates to notices served under the 1981 Act. The act contains four parts and 17 schedules, which cover:

- Part 1: Wildlife (includes protection of birds, animals and plants; and measures to prevent the establishment of non-native species which may be detrimental to native wildlife).
- Part 2: Nature conservation, the countryside and National Parks (including the designation of protected areas).
- Part 3: Public rights of way.
- Part 4: Miscellaneous provisions of the act.

A.92 The National Parks and Access to the Countryside Act 1949 **[See reference 234]** is an Act of Parliament to make provision for National Parks and

the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

Historic Environment

A.93 Historic England, Corporate Plan 2026-2031 **[See reference 235]** provides a framework for Historic England's work as an organisation and helps maintain a collective approach to delivering on their long-term vision.

A.94 The Heritage Statement 2017 **[See reference 236]** sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

A.95 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016) **[See reference 237]** sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

A.96 The Planning (Listed Buildings and Conservation Areas) Act 1990 **[See reference 238]** is an Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

A.97 The Ancient Monuments and Archaeological Areas Act 1979 **[See reference 239]** is a law passed by the UK government to protect the archaeological heritage of England and Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

A.98 The Historic Buildings and Ancient Monuments Act 1953 **[See reference 240]** is an Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

Water and Air

A.99 Water White Paper (2026) **[See reference** 241**]** aims to overhaul the water regulation and infrastructure system across England and Wales. One of the key reforms proposed by the White Paper is the creation of a new, single water regulator which will take on the water-related functions of Ofwat, the Drinking Water Inspectorate

A.100 The National Framework for Water Resources 2025: Water for Growth, Nature and a Resilient Future (2025) **[See reference** 242**]** provides a strategic blueprint for managing England's long-term water needs. It emphasises the twin imperatives of securing resilient water supplies to support housing, energy, food production, economic growth, and a thriving natural environment, while safeguarding ecosystems through sustainable abstraction and nature-based solutions. The Framework projects significant pressures on water resources driven by climate change, population growth, and emerging industrial demands, forecasting a shortfall of up to 5 billion litres per day by 2055. It calls for integrated, multi-sector planning across national, regional, and local levels, combining demand management (such as leakage reduction and efficiency improvements) with development of new infrastructure and environmental enhancements.

A.101 Environmental Improvement Plan (2025) **[See reference** 243**]** is a long-term delivery plan setting out 10 goals, commitments and actions in relation to the natural environment. The plan sets out how the government will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the plan is achieving "restored nature", including progress towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

A.102 National Assessment of Flood and Coastal Erosion Risk ('NaFRA 2') (2025) **[See reference** 244**]** provides an assessment of flood and coastal risk in England. The assessment provides detailed maps and data for current and future risks from rivers, the sea, and surface water, incorporating climate change projections and confirms that approximately 6.3 million properties are in areas at risk of flooding from one or a combination of sources (rivers, the sea, and surface water). The total number of properties in areas at risk from surface water is around 4.6 million, representing a 43% increase compared with the

previous assessment in 2018. NaFRA 2 also highlights significant increases in properties located in high-risk zones, especially for surface water flooding.

A.103 The Air quality strategy for England (2023) **[See reference** 245**]** sets out local authorities' powers and responsibilities as well as the actions that Defra expects local authorities to take in support of the governments long-term air quality goals, including new PM2.5 targets.

A.104 Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023) **[See reference** 246**]** sets out actions to transform the management of the water system, deliver cleaner water for nature and people, and secure a plentiful water supply. The plan also sets out measures to address sources of pollution, and boost water supplies through more investment, tighter regulation, and more effective enforcement.

A.105 Establishing the Best Available Techniques for the UK (UK BAT) (2022) **[See reference** 247**]** sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

A.106 The National Flood and Coastal Erosion Risk Management Strategy for England (2022) **[See reference** 248**]** sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are:

- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the future in the face of climate change;
- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change; and
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change and know their responsibilities and how to act.

A.107 Managing Water Abstraction (2021) **[See reference 249]** is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

A.108 The Environment Act 2021 **[See reference 250]** sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

- Resource efficiency, producer responsibility, and the management, enforcement and regulation of waste;
- Local air quality management frameworks and the recall of motor vehicles etc; and
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

A.109 National Chalk Streams Strategy (2021) **[See reference 251]** was built around the “trinity of ecological health”: water quantity, water quality and habitat quality and included 30+ recommendations to Defra, the Environment Agency, Natural England, the water companies, NGOs and stakeholders.

A.110 The National Framework for Water Resources 2025: Water for Growth, Nature and a Resilient Future (2025) **[See reference 252]** marks a step change in water resources planning. The 5 regional water resources groups will produce a set of co-ordinated, cross-sector plans. These plans will:

- address the scale of challenges we face by identifying the options needed in their region to manage demand and increase supply
- realise opportunities from water resources planning by working collaboratively

A.111 Land contamination risk management (LCRM) (2020) **[See reference 253]** guides the assessment, remediation, and validation of contaminated land.

A.112 The Clean Air Strategy 2019 **[See reference 254]** sets out the comprehensive action that is required from across all parts of Government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones

to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

A.113 The Environment Agency's Approach for Groundwater Protection (2018) **[See reference 255]** contains position statements which provide information about the Environment Agency's approach to managing and protecting groundwater. They detail how the Environment Agency delivers government policy for groundwater and adopts a risk-based approach where legislation allows. Many of the approaches set out in the position statements are not statutory but may be included in, or referenced by, statutory guidance and legislation.

A.114 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 **[See reference 256]** protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process. These Regulations establish the need to prevent deterioration of waterbodies and to protect, enhance and restore waterbodies with the aim of achieving good ecological and chemical status.

A.115 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations 2017 **[See reference 257]** sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles, a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help Local Authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

A.116 Drought Response: Our framework for England (2017) **[See reference 258]** tells you how drought affects England and how the Environment Agency works with government, water companies and others to manage the effects on people, business and the environment. It aims to ensure consistency in the way we co-ordinate drought management across England. It sets out:

- how drought affects different parts of England
- who is involved in managing drought and how we work together
- how we and others take action to manage drought

- how we monitor and measure the impacts of drought to advise senior management and government on the prospects and possible action
- how we report on drought and communicate with others

A.117 Groundwater protection in England (2017) **[See reference** 259**]** sets out guidance covering requirements, permissions, risk assessments and controls relating to groundwater.

A.118 The Nitrate Pollution Prevention Regulations 2016 **[See reference 260]** provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

A.119 The Water Supply (Water Quality) Regulations 2016 **[See reference 261]** focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

A.120 The Environmental Permitting Regulations 2016 **[See reference 262]** streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

A.121 The Air Quality Standards (Amendment) Regulations 2016 **[See reference 263]** set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

A.122 National Policy Statement For Waste Water (2012) **[See reference** 264**]** sets out Government policy for the provision of major waste water infrastructure. It is to be used by the decision maker as the primary basis for deciding development consent applications for waste water developments that fall within

the definition of Nationally Significant Infrastructure Projects (NSIP) as defined in the Planning Act 2008.

A.123 The Flood and Water Management Act 2010 **[See reference 265]** and The Flood and Water Regulations (2019) **[See reference 266]** sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

A.124 Groundwater (England and Wales) Regulations 2009 **[See reference 267]** implement in England and Wales Community legislation on pollution of groundwater. They provide rules for the granting by the Environment Agency of a permit under these Regulations, consent under section 91(8) of the Water Resources Act 1991 and (with exceptions) an environmental permit under the Environmental Permitting (England and Wales) Regulations. In addition, the Regulations create an offence of discharge of a hazardous substance or non-hazardous pollutant without a permit, provide for powers of enforcement of the Environment Agency and prescribe penalties for offences committed under these Regulations.

A.125 Safeguarding our Soils – A Strategy for England (2009) **[See reference 268]** sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention on tackling degradation threats, including better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and dealing with contaminated land.

A.126 The Environmental Noise (Amendment) Regulations 2018 **[See reference 269]** updated the UK's legal framework for managing noise that was originally set out in the 2006 Regulations. They implemented common noise assessment methods (CNOSSOS-EU) for strategic noise mapping, helping authorities evaluate and manage noise from roads, railways, and large urban areas.

A.127 The Urban Waste Water Treatment Regulations (2003) **[See reference 270]** protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste

water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

A.128 The Environmental Protection Act 1990 **[See reference 271]** makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

Economic Growth

A.129 UK Infrastructure: A 10 Year Strategy (2025) **[See reference** 272**]** sets out an integrated plan to transform economic, housing and social infrastructure over the next decade. It commits to at least £725 billion in public investment, supplemented by private financing via carefully targeted public-private partnership models and a new National Wealth Fund. The strategy introduces multiyear capital budgets (initially five-year, reviewed biennially) and establishes the National Infrastructure and Service Transformation Authority (NISTA) to unify planning, improve project delivery, assure major schemes, and coordinate a transparent Infrastructure Pipeline launched in July 2025. It aims to boost growth, align infrastructure with government missions, including housing, clean energy, public services and net zero, reduce planning delays, build institutional capacity, support supply chains and skills development, and provide stability and clarity to investors.

A.130 The UK's Modern Industrial Strategy (2025) **[See reference** 273**]** outlines a 10-year plan to boost business investment and elevate the UK's performance in eight designated growth driving sectors: advanced manufacturing; clean energy industries; creative industries; defence; digital and technologies; financial services; life sciences; and professional and business services. The strategy aims to provide long term stability and certainty to encourage both domestic and international investment, through sector plans, streamlined regulation, enhanced access to finance, including via the National Wealth Fund and British Business Bank, and by accelerating grid connections and infrastructure delivery. It includes regional and place-based initiatives, with targeted support for city regions, industrial clusters and Industrial Strategy Zones to drive inclusive growth across the UK. The strategy is also supported by a robust monitoring framework overseen by a newly established Industrial Strategy Advisory Council, and embeds vocabulary around long-termism, pro-business engagement, competition policy, skills development and innovation.

A.131 The Plan for Change (2024) **[See reference** 274**]** outlines the UK Government's framework for long-term policy delivery across five priority areas: economic growth, healthcare, public safety, opportunity, and clean energy. It sets out specific targets within this Parliament, underpinned by aims to ensure economic stability, reform public services, and implement a more mission-focused approach to governance.

A.132 Kickstarting Economic Growth: Milestone: Raising Living Standards in Every Part of the United Kingdom (2024) **[See reference** 275**]** identifies economic growth as the number one mission of the Government. The Government seeks to deliver a milestone of higher living standards through economic growth by working in partnership with businesses, ensuring every nation and region realises its full potential, driving innovation, investment and the adoption of technology to seize the opportunities of a future economy, and helping people to get a job, stay at work, and progress in their careers, with good employment opportunities across the country. Rebuilding Britain (2024) **[See reference** 276**]** seeks to address the housing crisis by delivering new homes and the critical infrastructure that underpins economic growth. This will be achieved by reforming the planning system so that it is pro-growth and pro-infrastructure, working in partnership with local leaders, housebuilders and infrastructure developers, and increasing supply and delivery through the biggest boost to social and affordable housing in a generation.

A.133 Invest 2035: The UK's Modern Industrial Strategy (2024) **[See reference** 277**]** is the Government's credible, 10-year plan to deliver the certainty and stability businesses need to invest in the high growth sectors. The Strategy will focus on tackling barriers to growth, creating the right conditions for increased investment, high-quality jobs and ensuring tangible impact in communities across the UK.

A.134 The Agricultural Transition Plan 2021 to 2024 **[See reference 278]** aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

A.135 The Agriculture Act 2020 **[See reference 279]** sets out how farmers and land managers in England will be rewarded in the future with public money for "public goods" – such as better air and water quality, thriving wildlife, soil health,

or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace. Agricultural Transition Plan 2021 to 2024.

Transport

A.136 Better Connected: a strategy for integrated transport (2026) **[See reference** 280**]** outlines eight priorities for creating an integrated transport system that makes greener modes of transport easier and more reliable. They are:

- Simplify payments and information
- Provide safe and dependable journeys
- Make travel accessible and affordable
- Create healthier communities
- Align transport and development
- Champion data and technology
- Empower local leaders
- Optimise decision-making and appraisal

A.137 UK Infrastructure: A 10 Year Strategy (2025) **[See reference** 281**]** sets out an integrated plan to transform economic, housing and social infrastructure over the next decade. It commits to at least £725 billion in public investment, supplemented by private financing via carefully targeted public-private partnership models and a new National Wealth Fund. The strategy introduces multiyear capital budgets (initially five-year, reviewed biennially) and establishes the National Infrastructure and Service Transformation Authority (NISTA) to unify planning, improve project delivery, assure major schemes, and coordinate a transparent Infrastructure Pipeline launched in July 2025. It aims to boost growth, align infrastructure with government missions, including housing, clean energy, public services and net zero, reduce planning delays, build institutional capacity, support supply chains and skills development, and provide stability and clarity to investors.

A.138 Future of Transport: supporting rural transport innovation (2023) **[See reference** 282**]** shows how innovative and emerging transport technologies could address some of the major challenges in rural communities. It highlights

the importance of transport to everyday life rural life and provides guiding carbonising Transport: Setting the Challenge principles for the introduction of new technologies and services.

A.139 National Highways Environmental Sustainability Strategy (2023) **[See reference** 283**]** sets out National Highways' vision for the organisation in terms of the role it can play in national prosperity and helping to protect and enhance the environment. It sets out that the organisation will deliver net zero corporate emissions by 2030, maintenance and construction emissions by 2040 and road user emissions by 2050.

A.140 Future of freight plan (2022) **[See reference** 284**]** vision is to create a freight and logistics sector that is cost-efficient, reliable resilient, environmentally sustainable and valued by society. It identifies the main challenges, objectives and actions that need to be taken in the following 5 priority areas:

- National Freight Network (NFN)
- Enabling the transition to net zero
- Planning
- People and skills
- Data and technology

A.141 Decarbonising Transport: A Better, Greener Britain (2021) (Decarbonising Transport Plan (DTP)) **[See reference 285]** sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DPT also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

A.142 The Road to Zero (2018) **[See reference 286]** sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

A.143 The Highways England Sustainable Development Strategy and Action Plan (2017) **[See reference 287]** is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

A.144 Door to Door: A strategy for improving sustainable transport integration (2013) **[See reference** 288**]** focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options.
- Convenient and affordable tickets.
- Regular and straightforward connections at all stages of the journey and between different modes of transport.
- Safe and comfortable transport facilities.

A.145 The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

Regional and sub-regional plans and programmes of most relevance for the Local Plan

Aire and Calder Abstraction Licensing Strategy

6.6 The strategy **[See reference** 289**]** sets out our approach to managing new and existing abstraction and impoundment within the Aire and Calder catchment in the Humber river basin district. The approach ensures that the Environment Agency:

- meets river basin management plan objectives for water resources activities.

- avoids deterioration within the catchment.

West Yorkshire Local Growth Plan

6.7 The West Yorkshire Local Growth Plan (2025–2035) **[See reference** 290**]** sets out how the Mayor and Combined Authority will work with businesses, universities and local councils to close the region's productivity gap – adding £26 billion to the UK economy, creating 40,000 jobs and supporting 18,000 new businesses over the next ten years. It tackles the three key barriers holding West Yorkshire back: investment, skills and connectivity, across Bradford, Calderdale, Kirklees, Leeds and Wakefield.

West Yorkshire Local Nature Recovery Strategy

A.146 The West Yorkshire Local Nature Recovery Strategy (LNRS) **[See reference** 291**]** is an evidence-based spatial plan mapping practical actions to reverse biodiversity decline, build climate resilience, and expand ecological networks across the region. Led by the West Yorkshire Combined Authority, it is one of 48 statutory strategies covering England.

Kirklees Inclusive Economy Strategy

6.8 The Kirklees Inclusive Economy Strategy (2025-2030) **[See reference** 292**]** sets out how, working with a wide range of public, private and voluntary sector partners, Kirklees Council will create the conditions for economic growth across Kirklees – and how, working together, it will be ensured that as many communities and residents as possible both contribute to and benefit from growth.

West Yorkshire Rail Strategy

A.147 The West Yorkshire Rail Strategy (2024) **[See reference** 293**]** sets out the Wet Yorkshire Combined Authority's priorities and next steps and inventions required to deliver their Rail Vision for West Yorkshire up to 2050. The Strategy looks at how the West Yorkshire Combined Authority can address urgent issues, such as delivering additional capacity and service frequency and improving passenger experience of travelling by rail.

West Yorkshire Vision Zero Strategy

A.148 The West Yorkshire Vision Zero Strategy (2024) **[See reference** 294**]** sets out the plan to eradicate all road deaths and serious injuries in the county by 2040. It focuses on:

- Creating safe roads, which involves changes to the physical road environment to prevent collisions from happening.
- Encouraging safe behaviours, which will help ensure all road users, regardless of how they travel, know how to keep themselves safe and look out for others.
- Encouraging safe speeds, as 25% of fatal crashes are as a result of inappropriate speeds.
- Ensuring roadworthy, safe vehicles that meet regulations.
- An improved post-collision response.

Kirklees Council Plan

A.149 Kirklees Council 'Our Council Plan' (2026-2029) **[See reference** 295**]** sets out the Council's priorities to help it make the fair and balanced decisions needed to transform services and enable a better, greener, and healthier Kirklees.

Kirklees Environment Strategy

A.150 The Kirklees Environment Strategy (2024) **[See reference** 296**]** outlines targets for protecting and enhancing the environment, which are supported by 31 objectives. The targets are:

- Achieving zero avoidable waste by 2038.
- Supporting the growth of the sharing and circular economy, with Kirklees aspiring to national leadership in this area.
- Delivering nature recovery across the district by 2030.
- Securing the restoration of all degraded peatland by 2038.
- Increasing tree canopy cover across Kirklees to 21% by 2050.

- Ensuring all residents, workers and students have access to high-quality green and blue infrastructure within a 5–10 minute (approximately 500m) walk by 2038.
- Improving the energy efficiency of the built environment, with all buildings achieving a minimum EPC rating of C by 2030.
- Achieving a net zero carbon energy supply across Kirklees by 2038.
- Delivering a Sustainable Neighbourhoods programme by the mid-2020s.
- Increasing the proportion of journeys made by sustainable modes to 60% by 2030.
- Transitioning the Council's fleet to 100% zero carbon vehicles by 2038.
- Ensuring all homes are located within 1 km of a public transport access point, connected via a safe pedestrian route, by 2038.

West Yorkshire Climate and Environment Plan 2025-2038

6.9 The West Yorkshire Climate and Environment Plan (2024) **[See reference** 297**]** sets out how the region will cut greenhouse gas emissions by 81% before 2038, through investment in clean energy, zero-emission transport, energy-efficient homes, green jobs and nature recovery. It covers Bradford, Calderdale, Kirklees, Leeds and Wakefield, and requires around £6 billion in public investment to deliver.

West Yorkshire Local Growth Plan

6.10 The West Yorkshire Local Growth Plan 2025–2035 (2024) **[See reference** 298**]** sets out how the Mayor and Combined Authority will work with businesses, universities and local councils to close the region's productivity gap - adding £26 billion to the UK economy, creating 40,000 jobs and supporting 18,000 new businesses over the ten year period. It tackles the three key barriers holding West Yorkshire back: investment, skills and connectivity, across Bradford, Calderdale, Kirklees, Leeds and Wakefield.

A Heritage Strategy for Kirklees

A.151 A Heritage Strategy for Kirklees (2024) **[See reference** 299**]** provides a set of objectives and key principles to help deliver the vision for heritage in Kirklees from 2024 -2033. It is underpinned by a Strategic Heritage Action Plan

for 2024-2027 (Section 10 of the strategy), which includes the development of an online Heritage Hub as a central point for connectivity, coordination, collaboration and showcasing of heritage activity across Kirklees, also supplemented by other non-digital communication.

Draft West Yorkshire Mass Transit Vision 2024

A.152 The Draft Mass Transit Vision 2040 (2023) **[See reference** 300**]** sets out how mass transit will help make West Yorkshire's public transport network more accessible and more inclusive, while also helping them to achieve net zero carbon emissions by 2038. Mass transit is a large-scale public transport system in a metropolitan area. Typically, mass transit would use one or more of modern, high-capacity buses, trans and tram-train vehicles.

West Yorkshire HealthTech Strategy 2022-2027

A.153 The HealthTech strategy (2022) **[See reference** 301**]** aims to capitalise on the strengths in the area of health related technologies across West Yorkshire and the Leeds City Region to drive both future economic prosperity and improve health outcomes. It outlines a number of goals to develop the healthtech ecosystem further:

- Develop and strengthen the Healthtech Cluster partnership.
- Map healthtech innovation support provision to reduce fragmentation and address gaps.
- Develop a collective understanding of regional projects and how they fit together in a cohesive narrative.

Draft Yorkshire Water Resources Management Plan 2024

A.154 The Water Resources Management Plan (2022) **[See reference** 302**]** sets out the plan to maintain a safe and reliable water supply to Yorkshire’s customers over the long term. It provides a comparison of the long-term supply forecast against a long-term demand forecast. The latest plan, has identified some significant risks to the future supply-demand balance. These risks include the impacts of climate change, population growth, reductions in supply to protect the environment and the loss of a water transfer currently received from a neighbouring water company. In October 2023 the draft plan was resubmitted to the regulators for further feedback.

West Yorkshire Bus Service Improvement Plan

A.155 The Bus Service Improvement Plan (2022) sets out WYCA's vision for buses in the region and their short, medium and long-term goals that aim to help reverse the shift away from public transport that was seen during the COVID-19 pandemic, and encourage passengers back to buses. Its main focuses are:

- An enhanced, fully inclusive and more cohesive bus and wider public transport network, which takes people where they need to go, when they need to go, and caters for the complexity of modern travel patterns.
- Clear and simple fares to make paying for bus travel more affordable, easier, convenient and flexible.
- Improved, more inclusive customer service and support so all passengers have the right tools to travel with confidence and the help they need if their journey does not go to plan.
- Priority for buses on the roads so journeys by bus are quicker, with less time spent stuck in traffic, and are a viable alternative to the private car.
- More green and better vehicles to improve the onboard xperience and make bus the sustainable choice for travel in West Yorkshire.
- Safe accessible and welcoming stations, stops and public spaces that provide a high-quality environment for passengers waiting for their services.

Kirklees Climate Change Action Plan

A.156 Climate Change Action Plan **[See reference** 303**]** presents Kirklees Council's approach as to how the district can achieve its ambition to be Net Zero and Climate Ready by 2038.

Kirklees Health and Wellbeing Strategy 2022 to 2027

A.157 The Kirklees Health and Wellbeing Strategy (2022) **[See reference** 304**]** seeks to achieve four outcomes for people who live, work or study in Kirklees. These include: Best start, Independent, Well and Shaped by people. To achieve these four outcomes, the Strategy focuses on three priorities: mental wellbeing, healthy places and connected care and support. The Strategy is currently being updated.

Kirklees Social Value Policy

A.158 Kirklees Social Value Policy (2022) **[See reference** 305**]** sets out how Kirklees Council will harness its purchasing power, investment decisions and role as a major employer to maximise the economic, social and environmental benefits to its residents, communities and businesses.

Leeds City Region Innovation Framework: Innovation for Everyone

A.159 The vision outlined in the Innovation Framework (2021) **[See reference** 306**]** is for Leeds City Region to be "A place that is globally recognised for developing an open, inclusive, thriving and coherent innovation ecosystem, where SMEs, budding entrepreneurs and individuals are inspired to innovate, and can easily navigate the support landscape and connect and collaborate with others to create new and better solutions for business growth and societal good". Their focus is twofold:

- Support leading frontier businesses (and more cautious innovators) to 'do more' innovation.
- Support broader diffusion of ideas and technology into their micro dominant business base, within both urban and rural settings, to further drive-up innovative activity, behaviours and productivity in the wider business base, and support net zero.

Draft West Yorkshire Connectivity Infrastructure Plan

A.160 The Connectivity Infrastructure Plan (2021) **[See reference** 307**]** sets out a long-term transport infrastructure investment programme for the next 20 years, providing a picture of where improvements are most needed to enhance people's quality of life and bring investment to the area.

West Yorkshire Employment and Skills Framework

A.161 The Employment and Skills Framework (2021) **[See reference** 308**]** is a key document in the Strategic Economic Framework (SEF) **[See reference** 309**]** which sets out the strategic priorities and indicative actions for improving employment and skills in West Yorkshire.

West Yorkshire Investment Strategy 2021-2024

A.162 The West Yorkshire Investment Strategy (WYIS) (2021) **[See reference** 310**]** sets out the arrangements by which the Combined Authority will direct and make decisions about funding contained within the Single Investment Fund over a defined investment period. It outlines the Combined Authority's key investment priorities and the criteria against which any schemes will be evaluated to ensure strategic fit. The priorities within the investment strategy have been informed by the Strategic Economic Framework. The WYIS also sets out the approach to delivery, identifying the role of the Combined Authority in maximising the benefits of future investment and how investment decisions are made through its, Government approved, Assurance Framework.

West Yorkshire Police and Crime Plan 2021-2024

A.163 The overall vision of the Policy and Crime Plan 2021-2024 (2021) **[See reference** 311**]** is a safe, just and inclusive West Yorkshire, underpinned by four priorities:

- Supporting victims and witnesses and improving criminal justice outcomes
- Keeping people safe and building resilience
- Safe places and thriving communities
- Responding to multiple and complex needs

A.164 It is also underpinned by three cross cutting themes:

- The safety of women and girls
- Equality, diversity and inclusion
- Early intervention and prevention

Draft Leeds City Region Local Industrial Strategy

A.165 The Local Industrial Strategy (2019) **[See reference** 312**]** is a long-term plan for the Leeds City Region to boost productivity and transform the City Region, building on people's strengths, improving people's skills and helping businesses grow while protecting the environment, so everyone can benefit from a strong economy.

The West Yorkshire Plan 2040

A.166 The West Yorkshire Plan **[See reference** 313**]** outlines a vision and five 'missions' for sub-region to achieve by 2040. These provide a framework for future strategies and investments in West Yorkshire.

- Mission 1: a prosperous West Yorkshire – an inclusive economy with well paid jobs
- Mission 2: a happy West Yorkshire – great places and healthy communities
- Mission 3: a well-connected West Yorkshire – a strong transport system
- Mission 4: a sustainable West Yorkshire – making lives greener
- Mission 5: a safe West Yorkshire – a region where everyone can flourish

Leeds City Region Green and Blue Infrastructure Strategy

A.167 The Green and Blue Infrastructure Strategy (2018) **[See reference** 314**]** sets out how the Leeds City Region will make the most of the region's natural assets to help the economy prosper, enable people to enjoy a great quality of life and combat the effects of climate change. As a result of the Strategy, the Leeds City Region wants to ensure that everyone has easy access to a high-quality, safe and well-used network of footpaths, cycleways, green spaces, waterways and wildlife habitats.

West Yorkshire Combined Authority Transport Strategy 2040

A.168 The Strategy (2017) **[See reference** 315**]** outlines the strengths and underlying issues in increasing demand for sustainable travel in the sub-region while realising the ambitions for inclusive growth contained in the various district Local Plans. It is framed by six core themes:

- Inclusive Growth, Environment, Health and Wellbeing
- Road network
- Places to live and work
- One System Public Transport
- Smart futures

- Asset management and resilience

A.169 The WYCA is presently developing a new Local Transport Plan in two phases. This first phase involves developing the strategic direction, including the vision, objectives and principles for West Yorkshire's transport network. In the second phase, the Combined Authority will develop the full Local Transport Plan, including the policies needed to achieve the vision and objectives, together with an implementation plan. A statutory consultation on the full Local Transport Plan is expected to be undertaken in 2025.

West Yorkshire Bus Strategy 2040

A.170 The West Yorkshire Bus Strategy (2017) **[See reference** 316**]** outlines a number of objectives to develop the bus system in West Yorkshire. These include:

- To enable economic growth in West Yorkshire by improving connectivity to areas of economic opportunity.
- To realise environmental aspirations, including significantly reducing local emissions.
- To support local communities by improving access to health services, education, employment, leisure and retail destinations.

A.171 The West Yorkshire Bus Service Improvement Plan is built on the ambitions of the Bus Strategy and aims to deliver the bus system needed by the sub-region, including the supporting infrastructure required such as bus shelters, stops and stations.

West Yorkshire Strategic Economic Framework

A.172 The West Yorkshire Strategic Economic Framework outlines the vision for the region: 'to be recognised globally as a place with a strong, successful economy where everyone can build great businesses, careers and lives supported by a superb environment and world-class infrastructure'. It also sets out the following priorities for achieving this vision:

- Boost productivity: Helping businesses to grow and invest in the region and their workforce, to drive economic growth, increase innovation and create jobs.

- Enable inclusive growth: Enabling as many people as possible to contribute to, and benefit from, economic growth in West Yorkshire's communities, towns and cities.
- Tackle the climate emergency: Growing West Yorkshire's economy while cutting emissions and caring for our environment.
- Deliver 21st century transport: Creating efficient transport infrastructure to connect West Yorkshire's communities, making it easier to get to work, do business and connect.
- Secure money and powers: Empowering the region by negotiating a devolution deal and successfully bidding for substantial additional funds.

West Yorkshire Housing Strategy 2040

A.173 The Strategy **[See reference** 317**]** outlines four objectives to develop the volume and quality of housing in West Yorkshire:

- Objective 1: Boost the supply of the right homes in the right places.
- Objective 2: Increase the provision of truly affordable, accessible and adaptable homes.
- Objective 3: Improve the quality of our existing homes.
- Objective 4: Creating resilient places that support the well-being of our residents.

River Calder: Catchment flood management plan

A.174 The plan **[See reference** 318**]** provides an overview of the flood risk across the river catchment and recommended ways of managing the risk now and over the next 50 to 100 years.

Appendix B
Health Impact Assessment framework

B.1 The HIA seeks to measure the potential health impacts of a policy, programme or project on the wider population. The assessment considers impacts on health and health inequalities in a systematic and transparent way. Ultimately the aims of the HIA are to reduce health inequalities, contribute to improved health and contribute to better decision making.

B.2 The Local Plan will be considered as a whole, however, the assessment of the plan through the HIA recognises that amendments may be needed to the plan's policies to contribute to a reduction in health inequalities.

B.3 The HIA framework is structured around 11 'influences', each of which are key determinants of human health. For each influence, a summary of potential impacts on human health and the positive effect planning can have in relation to that influence are included. Several decision aiding questions are also included for each influence to help guide the assessment of the Local Plan against the framework.

Influence 1: Housing

Impacts

- Overcrowding and sanitation
- Lack of affordable housing – low income residents spend high proportion of income on housing to detriment of lifestyle
- Poor choice of location and bad design/ orientation (including the provision of minimal internal space and external amenity space) can lead to physical and mental health conditions
- Poor construction methods can have impacts on wellbeing
- Poor match between housing stock and household needs
- Some houses may lack basic facilities to enable the preparation of healthy foods

Positive effects of planning

- Accessibility
- Adaptable / lifetime homes
- Good design and orientation including internal layout (such as that promoted through the nationally described space standards and WYCA's dementia-ready housing design criteria)
- Housing mix (the type and tenure)
- Energy efficiency
- Affordable homes
- Location close to basic services such as post offices, shops and health facilities
- The provision of land in the right places to fulfil housing need

Decision making questions (does the Plan …)

- Promote adaptable/ lifetime homes?
- Promote high quality / sustainable design of residential accommodation, including internal and external spaces?
- Ensure residential developments are located close to basic services?
- Seek to provide a mix of types and tenures of housing?
- Seek to provide sufficient affordable housing?
- Promote adaptable/ lifetime homes, including those for older people and people with disabilities such as dementia

Influence 2: Access to public services such as health centres, libraries and information centres and education facilities

Impacts

- Access to public services required to develop strong communities, can lead to greater community cohesion

- Use of primary/ preventative healthcare dependent on accessibility
- Services located far away can cause significant problems for the less mobile, including elderly, particularly lack of social interaction – potentially leading to isolation and depression
- Access to effective and affordable Early Years Development Provision is critical in reducing inequalities not just in educational attainment, but also in health

Positive effects of planning

- Take account of public service needs, location and accessibility
- Ensure timely provision of required services following delivery of new developments
- Reconfiguration of health and social service provision
- Co-location of public services
- Planning for extended schools

Decision making questions (does the Plan…)

- Consider the needs, location and accessibility of public services?
- Consider the timing of public service provisions?

Influence 3. Opportunities for physical activity

Impacts

- Low levels of physical activity are a main cause of obesity and a range of other significant health issues
- Green space facilitates opportunities for exercise
- Green spaces can help reduce depression for those in urban areas
- Physical activity in childhood perceived to be a significant determinant in adult behaviour – access to sport and play facilities important
- Isolated developments can lead to sedentary lifestyles and mental ill health

- Badly located facilities can lead to excessive use of cars and lack of physical activity
- Moderate physical activity can help against cognitive decline in older people

Positive effects of planning

- Facilitating walking and cycling
- Recreation opportunities distributed equally across communities •
- Protecting / enhancing green space
- Locating housing and employment close to services / facilities

Decision making questions (does the Plan…)

- Make provision for a walking and cycling network and seek to prioritise walking and cycling?
- Seek to enhance sports, recreation and leisure facilities?
- Protect and enhance existing green spaces and seek to create new ones?
- Ensure residential developments are located close to basic services?
- Seek to enhance the quantity and quality of open space provision?

Influence 4. Air quality, Noise, Neighbourhood Amenity and Natural Environment

Impacts

- Poor air quality can lead to increased incidence of a range of health conditions, including lung, heart (and potentially asthma amongst children) and mental health conditions as well as cognitive decline
- Living in proximity to busy roads is linked to negative health outcomes
- Absence of a good neighbour policy can mean residents and workers are subject to excessive noise, fumes, odour and/or dust
- Visually arid environments can undermine wellbeing and not facilitate physical activity

- The quality of the natural environment in general can contribute to well being in the same way as green spaces and amenity spaces

Positive effects of planning

- Segregation of 'bad neighbour' uses
- Enhanced green space and green blue infrastructure
- Good quality amenity space incorporated into development
- Deter car use and restrict lorries to specific routes

Decision making questions (does the Plan)

- Seek to minimise air and noise pollution as well as odours and dust, particularly in residential areas?
- Promote enhanced air quality? (particularly through better green blue infrastructure)
- Seek to provide high quality amenity space close to people's homes?
- Seek to minimise car use and / or road freight?
- Segregate 'bad neighbour' uses?
- Seek to protect and enhance the natural environment?
- Seek to protect open spaces that offer visual amenity?

Influence 5. Accessibility and transport

Impacts

- Easy, well orientated and walkable access to facilities provides opportunities for greater social interaction
- Easily accessible buildings and spaces encourages greater use by elderly / disabled
- Reducing car dependency leads to more physical exercise
- Poor access can disadvantage particular community groups such as elderly, children

- Traffic congestion can lead to more hostile environments and reduce reliability of bus services, therefore decreasing walking
- Road traffic accidents are a major cause of injury and fatality in young people and perceived danger from roads places restrictions on children's independent mobility

Positive effects of planning

- Improved streetscape
- Improved choice of modes of transport by ensuring homes, jobs and services are well connected to each other and to existing transport corridors
- Making local facilities accessible by walking and cycling
- Promoting walking and cycling networks
- Traffic calming in residential areas
- Developing home zones or low traffic neighbourhoods can lead to greater community involvement and sense of ownership – increased community safety
- Requiring travel plans to support modal shift
- Managing car parking effectively to deter commuting by car

Decision making questions (does the Plan…)

- Reduce the need to travel by private vehicle?
- Promote an enhanced streetscape?
- Seek to enhance public transport provision, including through the provision of required supporting infrastructure and supporting frequency and reliability of services?
- Ensure residential developments are located close to basic services?
- Make provision for a walking and cycling network and seek to prioritise walking and cycling, including through an integrated active travel network?
- Promote home zone, low traffic neighbourhood and traffic calming measures in residential areas?

Influence 6. Crime reduction and safety

Impacts

- Environment (street design, unfriendly environments) can increase 'fear of crime' and be detrimental to wellbeing
- Where a pedestrian environment is intimidating people use cars and social interaction is reduced – increasing potential for crime
- Poorly designed green space and lack of investment in green space can potentially increase crime and antisocial behaviour
- Lack of trust in services can increase the fear of crime

Positive effects of planning

- Layout of spaces to ensure natural surveillance
- Designing places to enhance opportunities for social interaction
- Improved lighting in public spaces
- Designing out crime

Decision making questions (does the Plan…)

- Contain urban design policies that seek to 'design out crime'?
- Support the creation and maintenance of active frontages?
- Support bringing disused buildings back into active use?

Influence 7. Access to healthy food

Impacts

- People on low incomes less able to eat well
- Food production co-op schemes can increase wellbeing, levels of physical activity and social interaction
- Centralisation of food shopping facilities can reduce variety locally and exacerbate social inequity

- A concentration of fast food outlets, particularly in areas close to schools, could potentially increase consumption of unhealthy foods

Positive effects of planning

- Safeguarding areas for community food growing projects
- Diversity of food shopping facilities including access to affordable healthy food and avoiding an over concentration of fast food outlets.
- Reduced reliance on large supermarkets
- Retention / enhancement / provision of allotments
- Development of farmers markets

Decision making questions (does the Plan…)

- Make provision for spaces where community can grow their own food?
- Seek to enhance convenience goods retail if there is a shortfall?
- Seek to avoid an over concentration of fast food outlets?
- Protect / enhance the provision of allotments?
- Maintain / enhance the vitality and viability of town and local centres?

Influence 8. Access to work and impact of unemployment and low incomes

Impacts

- Job security and job variety leads to increased health and wellbeing
- Income is a strong indicator of health
- Job satisfaction links to increased contribution to social networks
- Correlation between unemployment and heightened health risks
- Employment opportunities in inaccessible locations can affect health and wellbeing
- Low income leads people to refrain from purchasing goods / services that would improve health

- Low income minimises participation in social life

Positive effects of planning

- Allocating appropriate accessible sites
- Encouraging diversity in employment
- Local job retention through local labour agreements
- Promoting access to work via walking and cycling
- Increasing the availability of support services – such as childcare – and other town centre uses – such as shops and services.
- Provision of facilities / activities for people on low / limited incomes

Decision making questions (does the Plan…)

- Seek to provide a range of jobs close to where people live, in accessible locations, particularly the most deprived communities?
- Promote the use of local labour agreements, to support the hiring and upskilling of local people?
- Ensure employment sites are located close to basic services?
- Seek to raise the profile of the district to encourage investment, particularly in sectors which align with expected growth trends and higher wages?

Influence 9. Social cohesion and social capital

Impacts

- Fragmentation of social structure can lead to ghettos – contributing to isolation and insecurity
- Material deprivation but also social and psychological problems of living in poverty
- Dispersal of residential communities and roads serving as barriers
- Loss of community facilities such as healthcare, education and meeting places.

- Indirect impacts on income arising from spatial planning such as access to employment
- Risks associated with negative perceptions of the planning process as people may feel they've lost out.
- Perceptions of racial discrimination contribute to mental ill health in BAME (Black, Asian and Minority Ethnic) communities
- Improved social networks and social support can improve mental wellbeing

Positive effects of planning

- Mixed use developments in town centres
- Safe and permeable environments with natural social foci
- Providing diverse employment opportunities
- Involvement of the voluntary sector in the planning process

Decision making questions (does the Plan…)

- Seek to provide a mix of types and tenures of housing in all communities, where possible?
- Seek to reduce deprivation in the plan area, including by supporting regeneration in areas of most need?
- Seek to prevent the fragmentation of settlements through the appropriate location and planning of infrastructure that might otherwise impede movement and integration?
- Support the provision of social infrastructure and public spaces that can be used by a range of resident types and can encourage informal interactions and support social tolerance?

Influence 10. Resource minimisation

Impacts

- Reducing and minimising waste can improve environmental quality and improve human health

- Disposal of hazardous waste can have significant health impacts
- Maximising natural light can have a therapeutic / calming effect

Positive effects of planning

- Impose standards on hazardous waste disposal and waste linked to development
- Redevelopment of brownfield sites – recycling land
- Improved building design by meeting BREEAM (an environmental assessment of buildings) and BREEAM Infrastructure (an evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and public realm projects) construction standards

Decision making questions (does the Plan…)

- Encourage the redevelopment of brownfield land?
- Encourage and promote recycling?
- Promote building designs which seek to minimise resources?

Influence 11. Climate change

Impacts

- Extreme weather events can affect health
- Anxiety arising from vulnerability to flooding
- Physical health risks from flooding, with threat of sewers flooding, etc.

Positive effects of planning

- Impact on energy use through building design, transportation etc.
- Avoid inappropriate development in areas at risk of flooding in accordance with the sequential and exception tests including flood resilient development where applicable

- Promote the incorporation of measures that support climate change resilience, such as green blue infrastructure

Decision making questions (does the Plan…)

- Promote the use of renewable energy?
- Promote the delivery of infrastructure for renewable and low carbon energy generation?
- Promote the use of public and active travel?
- Promote sustainable drainage systems?
- Seek to minimise flood risk impacts of new development?
- Seek to avoid inappropriate development in areas at risk of flooding?
- Promote climate change resilience and adaptation at new developments?

Influence 12. Fuel poverty

Impacts

- Cold housing is a health risk and contributes to extra deaths in winter

Positive effects of planning

- Sustainable design

Decision making questions (does the Plan…)

- Promote building designs which seek to minimise resources?

Appendix C
Site Assessment Criteria

C.1 The site assessment criteria to be used for the assessment of residential and employment site options against each SEA objective are set out below.

C.2 For each objective, a table is included to set out the individual criteria and how they will be applied. A description of how the significance of effect (i.e. minor and significant positive/negative effects) will be identified for the overarching SEA objective is also provided. This sets out how the scores relating to each individual criteria for the SEA objective in question (i.e. major and minor positive/negative) will be considered cumulatively to assign an overall significance rating.

Assumptions regarding threshold distances applied

C.3 Reference is made to distances in the site assessment criteria included in relation to SEA objectives 4: health and wellbeing and 8: town centres. The most sustainable and easily achievable mode of transport is walking, and the distances relate to walking distances. For the purposes of the SEA all measurements are straight line ‘as the crow flies’ distances.

C.4 The most commonly used research that includes guidance distances for walking is the Chartered Institute of Highways and Transportation, which categorises walking distances (and times) depending upon location and purpose of the trip, as 'desirable, 'acceptable' and 'preferred maximum'. LUC has developed guideline distances based on this information for use in SEA work, and these are reflected in some of the site assessment criteria for SEA objectives 4: health and wellbeing and 8: town centres. The assessment criteria used for SEA objective 4 also reflect open space study work undertaken in Kirklees which sets catchment distances for the following types of open space:

- Parks and recreation grounds - 720m
- Natural/semi-natural greenspace - 720m
- Amenity greenspace - 480m
- Allotments - 720m
- Children’s play facilities - 720m

- Young people's provision - 2km

C.5 Please note that it is the intention that the assessment of site options in relation to several SEA objectives will be informed by outputs from the Department for Transport's Connectivity Tool **[See reference** 319**]**. This work will provide information on the accessibility of sites by various modes of transport to a range of services and facilities. As such, it is the intention that the findings from the Council's use of the Connectivity Tool will feed into the assessment work against SEA objectives where relevant/applicable. Where this work is to be made use of, the mean overall score for all modes of transport except driving will be used. This is because these modes of transport are most accessible to the widest range of people in Kirklees.

Residential site assessment criteria

SEA objective 1: Contribute positively to delivering climate change mitigation measures

C.6 The extent to which the location of residential site options would facilitate the use of sustainable modes of transport in place of cars is considered separately under SEA objective 6. The location of development will not otherwise affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design. This SEA objective is therefore scoped out for the appraisal of site options. It will be considered further as part of the appraisal of policies included in the Local Plan and any related reasonable alternatives.

SEA objective 2: Support increased resilience to the effects of climate change

C.7 The extent to which the location of residential site options would be affected by flood risk is considered separately under SEA objective 13. The location of development will not otherwise affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage for development sites which includes essential infrastructure such as foul drainage. This SEA objective is therefore scoped out for the appraisal of site options. It will be considered further as part of the

appraisal of policies included in the Local Plan and any related reasonable alternatives.

SEA objective 3: Ensure the delivery of well-designed homes that meet local needs, including affordable housing

C.8 All residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. Sites that have a capacity for a larger number of homes will make a greater contribution to the local housing need.

Significance scoring for SEA objective 3 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- All other 0

Table C.1: SEA site assessment criteria for objective 3

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
3a Housing provision	Significantly contributes to the delivery of housing: >=100 dwellings	Contributes to the delivery of housing: <100 dwellings	N/A	N/A	N/A	Based on data provided by Kirklees Council on expected site capacity.

SEA objective 4: Support improved levels of public health and wellbeing and help to address health inequalities

C.9 Residential sites that are close to existing areas of open space and Public Rights of Way (PRoWs) will help ensure residents have access to facilities that encourage more active lifestyles. Similarly, residential sites that are accessible to healthcare facilities (i.e. GP surgeries and hospitals) will help to ensure residents have access to healthcare services. A factor not captured by the assessment of site options is whether there is capacity at those healthcare facilities to accommodate new residents and whether new residential development supports the provision of additional healthcare capacity. Noise pollution and odours can have adverse effects on wellbeing and ensuring sites are not close to these pollution sources will help protect people's health and wellbeing.

Significance scoring for SEA objective 4 criteria

Criteria 4a to 4f are scored:

- Major positive +3
- Minor positive +1
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 6). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Minor negative <0 to >-2
- Significant negative <= -2

Table C.2: SEA site assessment criteria for objective 4

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
4a Open space, sport and recreation	<=480m from open space	481-720m from open space	N/A	721-1,200m from open space	>1,200m from open space	Kirklees Council open space data showing parks and recreation grounds, natural/semi-natural greenspace, amenity greenspace, allotments and play facilities
4b Loss of open space	N/A	N/A	All other sites	1-24.9% of site is open space	>=25% of site is open space	Kirklees Council open space data
4c Public Rights of Way	<=200m from PRoW	201-400m from PRoW	N/A	401-800m from PRoW	>800m from PRoW	Kirklees Council PRoW data
4d GP surgeries	Site rated as being most accessible to healthcare facilities	Site rated as being more accessible to	N/A	Site rated as being less accessible to	Site rated as being least accessible to	Outputs of Department for Transport

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
	as per the Department for Transport Connectivity Tool	healthcare facilities as per the Department for Transport Connectivity Tool		healthcare facilities as per the Department for Transport Connectivity Tool	healthcare facilities as per the Department for Transport Connectivity Tool	Connectivity Tool
4e Noise pollution from roads and railways	N/A	N/A	All other sites.	>=25% site within: Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB	>=25% site within: Lnight >=55.0 dB, or Laeq,16 >= 60.0 dB	Defra road and rail noise data
4f Odour	N/A	N/A	All other sites.	N/A	Site is <=400m from a wastewater treatment works, <=500m from an anaerobic digestion facility OR <= 250m from a Site Safeguard Area of a waste management facility or a	Environment Agency wastewater treatment plant data; Environment Agency anaerobic digestion facilities data; Kirklees Council waste management

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
					waste management facility	facilities; Kirklees Council Site Safeguard Area of a waste management facility

SEA objective 5: Address poverty and inequality and encourage increased levels of social inclusion

C.10 Residential site options that fall within the most deprived areas of Kirklees can help regenerate those areas through new residential development and the delivery of supporting infrastructure.

Significance scoring for SEA objective 5 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- All other 0

Table C.3: SEA site assessment criteria for objective 5

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
5a Levels of deprivation	>=25% of site located within one of the 10% most deprived areas nationally	>=25% of site located within one of the 20% most deprived areas nationally	All other sites	N/A	N/A	Index of Multiple Deprivation

SEA objective 6: Support increased active and sustainable transport

C.11 The assessment criterion under this SEA objective considers the potential for residents to access a range of services and facilities by all modes of transport (other than private car). It is acknowledged that the actual use of sustainable transport modes will depend on people's behaviour. It is possible that new services and facilities and transport links such as bus routes or cycle paths will be provided as part of new developments, particularly at larger sites, but this is not assumed in assessing site options.

Significance scoring for SEA objective 6 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- All other 0

Table C.4: SEA site assessment criteria for objective 6

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
6a Accessibility by sustainable modes	Site rated as being most accessible to a variety of services and facilities **[See reference** 320**]** by all modes of transport (other than private car) as per the Department for Transport Connectivity Tool	Site rated as being more accessible to a variety of services and facilities by all modes of transport (other than private car) as per the Department for Transport Connectivity Tool	N/A	Site rated as being less accessible to a variety of services and facilities by all modes of transport (other than private car) as per the Department for Transport Connectivity Tool	Site rated as being least accessible to a variety of services and facilities by all modes of transport (other than private car) as per the Department for Transport Connectivity Tool	Outputs of Department for Transport Connectivity Tool

SEA objective 7: Support increased economic growth and prosperity

C.12 The location of residential sites will influence the achievement of this objective by affecting how easily residents can access job opportunities in existing employment areas. Assessment of this SEA objective also acknowledges that if residential development takes place on existing employment sites, it would result in the loss of employment uses. Furthermore, where residential development occurs in areas that are noted to be more deprived in relation to employment provision as identified through the Index of Multiple Deprivation, there is potential for new residents to be similarly excluded from the workforce.

Significance scoring for SEA objective 7 criteria

Criteria 7a, 7c and 7d are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Minor negative <0 to >-2
- Significant negative <= -2

Table C.5: SEA site assessment criteria for objective 7

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
7a Loss of employment land	N/A	N/A	All other sites	1.0-24.9% of site is an existing employment area	>=25% of site is an existing employment area or the site is identified as containing an existing employment generating use	Kirklees Council employment area data
7b Provision of employment sites	N/A for residential site options	N/A for residential site options	N/A for residential site options	N/A for residential site options	N/A for residential site options	N/A
7c Employment deprivation	N/A	N/A	All other sites	>=25% of site located within one of the 20-40% most deprived areas nationally (‘Employment'	>=25% of site located within one of the 20% most deprived areas nationally (‘Employment'	'Employment' domain of the Index of Multiple Deprivation 2019

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
				domain of the Index of Multiple Deprivation).	domain of the Index of Multiple Deprivation).	
7d Access to employment sites	Site rated as being most accessible to workplaces as per the Department for Transport Connectivity Tool	Site rated as being more accessible to workplaces as per the Department for Transport Connectivity Tool	N/A	Site rated as being less accessible to workplaces as per the Department for Transport Connectivity Tool	Site rated as being least accessible to workplaces as per the Department for Transport Connectivity Tool	Outputs of Department for Transport Connectivity Tool

SEA objective 8: Enhance the regeneration of town, district and local centres

C.13 The proximity of residential site options to town centre locations has been considered as this has the potential to increase footfall and contribute towards the viability of these areas. Furthermore, Kirklees Council has identified town centre blueprint areas within which certain types of development could support regeneration. Where development sites align with the identified needs of a blueprint area, positive regeneration is more likely to be achieved.

Significance scoring for SEA objective 8 criteria

Criteria 8a to 8b are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Minor negative <0 to >-2
- Significant negative <= -2

Table C.6: SEA site assessment criteria for objective 8

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
8a Town centres	<=400m from town centre OR <=200m from district centre	401-800m from town centre OR 201-400m from district centre	N/A	801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre	>1,200m from town centre AND >800m from district centre AND >400m from local centre	Kirklees Council centre data
8b Town centres	Sites for a compatible use that lie within a town centre blueprint area	N/A	N/A	N/A	N/A	Kirklees Council town centre blueprints

SEA objective 9: Opportunities to improve levels of skills and education

C.14 Residential sites that are accessible to schools will help to ensure residents have access to education facilities. The assessment of site options does not consider whether there is capacity at schools to accommodate new residents and whether new residential development supports the provision of additional education capacity.

Significance scoring for SEA objective 9 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- All other 0

Table C.7: SEA site assessment criteria for objective 9

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
9a Education facilities	Site rated as being most accessible to education facilities as per the Department for Transport Connectivity Tool	Site rated as being more accessible to education facilities as per the Department for Transport Connectivity Tool	N/A	Site rated as being less accessible to education facilities as per the Department for Transport Connectivity Tool	Site rated as being least accessible to education facilities as per the Department for Transport Connectivity Tool	Outputs of Department for Transport Connectivity Tool

SEA objective 10: Reduce air pollution and help to ensure that air quality objectives are met

C.15 The site assessment criteria focus on the potential for development to contribute to traffic within AQMAs, to contribute to air pollution in areas where there are already issues of poor air quality, or to result in new residents being exposed to air pollution.

C.16 The assessment of site options does not take into account planned measures that will improve future air quality (such as the ban on sale of new petrol and diesel cars in the UK from 2035), or site-specific mitigation. The effect of the plan as a whole on air quality will be assessed elsewhere, within the cumulative effects section of the SEA.

C.17 In 2021, the WHO updated its recommended guidelines for air pollutants ("WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulphur dioxide and carbon monoxide" **[See reference** 321**]**). The new air quality guidelines reflect the best available health evidence and WHO's recommendations continue to be recognised globally as the targets that should be met to protect public health. Minor negative effects are assumed to occur when residential development would occur in a location where the current baseline annual mean concentration of a pollutant exceeds these 2021 WHO guidelines. Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives **[See reference** 322**]**.

Significance scoring for SEA objective 10 criteria

Each criterion 10a to 10d is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table C.8: SEA site assessment criteria for objective 10

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
10a Air quality	N/A	N/A	All other sites	N/A	Site located within or connected to an AQMA	Defra AQMA mapping
10b NO_2 pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 10-40 µg/m3	>=25% of site has pollutant concentration of >40 µg/m3	Defra NO2 pollution data
10c PM_{10} pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 15-40 µg/m3	>=25% of site has pollutant concentration of >40 µg/m3	Defra PM10 pollution data
10d $PM_{2.5}$ pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 5-20 µg/m3	>=25% of site has pollutant concentration of >20 µg/m3	Defra PM2.5 pollution data

SEA objective 11: Promote the reuse of land and protect and enhance soils

C.18 The appraisal of residential site options in relation to this SEA objective considers whether the site is greenfield or brownfield and also what quality of agricultural land it contains (based on the Agricultural Land Classification). Development on brownfield land represents a more efficient use of land in comparison to the development of greenfield sites.

Significance scoring for SEA objective 11 criteria

If criterion 11a is a major positive then site scores significant positive, irrespective of criterion 11b.

If criterion 11a is not major positive, then criteria 11a to 11b are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Minor negative <0 to >-2
- Significant negative <= -2

Table C.9: SEA site assessment criteria for objective 11

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
11a Brownfield/ greenfield land	Majority of site is brownfield land (i.e. >50%)	N/A	N/A	N/A	Majority of site is greenfield land (i.e. >50%)	Contained within the shapefile for each site provided by Kirklees Council
11b Agricultural Land Classification	N/A	N/A	All other sites	Greenfield site with >=25% area classed as Grade 3 agricultural land (but not with >=25% area classed as Grade 1 or 2 agricultural land)	Greenfield site with >=25% area classed as Grade 1 or 2 agricultural land	Natural England Agricultural Land Classification

SEA objective 12: Protect and enhance water quality and help to ensure the achievement of water efficiency targets

C.19 Levels of water consumption within new development will be determined by its design and onsite practices, rather than the location of the site, and therefore effects on water resource availability are not considered in the assessment of site options. However, the location of development could affect water quality during construction depending on its proximity to watercourses, water bodies and Groundwater Source Protection Zones. The extent to which water quality is actually affected would depend on construction techniques and the use of Sustainable Drainage Systems. These practices will be promoted and secured through the detailed design proposals for each site at the planning application stage and through other Local Plan policies, are appraised separately.

Significance scoring for SEA objective 12 criteria

Each criterion 12a and 12b is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible 0
- Minor negative <0 to >-2

Table C.10: SEA site assessment criteria for objective 12

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
12a Source Protection Zones	N/A	N/A	All other sites.	>=25% site falls within Source Protection Zone 2 or 3.	>=25% site falls within Source Protection Zone 1.	Environment Agency Source Protection Zones
12b Water quality	N/A	N/A	All other sites	Site is within 100m of a watercourse or water body	Site contains a watercourse or water body	Ordnance Survey Open Rivers watercourses data; Ordnance Survey water bodies

SEA objective 13: Limit the effects of flooding on people and property

C.20 The location of residential site options in relation to areas of fluvial and surface water flood risk is considered through this SEA objective.

Significance scoring for SEA objective 13 criteria

If either criterion 13a or 13b receives a major negative, the SEA objective automatically receives a significant negative effect.

If both of these criteria are minor negative, then a significant negative is given.

If only one criterion of these two scores minor negative and the other scores negligible, then a minor negative is given.

Table C.11: SEA site assessment criteria for objective 13

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
13a Flood zones	N/A	N/A	All other sites	>=25% site within Flood Zone 2	>=25% site within Flood Zone 3	Environment Agency Flood Zone 3; Environment Agency Flood Zone 2
13b Surface water flood risk	N/A	N/A	All other sites	>=25% on land with a 1 in 100 year risk of surface water flooding	>=25% on land with a 1 in 30 year risk of surface water flooding	Environment Agency 1:30 surface water flooding data; Environment Agency 1:100 surface water flooding data

SEA objective 14: Support more efficient use of natural resources

C.21 The location of residential sites is not likely to influence sustainable design and construction techniques which would encourage more efficient use of natural resources. The location of sites is also not likely to have an effect on the recovery, re-use or recycling of waste materials, or the demand for recycled material. These will be more influenced by development management style policies, which have been appraised separately to site options. The potential for the re-use of brownfield land within site options has been considered separately under SEA objective 11.

C.22 However, there is potential for the location of residential development on site options to result in the loss of access to or sterilisation of mineral resources in Kirklees, and negative effects are recorded for SEA objective 14 where this is the case.

Significance scoring for SEA objective 14 criteria

Scoring of significance will match the minor and negligible effects:

- Minor negative -
- All other 0

Table C.12: SEA site assessment criteria for objective 14

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets
14a: Minerals locations	N/A	N/A	All other sites.	Significant proportion of site (>=25%) is within a Mineral Safeguarding Area, Minerals Area of Search, Minerals Extraction Site, Minerals Infrastructure Site or Minerals Preferred Area	N/A	Kirklees Council minerals locations

SEA objective 15: Protect and enhance biodiversity and geodiversity

C.23 Residential sites that are close to internationally, nationally or locally designated nature conservation sites have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure. Conversely, there may be opportunities to promote habitat connectivity if new developments include green blue infrastructure. Therefore, while proximity of residential site options to designated sites provides an indication of the potential for an adverse effect, appropriate mitigation may avoid adverse effects and may even result in beneficial effects. It is generally not considered proportionate for assessment at the plan level to attempt to identify the particular biodiversity assets present at different locations and their sensitivity to different types of development. Instead, this would be determined once more specific proposals are developed and submitted as part of a planning application. The separate Habitats Regulations Assessment also considers the potential for different types of impact pathways from site allocations in the Local Plan to have a significant effect on Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Significance scoring for SEA objective 15 criteria

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria score minor negative, then the effect is significant negative.

If only one criterion scores minor negative, then the effect is minor negative.

All other sites score negligible (0).

Table C.13: SEA site assessment criteria for objective 15

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
15a International and national biodiversity and geodiversity assets	N/A	N/A	All other sites	<=1km from an internationally or nationally designated site	<=250m from an internationally or nationally designated site	Natural England SSSI, Ramsar, SAC, SPA, NNR
15b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland	N/A	N/A	All other sites	<=250m from a LWS, LNR, Priority Habitat or Ancient Woodland	>=1% of site intersects with a LWS, LNR, Priority Habitat or Ancient Woodland	Local Wildlife Sites; Local Geological Sites; Local Nature Reserves (LNR); Natural England Priority Habitat Inventory; Natural England Ancient Woodland

SEA objective 16: Conserve and enhance the historic environment, including heritage assets and their settings

C.24 Development that results in harm to or loss of the significance of a heritage asset through alteration or destruction or development within its setting is required by the NPPF to be justified. Development could also enhance the significance of assets, provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset. In all cases, effects from a residential site option will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

C.25 The proximity tests outlined below are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a historic environment sensitivity study or similar for all reasonable alternative site options, effects identified by the SEA are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural versus urban areas.

Significance scoring for SEA objective 16 criteria

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

However, all effects for site options considered will acknowledge uncertainty in the absence of a heritage impact assessment. It is expected that heritage impact assessment work will be undertaken for sites proposed for allocation and where this is the case this work will be used to inform the appraisal of these sites. The use of this two stage approach for the

appraisal of site options and sites proposed for allocation will allow for a consistent approach to the appraisal work.

Table C.14: SEA site assessment criteria for objective 16

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
16a Proximity to historic assets: sites within existing settlements, or	N/A	N/A	All other sites	101-250m	<=100m	Kirklees Council settlement boundaries; Kirklees Council /Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens
16b Proximity to historic assets: sites outside of existing settlements	N/A	N/A	All other sites	501-1,000m	<=500m	Kirklees Council settlement boundaries; Kirklees Council /Historic England Conservation

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
						Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens

SEA objective 17: Protect and enhance landscapes of local value as well as the character and quality of townscapes

C.26 All development could have some effect depending on the character and sensitivity of the landscape and townscape, which needs to be assessed in the field. Residential site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. The actual effect on landscape/townscape will also depend on the design, scale and layout of development within the site, which may help mitigate any adverse effects on landscape and/or enhance effects on the existing townscape. Therefore, effects from a site option will be subject to a degree of uncertainty.

Significance scoring for SEA objective 17 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor negative -?
- Major negative --?
- All other 0?

Table C.15: SEA site assessment criteria for objective 17

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
17a Landscape sensitivity	N/A	N/A	Site identified as having no/limited sensitivity to development	Site identified as having low to medium sensitivity to development	Site identified as having medium or higher sensitivity to development	Kirklees Council landscape sensitivity work

Employment site assessment criteria

SEA objective 1: Contribute positively to delivering climate change mitigation measures

C.27 The extent to which the location of employment site options would facilitate the use of sustainable modes of transport in place of cars is considered separately under SEA objective 6. The location of development will not otherwise affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design. This SEA objective is therefore scoped out for the appraisal of site options. It will be considered further as part of the appraisal of policies included in the Local Plan and any related reasonable alternatives.

SEA objective 2: Support increased resilience to the effects of climate change

C.28 The extent to which the location of employment site options would be affect by flood risk is considered separately under SEA objective 13. The location of development will not otherwise affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan and details submitted at the planning application stage for development sites which includes essential infrastructure such as foul drainage. This SEA objective is therefore scoped out for the appraisal of site options. It will be considered further as part of the appraisal of policies included in the Local Plan and any related reasonable alternatives.

SEA objective 3: Ensure the delivery of homes that meet local needs, including affordable housing

C.29 The delivery, specific location and size of employment sites will not influence the ability of Kirklees to provide a sufficient level and suitable mix of housing to meet its assessed need over the plan period. This objective has therefore been scoped out for the appraisal of employment site options.

SEA objective 4: Support improved levels of public health and wellbeing and help to address health inequalities

C.30 Employment sites that are close to existing areas of open space and Public Rights of Way (PRoWs) will help ensure residents have access to facilities that encourage more active lifestyles during breaks and before and after working hours. The accessibility of employment sites to healthcare facilities is not expected to greatly influence the potential for residents to access these types of facilities given that the majority of journeys are likely to be made from home. While noise pollution and odours can have adverse effects on wellbeing, these issues are most relevant when considering a population's regular living environment. As such these issues are also not considered for the assessment of employment sites.

Significance scoring for SEA objective 4 criteria

Criteria 4a to 4c are scored:

- Major positive +3
- Minor positive +1
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Minor negative <0 to >-2
- Significant negative <= -2

Table C.16: SEA site assessment criteria for objective 4

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
4a Open space, sport and recreation	<=480m from open space	481-720m from open space	N/A	721-1,200m from open space	>1,200m from open space	Kirklees Council open space data showing parks and recreation grounds, natural/semi-natural greenspace, amenity greenspace, allotments and play facilities
4b Loss of open space	N/A	N/A	All other sites	1-24.9% of site is open space	>=25% of site is open space	Kirklees Council open space data
4c Public Rights of Way (PRoW)	<=200m from PRoW	201-400m from PRoW	N/A	401-800m from PRoW	>800m from PRoW	Kirklees Council PRoW data
4d healthcare facilities	N/A	N/A	N/A	N/A	N/A	N/A

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
4e Noise pollution from roads and railways	N/A	N/A	N/A	N/A	N/A	N/A
4f Odour	N/A	N/A	N/A	N/A	N/A	N/A

SEA objective 5: Address poverty and inequality and encourage increased levels of social inclusion

C.31 Employment site options that fall within the most deprived areas of Kirklees can help regenerate those areas through new employment development and the delivery of supporting infrastructure.

Significance scoring for SEA objective 5 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- All other 0

Table C.17: SEA site assessment criteria for objective 5

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
5a Levels of deprivation	>=25% of site located within one of the 10% most deprived areas nationally	>=25% of site located within one of the 20% most deprived areas nationally	All other sites	N/A	N/A	Index of Multiple Deprivation

SEA objective 6: Support increased active and sustainable transport

C.32 The assessment criteria under this SEA objective look at the accessibility of employment sites to residential properties by all modes of transport (other than private car). It is acknowledged that the actual use of sustainable transport modes will depend on people's behaviour. It is possible that new services and facilities and transport links such as bus routes or cycle paths will be provided as part of new developments, particularly at larger sites, but this is not assumed in assessing site options.

Significance scoring for SEA objective 6 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- All other 0

Table C.18: SEA site assessment criteria for objective 6

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
6a Accessibility by sustainable modes	Site rated as being most accessible to residential properties by all modes of transport (other than private car) as per the Department for Transport Connectivity Tool	Site rated as being more accessible to residential properties by all modes of transport (other than private car) as per the Department for Transport Connectivity Tool	N/A	Site rated as being less accessible to residential properties by all modes of transport (other than private car) as per the Department for Transport Connectivity Tool	Site rated as being least accessible to residential properties by all modes of transport (other than private car) as per the Department for Transport Connectivity Tool	Outputs of Department for Transport Connectivity Tool

SEA objective 7: Support increased economic growth and prosperity

C.33 The allocation of employment land in Kirklees will contribute to economic growth regardless of its location. Larger sites will make a substantial contribution to meeting the employment needs of the plan area. Where employment development occurs in areas that are noted to be more deprived in relation to employment provision as identified through the Index of Multiple Deprivation, it is likely to help address the exclusion of certain parts of the local population from the workforce.

Significance scoring for SEA objective 7 criteria

Criteria 7b and 7c are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Minor negative <0 to >-2
- Significant negative <= -2

Table C.19: SEA site assessment criteria for objective 7

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
7a Loss of employment land	N/A	N/A	N/A	N/A	N/A	Kirklees Council employment area data
7b Provision of employment sites	Sites that are >=3ha	Sites that are <3ha	N/A	N/A	N/A	Within the shapefile for the site
7c Employment deprivation	>=25% of site is located within one of the 20% most deprived areas nationally (‘Employment’ domain of the Index of Multiple Deprivation).	>=25% of site located within one of the 20-40% most deprived areas nationally (‘Employment’ domain of the Index of Multiple Deprivation).	All other sites	N/A	N/A	'Employment' domain of the Index of Multiple Deprivation 2019
7d Access to jobs, N.B. Jobs density = number of	N/A	N/A	N/A	N/A	N/A	N/A

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
employees / population						

SEA objective 8: Enhance the regeneration of town, district and local centres

C.34 The proximity of employment site options to town centre locations has been considered as this has the potential to increase footfall and contribute towards the viability of these areas. Furthermore, Kirklees Council has identified town centre blueprint areas within which certain types of development could support regeneration. Where development sites align with the identified needs of a blueprint area, positive regeneration is more likely to be achieved.

Significance scoring for SEA objective 8 criteria

Criteria 8a to 8b are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Minor negative <0 to >-2
- Significant negative <= -2

Table C.20: SEA site assessment criteria for objective 8

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
8a Town centres	<=400m from town centre OR <=200m from district centre	401-800m from town centre OR 201-400m from district centre	N/A	801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre	>1,200m from town centre AND >800m from district centre AND >400m from local centre	Kirklees Council centre data
8b Town centres	Sites for a compatible use that lie within a town centre blueprint area	N/A	N/A	N/A	N/A	Kirklees Council town centre blueprints

SEA objective 9: Opportunities to improve levels of skills and education

C.35 The ability of employment site options to support opportunities for training and learning will be most influenced by the specific uses to be delivered at the site. For example, where a site is to be developed to incorporate uses that support the green economy and is likely to provide opportunities for training local people in high value, long term areas of employment. Given that this level of detail is not available for all employment site options, a negligible effect is recorded for all sites.

SEA objective 10: Reduce air pollution and help to ensure that air quality objectives are met

C.36 The site assessment criteria focus on the potential for development to contribute to traffic within AQMAs, to contribute to air pollution in areas where there are already issues of poor air quality, or to result site users being exposed to air pollution.

C.37 The assessment of site options does not take into account planned measures that will improve future air quality (such as the ban on sale of new petrol and diesel cars in the UK from 2035), or site-specific mitigation. The effect of the plan as a whole on air quality will be assessed elsewhere, within the cumulative effects section of the SEA.

C.38 In 2021, the WHO updated its recommended guidelines for air pollutants ("WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulphur dioxide and carbon monoxide" **[See reference** 323**]**. The new air quality guidelines reflect the best available health evidence and WHO's recommendations continue to be recognised globally as the targets that should be met to protect public health. Minor negative effects are assumed to occur when employment development would occur in a location where the current baseline annual mean concentration of a pollutant exceeds these 2021 WHO guidelines. Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives **[See reference** 324**]**.

Significance scoring for SEA objective 10 criteria

Each criterion 10a to 10d is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible 0
- Minor negative <0 to >-2
- Significant negative <= -2

Table C.21: SEA site assessment criteria for objective 10

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
10a Air quality	N/A	N/A	All other sites	N/A	Site located within or connected to an AQMA	Defra AQMA mapping
10b NO_2 pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 10-40 µg/m3	>=25% of site has pollutant concentration of >40 µg/m3	Defra NO2 pollution data
10c PM_{10} pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 15-40 µg/m3	>=25% of site has pollutant concentration of >40 µg/m3	Defra PM10 pollution data
10d $PM_{2.5}$ pollution	N/A	N/A	All other sites	>=25% of site has pollutant concentration of 5-20 µg/m3	>=25% of site has pollutant concentration of >20 µg/m3	Defra PM2.5 pollution data

SEA objective 11: Promote the reuse of land and protect and enhance soils

C.39 The appraisal of employment site options in relation to this SEA objective considers whether the site is greenfield or brownfield and also what quality of agricultural land it contains (based on the Agricultural Land Classification). Development on brownfield land represents a more efficient use of land in comparison to the development of greenfield sites.

Significance scoring for SEA objective 11 criteria

If criterion 11a is a major positive then site scores significant positive, irrespective of criterion 11b.

If criterion 11a is not major positive, then criteria 11a to 11b are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Minor negative <0 to >-2
- Significant negative <= -2

Table C.22: SEA site assessment criteria for objective 11

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
11a Brownfield/ greenfield land	Majority of site is brownfield land (i.e. >50%)	N/A	N/A	N/A	Majority of site is greenfield land (i.e. >50%)	Contained within the shapefile for each site provided by Kirklees Council
11b Agricultural Land Classification	N/A	N/A	All other sites	Greenfield site with >=25% area classed as Grade 3 agricultural land (but not with >=25% area classed as Grade 1 or 2 agricultural land)	Greenfield site with >=25% area classed as Grade 1 or 2 agricultural land	Natural England Agricultural Land Classification

SEA objective 12: Protect and enhance water quality and help to ensure the achievement of water efficiency targets

C.40 Levels of water consumption within new development will be determined by its design and onsite practices, rather than the location of the site, and therefore effects on water resource availability are not considered in the assessment of site options. However, the location of development could affect water quality during construction depending on its proximity to watercourses, water bodies and Groundwater Source Protection Zones. The extent to which water quality is actually affected would depend on construction techniques and the use of Sustainable Drainage Systems. These practices will be promoted and secured through the detailed design proposals for each site at the planning application stage and through other Local Plan policies, are appraised separately.

Significance scoring for SEA objective 12 criteria

Each criterion 12a and 12b is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive >= +2
- Minor positive >0 to <2
- Negligible 0
- Minor negative <0 to >-2

Table C.23: SEA site assessment criteria for objective 12

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
12a Source Protection Zones	N/A	N/A	All other sites.	>=25% site falls within Source Protection Zone 2 or 3.	>=25% site falls within Source Protection Zone 1.	Environment Agency Source Protection Zones
12b Water quality	N/A	N/A	All other sites	Site is within 100m of a watercourse or water body	Site contains a watercourse or water body	Ordnance Survey Open Rivers watercourses data; Ordnance Survey water bodies

SEA objective 13: Limit the effects of flooding on people and property

C.41 The location of employment site options in relation to areas of fluvial and surface water flood risk is considered through this SEA objective.

Significance scoring for SEA objective 13 criteria

If either criterion 13a or 13b receives a major negative, the SEA objective automatically receives a significant negative effect.

If both of these criteria are minor negative, then a significant negative is given.

If only one criterion of these two scores minor negative and the other scores negligible, then a minor negative is given.

Table C.24: SEA site assessment criteria for objective 13

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
13a Flood zones	N/A	N/A	All other sites	>=25% site within Flood Zone 2	>=25% site within Flood Zone 3	Environment Agency Flood Zone 3; Environment Agency Flood Zone 2
13b Surface water flood risk	N/A	N/A	All other sites	>=25% on land with a 1 in 100 year risk of surface water flooding	>=25% on land with a 1 in 30 year risk of surface water flooding	Environment Agency 1:30 surface water flooding data; Environment Agency 1:100 surface water flooding data

SEA objective 14: Support more efficient use of natural resources

C.42 The location of employment sites is not likely to influence sustainable design and construction techniques. This includes the production of waste from the consumption of materials or resources, volumes of waste produced including the generation of hazardous waste, or the construction/demolition waste sent to waste management/recycling centres or landfill. The location of sites is also not likely to have an effect on the recovery, re-use or recycling of waste materials, or the demand for recycled material. The potential for the re-use of brownfield land has been considered separately under SEA objective 11.

C.43 However, there is potential for the location of employment development to result in the loss of access to or sterilisation of mineral resources in Kirklees and negative effects are recorded where this is the case.

Significance scoring for SEA objective 14 criteria

Scoring of significance will match the minor and negligible effects:

- Minor negative -
- All other 0

Table C.25: SEA site assessment criteria for objective 14

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets
14a: Minerals locations	N/A	N/A	All other sites.	Significant proportion of site (>=25%) is within a Minerals Area of Search, Minerals Extraction Site, Minerals Infrastructure Site or Minerals Preferred Area	N/A	Kirklees Council minerals locations

SEA objective 15: Protect and enhance biodiversity and geodiversity

C.44 Employment sites that are close to internationally, nationally or locally designated nature conservation sites have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure. Conversely, there may be opportunities to promote habitat connectivity if new developments include green blue infrastructure. Therefore, while proximity of employment site options to designated sites provides an indication of the potential for an adverse effect, appropriate mitigation may avoid adverse effects and may even result in beneficial effects. It is generally not considered proportionate for assessment at the plan level to attempt to identify the particular biodiversity assets present at different locations and their sensitivity to different types of development. Instead, this would be determined once more specific proposals are developed and submitted as part of a planning application. The separate Habitats Regulations Assessment also considers the potential for different types of impact pathways from site allocations in the Local Plan to have a significant effect on Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Significance scoring for SEA objective 15 criteria

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria score minor negative, then the effect is significant negative.

If only one criterion scores minor negative, then the effect is minor negative.

All other sites score negligible (0).

Table C.26: SEA site assessment criteria for objective 15

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
15a International and national biodiversity and geodiversity assets	N/A	N/A	All other sites	<=1km from an internationally or nationally designated site	<=250m from an internationally or nationally designated site	Natural England SSSI, Ramsar, SAC, SPA, NNR
15b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland	N/A	N/A	All other sites	<=250m from a LWS, LNR, Priority Habitat or Ancient Woodland	>=1% of site intersects with a LWS, LNR, Priority Habitat or Ancient Woodland	Local Wildlife Sites; Local Geological Sites; Local Nature Reserves (LNR); Natural England Priority Habitat Inventory; Natural England Ancient Woodland

SEA objective 16: Conserve and enhance the historic environment, including heritage assets and their settings

C.45 Development that results in harm to or loss of the significance of a heritage asset through alteration or destruction or development within its setting is required by the NPPF to be justified. Development could also enhance the significance of assets, provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset. In all cases, effects from a employment site option will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

C.46 The proximity tests outlined below are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a historic environment sensitivity study or similar for all reasonable alternative site options, effects identified by the SEA are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural versus urban areas.

Significance scoring for SEA objective 16 criteria

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

However, all effects for site options considered will acknowledge uncertainty in the absence of a heritage impact assessment. It is expected that heritage impact assessment work will be undertaken for sites proposed for allocation and where this is the case this work will be used to inform the appraisal of these sites. The use of this two stage approach for the

appraisal of site options and sites proposed for allocation will allow for a consistent approach to the appraisal work.

Table C.27: SEA site assessment criteria for objective 16

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
16a Proximity to historic assets: sites within existing settlements, or	N/A	N/A	All other sites	101-250m	<=100m	Kirklees Council settlement boundaries; Kirklees Council /Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens
16b Proximity to historic assets: sites outside of existing settlements	N/A	N/A	All other sites	501-1,000m	<=500m	Kirklees Council settlement boundaries; Kirklees Council /Historic England Conservation

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
						Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens

SEA objective 17: Protect and enhance landscapes of local value as well as the character and quality of townscapes

C.47 All development could have some effect depending on the character and sensitivity of the landscape and townscape, which needs to be assessed in the field. Employment site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. The actual effect on landscape/townscape will also depend on the design, scale and layout of development within the site, which may help mitigate any adverse effects on landscape and/or enhance effects on the existing townscape. Therefore, effects from a site option will be subject to a degree of uncertainty.

Significance scoring for SEA objective 17 criteria

Scoring of significance will match the major, minor and negligible effects:

- Minor negative -?
- Major negative --?
- All other 0?

Table C.28: SEA site assessment criteria for objective 17

Criterion	Major positive	Minor positive	Negligible	Minor negative	Major negative	Data
17a Landscape sensitivity	N/A	N/A	Site identified as having no/limited sensitivity to development	Site identified as having low to medium sensitivity to development	Site identified as having medium or higher sensitivity to development	Kirklees Council landscape sensitivity work

Appendix D

Consultation Comments received on the SA Scoping Report and how they have been addressed

Environment Agency

Comment

D.1 Recommends better integration of water-related topics into the wider narrative of Green Infrastructure, encouraging the consistent use of the term “Green Blue Infrastructure” to reflect both land and water-based assets.

SEA team response/ action

D.2 Reference to “Green-Blue Infrastructure” is now included throughout the report where appropriate.

Comment

D.3 States that the Scoping Report underrepresented issues of water demand and consumption, especially in light of development growth and climate change. The baseline information and SEA objectives should more accurately reflect the potential impact of water demand and consumption from economic growth and housing delivery.

SEA team response/ action

D.4 The baseline information (Chapter 3) has been updated to include further information on water demand and consumption. SEA objective 12: water quality and water resources has been updated to include an additional appraisal question “Will it help to reduce water demand and per capita water consumption in light of expected demand from new housing and economic growth in the plan area?”

Comment

D.5 Notes that groundwater protection is currently considered in a narrow context and recommends expanding coverage to include wider considerations such as community use of groundwater, full characteristics of groundwater, how local communities use their groundwater and the location of potentially contaminated land/ future higher risk development. Recommends that the SEA should be revised to reflect other key aspects of groundwater as detailed in the Environment Agency's approach to groundwater protection document.

SEA team response/ action

D.6 The policy context (Chapter 2 and Appendix A) has been updated to refer to The Environment Agency's approach to groundwater protection document.

Comment

D.7 Suggests greater emphasis on the importance of following the drainage hierarchy to protect the environment for wildlife and human health. This should be reflected in the SEA and Local Plan

SEA team response/ action

D.8 SEA objective 12: water quality and water resources has been updated to include an additional appraisal question "Will it promote the achievement of the drainage hierarchy to protect the environment for wildlife and human health?"

Comment

D.9 Supports the separation of climate mitigation and adaptation into separate objectives. However, suggests that SEA objective 1: climate change mitigation is framed to be a facilitator in the positive contribution towards delivering climate change mitigation measures.

SEA team response/ action

D.10 SEA objective 1: climate change mitigation has been updated to "SA objective 1: Contribute positively to delivering climate change mitigation measures".

Comment

D.11 Notes support for SEA objective 2: climate resilience.

SEA team response/ action

D.12 Comment noted.

Comment

D.13 Recommends that in the text for SEA objective 10: air quality “promote” should be replaced in the title as the emphasis should be more of implementation and enforcement.

SEA team response/ action

D.14 SA objective 10: air quality has been updated to “SEA objective 10: Reduce air pollution and help to ensure that air quality objectives are met”.

Comment

D.15 States that “promote” should not be used in the title of SEA objective 12: water quality and water resources given that it is passive rather than instructive.

SEA team response/ action

D.16 SEA objective 12: water quality and water resources has been updated to “SA objective 12: Protect and enhance water quality and help to ensure the achievement of water efficiency targets”.

Comment

D.17 Recommends that clear reference is made to the Water Framework Directive (WFD) in the appraisal questions relating to SEA objective 12.

D.18 Considers that the passive support in the Appraisal Questions (promote… where appropriate) for deculverting does not comply with the mandatory targets of the WFD and questions what the aspired aims are corresponding to biodiversity.

D.19 Recommends that an indicator is included that considers the length of rivers protected and enhanced via WFD and net gain ambitions.

D.20 Recommends than an indicator is included in relation to measurable biodiversity net gain and achieving 10% or more on developments in accordance with legislation and the NPPF.

SEA team response/ action

D.21 SEA objective 12: water quality and water resources is supported by the following assessment questions that address the consultee's recommendations:

- Will it help to prevent water pollution, improve ecological and chemical conditions in waterbodies and support the protection and enhancement of rivers in and around Kirklees in accordance with the Water Framework Directive (WFD)?
- Will it help to achieve the deculverting of the watercourses and in Kirklees?

D.22 SEA objective 15: biodiversity and geodiversity is supported by an assessment question that addresses the achievement of biodiversity net gain of 10% or more on developments.

Comment

D.23 Recommends adding to consideration of water supply through SEA objective 12: water quality and resources by also including reference to a focus on water efficiency.

D.24 Recommends considering an indicator that reflects employment and housing development with water efficiency elements (e.g. greywater capture/ SuDS). Also suggests an indicator that reflects the policy shift towards all new homes meeting the mandatory national standard set out in the Building Regulations of 125 litres/person/day.

SEA team response/ action

D.25 As highlighted earlier in this appendix, SEA objective 12: water quality and water resources has been updated to "SEA objective 12: Protect and enhance water quality and help to ensure the achievement of water efficiency targets".

D.26 SEA objective 12: water quality and water resources is supported by the following assessment questions that address the consultee's recommendations:

- Will it help to ensure the adoption of more stringent water efficiency standards in developments such as the incorporation of efficiency measures such as greywater capture and SuDS?
- Will it help to ensure the incorporation of the mandatory national water efficiency standard for housing set out in the Building Regulations of 125 litres/person/day?

Comment

D.27 Suggests that the use of the verb "prevent" in the title of SEA objective 13: flood risk should be replaced, given that when considered in light of the effects of climate change this is unlikely to be achievable.

SEA team response/ action

D.28 SEA objective 13 has been redrafted to read "SA objective 13: Limit the effects of flooding on people and property".

D.29 SEA objective 13 is also supported by the updated assessment question "Will it ensure that development does not expose people and property to risk of flooding, taking into account the impacts of climate change?" To avoid duplication the appraisal question "Will it support opportunities for flood risk reduction?" that was included in the SA Scoping Report is deleted.

Comment

D.30 All waste sources should be adequately reflected in the SEA and the Council should consider whether there will there be a demand to provide for these by the Local Plan. Attention is drawn to the limited reference to commercial waste and the complete absence of construction, excavation and demolition wastes, plus also hazardous wastes.

D.31 There may be guidance to assist Kirklees in the waste management plan for England and national planning policy on waste.

SEA team response/ action

D.32 The baseline information presented in Chapter 3 includes a more thorough overview of waste in Kirklees. The review of relevant plans, policies and programmes in Appendix A includes the Waste Management Plan for England and National Planning Policy for Waste.

D.33 Furthermore, SEA objective 14: Support more efficient use of natural resources is now supported by the revised assessment question "Will it help to reduce all types of waste (including household, commercial, construction, excavation, demolition and hazardous)?"

Comment

D.34 Recommends that reference is made to the WFD in the indicators relating to SEA objective 15: biodiversity and geodiversity within the context of the role blue infrastructure and improved water quality plays for supporting biodiversity. An indicator that considers the kilometres of rivers protected and enhanced via WFD and net gain ambitions is considered appropriate.

D.35 Also recommends an indicator in relation to measurable biodiversity net gain and achieving 10% or more on developments in line with the Environment Bill. Furthermore, the verb "support" should not be used given that biodiversity net gain is a legal requirement and the text should reflect the need to comply.

SEA team response/ action

D.36 SEA objective 15: biodiversity and geodiversity is supported by the following assessment questions that address the consultee's recommendations:

- Will it help to improve ecological conditions in waterbodies and support an increase in the length of rivers protected and enhanced in line with the WFD in Kirklees?
- Will it help to ensure the achievement of biodiversity net gain of 10% or more in developments in line with the Environment Act?

Comment

D.37 Recommends including additional plans in the review of policies and programmes. Specific attention is drawn to the Waste Framework Directive, the

Catchment Flood Risk Management Plans, the Catchment Abstraction Management Strategies, and the Environment Agency's guidance on groundwater protection.

SEA team response/ action

D.38 The review of plans, policies and programmes included in Chapter 2 and Appendix A now includes the documents highlighted by the consultee.

Natural England

Comment

D.39 States that no specific comments are made in relation to the SEA Scoping Report.

SEA team response/ action

D.40 Comment noted.

Historic England

Comment

D.41 States that the baseline information set out in the report lacks detail on the historic environment, particularly in relation to risks and pressures affecting heritage assets.

SEA team response/ action

D.42 The baseline information in Chapter 3 to reflect the latest situation with designated heritage assets including Conservation Areas.

Comment

D.43 States that the summary of designated heritage assets (e.g. listed buildings, conservation areas and scheduled monuments) should be reviewed and verified. Makes reference to Historic England data from September 2023 (see link below) which suggests that there are 2,980 Listed Buildings, 22 Scheduled Monuments, 4 Registered Park and Gardens and 57 Conservation Areas within the Kirklees Council area: Designated Assets, Protected Areas and the Built Environment

SEA team response/ action

D.44 The summary of designated heritage assets has been reviewed as part of drafting the updated baseline information in this report. The updated information is presented in Chapter 3.

Comment

D.45 States that figures relating to the Heritage at Risk register appeared incorrect, as some designated assets listed as “at risk” fall outside the Kirklees boundary. The Castle Hill Scheduled Monument and various listed buildings at Home Farm are provided as examples.

D.46 Furthermore, although the number of assets on the Heritage at Risk register in Kirklees has declined from 2019 to 2023 (from 25 to 23), ongoing risk remains, and the SEA should recognise this improvement while still focusing on protection needs. The SEA should also provide further information on the trend for recent years.

SEA team response/ action

D.47 Baseline information about the Heritage at Risk register has been checked and updates have been made where appropriate in Chapter 3.

D.48 The environmental and sustainability issues set out in Chapter 4 of this report include reference to the trend towards decreasing numbers of heritage assets in Kirklees found on the Heritage at Risk register and also the continued need to ensure that assets are adequately protected. The baseline information in Chapter also sets out an overview of changes in the number of heritage assets at risk in Kirklees in recent years.

Comment

D.49 Recommends including Conservation Area Character Appraisals and Management Plans in the review of relevant plans, policies and programmes.

SEA team response/ action

D.50 The baseline information included in Chapter 3 details which Conservation Areas benefit from Appraisals and Management Plans in Kirklees. It is considered excessive to include a review of all of these documents given the large number.

City of Bradford Metropolitan District Council

Comment

D.51 Suggests that figures in the SEA Scoping Report (e.g. Figure 1.1) could more clearly distinguish the Kirklees Local Planning Authority boundary from the wider district boundary, reflecting the area covered by the Peak District National Park.

SEA team response/ action

D.52 Figures in this report clearly distinguish the Kirklees Local Planning Authority boundary from the wider district area and include a clearer visual delineation of the Peak District National Park area.

Calderdale Council

Comment

D.53 States that there are a large number of proposed scores in the SEA and that this may over-complicate the process.

SEA team response/ action

D.54 LUC has prepared numerous SEA Report for Local Plans and is greatly experienced in this area of work. The scoring system proposed has been used for the majority of these reports. The scores proposed allow for the identification of a range of effects, from significant positive to significant negative as well as mixed effects.

Comment

D.55 Notes that SEA objective 4 refers to supporting health care infrastructure delivery. Queries whether the first part of question 1 for SEA Objective 4 is appropriate given the Local Plan does not deliver health care facilities.

SEA team response/ action

D.56 The adopted NPPF states that “strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for … community facilities (such as health, education and cultural infrastructure)”. As such it is considered appropriate for the SEA to consider the support the plan provides for these types of provisions.

Comment

D.57 Suggests incorporating the West Yorkshire Combined Authority’s guidance on dementia-ready housing design into the Health Impact Assessment Framework in Appendix B of the SEA Scoping Report.

SEA team response/ action

D.58 The Health Impact Assessment Framework in Appendix B of this report notes the role “good design and orientation including internal layout (such as that promoted

through the nationally described space standards and WYCA's dementia-ready housing design criteria)" can play in terms of promoting health and wellbeing under the "positive effects of planning" heading. Furthermore, the decision-making questions include "does the plan … promote adaptable/ lifetime homes, including those for older people and people with disabilities such as dementia?". In this way the appraisal of the Local Plan through the HIA considers its alignment with WYCA's dementia-ready housing design criteria.

Comment

D.59 States that it is not clear in Appendix C of the SEA Scoping Report whether the data employed for SEA will be used for site assessments for the Local Plan.

SEA team response/ action

D.60 The site assessment criteria in Appendix C of this report are applicable to the assessment of site options through the SEA only.

Comment

D.61 Recommends that site type (i.e. whether a site is greenfield or brownfield) should be considered as part of the assessment of SEA objectives 1, 2, 8 and 11.

SEA team response/ action

D.62 The recommendation is noted. Site type relates most directly to SEA objective 11: reuse of land and soils. Therefore, this objective considers whether a site is greenfield or brownfield. SEA objectives 1: climate change mitigation, 2: climate change resilience and 8: town centres are less influenced by this issue. It is not considered appropriate to also consider whether a site is greenfield or brownfield within SEA objectives 1, 2 and 8, in order to avoid double counting effects relating to this issue.

Comment

D.63 Suggests that the location of proposed development should be considered under SEA objective 1: climate change mitigation. A settlement hierarchy might be employed to inform the appraisal of this objective.

SA team response/ action

D.64 As stated in text for SEA objective 1, the extent to which the location of site options would facilitate the use of sustainable modes of transport in place of cars is considered separately under SEA objective 6: sustainable transport.

Wakefield Council

Comment

D.65 States that the West Yorkshire Local Nature Recovery Strategy should be listed in the review of sub-national plans and programmes.

D.66 Notes that paragraph 2.16 of the Scoping Report cites the July 2021 version of the NPPF and advises that this should be updated to reflect the December 2024 version of the Framework.

SEA team response/ action

D.67 The West Yorkshire Local Nature Recovery Strategy is referred to in Chapter 2 and Appendix A of this SEA Scoping Report.

D.68 All references to the NPPF have been checked throughout this report to ensure the most recent version is referred to.

Comment

D.69 States that paragraph 3.93 refers to 2022 being the warmest year on record, but it is understood this has now been surpassed by 2024, which was the first year to pass the 1.5 degree C global average temperature limit.

D.70 Highlights that the National Flood Risk Assessment 2 and flood map for planning, published on 25 March 2025 by the Environment Agency, includes climate risk scenarios that should be used for planning decisions and plan making to inform flood risk sequential and exception tests and the SFRA.

SEA team response/ action

D.71 The baseline information in Chapter 3 includes updated information relating to climate change and recent temperature trends in the UK.

D.72 We have incorporated findings from the National Flood Risk Assessment and Environment Agency's recent flood map for planning into the figures supporting the flood risk baseline. The assessment of site options will informed by the latest data relating to flood risk.

Comment

D.73 States that the SEA framework, assessment criteria and objectives appear to be generally appropriate to assessing the environmental, economic and social effects of the Local Plan.

SEA team response/ action

D.74 Comment noted.

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