



Kirklees Local Plan Examination

Matter 18 Retailing and Town Centre policies

Council Response to Inspector's Requests

January 2018

Planning Policy Group
Investment and Regeneration Service
Kirklees Council
PO Box B93
Civic Centre III
Huddersfield
HD1 2JR

Matter 18 (Item 28): Policy PLP 14 – Shopping frontages

Inspector's request for:

The evidence base to justify the target of 60% A1 units on Primary Shopping Frontages and 40% A1 units on Secondary Shopping Frontages in the proposed modifications to policy PLP 14 in Local Plan set out in table 4 in the council's response (M18.1).

Council Evidence:

In the council's Retailing and Town Centres technical paper (BP15), paragraph's 4.2.20 to 4.2.22 explain the rationale for the targets.

When producing the draft Local Plan, the council commissioned consultants WYG to identify a town centre boundary, primary shopping area, primary and secondary shopping frontages for each of the six town centres.

Appendix B (BP16) of the technical paper shows the primary and secondary shopping frontages recommended by WYG for designation in the Local Plan and includes the town centre occupancy surveys that were used as part of their decision making.

In 2017, shop unit occupancy surveys of the six town centres were undertaken by the council as part of its Annual Town Centre Audit Programme. Analysis of the data as set out in the table below shows the percentage of A1 uses on primary and secondary frontages and that predominately A1 uses on the frontages identified are above the percentages identified.

Analysis of shopping frontages 2017

Town	Type	Frontage Reference	Length of frontage and number of units	Comparison*	Convenience*	Financial & Business Services	Leisure Services	Office	Other	Residential	Retail Service*	Vacant Outlets*	Total	% A1 Retail including Vacant Outlets*		
Huddersfield	Primary Shopping Frontage	HudPSF 1	Frontage (m)	110.70	5.31	4.69	33.09	1.30			5.52	55.22	215.82	82%		
			Count Units	7	1	1	3	1			1	1	15	67%		
		HudPSF 2	Frontage (m)	55.96	23.13	6.55	44.92					17.84	80.26	228.65	77%	
			Count Units	4	2	1	2					2	7	18	83%	
		HudPSF 3	Frontage (m)	44.01	4.79	26.89	42.62						16.07	134.37	48%	
			Count Units	6	1	2	5						3	17	59%	
		HudPSF 4	Frontage (m)	57.81	4.73					3.20			34.33	37.03	137.11	98%
			Count Units	6	1					1			4	4	16	94%
		HudPSF 5	Frontage (m)	69.88									18.76	6.16	94.79	100%
			Count Units	4									2	1	7	100%
		HudPSF 6	Frontage (m)	57.99	7.00	11.67	20.89							16.75	114.31	72%
			Count Units	9	1	1	2							1	14	79%
		HudPSF 7	Frontage (m)	18.13			21.29								39.42	46%
			Count Units	2			3								5	40%
		HudPSF 8	Frontage (m)	56.15	5.66									16.83	78.64	100%
	Count Units		5	1									3	9	100%	
	HudPSF 9	Frontage (m)	95.59	15.20									79.13	189.92	100%	
		Count Units	9	3									2	14	100%	
	HudPSF 10	Frontage (m)	135.62			22.53						21.83	11.13	191.11	88%	
		Count Units	2			1						2	2	7	86%	
	HudPSF 11	Frontage (m)	66.50	4.45		11.57								82.52	86%	
		Count Units	5	1		1								7	86%	
	HudPSF 12	Frontage (m)	52.52	4.72		7.93				26.92		4.37	22.43	118.88	71%	
		Count Units	10	1		2				4		1	5	23	74%	
	HudPSF 13	Frontage (m)	403.98	8.18		4.51						19.14	29.07	464.88	99%	
		Count Units	31	2		1						3	4	41	98%	
	HudPSF 14	Frontage (m)	109.09	22.19	22.03	83.91						10.17	90.81	338.20	69%	
		Count Units	13	4	5	7						2	10	41	71%	
	HudPSF 15	Frontage (m)	58.15	22.61	19.61							2.76	14.02	117.15	83%	
		Count Units	5	1	1							1	1	9	89%	
	Secondary Shopping Frontage	HudSSF 1	Frontage (m)	29.45		3.07	11.01	2.65				6.70		52.88	68%	
			Count Units	4		1	1	1				1		8	63%	
		HudSSF 2	Frontage (m)	9.93		21.07							7.05	21.59	59.65	65%
			Count Units	1		2							1	2	6	67%
		HudSSF 3	Frontage (m)	13.26	5.87	19.17	19.20				10.14		8.79	23.17	99.60	51%
			Count Units	2	1	2	1				1		2	1	10	60%
		HudSSF 4	Frontage (m)	60.22		7.72	23.87	5.03	3.95					24.84	125.63	68%
			Count Units	2		1	3	1	1					2	10	40%
		HudSSF 5	Frontage (m)	21.40		25.30				21.11			6.07	11.11	85.00	45%
Count Units			3		2				1			1	1	8	63%	
HudSSF 6		Frontage (m)		70.33								22.28		92.62	100%	
		Count Units		2								2		4	100%	
HudSSF 7		Frontage (m)	6.63		27.56	8.44								42.63	16%	
		Count Units	1		3	1								5	20%	
HudSSF 8	Frontage (m)	9.37		24.66	18.74						6.41	6.49	65.66	34%		
	Count Units	2		2	2						1	1	8	50%		
HudSSF 9	Frontage (m)	4.78		42.65	7.42							12.68	67.53	26%		
	Count Units	1		2	1							2	6	50%		
HudSSF 10	Frontage (m)	25.00		45.49	12.74				7.87				91.10	27%		
	Count Units	4		3	2				1				10	40%		
HudSSF 11	Frontage (m)	17.55		41.80	24.80						4.69	8.58	97.43	32%		
	Count Units	3		3	3						1	1	11	45%		
HudSSF 12	Frontage (m)	18.08	10.74	6.79	42.92	3.60						4.16	86.30	38%		
	Count Units	3	2	1	3	1						1	11	55%		
HudSSF 13	Frontage (m)	4.46		12.00	27.53								43.99	10%		
	Count Units	1		1	3								5	20%		
HudSSF 14	Frontage (m)	36.37									10.53	12.95	59.85	100%		
	Count Units	2									1	1	4	100%		
HudSSF 15	Frontage (m)	9.62	4.18		81.57								95.36	14%		
	Count Units	2	1		4								7	43%		
HudSSF 16	Frontage (m)	19.87	14.00		34.46	4.96	6.23				14.90		94.42	52%		
	Count Units	3	1		4	1	1				1		11	45%		
HudSSF 17	Frontage (m)	5.48	6.26		9.83				4.89	37.34	19.38		83.18	37%		
	Count Units	1	1		1				1	1	1		6	50%		
HudSSF 18	Frontage (m)	4.50		41.32	7.89							32.03	85.75	43%		
	Count Units	1		3	1							1	6	33%		
HudSSF 19	Frontage (m)	8.32	5.22	24.57	17.50						24.12	20.87	100.60	58%		
	Count Units	1	1	4	3						2	2	13	46%		

Town	Type	Frontage Reference	Length of frontage and number of units	Comparison*	Convenience*	Financial & Business Services	Leisure Services	Office	Other	Residential	Retail Service*	Vacant Outlets*	Total	% A1 Retail including Vacant Outlets*		
		HudSSF 20	Frontage (m)	4.69	11.30	12.08	10.15			31.74	14.47	5.27	89.70	40%		
			Count Units	1	1	1	1			1	2	1	8	63%		
		HudSSF 21	Frontage (m)				13.68	43.79	14.69	15.98		9.82		97.97	10%	
			Count Units				1	4	2	2		1		10	10%	
		HudSSF 22	Frontage (m)	38.81				10.58						39.85	89.24	88%
			Count Units	4				2						1	7	71%
		HudSSF 24	Frontage (m)	12.45	5.85			80.18						18.96	117.43	32%
			Count Units	2	1			9						1	13	31%
		HudSSF 25	Frontage (m)	25.47	18.98	3.76	26.00					30.54	14.47	119.22	75%	
			Count Units	2	4	1	3					6	2	18	78%	
		HudSSF 26	Frontage (m)					51.35				21.52	5.80	78.67	35%	
			Count Units					5				1	1	7	29%	
HudSSF 27	Frontage (m)	35.25		5.89	48.58					10.81	7.36	107.90	50%			
	Count Units	2		1	5					2	1	11	45%			
HudSSF 28	Frontage (m)	4.12				8.08						4.26	16.47	51%		
	Count Units	1				2						1	4	50%		
HudSSF 29	Frontage (m)	48.23				26.55	4.01	4.44				6.10	89.33	61%		
	Count Units	5				2	1	1				1	10	60%		
HudSSF 30	Frontage (m)	52.39	8.93	16.77	27.69					21.51	33.26	160.55	72%			
	Count Units	7	2	1	2					4	6	22	86%			
HudSSF 31	Frontage (m)	77.71	11.01		25.01					27.69	25.61	167.03	85%			
	Count Units	6	1		1					4	3	15	93%			
HudSSF 32	Frontage (m)	5.21	38.84	7.97	34.70					2.80		89.51	52%			
	Count Units	1	6	1	4					1		13	62%			
Dewsbury	Primary Shopping Frontage	DewPSF 1	Frontage (m)	104.21	11.78						13.16		129.14	100%		
			Count Units	6	2						2		10	100%		
		DewPSF 2	Frontage (m)	90.51									2.27	92.78	100%	
			Count Units	8									1	9	100%	
		DewPSF 3	Frontage (m)	46.11			8.62					29.60	14.90	99.22	91%	
			Count Units	5			1					1	1	8	88%	
		DewPSF 4	Frontage (m)	12.49		18.82	4.54					9.14		44.98	48%	
			Count Units	1		2	1					1		5	40%	
	DewPSF 5	Frontage (m)	4.16			9.39					2.81	19.23	35.59	74%		
		Count Units	1			1					1	3	6	83%		
	DewPSF 6	Frontage (m)	20.72	11.74	11.50						5.52	15.43	64.90	82%		
		Count Units	3	2	1						1	2	9	89%		
	DewPSF 7	Frontage (m)	21.55		5.05	15.90						15.91	58.41	64%		
		Count Units	4		1	2						3	10	70%		
	DewPSF 8	Frontage (m)	38.37	5.04		6.73							50.14	87%		
		Count Units	4	1		1							6	83%		
Secondary Shopping Frontage	DewSSF 1	Frontage (m)	15.40	36.61									52.01	100%		
		Count Units	1	2									3	100%		
	DewSSF 2	Frontage (m)	55.47	40.58	1.50	5.51					6.01	12.60	121.67	94%		
		Count Units	2	3	1	1					1	1	9	78%		
	DewSSF 3	Frontage (m)	10.40		21.21				23.58		7.16		62.35	28%		
		Count Units	1		1				2		2		6	50%		
	DewSSF 4	Frontage (m)	12.53		31.48	24.64	8.95				10.22	28.34	116.16	44%		
		Count Units	2		2	4	1				2	4	15	53%		
	DewSSF 5	Frontage (m)	24.42	10.83		15.34					11.55	23.13	85.27	82%		
		Count Units	4	2		1					1	4	12	92%		
	DewSSF 6	Frontage (m)	21.03		34.56						8.26	16.41	80.25	57%		
		Count Units	1		3						2	3	9	67%		
	DewSSF 7	Frontage (m)	10.63	4.25	17.80	13.60					5.36	16.79	68.43	54%		
		Count Units	1	1	1	1					1	1	6	67%		
DewSSF 8	Frontage (m)		16.57		6.61							98.67	121.85	95%		
	Count Units		2		1							17	20	95%		
DewSSF 9	Frontage (m)	10.28	8.38	12.66	7.51							6.11	44.94	55%		
	Count Units	2	1	2	1							1	7	57%		
DewSSF 10	Frontage (m)			16.86	17.51			5.71				20.29	60.37	34%		
	Count Units			2	1			1				2	6	33%		
DewSSF 11	Frontage (m)											86.28	86.28	100%		
	Count Units											9	9	100%		
DewSSF 12	Frontage (m)	22.89	5.17	10.32				55.74				34.83	128.94	49%		
	Count Units	2	1	1				1				2	7	71%		
DewSSF 13	Frontage (m)	57.91		23.18	32.93					3.72	35.83	153.56	63%			
	Count Units	7		3	5					1	3	19	58%			
DewSSF 14	Frontage (m)	33.89			13.55							47.43	71%			
	Count Units	3			1							4	75%			
		Frontage (m)	41.88				11.21				6.46	5.22	64.77	83%		

Town	Type	Frontage Reference	Length of frontage and number of units	Comparison*	Convenience*	Financial & Business Services	Leisure Services	Office	Other	Residential	Retail Service*	Vacant Outlets*	Total	% A1 Retail including Vacant Outlets*	
		DewSSF 15	Count Units		5		2				2	1	10	80%	
			Frontage (m)		9.33	18.50	16.49				7.02	4.29	55.63	37%	
		DewSSF 16	Count Units		2	2	2				1	1	8	50%	
			Frontage (m)		24.78		26.79					9.84	61.41	56%	
		DewSSF 17	Count Units		5		3					2	10	70%	
			Frontage (m)		37.04	5.68	23.51	29.94					96.17	44%	
		DewSSF 18	Count Units		3	1	1	2					7	57%	
			Frontage (m)		26.45	3.80		5.88		6.22		7.17		49.52	76%
DewSSF 19	Count Units		4	1		1			1		2	9	78%		
	Frontage (m)		17.10			18.30				19.68	6.24	61.33	70%		
DewSSF 20	Count Units		3			3					2	1	9	67%	
Batley	Primary Shopping Frontage		Frontage (m)		32.72	15.30	14.73	19.87				11.03	8.21	101.87	66%
		BatPSF 1	Count Units		5	3	2	2				2	1	15	73%
			Frontage (m)		39.53	9.07	13.07	13.19				13.90	21.30	110.06	76%
		BatPSF 2	Count Units		4	1	1	2				2	2	12	75%
		Frontage (m)		12.01	48.54							108.60	169.15	100%	
	BatPSF 3	Count Units		1	1							12	14	100%	
		Frontage (m)			111.60								111.60	100%	
	BatPSF 4	Count Units			1								1	100%	
	Secondary Shopping Frontage		Frontage (m)		18.58							14.70	42.61	75.89	100%
		BatSSF 1	Count Units		3							3	4	10	100%
			Frontage (m)		17.83	6.34	5.98	23.78				18.88	19.97	92.78	68%
		BatSSF 2	Count Units		2	1	1	3				3	2	12	67%
			Frontage (m)		30.00			36.44				14.29	25.03	105.76	66%
		BatSSF 3	Count Units		4			4				3	1	12	67%
		Frontage (m)		19.53	6.24	6.59	34.80					6.94	74.09	44%	
BatSSF 4		Count Units		3	1	1	3					1	9	56%	
		Frontage (m)		35.55	11.80						40.59		87.94	100%	
BatSSF 5		Count Units		5	2						6		13	100%	
	Frontage (m)		27.58	13.77	12.95	27.18	3.63	28.67		5.28	5.32	124.38	42%		
BatSSF 6	Count Units		4	3	1	3	1	1		1	1	15	60%		
	Frontage (m)		22.23		4.89	13.20				4.73		45.04	60%		
BatSSF 7	Count Units		3		1	2				1		7	57%		
Cleckheaton	Primary Shopping Frontage		Frontage (m)		42.68	11.27	4.86	20.38				5.02		84.21	70%
		CleckPSF 1	Count Units		7	1	1	2				1		12	75%
			Frontage (m)		35.90		10.46	17.81				5.69	5.95	75.80	63%
		CleckPSF 2	Count Units		3		1	1				1	1	7	71%
			Frontage (m)		42.98	11.37		4.70				35.54		94.58	95%
		CleckPSF 3	Count Units		3	1		1				4		9	89%
		Frontage (m)		8.94	15.14		23.94	4.85			9.50		62.37	54%	
	CleckPSF 4	Count Units		2	3		2	1			2		10	70%	
		Frontage (m)		25.11	5.60	11.38	16.46						58.55	52%	
	CleckPSF 5	Count Units		3	1	2	1						7	57%	
		Frontage (m)		29.66	7.06	6.40	4.98	4.60			8.96		61.67	74%	
	CleckPSF 6	Count Units		5	2	1	1	1			2		12	75%	
	Secondary Shopping Frontage		Frontage (m)		20.07	39.40	14.66	19.62				3.60		97.35	65%
		CleckSSF 1	Count Units		3	1	1	2				1		8	63%
			Frontage (m)		15.01	14.96	8.58	7.27				15.39	5.20	66.42	76%
		CleckSSF 2	Count Units		3	1	1	1				2	1	9	78%
			Frontage (m)		29.89		15.45	7.43				11.03		63.80	64%
		CleckSSF 3	Count Units		2		1	1				1		5	60%
			Frontage (m)		22.89	5.72	18.21					13.76		60.58	70%
		CleckSSF 4	Count Units		3	1	2					2		8	75%
		Frontage (m)		6.69		38.78	15.48						60.95	11%	
CleckSSF 5		Count Units		1		2	1						4	25%	
		Frontage (m)		14.34				7.16		4.72	39.13	4.95	70.30	83%	
CleckSSF 6		Count Units		2				1		1	4	1	9	78%	
		Frontage (m)		22.82		43.21	8.35		13.34		16.30		104.03	38%	
CleckSSF 7		Count Units		2		5	1		1		2		11	36%	
	Frontage (m)		4.47		16.66					4.08		25.21	34%		
CleckSSF 8	Count Units		1		1					1		3	67%		
	Frontage (m)		11.69		17.50	15.65				3.14		47.99	31%		
CleckSSF 9	Count Units		2		1	3				1		7	43%		
	Frontage (m)		45.99		14.63	47.23						107.86	43%		
CleckSSF 10	Count Units		4		2	5						11	36%		
Heckmondwike	Primary Shopping Frontage		Frontage (m)		49.55	21.17	25.01				15.43	16.99	128.15	80%	
		HeckPSF 1	Count Units		6	3	4				2	2	17	76%	
			Frontage (m)		83.56	40.37					5.40	7.55	136.88	100%	
	HeckPSF 2	Count Units		6	1					1	2	10	100%		
Secondary Shopping Frontage		Frontage (m)			9.65	22.04	26.01		5.77			22.46	85.93	37%	

Town	Type	Frontage Reference	Length of frontage and number of units	Comparison*	Convenience*	Financial & Business Services	Leisure Services	Office	Other	Residential	Retail Service*	Vacant Outlets*	Total	% A1 Retail including Vacant Outlets*
		HeckSSF 1	Count Units		2	3	3			1		5	14	50%
			Frontage (m)	33.46	11.04		17.91				4.73	10.78	77.92	77%
		HeckSSF 2	Count Units	7	3		3				1	2	16	81%
			Frontage (m)	7.82		22.30	4.63				32.56	9.51	76.83	65%
		HeckSSF 3	Count Units	1		3	1				4	2	11	64%
			Frontage (m)	10.07			22.53			5.15	17.98	9.00	64.73	57%
		HeckSSF 4	Count Units	2			3			1		2	10	60%
			Frontage (m)	6.68		19.48					13.60	10.05	49.81	61%
		HeckSSF 5	Count Units	1		2					2	1	6	67%
Holmfirth	Primary Shopping Frontage		Frontage (m)	44.21	9.53	4.81	3.01	4.13			14.37		80.05	85%
		HolPSF 1	Count Units	7	2	1	1	1			2		14	79%
			Frontage (m)	23.46	15.07						12.11		50.64	100%
		HolPSF 2	Count Units	3	3						2		8	100%
	Secondary Shopping Frontage		Frontage (m)	18.63			10.24		2.94		26.80	19.17	77.78	83%
		HolSSF 1	Count Units	1			1		1		2	1	6	67%
			Frontage (m)	50.56							20.54		71.11	100%
		HolSSF 2	Count Units	5							3		8	100%
			Frontage (m)	26.08	21.66	26.75	5.06				6.35	6.67	92.57	66%
		HolSSF 3	Count Units	4	1	3	1				1	1	11	64%
			Frontage (m)	11.44		47.25						11.46	70.15	33%
		HolSSF 4	Count Units	2		4						1	7	43%
			Frontage (m)	13.40	4.90						7.51		25.81	100%
		HolSSF 5	Count Units	2	1						1		4	100%
			Frontage (m)	65.16			57.83				11.42		134.41	57%
		HolSSF 6	Count Units	3			4				1		8	50%
			Frontage (m)	39.33		10.07	102.26				10.25		161.91	31%
		HolSSF 7	Count Units	2		1	7				1		11	27%
			Frontage (m)	34.22		7.81	33.58	8.36			7.39	3.54	94.90	48%
		HolSSF 8	Count Units	6		1	5	1			1	1	15	53%
			Frontage (m)		5.30		4.54				7.57		17.41	74%
		HolSSF 9	Count Units		1		1				1		3	67%
			Frontage (m)	30.18	13.48								43.66	100%
		HolSSF10	Count Units	2	1								3	100%
			Frontage (m)	40.70	26.48	9.85							77.03	87%
		HolSSF11	Count Units	1	2	2							5	60%
			Frontage (m)	41.26	10.66		16.40						68.32	76%
		HolSSF 12	Count Units	4	1		1						6	83%
			Frontage (m)	43.53		12.94	5.25	3.33				3.77	68.82	69%
		HolSSF13	Count Units	6		1	1	1				1	10	70%
			Frontage (m)	11.81			25.19						37.01	32%
		HolSSF 14	Count Units	1			3						4	25%
Total Frontage (m)				4090.0	1022.4	1204.0	2062.0	105.6	222.4	78.9	1088.6	1649.5	11523.6	
Total Count Units				418	107	119	215	18	21	4	153	182	1237	