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# **Draft Kirklees Local Plan**

## **Sustainability Appraisal Report: Non-Technical Summary**

Incorporating Equalities Impact Assessment and Health Impact Assessment

Prepared by LUC  
September 2015

**Project Title:** Sustainability Appraisal of the Kirklees Local Plan

**Client:** Kirklees Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1	21/09/15	SA Report for the Draft Kirklees Local Plan: Non-Technical Summary	Kate Nicholls	Taran Livingston	Taran Livingston
2	30/09/15	Final SA Report for the Draft Kirklees Local Plan: Non-Technical Summary	Kate Nicholls	Taran Livingston	Taran Livingston

## Tell us what you think about the draft Local Plan and its supporting information

This is the Kirklees Draft Local Plan Sustainability Appraisal Report: Non-Technical Summary, this document is available for comment during the consultation on the Draft Local Plan.

The draft local plan documents consist of:

- Draft Local Plan – Strategy and Policies
- Draft Local Plan – Allocations and Designations (and associated maps)

Documents setting out rejected site options (and maps) and the outcomes of the green belt review (and maps) are also available for consultation and comments can be made on them.

You can send your responses in a number of ways but we would encourage you to submit them online via the Kirklees consultation pages at:

[kirklees.gov.uk/consultplanningpolicy](http://kirklees.gov.uk/consultplanningpolicy)

If you are on our consultation database, we will have notified you about the draft Local Plan consultation and registered you on our on-line consultation system. If you are not currently on our Local Plan database you will need to register with our on-line consultation system.

You can also send your comments by e-mail to: [local.development@kirklees.gov.uk](mailto:local.development@kirklees.gov.uk)

By post to:

Planning Policy Group  
PO Box B93  
Civic Centre 3  
Market Street  
Huddersfield  
HD1 2JR

Copies of the consultation documents and maps are available to view on our website at [kirklees.gov.uk/planningpolicy](http://kirklees.gov.uk/planningpolicy), and in printed format at the following locations:

Huddersfield Customer Service Centre	Dewsbury Service Centre
Civic Centre 3	The Walsh Building
Market Street	Town Hall Way
Huddersfield	Dewsbury
HD1 2YZ	WF12 8EE

Please use one method of reply only to avoid duplication of representations. All comments must be received by **5pm on 21st December 2015**. Comments received after this date will not be considered to be duly made and may not be considered.

### **How will we use the information you give us?**

Any comments received will be used help us to improve the way we develop our plans and policies. We will take the views and suggestions received through consultations into account when finalising our plans. The information may be used to seek your opinion on future plans and policies appropriate to your interests. Once your comments have been submitted they will be checked and added to the on-line consultation system where you will be able to see your comments and those that have been made by others. Your name and comments will be displayed publicly. Your comments may be disregarded if they are deemed to be disrespectful, offensive, break the law or link to inappropriate web-sites or contain marketing/sales information.

### **Data Protection Statement**

The consultation process requires that you supply personal information about yourself. The purpose for collecting these details is to help us understand who is contributing to our consultation and so the Council can keep you informed of the next steps in the process. Personal information the council receives will be stored confidentially within a secure database and will be retained for up to 6 years. Personal information will not be retained longer than we need to and, once the retention period is over the council will ensure that records are either fully anonymised or are securely destroyed. We will not pass on personal details to any third party organisations. If you do not provide contact information the Council will not be able to keep you informed of progress and next steps on the local plan.

### **Next steps**

Following the close of the consultation period, we will consider your comments, gather further evidence where required and redraft the local plan. We will then ask for your views on a publication version and ask whether the revised Local Plan meets the Government's tests of soundness. Once the Council is satisfied its plan is sound we will formally submit the local plan to the Government for inspection. At this point an examination in public will take place. Further to the examination in public, it is anticipated that the plan will be adopted in late 2017.



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# Draft Kirklees Local Plan

## Sustainability Appraisal Report: Non-Technical Summary

Prepared by LUC  
September 2015

Planning & EIA  
Design  
Landscape Planning  
Landscape Management  
Ecology  
Mapping & Visualisation

LUC BRISTOL  
12<sup>th</sup> Floor Colston Tower  
Colston Street Bristol  
BS1 4XE  
T +44 (0)117 929 1997  
[bristol@landuse.co.uk](mailto:bristol@landuse.co.uk)

Offices also in:  
London  
Glasgow  
Edinburgh



Land Use Consultants Ltd  
Registered in England  
Registered number: 2549296  
Registered Office:  
43 Chalton Street  
London NW1 1JD  
LUC uses 100% recycled paper

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## Introduction

- 1.1 This Non-Technical Summary relates to the Sustainability Appraisal Report for the Kirklees Local Plan, which is being produced by Kirklees Council. The Local Plan sets out the long-term spatial vision and objectives for the District and the policies that are required to deliver that vision over the period up to 2031.
- 1.2 Plans and strategies such as the Kirklees Local Plan are subject to a process called Sustainability Appraisal, which assesses the likely effects of a plan on social, economic, and environmental issues. Kirklees Council has commissioned independent consultants (LUC) to carry out the Sustainability Appraisal of the Draft Local Plan largely on its behalf, although Council officers have undertaken some parts of the appraisal in-house. The Sustainability Appraisal Report and this Non-Technical Summary incorporates all of the work undertaken by LUC and the Council.
- 1.3 This Non-Technical Summary relates to the full Sustainability Appraisal Report for the Draft version of the Local Plan which comprises two parts: "Strategy and Policies" and "Allocations and Designations".

## The Kirklees Local Plan

- 1.4 Between 2005 and 2012, Kirklees Council was preparing a Local Development Framework (LDF) Core Strategy to provide the framework for planning decisions in Kirklees up to 2028 and to specify broadly where development should take place. In October 2013, the decision was made to withdraw the Core Strategy and move towards the production of a new-style Local Plan instead. The new Local Plan will set out how Kirklees will develop over the next 15-20 years. It will identify site allocations for specific types of land use and will set out policies that will be used to assess planning applications.
- 1.5 An 'Early Engagement Report' relating to the new Local Plan was consulted on between April and May 2014. That report set out information about what would be included in the Local Plan and when and how it would be prepared. It also presented a draft vision and strategic objectives which were taken from the withdrawn Core Strategy, and the Council asked people to make comments about how they might be amended for inclusion in the new Local Plan.
- 1.6 A further engagement exercise was carried out between November and December 2014. The engagement document that was consulted on by the Council at that time set out information about how the Local Plan would be developed as well as key statistics, facts and information to provide the basis of the Kirklees Local Plan. Options were also set out for how Kirklees Council should decide where new development could go.

## Sustainability Appraisal

- 1.7 Kirklees Council is required by law to carry out Sustainability Appraisal and Strategic Environmental Assessment (SEA) of the Local Plan, and appointed LUC to lead this work on its behalf. The Government recommends that these two legal requirements are met through one integrated process, referred to as Sustainability Appraisal (or SA).
- 1.8 The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. It should be viewed as an integral part of good plan making, involving ongoing iterations to identify and report on the likely social, economic and environmental effects of the plan and the extent to which sustainable development is expected to be achieved through its implementation.
- 1.9 This Non-Technical Summary relates to the full SA Report for the Draft Kirklees Local Plan (November 2015). The SA has been undertaken in stages alongside the preparation of the Draft Local Plan in order to provide sustainability guidance as the plan is developed.

- 1.10 SA must be carried out in accordance with Government guidance<sup>1</sup> and (as an integrated SA and SEA process is being undertaken) must meet the requirements of the European Strategic Environmental Assessment Directive<sup>2</sup>.
- 1.11 **Table 1** below signposts how the requirements of the SEA Regulations have been met within the SA work undertaken to date (presented in the full SA Report and this Non-Technical Summary).

**Table 1 Requirements of the SEA Regulations and where these have been addressed**

SEA Regulation Requirements	Where covered in the SA Report and this Non-Technical Summary
Preparation of an environmental report in which 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, are identified, described and evaluated. The information to be given is (Art. 5 and Annex 1):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Chapter 3 and Appendix 2 in the full SA report and summarised in this Non-Technical Summary.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3 and Appendix 3 in the full SA report and summarised in this Non-Technical Summary.
c) The environmental characteristics of areas likely to be significantly affected	Chapter 3 and Appendix 3 in the full SA report and summarised in this Non-Technical Summary.
d) 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 and 92/43/EEC.	Chapter 3 and Appendix 3 in the full SA report and summarised in this Non-Technical Summary.
e) The environmental protection, objectives, established at international, Community or national 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	Chapter 3 and Appendix 2 in the full SA report and summarised in this Non-Technical Summary.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Chapters 4-12 and Annexes 1-7 in the full SA report and summarised in this Non-Technical Summary.
g) 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;	Chapters 4-12 and Annexes 1-7 in the full SA report and summarised in this Non-Technical Summary.
h) 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;	Chapters 2 and 4-12 and Appendix 5 in the full SA report and summarised in this Non-Technical Summary.

<sup>1</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

<sup>2</sup> European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'.

SEA Regulation Requirements	Where covered in the SA Report and this Non-Technical Summary
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 6 in the full SA report and summarised in this Non-Technical Summary.
j) a non-technical summary of the information provided under the above headings	This document is the Non-Technical Summary for the Draft Local Plan.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	Addressed throughout the full SA report and this Non-Technical Summary.
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4)</li> </ul>	Consultation on the SA Scoping Report for the Kirklees Local Plan was undertaken between March and April 2015. The report was then updated in response to consultation responses received and the final version was published in May 2015.
<ul style="list-style-type: none"> <li>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</li> </ul>	Consultation is being undertaken in relation to the Draft Kirklees Local Plan between November 2015 and December 2016 and will continue to be undertaken for all future iterations of the plan. The current consultation documents are accompanied by the full SA report and this Non-Technical Summary.
<ul style="list-style-type: none"> <li>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</li> </ul>	N/A
<b>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</b>	
<p><b>Provision of information on the decision:</b> When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>the plan or programme as adopted</li> <li>a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>the measures decided concerning monitoring (Art. 9)</li> </ul>	To be addressed after the Local Plan is adopted.
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	To be addressed after the Local Plan is adopted.

SEA Regulation Requirements	Where covered in the SA Report and this Non-Technical Summary
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>The SA report and this Non-Technical Summary have been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Directive have been met.</p>

1.12 The approach that has been taken to the SA of the Kirklees Local Plan to date is described below.

### Stage A: Scoping

1.13 The SA process began in March 2015 with the production of a Scoping Report for the Local Plan, which was prepared by LUC on behalf of Kirklees Council.

1.14 The Scoping stage of SA involves collating information about the social, economic and environmental baseline for the plan area and the key sustainability issues facing it, as well as information about the policy context for the preparation of the plan. The SA Scoping Report presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the Local Plan were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
- In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and the landscape. Data on social and economic issues were also taken into consideration. This baseline information provides the basis for predicting and monitoring the likely effects of the Local Plan and helps to identify alternative ways of dealing with any adverse effects identified.
- Drawing on the review of relevant plans, policies and programmes and the baseline information, key sustainability issues for the District were identified (including environmental problems, as required by the SEA Regulations). Consideration was given to the likely evolution of each issue, if the Local Plan were not to be implemented.
- A Sustainability Appraisal 'framework' was then presented, setting out the SA objectives against which options and subsequently policies in the Local Plan would be appraised. The SA framework provides a way in which the sustainability impacts of implementing a plan can be described, analysed and compared. The SA framework comprises a series of sustainability objectives and associated questions that can be used to 'interrogate' options and draft policies during the plan-making process. These SA objectives define the long-term aspirations of the District with regard to social, economic and environmental issues. During the SA, the performance of the plan options (and later, policies) are assessed against these SA objectives and sub-questions.

1.15 The SA Scoping Report for the Kirklees Local Plan was published in March 2015 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England). The comments received during the consultation were then reviewed and addressed as appropriate and a final version of the Scoping Report was published in May 2015.

1.16 Appendix 1 in the full SA Report lists the comments that were received during the Scoping consultation and describes how each one has been addressed. The review of plans, policies and programmes and the baseline information are presented in Appendices 2 and 3 respectively of the full SA Report.

1.17 **Table 2** below presents the 19 SA objectives in the Kirklees SA framework and shows how all of the required 'SEA topics' have been covered by the SA objectives.

**Table 2 SA framework for Kirklees**

SA Objectives	SEA Directive Topic(s)
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	Population
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	Population
3. Ensure education facilities are available to all.	Population
4. Improve the health of local people and ensure that they can access the health and social care they need.	Population Human health
5. Protect local amenity including avoiding noise and light pollution.	Population Human health
6. Retain and enhance access to local services and facilities.	Population
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	Population
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	Population
9. Ensure all people are able to live in a decent home which meets their needs.	Population
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	Air
11. Secure the efficient and prudent use of land.	Soil
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	Landscape
13. Conserve and enhance the historic environment, heritage assets and their settings.	Cultural heritage including architectural and archaeological heritage Material assets
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	Biodiversity Flora Fauna
15. Reduce air, water and soil pollution.	Soil Water Air
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	Material assets
17. Increase prevention, re-use, recovery and recycling of waste close to source.	Material assets
18. Increase efficiency in water, energy and raw material use.	Water Material assets
19. Reduce the contribution that the District makes to climate change.	Climatic factors

**SA Stage B: Developing and refining options and assessing effects**

- 1.18 Developing options for a plan is an iterative process, usually involving a number of rounds of consultation with stakeholders and the public. Consultation responses and the SA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In terms of the Kirklees Local Plan, options include different policy approaches to delivering future development (i.e. options for how much development, what type of development and how it should be designed and delivered) and locational options for where development should or should not go.
- 1.19 The SA findings are not the only factors taken into account by a local authority when determining which options to take forward in a plan. There will often be an equal number of positive or negative effects identified for each option, so it is not possible to 'rank' them based on 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 by plan-makers when selecting preferred options.

- 1.20 The alternative options for Local Plan policies have been identified by Kirklees Council and have drawn from the most up-to-date evidence, in particular in relation to the levels of development required in the District. For several of the proposed policy approaches, reasonable alternatives were not identified as any approach other than that set out in the draft policy would be incompatible with the requirements of the National Planning Policy Framework (NPPF).
- 1.21 Site options were identified through a number of sources including a Call for Sites process, a review of Council assets, existing Unitary Development Plan (UDP) allocations and existing UDP Provisional Open Land. The Council identified those sites that were deliverable and (in the case of site options for built development) were developable and these were also considered to be 'reasonable' options for the purposes of the SA.
- 1.22 All of the reasonable site options for residential, employment and other types of development and the reasonable policy options were subject to SA in accordance with the methodology described further ahead in this Non-Technical Summary and in detail in Chapter 2 of the full SA report. The findings were originally presented in SA summary notes which were provided to the Kirklees Council officers preparing the Draft Local Plan so that the SA findings could be taken into account in decision making. (Once the Local Plan was drafted, the SA work for the policy and site options was then incorporated into the full SA Report and this Non-Technical Summary along with the SA findings for the Draft Local Plan policies and preferred site allocations.)
- 1.23 The Council took into account the findings of the SA as well as other factors when deciding which policy options to include as draft policies in the Draft Local Plan (Strategy and Policies document), and which site options to include in the Allocations and Designations document. This decision making process is described in detail for the policy options in Chapter 11 of the full SA Report and in Appendix 5 for the site options.

### **SA Stage C: Preparing the Sustainability Appraisal Report**

- 1.24 The full SA Report describes in detail the process that has been undertaken to date in carrying out the SA of the Kirklees Local Plan. It sets out the findings of the appraisal of options and draft policies, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the plan as it is drafted. It also describes the reasons for selecting or rejecting certain options during the preparation of the Draft Local Plan. All of this information is summarised in this Non-Technical Summary.

### **SA Stage D: Consultation on the Kirklees Local Plan and this SA Report**

- 1.25 Kirklees Council is inviting comments on the Draft Local Plan and the full SA Report which this Non-Technical Summary relates to. The SA Report and this Non-Technical Summary are being published on the Council's website for consultation alongside the Draft Local Plan between November and December 2015.

### **SA Stage E: Monitoring implementation of the Local Plan**

- 1.26 Recommendations for monitoring the social, environmental and economic effects of implementing the Kirklees Local Plan are presented in Chapter 13 in the full SA report and are summarised further ahead in this document.

## **Policy context**

### **Review of Plans, Policies and Programmes**

- 1.27 The Kirklees Local Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture

and heritage. The Local Plan must also conform to environmental protection legislation and contribute to achieving the sustainability objectives established at the international and national levels.

- 1.28 A review has been undertaken of the other plans, policies and programmes that are relevant which was originally presented in the SA Scoping Report, can be seen in full in Appendix 2 in the full SA Report and the key findings are summarised below.
- 1.29 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Kirklees Local Plan. These processes should be undertaken iteratively and integrated into the production of the Local Plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and mitigated.
- 1.30 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however the relevant international directives have been included in Appendix 2 in the full SA Report for completeness.
- 1.31 The most significant development in terms of the national policy context for the Kirklees Local Plan has been the publication of the National Planning Policy Framework in 2012 which replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). The purpose of the NPPF was to streamline national planning policy. The Local Plan must be consistent with the requirements of the NPPF.
- 1.32 The NPPF sets out information about the purposes of local plan-making, stating that:  
*"Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development."*
- 1.33 The NPPF also requires Local Plans to be 'aspirational but realistic'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 1.34 The NPPF requires local planning authorities to set out the strategic priorities for the plan area. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
  - the provision of retail, leisure and other commercial development;
  - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - the provision of health, security, community and cultural infrastructure and other local facilities; and
  - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 1.35 In addition, Local Plans should:
- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
  - be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
  - be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;

- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

#### *Local plans, policies and programmes*

- 1.36 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to West Yorkshire and Kirklees, which provide further context for the emerging Local Plan. These plans and programmes relate to issues such as housing, transport, renewable energy and green infrastructure and have also been reviewed in Appendix 2 in the full SA Report.

#### **Baseline Information**

- 1.37 Baseline information provides the context for assessing the sustainability of proposals in the Kirklees Local Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.
- 1.38 Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included; for example information about housing, social inclusiveness, transport, energy, waste and economic growth. The baseline information for Kirklees, which was originally presented in the Scoping Report, is set out in Appendix 3 in the full SA Report and some of the key information is summarised below.

#### *Summary of baseline information*

- 1.39 Kirklees District lies in West Yorkshire. The authority is diverse, comprising urban conurbations in the north and west and large areas of Green Belt in the south. The resident population of Kirklees in 2013 was 428,279 people. Of those, 49% were male and 51% were female. By 2023 the population of Kirklees is predicted to reach 456,200<sup>3</sup>. The health of people in Kirklees is varied compared with the England average. Deprivation is higher than average and about 20% (17,000) children live in poverty. Life expectancy for both men and women is lower than the England average<sup>4</sup>.
- 1.40 The percentage of economically active people in Kirklees is currently 72.3%<sup>5</sup>. This is below the British average of 77.5%. The unemployment rate of 8.5% of the economically active population (Oct 2013-Sep 2014) was higher than the regional average of 8.1% and remained above the British average of 6.5%<sup>5</sup>.
- 1.41 The landscape of the District is distinctive and ranges from the high wind swept moors of the South Pennines in the west, through the central plateau that dips down towards the east and which is incised by river valleys to produce characteristic steep gritstone edges, whilst to the north the land is described by a large number of individual settlements separated by tracts of agricultural pasture lands. Despite a population of approximately 400,000 people there is little coalescence of settlements, primarily due to the physical landscape.

<sup>3</sup> Kirklees Factsheet 2014: Population and Households.

<sup>4</sup> PHE (2014) Kirklees Unitary Authority: Health Profile

<sup>5</sup> ONS: Labour Market Profile: Kirklees: Accessed in February 2015.

- 1.42 The south western parts of the District's upper moorland form 10% of the Peak District National Park with much of the remainder being within the much larger South Pennine Heritage Area. These moorlands provide a range of habitats and contain a number of species that have ecological significance of European importance and form part of the South Pennines Special Area of Conservation and the Special Protection Area. Kirklees also contains five Sites of Special Scientific Interest (4,872.5 ha), three of which are classed as being in 'favourable' condition and two as being in 'unfavourable recovering' condition. In addition there are 45 Sites of Wildlife Significance (410 ha) and 84 Biodiversity Action Plan sites (also known as priority habitats) (679.6 ha). The Council has itself designated nine Local Nature Reserves, the majority of which are within or very close to settlements within the District.
- 1.43 Kirklees has some 3,000 Listed Buildings - the highest number of any local planning authority in the region. Of these, 20 are on the Heritage at Risk register<sup>6</sup>. In addition, there are 59 Conservation Areas, five Historic Parks and Gardens, 19 Scheduled Monuments and part of a Registered Battlefield at Adwalton Moor.
- 1.44 Air quality in Kirklees is generally good and the industrial contribution to air pollution has declined although there are two Air Quality Management Areas in the District.
- 1.45 There are areas of best and most versatile agricultural land in Kirklees, mainly in the north of the District. In that area, most of the land outside of urban areas is Grade 3 agricultural quality and the eastern edge of the District is also Grade 3. There are no areas of Grade 1 or 2 land in Kirklees. The centre of the District is mainly Grade 4 land, and the south western area is Grade 5.
- 1.46 The majority of waterbodies in Kirklees have been classed as moderate status and as such are failing to meet Water Framework Directive standards. The River Holme from Mag Brook to River Colne and Fenay Beck from source to River Colne are the worst failing waterbodies in Kirklees. The Strategic Flood Risk Assessment has identified areas of potential flood risk, particularly around the rivers Colne (north-east of Huddersfield) and Calder (east of Mirfield and south of Dewsbury) where there are large areas of flood zones 2 and 3.

### Key Sustainability Issues

- 1.47 An up-to-date set of key sustainability issues for Kirklees was identified during the Scoping stage of the SA and was presented in the Scoping Report.
- 1.48 The SEA Regulations (Schedule 2) require that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme are described. In order to address this requirement, **Table 3** overleaf describes the likely evolution of each key sustainability issue if the Kirklees Local Plan were not to be adopted.

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<sup>6</sup> Historic England. Heritage at Risk Register. Accessed February 2015.

**Table 3: Key Sustainability Issues for the Kirklees Local Plan**

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
<p><b>Business Growth and Employment</b> - Employment in Kirklees is below the national average and the unemployment rate significantly increased between 2008 and 2010. The proportion of people claiming Job Seekers Allowance for more than six months is above the national average.</p>	<p>The saved Business and Industry Policy B1 in the adopted Kirklees Unitary Development Plan (UDP) states that the employment needs of the District will be met by the implementation of measures such as the provision of land for new business/expansion of existing business, encouraging the development of land within town centres for office use and the promotion of tourism. In addition, the NPPF states that “the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future” (paragraph 18). Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy.</p> <p>Unemployment levels in Kirklees are currently slightly higher than the national average, however, the number of people claiming Jobseeker’s Allowance as a percentage of the working age resident population has reduced. Given that Policy B1 has been in place since 1999 there is uncertainty about how influential it has been on this trend in relation to other factors such as the wider economic recovery. The implementation of up to date policies in the new Local Plan would help address unemployment and help to bring about reduced unemployment rates.</p>
<p><b>Diversification in Rural Areas</b> - Agriculture is in decline across the District and there is little evidence of diversification.</p>	<p>The saved Business and Industry Policy B1 in the adopted Kirklees UDP recognises that one measure to address unemployment across the District would be to accommodate agricultural development and diversify the rural economy. Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy.</p> <p>However, the UDP was adopted in 1999 and since then agriculture remains in decline across the District and rural diversification is limited. Although paragraph 28 of the NPPF supports the rural economy by encouraging the sustainable growth and expansion of all types of business and enterprise in rural areas and promoting the development and diversification of agricultural and other land-based rural businesses, the implementation of up-to-date Local Plan policies specifically relating to agriculture and rural diversification in Kirklees would give more certainty in relation to how this issue will be addressed.</p>
<p><b>Housing Provision (Supply)</b> - There is a need to ensure sufficient land is available to meet future housing requirements within Kirklees.</p>	<p>The saved UDP Policy H1 states that one way in which the housing needs of the District will be met is by “providing land to meet the requirement for a range of house types by allocating sites of various sizes and in different types of locations having regard to local patterns of demand”. Although the UDP contains proposal maps which provide sites for new housing requirements, it is recognised that these locations are based on the outdated <i>Strategic Guidance</i> and that updated policies/site allocations are required to reflect the latest projected housing requirements. Without the implementation of the new Local Plan it is therefore uncertain whether there will be sufficient land allocations to develop new housing.</p>

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
<p><b>Housing Provision (Affordable Housing)</b> - There is a need for affordable housing across Kirklees due to the fact average earnings are below regional and national averages.</p>	<p>The saved UDP Policy H1 makes provision for affordable housing; therefore even without the new Local Plan this issue is being addressed to some extent by other policy. However, since the adoption of the Unitary Development Plan there has been a new assessment of the affordable housing required across the District. In the 2012 Strategic Housing Market Assessment for Kirklees the level of affordable housing need in the District was estimated to be 1,457 houses per annum. This is greater than the figure set out in the Council's Housing Strategy and the Housing Association Development Strategy i.e. 3,800 additional units of affordable accommodation within the first five years of the UDP and 6,900 over ten years. It is therefore unlikely that affordable housing needs will be adequately addressed without the implementation of up-to-date policies within the Local Plan that reflect the most recent evidence.</p> <p>Without the Local Plan, an ongoing lack of affordable housing is likely to lead to many people being priced out of the market and the population profile of the District may become distorted. This may have secondary effects on the economy, reducing the District's ability to attract key workers in particular. Therefore, although policies are already in place, the implementation of updated policies in the new Local Plan would provide more certainty in relation to how affordable housing provision will be addressed locally.</p>
<p><b>Housing Provision (Regeneration)</b> - There are a large proportion of properties which are either unfit or in a poor state of repair across the District.</p>	<p>Saved UDP Policy H1 states that the housing needs of the District will be met by "improving existing housing particularly through the designation of renewal areas and areas for housing improvement [Policy H3]". In addition, saved UDP policy H2 also refers to the fact that Regeneration Areas have been identified in the proposal maps. Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy. However, UDP policy H3 which is referred to in policy H1, and which identified areas for housing improvement, was not saved beyond 2007. In addition, the UDP policies have been in place since 1999, over which time the trend has not been reversed.</p> <p>Without the implementation of updated policies within the Local Plan to identify opportunities for housing regeneration, and bring local policy in line with the NPPF, it is therefore unlikely that the issue of housing stock repair will be addressed fully across the District.</p>
<p><b>Housing Provision (Mix)</b> - There is the need for a mix of housing types including social rented housing and provision in rural communities.</p>	<p>UDP Policy H7 concerning the provision of a mix of housing types was not saved beyond 2007 and was replaced by guidance in the form of PPS 3: Housing, which has now itself been replaced by the NPPF. Therefore, there is limited existing local policy for Kirklees concerning the provision of an appropriate mix of housing. The NPPF identifies that local planning authorities should, "plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)" (paragraph 50).</p> <p>Although the NPPF encourages a mix of housing development, it is anticipated that this requirement would be implemented at the local level through an up-to-date policy in the new Local Plan. This would provide more certainty regarding the issue being addressed.</p>

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
<p><b>Service Accessibility</b> - Promote vibrant inclusive communities with good accessibility to services, education and employment.</p>	<p>There are no policies in the UDP that relate directly to the accessibility of services; however the NPPF encourages the development of vibrant communities and states that “supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being” (paragraph 7) is key to the realisation of sustainability.</p> <p>The NPPF may therefore have a positive influence on promoting more vibrant and inclusive communities in Kirklees District in the absence of the Local Plan; however the issue would be better addressed by implementing specific and up-to-date policies in the new Local Plan.</p> <p>In the absence of the new Local Plan, ongoing poor provision and use of public transport may cause the more rural parts of the District to become increasingly isolated in terms of access to employment opportunities and community services and facilities, whilst high levels of car use will increase levels of air pollution and noise disturbance.</p>
<p><b>Rural Accessibility</b> - Many rural areas suffer from a lack of facilities creating problems of accessibility.</p>	<p>There are no policies in the UDP that relate directly to service accessibility in rural areas. However, the NPPF states that “planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development” (paragraph 28). Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy; however this is unlikely to be as effective as if specific and up-to-date policies were included in the new Local Plan to address the issue.</p>
<p><b>Sport and Recreation</b> - The opportunities for sport and recreation within the District are low when compared to the population.</p>	<p>The saved UDP policy R6 states, “when development is proposed which gives rise to a need for public open space, measures should be included to ensure that this need can be satisfied by establishing new areas of public open space, either on site or in a readily accessible location, or by upgrading existing public open space.” The NPPF also recognises the need to provide enough recreational facilities to meet the needs of communities and states that “access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision” (paragraph 73). Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy; however this is unlikely to be as effective as if specific and up-to-date policies were included in the new Local Plan to address the issue.</p>

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
<p><b>Health</b> - There is a need to promote healthy lifestyles and reduce health inequalities within Kirklees.</p>	<p>There are no policies in the adopted UDP that relate directly to promoting healthy lifestyles in Kirklees. However, the NPPF states that, “local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being” (paragraph 171).</p> <p>Although the NPPF seeks to improve health and wellbeing, the implementation of Local Plan policies specifically relating to health and wellbeing in Kirklees would provide more certainty in relation to how health issues will be addressed.</p>
<p><b>Fear of Crime</b> - The fear of crime often fuelled by anti-social behaviour is seen as a problem across Kirklees as a whole.</p>	<p>Saved UDP policy BE23 states that new developments should incorporate crime prevention measures. In addition, the NPPF states that planning policies and decisions should aim to promote “safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion” (paragraph 69). Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy and the baseline information on crime shows that sustained reductions over the past few years have been achieved and levels of recorded crime in Kirklees continue to decrease. However, it is not clear to what extent this can be attributed to policy and how much other factors will have driven the changes. Nevertheless, in the absence of the new Local Plan, the trend is likely to continue as at present.</p>
<p><b>Biodiversity</b> - Kirklees has sites of European, national, regional and local ecological significance. The national and international concerns over declining biodiversity are reflected locally. Tree cover within the District is low particularly south of Huddersfield and North Kirklees.</p>	<p>Saved UDP policy NE3 states that “development proposals which would affect a site of wildlife significance will not normally be permitted unless provision can be made to maintain the site’s role for nature conservation”. In addition, the NPPF (paragraph 7) states that the planning system has a key environmental role including, “contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity...” Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy. However, given the current pressures for growth and development within the District, an up-to-date local policy reflecting the latest national guidance would be beneficial to help to avoid adverse impacts resulting from ongoing pressure on ecological sites.</p> <p>There are no policies in the UDP or NPPF that specifically address the lack of tree cover.</p>

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
<p><b>Heritage</b> - Kirklees has a large number of designated conservation areas and the greatest number of listed buildings of any authority in the north of England. The local character of Kirklees is also a distinctive local feature.</p>	<p>Saved UDP policy BE5 addresses the preservation and enhancement of conservation areas. The UDP policy relating to Listed Buildings specifically (BE4) was replaced by PPG 15: Planning and the Historic Environment, which was itself subsequently replaced by the NPPF. Paragraph 17 of NPPF states that the planning system should “conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations”.</p> <p>Therefore, whilst these policies make provision for the protection of listed buildings and conservation areas, it is considered that the implementation of more specific policies for Kirklees through the new Local Plan would provide greater protection for heritage assets at the local level.</p>
<p><b>Transport</b> - A high proportion of people travel to and from work by car which partially reflects limited public transport provision within rural parts of the District. Employment uses also rely on the transport network. The consequences of transport are also a significant issue, with air quality management areas being declared within Kirklees.</p>	<p>Saved UDP policy T1 states that priority will be given to “satisfying the needs of all sections of the community through an effectively integrated transport system with emphasis on improving public transport and encouraging a modal shift away from travel by private car”. In addition, paragraph 17 of the NPPF states that one of the core planning principles that should underpin plan making and decision making includes action to “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”.</p> <p>Although Policy T1 and the NPPF therefore address this issue to some extent, the implementation of up-to-date Local Plan policies specifically relating to public transport in Kirklees, would provide more certainty in relation to how public transport issues will be addressed locally.</p>
<p><b>Climate Change Adaptation and Mitigation</b> - There is the need to address issues related to climate change and low carbon development. Also, to reduce pollution and emissions including those from transport methods.</p> <p>The Strategic Flood Risk Assessment (November 2008) carried out within Kirklees and the more recent Environment Agency flood map updates have highlighted many areas which are liable to flooding. The effects of climate change may increase the incidence of flooding within the District.</p>	<p>There are no saved policies within the UDP that specifically address the effects of climate change and mitigation. However, paragraph 94 of NPPF states that “local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations”.</p> <p>There is a need for revised policies relating to flooding across the District to reflect the findings of The Strategic Flood Risk Assessment (November 2008) and latest Environment Agency flood maps. Without the implementation of updated Local Plan policies, existing and new developments may be at greater risk of flooding.</p>

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
<p><b>Resource Efficiency</b> - There is a need to respond to the international and national pressures for increased recycling and re-use of waste, reduction in waste to landfill, reduced energy demand, improved energy efficiency and the use of low carbon and renewable resources.</p> <p>Mineral extraction needs to be managed taking into account existing permitted reserves and the need for additional supply.</p>	<p>The current waste policy in Kirklees is contained National Planning Policy for Waste, which would continue to apply in the absence of the Local Plan. It states that ‘all local planning authorities should have regard to its policies when discharging their responsibilities to the extent that they are appropriate to waste management’.</p> <p>The NPPF also places a duty on the planning system to “use natural resources prudently, minimise waste and pollution” (paragraph 7). As can be seen from the baseline information, the amount of Local Authority Collected Waste (LACW) arising across Kirklees has risen over the last year, after falling previously, although recycling schemes are in place. Therefore, while National Planning Policy for Waste and the NPPF would continue to apply, in the absence of the new Local Plan it is possible that waste arisings would continue to increase.</p>
<p><b>Efficient use of Land</b> - Development pressures across Kirklees need to be managed to ensure previously developed land (brownfield) is utilised where possible.</p>	<p>Saved UDP policy DL1 states that “derelict and neglected land will be brought into beneficial use to assist in the regeneration of the District” and current trends show that a large amount of new housing developments are on redeveloped or brownfield land. Whilst this issue is therefore being addressed to some extent, it is important to ensure that there is brownfield land allocated for further development e.g. through site allocations within the new Local Plan, in order to address increasing development pressures.</p>
<p><b>Water Quality</b> - The majority of Kirklees waterbodies (rivers, lakes, estuaries, coastal and groundwaters) are classed as moderate and are failing to meet the requirements of the Water Framework Directive.</p>	<p>The UDP states that the current policy relating to water quality in Kirklees is contained in PPS23: Planning and Pollution Control; however this has now been cancelled. New local policy guidance is therefore required to ensure that water quality across the District is improved.</p>

## Appraisal methodology

- 1.49 The reasonable policy and site options for the Kirklees Local Plan and the draft policies set out in the Draft Local Plan (November 2015) have been appraised against the 19 SA objectives in the SA framework (see **Table 2** earlier in this Non-Technical Summary), with scores being attributed to each option or draft policy to indicate its likely sustainability effects on each objective as follows:

**Figure 1 Key to symbols and colour coding used in the SA of the Kirklees Local Plan**

++	The option is likely to have a <b>significant positive</b> impact on the SA objective(s).
+	The option is likely to have a <b>positive</b> impact on the SA objective(s).
0	The option is likely to have a <b>negligible or no impact</b> on the SA objective(s).
-	The option is likely to have a <b>negative</b> impact on the SA objective(s).
--	The option is likely to have a <b>significant negative</b> impact on the SA objective(s).
?	It is <b>uncertain</b> what effect the option will have on the SA objective(s), due to a lack of data.
+/-	The option is likely to have a <b>mixture of positive and negative impacts</b> on the SA objective(s).

- 1.50 Where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).
- 1.51 The likely effects of the options and draft policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or draft policy on the SA 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. However, scores are relative to the scale of proposals under consideration.

### Assumptions applied during the SA

- 1.52 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the large number of site options, detailed sets of assumptions were developed and applied for each type of site (e.g. residential, employment, mixed use, open space, Traveller, minerals and waste sites). These assumptions are presented in Appendix 4 in the full SA Report.
- 1.53 A number of the assumptions involve drawing on accessibility 'heatmapping' work that was undertaken by the West Yorkshire Combined Authority on behalf of Kirklees Council. This work involved assessing levels of access from each site option to various services and facilities via non-car based modes of transport. The methodology used for the work is described in detail in Chapter 2 in the full SA Report.

### Difficulties Encountered

- 1.54 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process.
- 1.55 A particular challenge in this SA work was the very high number of reasonable alternative site options to be appraised. There was a need to ensure that a very large number of site options

could be appraised consistently in order that the findings could reliably inform the Council's decision making. This was achieved by the use of defined assumptions for each type of site relating to each SA objective, as described in the previous section.

- 1.56 As also described above, many of the SA scores for the site options were informed by the heatmapping work that was undertaken by the West Yorkshire Combined Authority on behalf of Kirklees Council. While this heatmapping work provides a very helpful indication of the relative accessibility of each site, it was underpinned by a number of assumptions which need to be borne in mind when using the data. These are described in Chapter 2 of the full SA Report.

## SA findings for the site options

### Residential site options

- 1.57 A total of 859 reasonable alternative residential site options have been subject to SA in line with the assumptions set out in Appendix 4 of the full SA Report (Table A4.1).
- 1.58 The likely effects of the residential site options are summarised in detail in Chapter 4 of the full SA Report, in relation to each SA objective. The SA scores for all of the site options can be seen in Table 4.1 in the full SA Report. Due to the large number of sites, the table spans across 23 pages and so it is not reproduced in this Non-Technical Summary.
- 1.59 The detailed SA matrices for the residential site options are available in a separate document (Annex 1) which also includes maps of the sites that are likely to have significant effects (both positive and negative where relevant) on the various SA objectives.
- 1.60 A range of effects were identified for all of the residential site options, but in general they were found more likely to have significant positive effects on the social and economic objectives. This is due to the contribution they would make if developed to meeting housing need in the District and enabling access to employment, services and facilities, which in turn should help to reduce travel distances and greenhouse gas emissions. However, a number of potential negative (some significant) effects were identified in relation to the environmental objectives due to the greenfield land that would need to be used, and the potential for new development to affect sensitive environmental receptors.
- 1.61 Out of the 859 residential site options, 528 (61%) have been found to have a likely significant negative effect on at least one of the SA objectives (not taking into account mixed effects that include a partial significant negative effect). Therefore, there are a large number of residential site options (331 in total) in Kirklees that are relatively unconstrained in sustainability terms.
- 1.62 A total of 283 site options (33% of the total) are likely to have a significant negative effect on only one SA objective, and only 50 (6%) of the 859 sites would have a significant negative effect on four or more SA objectives. **Table 4** below shows the SA scores for the 50 sites that have been shown to have likely significant negative effects on four or more of the SA objectives. The sites are shown in order of the number of likely significant negative effects identified, with those that have four being listed first.
- 1.63 The purpose of the SA is not to identify sites that should or should not be allocated for development, as the SA is one of a number of tools to inform the Council's decision making. However, it is clear from the findings of the SA that there are sites that would be more likely to have a number of negative sustainability effects than others and it may therefore be that those sites are less appropriate for residential development. However, it is recognised that there is potential to mitigate many of the potential negative effects identified (in particular through development of appropriate policy safeguards within the Draft Local Plan), and several of the effects are uncertain depending on the eventual development proposals that come forward for a site.

**Table 4: SA Scores for the 50 Residential Site Options with Four or More Likely Significant Negative Effects**

Site option	SA objectives																		
	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H4	--	0	--?	--	-	--	0	++/--?	++	--	--	--?	?	0?	0	-	-	0	--
H647	--	0	--?	--	--	--	0	++	+	--	-	-?	0?	--?	0	-	-	0	--
H752	--	0	--?	--	--	--	0	++	+	--	-	-?	0?	--?	0	-	-	0	--
H178	--	0	--?	--	-	--	0	++	+	--	-	-?	0?	--?	0	-	-	0	--
H257	++/--	0	++?/--?	+/--	--	+/--	0	++	++	--	--	--?	?	--?	0	--	-	0	--
H822	--	0	--?	--	-	--	0	++	+	--	-	-?	0?	--?	0	-	-	0	--
H1765	--	0	--?	--	-	--	0	++	+	--	-	-?	0?	--?	0	-	-	0	--
H1766	--	0	--?	--	-	--	0	++/--?	+	--	-	-?	0?	--?	0	-	-	0	--
H1777	++/--	0	+?/--?	+/--	--	+	0	++/--?	++	--	--	--?	-?	--?	0	--	-	0	--
H95	--	0	--?	--	-	--	0	++/--?	+	--	-	-?	?	0?	0	-	-	0	--
H154	--	0	--?	--	0	--	0	++	+	--	+	+	?	-?	0	0	+	0	--
H238	--	0	--?	--	-	--	0	+	+	--	-	-?	?	0?	0	-	-	0	--
H256	++/--	0	++?/--?	+/--	-	+/--	0	++/--?	++	--	--	--?	?	--?	0	--	-	0	--
H534	--	0	--?	--	-	--	0	++	+	--	-	-?	0?	0?	0	-	-	0	--
H584	--	0	--?	+/--	--	--	0	++	+	--	-	-?	?	-?	0	-	-	0	--
H619	--	0	--?	--	-	--	0	++	+	--	+	+	?	-?	0	0	+	0	--
H672	++/--	0	++?/--?	+/--	--	+/--	0	++/--?	+	--	--	--?	?	--?	0	-	-	0	--
H279	++/0	0	+++?/0?	+/-	--	0/--	0	++	++	--	--	--?	0?	0?	0	-	-	0	--
H307	++	0	--?	--	-	--	0	++	+	--	-	-?	?	0?	0	-	-	0	--
H505	++/--	0	+?/--?	0/--	--	0/--	0	++	++	--	--	--?	0?	-?	0	-	-	0	--
H588	+/--	0	+++?	+/--	-	+/--	0	++/--?	++	--	--	--?	?	--?	0	-	-	0	--
H1783	--	0	--?	++/--	-	++/--	0	++/--?	++	++	--	--?	0?	--?	0	-	-	0	++
H41	--	0	+	--?	-	--	0	++/--?	+	+	-	-?	0?	--?	0	-	-	0	+
H51	--	0	-?	-	--	-	0	++	+	--	-	-?	0?	-?	0	-	-	0	--
H106	--	0	+	-	--	-	0	++	+	+	-	--?	?	--?	0	-	-	0	+
H129	+	0	+++?/+?	+	--	++/+	0	++/--?	++	++	--	--?	0?	--?	0	-	-	0	++
H147	++	0	+++?/0?	+/0	--	++/0	0	++/--?	++	+	--	--?	0?	0?	0	--	-	0	+
H169	++/--	0	+?/--?	+/--	--	+/--	0	++	++	++	--	--?	0?	--?	0	-	-	0	++
H188	++	0	+++?	+	--	+	0	++	++	++	--	--?	?	-?	0	--	-	0	++
H222	++	0	+++?/+?	+/0	--	++/0	0	++/--?	++	++	--	--?	0?	--?	0	-	-	0	++
H223	0	0	+++?	+	--	++/0	0	++/--?	++	++	--	--?	?	--?	0	-	-	0	++
H231	++/+	0	+++?	+	--	+/0	0	++/--?	++	++	--	--?	0?	--?	0	-	-	0	++
H255	--	0	+?/--?	--	-	--	0	++	+	+	-	-?	?	--?	0	-	-	0	+
H259	0/-	0	+++?	+/0	--	+/0	0	++	++	++	--	--?	0?	--?	0	-	-	0	++
H265	0/++	0	+++?/+?	+	--	--/+	0	++/--?	++	+	--	--?	?	--?	0	-	-	0	+
H274	++/0	0	+	+/0	--	+/--	0	++/--?	++	+	--	--?	0?	--?	0	-	-	0	+
H275	++/--	0	+?/--?	+/--	--	+/--?	0	+	++	+	--	--?	0?	--?	0	-	-	0	+
H330	0/--	0	+?/--?	+/--	-	+/--	0	++	++	--	--	--?	?	-?	0	-	-	0	--
H484	+	0	+++?	+	--	+	0	++/--?	++	++	--	--?	0?	--?	0	-	-	0	++
H485	++/0	0	+?/--?	++/-	--	+/--	0	++/--?	++	+	--	--?	?	--?	0	-	-	0	+

Site option	SA objectives																		
	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H542	++/--	0	+?/--?	0	--	+	0	++/--?	++	+	--	--?	?	--?	0	-	-	0	+
H586	++/--	0	++?/--?	+/--	--	0/--	0	++/--?	++	+	--	--?	0?	--?	0	-	-	0	+
H608	0	0	+?/0?	+/0	--	+/-	0	++	++	++	--	--?	0?	--?	0	-	-	0	++
H629	+	0	+?	+	--	0	0	++	++	++	--	--?	?	--?	0	-	-	0	++
H676	+	0	++?/+?	+	--	++/+	0	++/--?	++	++	--	--?	0?	--?	0	-	-	0	++
H721	+	0	+?	+	--	+	0	++/--?	++	++	--	--?	0?	--?	0	-	-	0	++
H1718	+	0	++?/+?	+	--	++/0	0	++/--?	++	++	--	--?	?	--?	0	-	-	0	++
H1792	++/+	0	++?/0?	+	--	+/-	0	++/--?	++	+	--	--?	--?	-?	0	-	-	0	+
H1795	++/--	0	++?/--?	++/--	--	+/--	0	++/--?	++	--	--	-?	0?	0?	0	-	-	0	--
H2100	+/--	0	+?/--?	+/--	--	+/--	0	++/--?	++	++	--	--?	0?	--?	0	-	-	0	++

### Employment site options

- 1.65 A total of 88 reasonable alternative employment site options have been subject to SA in line with the assumptions set out in Appendix 4 of the full SA Report (Table A4.2).
- 1.66 The likely effects of the employment site options are summarised in detail in Chapter 5 of the full SA Report, in relation to each SA objective. The SA scores for all of the site options can be seen in **Table 5** below.
- 1.67 The detailed SA matrices for the employment site options are available in a separate document (Annex 2) which also includes maps of the sites that are likely to have significant effects (both positive and negative where relevant) on the various SA objectives.
- 1.68 A similar range of effects were identified for all of the employment site options, with all sites having positive (and some significant) effects on the economic objectives in particular due to the contribution they would make to providing new employment opportunities in the District. As new employment land provision would be provided alongside new housing development, this should help to reduce travel distances and greenhouse gas emissions. A number of SA objectives would not be affected by allocation of new employment sites. However, a number of potential negative (some significant) effects were identified in relation to the environmental objectives due to the greenfield land that would need to be used, and the potential for new development to affect sensitive environmental receptors.
- 1.69 Out of the 88 employment site options, 47 (53%) have been found to have a likely significant effect on at least one of the SA objectives (not taking into account mixed effects that include a partial significant negative effect). Therefore, there are a large number of employment site options (41 in total or 47%) in Kirklees that are relatively unconstrained in sustainability terms.
- 1.70 The highest number of likely significant effects identified for any one employment site is three – a total of eight (9%) of the options are likely to have a significant negative effect on three SA objectives. Twenty-one of the 88 (24%) sites would have a significant negative effect on only one of the SA objectives.
- 1.71 The purpose of the SA is not to identify sites that should or should not be allocated for development, as the SA is one of a number of tools to inform the Council's decision making. However, it is clear from the findings of the SA that there are sites that would be more likely to have a number of negative sustainability effects than others and it may therefore be that those sites are less appropriate for employment development. However, it is recognised that there is potential to mitigate many of the potential negative effects identified (in particular through development of appropriate policy safeguards within the Draft Local Plan), and several of the effects are uncertain depending on the eventual development proposals that come forward for a site.

**Table 5: SA scores for all 88 employment site options**

Site option	SA objectives																		
	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
E1707	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	0?	-?	0	-	-	0	+
E1748	++	++	0	0	-?	0	0	+	0	+	--	--?	?	0?	0	--	-	0	+
E1823	+	+	0	0	-?	0	0	-	0	+	+	+?	0?	-?	0	0	+?	0	+
E1824	+	+	0	0	-?	0	0	-	0	+	-	-?	0?	--?	0	-	-	0	+
E1825	+	+	0	0	--?	0	0	+/--?	0	+	+	+?	0?	0?	0	0	+?	0	+
E1826	++	++	0	0	0	0	0	+	0	+	--	--?	0?	--?	0	-	-	0	+
E1827	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	0?	0?	0	-	-	0	+
E1828	++	++	0	0	--?	0	0	+	0	++	--	--?	0?	0?	0	0	-	0	++
E1829	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	0?	--?	0	-	-	0	+
E1830	++	++	0	0	-?	0	0	+	0	+	--	--?	?	0?	0	-	-	0	+
E1831	++	++	0	0	-?	0	0	+	0	+	--	--?	0?	-?	0	-	-	0	+
E1832	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	?	0?	0	-	-	0	+
E1833	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	?	0?	0	-	-	0	+
E1834	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	?	0?	0	-	-	0	+
E1836	+	+	0	0	-?	0	0	+	0	0	-	-?	0?	--?	0	-	-	0	0
E1837	+	+	0	0	0	0	0	+	0	++	+	+?	-?	--?	0	0	+?	0	++
E1838	+	+	0	0	0	0	0	+	0	++	+	+?	0?	-?	--	0	+?	0	++
E1839	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	--?	0	-	-	0	+
E1840	+	+	0	0	-?	0	0	+/--?	0	0	-	-?	0?	--?	0	-	-	0	0
E1842	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	-?	0	-	-	0	+
E1843	++	++	0	0	-?	0	0	+	0	+	++	+?	?	-?	0	0	+?	0	+
E1844	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	?	-?	0	-	-	0	+
E1846	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	-?	0	-	-	0	+
E1847	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	0?	--?	0	-	-	0	+
E1848	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	0?	0	-	-	0	+
E1849	+	+	0	0	-?	0	0	+/--?	0	+	+	+?	0?	-?	0	0	+?	0	+
E1850	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	0?	--?	0	-	-	0	+
E1851	++	++	0	0	0	0	0	+	0	+	--	--?	0?	0?	0	-	-	0	+
E1852	+	+	0	0	-?	0	0	+	0	+	-	-?	?	-?	0	-	-	0	+
E1853	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	?	-?	0	-	-	0	+
E1854	+	+	0	0	-?	0	0	+	0	++	-	-?	0?	-?	0	-	-	0	++
E1855	+	+	0	0	0	0	0	+	0	++	-	-?	0?	--?	0	-	-	0	++
E1856	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	-?	0	-	-	0	+
E1857	+	+	0	0	-?	0	0	+	0	++	-	-?	0?	-?	0	-	-	0	++
E1858	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	?	0?	0	-	-	0	+
E1859	+	+	0	0	-?	0	0	+	0	++	+	+?	0?	0?	0	0	+?	0	++
E1860	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	0?	0?	0	-	-	0	+
E1861	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	0?	0?	0	-	-	0	+
E1862	+	+	0	0	0	0	0	+/--?	0	+	-	-?	0?	0?	0	-	-	0	+
E1865	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	-?	--?	0	-	-	0	+
E1866	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	0?	--?	0	-	-	0	+
E1867	+	+	0	0	-?	0	0	+	0	+	-	-?	?	0?	0	-	-	0	+
E1870	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	?	-?	0	-	-	0	+
E1871	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	0?	--?	0	--	-	0	+
E1872	+	+	0	0	0	0	0	+	0	+	-	-?	0?	0?	0	-	-	0	+
E1873	+	+	0	0	0	0	0	+	0	+	-	-?	0?	0?	0	-	-	0	+
E1874	+	+	0	0	-?	0	0	+	0	++	-	-?	-?	0?	0	-	-	0	++
E1875	++	++	0	0	-?	0	0	+/--?	0	++	--	--?	0?	0?	0	-	-	0	++

Site option	SA objectives																		
	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
E1876	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	0?	0?	0	-	-	0	+
E1877	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	0?	0	-	-	0	+
E1878	++	++	0	0	-?	0	0	+	0	++	++/-	+?	0?	-?	0	0	+?	0	++
E1879	+	+	0	0	0	0	0	+	0	+	-	-?	-?	-?	0	-	-	0	+
E1880	+	+	0	0	0	0	0	+	0	+	-	-?	-?	-?	0	--	-	0	+
E1881	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	0?	-?	0	-	-	0	+
E1882	++	++	0	0	-?	0	0	+/--?	0	+	++	+?	0?	0?	0	-	+?	0	+
E1883	++	++	0	0	-?	0	0	+	0	+	++	+?	0?	-?	0	0	+?	0	+
E1884	++	++	0	0	-?	0	0	+/--?	0	++	--	--?	0?	-?	0	-	-	0	++
E1885	+	+	0	0	-?	0	0	+	0	+	-	-?	-?	--?	0	-	-	0	+
E1886	++	++	0	0	-?	0	0	+/--?	0	+	++	+?	0?	--?	0	0	+?	0	+
E1887	+	+	0	0	0	0	0	+	0	++	-	-?	0?	--?	0	-	-	0	++
E1888	+	+	0	0	0	0	0	+/--?	0	++	-	-?	?	--?	0	-	-	0	++
E1889	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	?	--?	0	-	-	0	+
E1890	+	+	0	0	0	0	0	+	0	+	+	+?	-?	--?	0	-	+?	0	+
E1891	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	0?	-?	0	--	+?	0	+
E1892	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	--?	0	-	-	0	+
E1893	++	++	0	0	-?	0	0	+	0	+	++	+?	0?	-?	0	0	+?	0	+
E1894	+	+	0	0	-?	0	0	+/--?	0	+	+	+?	-?	0?	0	0	+?	0	+
E1895	+	+	0	0	0	0	0	+	0	+	-	-?	0?	--?	0	-	-	0	+
E1896	+	+	0	0	-?	0	0	+/--?	0	+	+	+?	0?	0?	0	0	+?	0	+
E1897	+	+	0	0	-?	0	0	+	0	++	-	-?	0?	-?	0	-	-	0	++
E1898	++	++	0	0	-?	0	0	+	0	+	++	+?	-?	--?	0	0	+?	0	+
E1899	+	+	0	0	-?	0	0	+	0	++	-	-?	0?	-?	0	-	-	0	++
E1900	+	+	0	0	-?	0	0	+/--?	0	+	-	-?	0?	--?	0	-	-	0	+
E1984	+	+	0	0	-?	0	0	+	0	++	+	+?	0?	0?	0	0	+?	0	++
E1985	++	++	0	0	-?	0	0	+/--?	0	0	--	--?	0?	--?	0	-	-	0	0
E1986	+	+	0	0	0	0	0	+	0	+	+	+?	0?	0?	0	0	+?	0	+
E1987	+	+	0	0	-?	0	0	+	0	++	+	+?	0?	0?	0	0	+?	0	++
E1988	+	+	0	0	-?	0	0	+	0	++	-	-?	0?	0?	0	-	-	0	++
E1989	+	+	0	0	0	0	0	+	0	++	-	-?	0?	-?	0	-	-	0	++
E1990	+	+	0	0	-?	0	0	+/--?	0	+	+	+?	0?	-?	0	0	+?	0	+
E1992	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	0?	--?	0	-	-	0	+
E1993	++	++	0	0	0	0	0	+/--?	0	+	++	+?	0?	0?	0	-	+?	0	+
E1996	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	?	-?	0	-	-	0	+
E1997	+	+	0	0	-?	0	0	+	0	+	+	+?	0?	-?	0	0	+?	0	+
E2102	++	++	0	0	-?	0	0	+/--?	0	++	--	--?	0?	-?	0	-	-	0	++
E2135	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	0?	-?	0	-	-	0	+
E2311	++	++	0	0	0	0	0	+/--?	0	+	--	--?	?	0?	0	-	-	0	+
E2333	++	++	0	0	-?	0	0	+/--?	0	+	--	--?	?	0?	0	-	-	0	+

### Mixed use site options

- 1.72 A total of 29 reasonable alternative mixed use site options have been subject to SA in line with the assumptions set out in Appendix 4 of the full SA Report (Table A4.3).
- 1.73 The likely effects of the mixed use site options are summarised in detail in Chapter 6 of the full SA Report, in relation to each SA objective. The SA scores for all of the mixed use site options are shown in **Table 6** below.
- 1.74 The detailed SA matrices for the mixed use site options are available in a separate document (Annex 3) which also includes maps of the sites that are likely to have significant effects (both positive and negative where relevant) on the various SA objectives.
- 1.75 Given the nature of mixed use development that would occur on these sites if allocated (i.e. having a mixture of housing and employment uses), the range of effects identified were similar to the residential and employment site options above. In general, the mixed use site options would have some minor and some significant positive effects on the social and economic objectives, is due to the contribution they would make to meeting housing and employment needs in the District. Where these sites are in proximity to existing residential and employment areas or services and facilities, they were also identified as having positive effects on sustainable transport and climate change as they should help to reduce travel distances and greenhouse gas emissions. However, a number of potential negative (some significant) effects were identified in relation to the environmental objectives due to the greenfield land that would need to be used, and the potential for new development to affect sensitive environmental receptors.
- 1.76 Out of the 29 mixed use site options, 24 (83%) have been found to have a likely significant effect on at least one of the SA objectives (not taking into account mixed effects that include a partial significant negative effect). Of these, eight site options (28% of the total) are likely to have a significant negative effect on only one SA objective (generally SA objective 5: local amenity), and only seven (24%) of the 29 sites would have a significant negative effect on four or more SA objectives. These are:
- MX1904, MX1911, MX1923, MX1925, MX1926 and MX1929 could have four significant negative effects.
  - MX1918 could have five potentially significant negative effects.
- 1.77 The purpose of the SA is not to identify sites that should or should not be allocated for development, as the SA is one of a number of tools to inform the Council's decision making. However, it is clear from the findings of the SA that there are mixed use site options that would be more likely to have a number of negative sustainability effects than others (such as the seven sites listed above) and it may therefore be that those sites are less appropriate for residential development. In addition, **it is recommended that the four sites in flood zone 2 and 3 (MX1912, MX1913, MX1915 and MX1918) are not allocated as Mixed Use sites in the Draft Local Plan, unless the sequential test can be met.** If these four sites are taken forward for development it is essential that appropriate mitigation is incorporated – this may involve only developing any part of a site which is outside of flood zones 3 and 2 and instead using that land for open space.
- 1.78 It is recognised however, that there is potential to mitigate many of the potential negative effects identified (in particular through development of appropriate policy safeguards within the Draft Local Plan), and several of the effects are uncertain depending on the eventual development proposals that come forward for a site.

**Table 6: SA Scores for all of the 29 Mixed Use site options**

Site option	SA objectives																		
	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
MX1902	+	+	0	0	0	0	0	+/-?	0	0/++	-	-?	0?	-?	0	-	-	0	0/+
MX1903	+	+	++?	+	--	++/0	0	++	++?	++	++	+	-?	-?	0	0	+	0	++
MX1904	+	+	++?/-?	++/--	--	++/--	0	++/--?	++?	++	--	--?	?	--?	0	-	-	0	++
MX1905	+	+	++?/-?	+/--	-	0/--	0	++/--?	++?	--/+	--	--?	0?	--?	0	-	-	0	--/+
MX1906	+	+	0	0	-	++	0	+/-?	0	++	+	+	-?	-?	0	0	+	0	++
MX1907	0	0	++?	+	--	++	0	++	+	++	+	+	0?	0?	0	0	+	0	++
MX1908	0	0	+	+	--	+	0	++/--?	+	++	-	-?	0?	--?/+	0	-	-	0	++
MX1909	+	+	++?	-	--	+	0	++/--?	+	++	+	+	0?	--?	0	0	+	0	++
MX1911	+	+	++?/-?	++/-	--	+/--	0	++/--?	++?	+	--	--?	?	--?	0	-	-	0	+
MX1912	+	+	++?	-	-	0	0	++/--?	++?	+	--	--?	0?	-?	0	--	-	0	+
MX1913	+	+	+	+	-	+	0	++/--?	+	++	-	-?	0?	--?	0	--	-	0	++
MX1914	+	+	++?/-?	+/--	--	+/--	0	++/--?	++?	+	--	--?	0?	-?	0	-	-	0	+
MX1915	0	0	++?	+	--	++	0	++	+	++	-	-?	0?	-?	0	--	-	0	++
MX1918	+	+	+	+/0	--	0	0	++/--?	++?	++	--	--?	0?	--?	0	--	-	0	++
MX1919	+	+	+	+	--	+	0	++/--?	+	++	+	--?	0?	-?	0	-	+	0	++
MX1920	+	+	+	+	-	++	0	++	+	++	+	+	?	--?	0	-	+	0	++
MX1921	+	+	++?/0?	0	--	0	0	++/--?	+	+	-	-?	?	0?	0	-	-	0	+
MX1922	+	+	0	0	-	0	0	+	0	++	+	+	0?	0?	0	0	+	0	++
MX1923	+	+	++?/--?	+/--	--	++/--	0	++/--?	++?	--/+	--	--?	-?	--?	0	-	-	0	--/+
MX1924	0	0	++?	++	--	++	0	++/--?	+	++	-	-?	0?	-?	0	-	-	0	++
MX1925	+	+	++?/-?	+/--	--	0/--	0	++/--?	++?	+	--	--?	0?	--?	0	-	-	0	+
MX1926	+	+	++?/-?	++/-	--	+/--	0	++/--?	++?	+	--	--?	?	--?	0	-	-	0	+
MX1927	+	+	++?/-?	+/--	--	++/--	0	++/--?	++?	++	--	--?	0?	-?	0	-	-	0	++
MX1928	+	+	++?/-?	++/0	--	++/--	0	++/--?	++?	++	--	--?	0?	-?	0	-	-	0	++
MX1929	+	+	++?/-?	+/--	--	++/--	0	++/--?	++?	++	--	--?	0?	--?	0	-	-	0	++
MX1930	+	+	++?	+	-	++	0	++	++?	++	++	+	?	-?	0	0	+	0	++
MX1931	+	+	0	0	-	++	0	+	0	++	+	+	0?	0?	0	0	+	0	++
MX2101	+	+	++?	++	--	+	0	++/--?	+	++	+	+	-?	--?	0	0	+	0	++
MX2155	+	+	++?	+	--	+	0	++/--?	+	++/+	+	+	0?	0?	0	0	+	0	++/+

### Open space site options

- 1.80 A total of 551 reasonable alternative open space site options (local green space and urban green space) have been subject to SA in line with the assumptions set out in Appendix 4 of the full SA Report (Table A4.4).
- 1.81 The likely effects of the open space site options are summarised in detail in Chapter 7 of the full SA Report, in relation to each SA objective. The SA scores for all of the site options can be seen in Table 7.1 in the full SA Report. Due to the large number of site options, the table spans across several pages and so it is not reproduced in this Non-Technical Summary.
- 1.82 The detailed SA matrices for the open space site options are available in a separate document (Annex 4) which also includes maps of the sites that are likely to have significant effects (both positive and negative where relevant) on the various SA objectives.
- 1.83 There is not a lot to distinguish between the 551 open space site options in sustainability terms. Allocating any open space sites within the Kirklees Local Plan will have no effects on most of the SA objectives except for positive effects (some significant) on access to recreation, contributing to landscape character and biodiversity networks. Most of the open space options could also help to protect or enhance the setting of heritage assets in the District as well, and the open space sites within the highest flood risk zones could help to reduce the risks of flooding in the District.

### Traveller site options

- 1.84 A total of 37 reasonable alternative Traveller site options have been subject to SA in line with the assumptions set out in Appendix 4 of the full SA Report (Table A4.5).
- 1.85 The likely effects of the Traveller site options are summarised in detail in Chapter 8 of the full SA Report, in relation to each SA objective. The SA scores for all of the Traveller site options are shown in **Table 7** at the end of this section.
- 1.86 The detailed SA matrices for the Traveller site options are available in a separate document (Annex 5) which also includes maps of the sites that are likely to have significant effects (both positive and negative where relevant) on the various SA objectives.
- 1.87 The range of effects identified for the Traveller site options were similar to the residential site options above. All of the Traveller use site options would have a significant positive effect on the housing objective due to the contribution they would make to meeting Traveller housing needs in the District. They would also have mainly positive effects on some of the other social and economic objectives (e.g. access to employment, health, education and other services and facilities), although some site options are further away from these services and facilities via sustainable modes of transport and therefore negative effects were identified. Negative effects were therefore also identified for some of the sites on sustainable transport and climate change as they would not help to reduce travel distances and greenhouse gas emissions. Finally, as with the residential, mixed use and employment site options, a number of potential negative (some significant) effects were identified in relation to the environmental objectives due to the greenfield land that would need to be used, and the potential for new development to affect sensitive environmental receptors.
- 1.88 Out of the 37 traveller site options, 33 (89%) have been found to have a likely significant negative effect on at least one of the SA objectives (not taking into account mixed effects that include a partial significant negative effect). Of these, 21 site options (57% of the total) are likely to have a significant negative effect on only one SA objective (generally SA objective 5: local amenity due to the potential either for new Traveller sites to increase noise and light pollution particularly during construction on nearby residents, or for the amenity of the Traveller sites to be affected due to proximity to major roads/railways or industrial areas), and only five (14%) of the 37 sites would have a significant negative effect on four or more SA objectives. These are:
- GTTS1960, GTTS1964 and GTTS2045 could have four significant negative effects.
  - GTTS1963 could have five potentially significant negative effects.
  - GTTS1962 could have eight potentially significant negative effects.

- 1.89 The purpose of the SA is not to identify sites that should or should not be allocated for development, as the SA is one of a number of tools to inform the Council's decision making. However, it is clear from the findings of the SA that there are Traveller site options that would be more likely to have a number of negative sustainability effects than others (such as the five sites listed above) and it may therefore be that those sites are less appropriate for residential development. In addition, **it is recommended that the four sites in flood zone 2 and 3 (GTTS1954, GTTS1955, GTTS1956 and GTTS2039) are not allocated as Traveller sites in the Draft Local Plan, unless the exception test can be met.** If these four sites are taken forward for development it is essential that appropriate mitigation is incorporated – this may involve only developing any part of a site which is outside of flood zones 3 and 2 and instead using that land for open space.
- 1.90 It is recognised however, that there is potential to mitigate many of the potential negative effects identified (in particular through development of appropriate policy safeguards within the Draft Local Plan), and several of the effects are uncertain depending on the eventual development proposals that come forward for a site.

**Table 7: SA Scores for all of the 37 Traveller site options**

Site option	SA objectives																		
	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
GTTS1953	++	0	+	0	--	+	0	+	++	++	-	-?	?	0?	0	-	-	0	++
GTTS1954	++	0	+	+/-	--	0	0	+	++	++	-	-?	0?	--?	-	--	-	0	++
GTTS1955	++	0	-/0?	+	--	0/-	0	++	++	+	-	-?	?	-?	0	--	-	0	+
GTTS1956	++	0	+	+	--	0	0	++	++	++	-	-?	?	-?	0	--	-	0	++
GTTS1957	++	0	+/0?	++	--	+	0	++	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS1958	++/+	0	+/0?	++	--	-	0	++	++	+	-	-?	0?	--?	0	-	-	0	+
GTTS1959	++	0	+/0?	+	--	-	0	++	++	+	-	-?	?	0?	0	-	-	0	+
GTTS1960	+	0	+/0?	+/0/-	--	--	0	++	++	--	-	-?	0?	-?	-	-	-	0	--
GTTS1961	++/+	0	+	+	--	0	0	++	++	+	-	-?	0?	0?	0	-	-	0	+
GTTS1962	--	0	--?	--	--	--	0	+	++	--	-	-?	--?	0?	0	-	-	0	--
GTTS1963	--	0	+	--	--	--	0	+	++	+	-	-?	0?	--?	0	-	-	0	+
GTTS1964	++	0	0?	0	--	0	0	++	++	--	-	-?	-?	--?	0	-	-	0	--
GTTS2039	++	0	++/+?	++	--	+	0	++	++	++	+	+?	0?	-?	0	-	+?	0	++
GTTS2042	+/-	0	++/--?	+/-	--	0/--	0	++	++	+	-	-?	0?	--?	0	-	-	0	+
GTTS2043	++	0	++?	+/++	-	0	0	+	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2044	++	0	++?	+	-	+	0	++	++	++	-	-?	?	--?	0	-	-	0	++
GTTS2045	++/-	0	++/--?	+/-	--	0/--	0	++	++	--	-	-?	0?	--?	0	-	-	0	--
GTTS2046	++	0	+	+	--	--	0	++	++	+	-	-?	?	--?	0	-	-	0	+
GTTS2047	-	0	++?	+	-	+	0	+	++	++	-	-?	?	0?	0	-	-	0	++
GTTS2048	0	0	++?	+	-	+	0	+	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS2049	++	0	++?	+	--	+	0	-	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2051	0	0	+	+	--	+	0	++	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS2052	++	0	++?	+	--	+	0	++	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2053	++	0	++?	++	--	0	0	++	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2054	-	0	++?	+	--	++	0	++	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2055	++	0	+	0	--	-/0	0	++	++	+	-	-?	0?	0?	0	-	-	0	+
GTTS2056	++	0	++?	+	--	+	0	+	++	++	-	-?	?	-?	0	-	-	0	++
GTTS2057	++	0	++?	0	-	-	0	+	++	++	-	-?	?	0?	0	-	-	0	++
GTTS2058	++	0	++?	+	--	-	0	+	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2059	+/-	0	+	+/-	--	+/-	0	++	++	+	-	-?	0?	0?	0	-	-	0	+
GTTS2060	++/-	0	++/--?	0/--	--	+/-	0	++	++	--	-	-?	0?	-?	0	-	-	0	--
GTTS2061	+	0	++?	+	--	+	0	+	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS2062	++	0	++?	+	--	++/+	0	++	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS2063	++	0	++/+?	++	--	+	0	++	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS2064	+	0	++?	+	--	+	0	++	++	++	-	-?	?	-?	0	-	-	0	++
GTTS2065	+	0	+	+	--	+	0	++	++	++	-	-?	?	-?	0	-	-	0	++
GTTS2487	++	0	+	0	--	+	0	+	++	++	-	-?	?	0?	0	-	-	0	++

### Minerals site options

- 1.93 A total of 37 reasonable alternative minerals site options have been subject to SA in line with the assumptions set out in Appendix 4 of the full SA Report (Table A4.6).
- 1.94 The likely effects of the minerals site options are summarised in detail in Chapter 9 of the full SA report, in relation to each SA objective. The SA scores for all of the site options are shown in **Table 8** below.
- 1.95 The detailed SA matrices for the minerals site options are available in a separate document (Annex 6) which also includes maps of the sites that are likely to have significant effects (both positive and negative where relevant) on the various SA objectives.
- 1.96 The minerals site options are unlikely to affect a number of the SA objectives (as they would not provide housing or improve access to education, health, services and facilities for example). However, they would have positive effects on the economic objectives due to the contribution they would make to employment opportunities and investment within the District. Minor negative effects could occur from most of the minerals sites in relation to local health and amenity (due to potential noise, light and dust pollution), efficient use of land due to land take and loss of agricultural land, and on landscape character in the vicinity of the site. There could also be some minor negative effects in relation to biodiversity and recreation assets, and potential for water, soil or air pollution.
- 1.97 Significant negative effects have only been identified in relation to:
- Recreational assets (SA objective 8) – Twenty-five (68%) of the 37 minerals site options could have a significant negative effect on this SA objective (as part of a mixed effect overall) as they include a leisure or recreational facility or open space.
  - Efficient use of land (SA objective 11) – Four (11%) of the 37 site options could have a significant negative effect as they are on Grade 3 best and most versatile agricultural land.
  - Biodiversity and geodiversity (SA objective 14) - Eight (22%) of the 37 minerals site options were identified as having a potentially significant negative effect on this SA objective as they are within 250m of one or more designated biodiversity or geodiversity sites.
- 1.98 It is recognised however, that there is potential to mitigate many of the potential negative effects identified (in particular through development of appropriate policy safeguards within the Draft Local Plan), and several of the effects are uncertain depending on the eventual development proposals that come forward for a site.

**Table 8: SA scores for all 37 minerals site options**

Site option	SA objectives																		
	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
ME1965	+	+	0	-?	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME1966	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME1968	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	--?/+?	0	0	0	0	0
ME1970	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME1971	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME1972	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME1973	+	+	0	0	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME1975	+	+	0	-?	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2240	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2241	+	+	0	0	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2242	+	+	0	0	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2243	+	+	0	-?	-?	0	0	0/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2244	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2245	+	+	0	-?	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2246	+	+	0	-?	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2247	+	+	0	-?	-?	0	0	-/+?	0	+	-	-?	0?	--?/+?	-?/0	0	0	0	0
ME2248	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	--?/+?	-?/0	0	0	0	0
ME2249	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	--?/+?	-?/0	0	0	0	0
ME2250	+	+	0	-?	-?	0	0	--/+?	0	+	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2251	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	--?/+?	-?/0	0	0	0	0
ME2252	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2253	+	+	0	-?	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2254	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2255	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2256	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2257	+	+	0	0	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2258	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2259	+	+	0	0	-?	0	0	-/+?	0	+	--	-?	?	0/+?	-?/0	0	0	0	0
ME2260	+	+	0	-?	-?	0	0	--/+?	0	+	--	-?	0?	-?/+?	-?/0	0	0	0	0
ME2263	+	+	0	-?	-?	0	0	0/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2264	+	+	0	0	-?	0	0	--/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2265	+	+	0	-?	-?	0	0	--/+?	0	0	--	-?	0?	-?/+?	-?/0	0	0	0	0
ME2267	+	+	0	0	-?	0	0	--/+?	0	0	-	-?	?	--?/+?	-?/0	0	0	0	0
ME2312	+	+	0	-?	-?	0	0	-/+?	0	+	-	-?	?	--?/+?	-?/0	0	0	0	0
ME2313	+	+	0	-?	-?	0	0	-/+?	0	0	--	-?	?	--?/+?	0	0	0	0	0
ME2314	+	+	0	-?	-?	0	0	--/+?	0	+	-	-?	?	-?/+?	-?/0	0	0	0	0
ME2315	+	+	0	-?	-?	0	0	--/+?	0	0	-	-?	?	-?/+?	-?/0	0	0	0	0

### Waste site option

- 1.100 Only one reasonable waste site option has been identified by Kirklees Council in line with the assumptions set out in Appendix 4 of the full SA Report (see Table A4.7). The waste site option is site W1 at Emerald Street, Huddersfield and it is an existing site although there is potential for the site to be redeveloped within the Draft Local Plan period to utilise further land to the east of the existing building.
- 1.101 The SA scores for the waste site option are shown in **Table 9** below and the detailed SA matrix is available in a separate document (Annex 6).

**Table 9: Summary of SA Scores for the Waste Site Option**

Site option	SA objectives																			
	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change	
W1	+	+	0	-?	-	0	0	-	0	+	-	-	0?	-?	-	0	0	0	0	+

- 1.102 One potential significant negative effect has been identified in relation to the waste site expansion option, on SA objective 14: biodiversity. This is because the site is within 250m of a number of designated biodiversity sites; however effects may be able to be mitigated through design and the implementation of other policies in the Local Plan. There may be minor positive effects on SA objectives 1: employment, 2: economic growth, 10: sustainable transport and 19: climate change because the site is within walking distance of bus stops which may enable people to travel to work at the site without using a car, and because the site is currently used for an Energy from Waste Facility. Potential minor negative effects are identified in relation to SA objectives 4: health, 5: amenity, 8: recreation and 15: pollution due to the proximity of the site to sensitive receptors and in relation to SA objectives 11: efficient use of land and 12: landscape because the site is partly on greenfield land.

### SA Findings for the Policy Options

- 1.103 The SA findings for the policy options that have been considered for the Kirklees Local Plan are described in detail in Chapter 11 of the full SA Report. As described earlier in this Non-Technical Summary, the alternative options for Local Plan policies were identified by the Council with input from LUC and have drawn from the most up-to-date evidence as well as guidance in national policy.
- 1.104 Detailed SA matrices for the draft policies (as set out in the Draft Local Plan, November 2015) and the reasonable alternatives considered are presented in a separate document (Annex 7).
- 1.105 The alternative options that have been considered in relation to each draft policy are presented in **Table 10** below. The table shows whether each option was considered to be 'reasonable' or not and therefore whether it has been subject to SA.

**Table 10: Local Plan Policy Options**

Local Plan policy	Alternatives	SA	Reason (if not appraised)
Spatial Development Strategy	Allocating development based on the size of settlements.	Yes	
	Allocating development based on an area's character, its constraints and opportunities.	Yes	
DLP1: Presumption in Favour of Sustainable Development	No policy.	No	Inconsistent with national policy.
DLP2: Location of New Development	No policy.	No	Inconsistent with national policy.
	Development of policy approaches consistent with the alternative spatial development strategies consulted on which have been rejected.	No	This relates to the options which are appraised under the alternatives for the spatial development strategy.
	Setting a specific brownfield land target.	No	This is appraised under the options for DLP6.
	Allowing significant new development in smaller centres.	No	Would be inconsistent with Local Plan principles for sustainable development and would be unjustified.
DLP3: Providing Infrastructure	No policy.	Yes	
	Include more prescriptive requirements and standards within the policy.	Yes	
DLP4: Masterplanning Sites	No policy.	Yes	
DLP5: Safeguarded Land	Do not allocate safeguarded land within the Local Plan.	No	Inconsistent with national policy.
	Allow flexibility in the Local Plan by allowing some safeguarded land to be brought forward.	Yes	
DLP6: Efficient and Effective use of Land and Buildings	No policy.	Yes	
	Setting a higher minimum density level.	Yes	
	Setting a lower minimum density level.	Yes	
	Setting a minimum target for the amount of development on brownfield land.	Yes	
DLP7: Place Employment provision	No policy.	No	Inconsistent with national policy.
	Make provision for the lowest employment growth scenario (19,326 jobs from 2013-2031).	Yes	
	Make provision for the highest employment growth scenario (43,722 jobs from 2013-2031).	Yes	
DLP8: Safeguarding Employment Land	To not allow any development to take place on safeguarded employment sites other than employment.	No	Inconsistent with national policy.
DLP9: Supporting Skilled	A very flexible policy which responds purely to market forces.	Yes	
	To not seek contributions for employment, training and skills.	Yes	
DLP10: Supporting the Rural Economy Housing quantum options	No policy.	Yes	
	The policy could be more specific.	Yes	
	Make provision for the lowest housing growth scenario (1,069 dwellings per annum from 2013-2031).	Yes	

Local Plan policy	Alternatives	SA	Reason (if not appraised)
	Make provision for the highest housing growth scenario (2,191 dwellings per annum from 2013-2031).	Yes	
DLP11: Affordability and Mix of Housing	No affordable housing element to the policy.	No	Inconsistent with national policy.
	No housing mix element to the policy.	No	Inconsistent with national policy.
	Setting a lower unit threshold to secure affordable housing and specifying housing mix.	No	Inconsistent with national policy.
	Setting a higher threshold for affordable housing and specifying housing mix.	No	Inconsistent with national policy.
	Requiring a higher percentage of affordable housing on site.	Yes	
	Requiring a lower percentage of affordable housing on site.	Yes	
	Setting different affordable housing percentage targets for different parts of Kirklees.	Yes	
	Outlining the affordable housing requirement on sites as a percentage of floorspace rather than units.	Yes	
DLP12: Accommodation for	No policy.	No	Inconsistent with national policy.
DLP13: Town Centre Uses	A detailed criteria-based policy.	Yes	
DLP14: Shopping Frontages	No policy.	Yes	
DLP15: Residential in Town Centres	A less detailed policy.	Yes	
DLP16: Food and Drink Uses and the	No policy.	Yes	
DLP17: Huddersfield Town	The policy could be more restrictive.	Yes	
DLP18: Dewsbury Town Centre	No policy.	Yes	
DLP19: Strategic Transport Infrastructure	A policy which sets out less criteria.	Yes	
DLP20: Sustainable Travel and Demand Management	No policy.	Yes	
DLP21: Highways and Access	No policy.	Yes	
DLP22: Parking	A less prescriptive policy.	Yes	
DLP23: Core Road and Bus Networks	No policy.	No	Inconsistent with national policy.
DLP24: Core Walking and	Set parking standards for different types of development.	No	Inconsistent with national policy.
DLP25: Design	Rely on an SPD.	Yes	
DLP26:	No policy.	Yes	
	Establish a wider core road and bus network specific to Kirklees.	No	Not justified.
	Generic policy relating to all Rights of Way.	Yes	
	No policy.	Yes	
	A policy setting out prescriptive standards and details.	No	Inconsistent with national policy.
	No policy.	Yes	

Local Plan policy	Alternatives	SA	Reason (if not appraised)
Advertisements	A more prescriptive policy.	Yes	
DLP27: Renewable and Low Carbon Energy	No policy. More detailed policy with specific targets. Identify areas that may be suitable for renewables.	No Yes Yes	Inconsistent with national policy.
DLP28: Flood Risk	Remove the restrictions on culverting. Directly reflect the NPPF flood zones.	No Yes	Would exacerbate flooding so not
DLP29: Drainage	Higher or lower rates of runoff restriction.	No	Would contradict agreements with other authorities, EA etc.
DLP30: Management of Water Bodies	No policy. <i>No reasonable alternatives</i>	No N/A	Inconsistent with national policy.
DLP31: Biodiversity and Geodiversity	No policy.	No	Inconsistent with national policy.
DLP32: Strategic Green	<i>No reasonable alternatives</i>	N/A	
DLP33: Landscape	No policy.	No	Inconsistent with national policy.
DLP34: Trees	No policy.	Yes	
DLP35: Conserving and Enhancing the Water Environment	No policy.	No	Inconsistent with EU legislation.
DLP36: Historic Environment	No policy. No policy.	No Yes	Inconsistent with national policy.
DLP37: Mineral Extraction	No policy.	No	Inconsistent with national policy.
DLP38: Site Restoration and Aftercare	No policy.	Yes	
DLP39: Minerals Safeguarding	No policy. Remove the need for buffers. Safeguard the entire mineral resource.	No Yes Yes	Inconsistent with national policy.
DLP40: Protecting Existing and Planned Minerals Infrastructure	No policy.	No	Inconsistent with national policy.
DLP41: Alternative Development on Protected Minerals Infrastructure Sites	No policy.	Yes	
DLP42: Proposals for Exploitation and Appraisal of Hydrocarbons	Include a series of separate policies on different hydrocarbons rather than a single policy. Incorporate the different phases of development with DLP43 and include proposals for production in a single policy.	No No	Option relates to presentation of policy content rather than a different approach. Option relates to presentation of policy content rather than a different approach.

Local Plan policy	Alternatives	SA	Reason (if not appraised)
DLP43: Proposals for Production of Hydrocarbons	Incorporate the different phases of development with DLP42 and include proposals for production in a single policy.	Yes	
DLP44: Waste Management Hierarchy	No policy.	No	Inconsistent with national policy.
DLP45: New Waste Management Facilities	No policy.	No	Inconsistent with national policy.
DLP46: Safeguarding	Don't allow any other development than employment.	Yes	
DLP47: Waste Disposal	No policy. A policy which does not allow for landfill.	Yes No	Inconsistent with national policy.
DLP48: Healthy, Active and Safe Lifestyles	No policy.	Yes	
DLP49: Community Facilities and Services	No policy. Provide more or less stringent criteria.	Yes No	Unclear and the no policy option is already considering a less stringent approach.
DLP50: Educational and Healthcare Needs	No policy.	Yes	
DLP51: Protection and Improvement of Local Air Quality	No policy. A policy concerned with the general protection and improvement of environmental quality.	No No	Inconsistent with national policy. Inconsistent with national policy.
DLP52: Protection and Improvement	Option 96 Option 97	No No	Inconsistent with national policy. Inconsistent with national policy.
DLP53: Contaminated and	No policy. A less prescriptive policy.	No No	Inconsistent with national policy. Inconsistent with national policy.
DLP54: Sport and Physical Activity	No policy. Protect all indoor and outdoor sports facilities.	Yes No	
DLP55: Development in the Green Belt	No policy.	Yes	
DLP56: Buildings for Agriculture and	No policy. The policy could be more specific.	Yes Yes	
DLP57: Agricultural and Forestry	No policy. The policy could be more specific.	Yes Yes	
DLP58: Facilities for Outdoor Sport,	No policy. The policy could be more specific.	Yes Yes	
DLP59: The Extension,	No policy. The policy could be more specific.	Yes Yes	
DLP60: Curtilage Extensions	<i>No reasonable alternatives</i>	N/A	

Local Plan policy	Alternatives	SA	Reason (if not appraised)
DLP61: Infilling and Redevelopment of	No policy. The policy could be more specific.	Yes	
DLP62: The Re-Use and Conversion of	No policy. The policy could be more specific.	Yes	
DLP63: Urban Green Space	No policy.	Yes	
DLP64: Local Green Space	No policy.	Yes	
DLP65: New Open Space	No policy. Continue to set the requirements set out in UDP policy H18.	Yes	

- 1.107 Given the narrow focus of many of the policies, a number of negligible effects on the SA objectives were identified. Where the Draft Local Plan policy options related directly to particular SA objectives, mostly positive effects were identified on the SA objectives because the policies are generally seeking to promote sustainable development, meet social and economic needs within the District and protect and enhance natural and cultural environmental assets.
- 1.108 In almost all cases, the Draft Local Plan policy was found to have more positive sustainability effects than the alternative options considered for each policy. In the case of DLP27: Renewable and Low Carbon Energy, one of the alternative options considered would have slightly more positive effects than the draft policy. That option would involve identifying particular parts of the District that may be suitable for renewables and could therefore provide slightly more certainty than the policy as drafted in relation to the development of renewables. However, the Council considers that its evidence base relating to wind turbine proposals is adequate to form an appropriate judgement for wind turbine applications across the District. In any case, the SA findings for the draft policy and that alternative option were broadly similar as the draft policy is still supportive of appropriate renewable developments.
- 1.109 In most cases the reasonable alternative options to Local Plan policies were 'no policy' options i.e. to not include a policy addressing the particular issue and instead rely on the NPPF and National Planning Practice Guidance as well as any other relevant policies in the Local Plan. Where this approach was considered to be reasonable and so was subject to SA, the likely effects identified were generally negligible. This is because although there would not be a locally specific policy in the Plan relating to the issue in question, other relevant national and local policy would still apply and therefore negligible effects were considered to be most appropriate for the 'no policy' options, as it is not in the scope of this SA to appraise the likely effects of national planning policy. In other cases, some policy options would involve setting more detailed criteria, standards or targets addressing a particular issue. While this may be an effective approach in the short term, there is a risk that any such detail may become quickly out of date and inappropriate standards relating to issues such as the design and appearance of development may then be enforced.
- 1.110 The SA findings for the policies that are included in the Draft Local Plan are summarised in the next section along with the preferred site allocations.

## Cumulative effects of the Draft Kirklees Local Plan

- 1.111 Once the individual policy and site options were appraised, the SA findings for the preferred policy approaches and sites that have been presented in the Draft Kirklees Local Plan were considered and described, in Chapter 12 of the full SA Report and summarised below. Table 12.1 in the full SA report presents a summary of the SA scores for all of the policies in the Draft Local Plan (Strategy and Policies document), and Table 12.2 presents a summary of the SA scores for all of the sites that are included as allocations in the Draft Local Plan (Allocations and Designations document). As these tables span several pages, they are not reproduced in this Non-Technical Summary. This enables an assessment to be made of the likely significant effects of the emerging Local Plan as a whole on each of the SA objectives, i.e. an assessment of cumulative effects as required by the SEA Regulations.
- 1.112 Under each of the SA objectives below, consideration is also given to ways in which the effects of the Draft Local Plan may be mitigated.

### **SA objective 1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible**

- 1.113 The Local Plan provides for the creation of 32,194 jobs which will help to ensure that there are enough jobs available to match population growth that will result from the housing development also proposed through the Draft Local Plan.
- 1.114 Nineteen sites have been allocated in the Sites and Allocation document for employment development, which will increase the amount and range of sites that are available for employment-generating development in the District. In addition, 11 of the 12 mixed use sites that have been allocated would incorporate some employment-related development. These allocated sites have been subject to SA along with the reasonable alternative site options and the

Council considers them to be the most appropriate sites for meeting local employment needs while minimising the potential adverse impacts of development.

- 1.115 Most of the allocated employment sites are in the northern half of Kirklees where the majority of the population is focussed and where there are generally good public transport links; however there are also some allocated employment sites further south which will ensure that employment delivery is not all focussed in one particular area.
- 1.116 The policy measures in the Draft Local Plan seeking to improve sustainable transport links in Kirklees, through improvements to the public transport network as well as walking and cycle routes, will help to ensure that people (including those without a car) are able to access employment opportunities throughout the District.
- 1.117 While the development of a large amount of employment land throughout the District could potentially result in the loss of greenfield land and environmental impacts including on the landscape, biodiversity and cultural heritage, there are a range of development management-style policies in the Draft Local Plan relating to these and other environmental issues that should help to mitigate the potential effects of development. In particular, DLP5: Efficient and Effective use of Land and Buildings, DLP25: Design, DLP31: Biodiversity and Geodiversity, DLP33: Landscape and DLP52: Protection and Improvement of Environmental Quality will all apply to new employment development on the allocated sites.
- 1.118 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on employment and access to jobs.

### **SA objective 2: Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship**

- 1.119 The likely cumulative effects of the Draft Local Plan on the economy in Kirklees are similar to those described above in relation to employment, particularly because the allocation of 19 sites for employment development will make a significant contribution towards achieving economic growth. In addition, the other policies in the Economy section of the Draft Local Plan seek to safeguard existing employment sites in the Priority Employment Areas (DLP8), increase skill levels amongst local people (DLP9) and support economic growth in rural areas (DLP10).
- 1.120 As well as policies directly relating to economic growth, the policies in the Draft Local Plan seeking to reduce congestion and conserve and enhance the quality of the built and natural environment in Kirklees will indirectly support economic growth by making the District more attractive to investors and employers.
- 1.121 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on the economy.

### **SA objective 3: Ensure education facilities are available to all**

- 1.122 The population growth that will result from the development of 1,630 new homes in Kirklees each year over the Draft Local Plan period could place pressure on existing schools. However, the Draft Local Plan makes provision for the development of new schools and additional school places to meet increased demand through DLP50: Education and Healthcare Needs. In addition, DLP3: Providing Infrastructure requires such essential infrastructure to be in place before the associated development comes forward.
- 1.123 All development sites that were considered for inclusion in the Draft Local Plan have been assessed in relation to their access to schools and colleges via sustainable modes of transport and the SA findings have been taken into account by the Council in identifying the sites that are now allocated. The sites that have been allocated in the Draft Local Plan were found to have broadly very positive effects on access to education with the vast majority of the residential site allocations having either minor or significant positive effects.
- 1.124 The Draft Local Plan also includes a range of measures to protect and improve sustainable transport links in the District which will help to provide people with good access to schools and colleges, including those without a car.
- 1.125 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on access to education.

#### SA objective 4: Improve the health of local people and ensure that they can access the health and social care they need

- 1.126 The population growth that will result from the development of 1,630 new homes per year in Kirklees over the Draft Local Plan period could place pressure on existing healthcare facilities. However, the Draft Local Plan provides for the development of new healthcare facilities to meet increased demand through DLP50: Education and Healthcare Needs. As described above in relation to education, DLP3: Providing Infrastructure requires such essential infrastructure to be in place before the associated development comes forward.
- 1.127 The Local Plan strongly encourages modal shift and a move towards increased walking and cycling, by seeking to link strategic development sites with the walking and cycling network (DLP24: Core walking and cycling network) and a number of the criteria-based policies include requirements such as cycle storage within residential developments. This will help to increase levels of activity day to day and will therefore benefit health, as will the allocation of sites for urban and local green space throughout the District.
- 1.128 The Local Plan seeks to restrict concentrations of food and drink establishments in town centres (DLP16: Food and drink uses and the evening economy) which will help to encourage and facilitate healthier diets. Improvements to air quality resulting from sustainable transport measures and reduced congestion will also benefit public health.
- 1.129 All development sites that were considered for inclusion in the Draft Local Plan have been assessed in relation to their access to healthcare facilities via sustainable modes of transport and the SA findings have been taken into account by the Council in identifying the sites that are now allocated. Most of the sites that have been allocated in the Draft Local Plan were found to have either minor or significant positive effects on access to healthcare. While a small number of sites are not as well-located in relation to existing healthcare facilities, the appraisal of site options could not take into account any new provision that may be made, as this has not been identified in the Draft Local Plan at this stage.
- 1.130 Overall, the Draft Local Plan is therefore considered to have a cumulative **minor positive** effect on health.

#### SA objective 5: Protect local amenity including avoiding noise and light pollution

- 1.131 The large amount of residential and employment development proposed through the Draft Local Plan could result in negative effects on amenity if noise and light pollution were to impact upon nearby sensitive receptors such as existing residential properties. However, such effects would be short-term during the construction phase and impacts may be able to be mitigated at least to some extent through the use of good practice construction techniques. In addition, a number of the criteria-based policies in the Draft Local Plan make specific reference to protecting local amenity, such as DLP15: Residential in Town Centres Policy, DLP25: Design, DLP55: Development in the Green Belt and a number of policies in the Minerals and Waste sections of the Draft Local Plan.
- 1.132 In the longer term, the improvements that are proposed to the sustainable transport network and measures to encourage modal shift could reduce the noise and other amenity impacts associated with traffic and congestion.
- 1.133 All development sites that were considered for inclusion in the Draft Local Plan have been assessed in relation to their likely impacts on amenity and the SA findings have been taken into account by the Council in identifying the sites that are now allocated. While minor and significant negative effects on amenity were identified in relation to most of the allocated sites (based on the assumptions that were applied in the appraisal), these effects may be able to be mitigated as described above and the alternative options considered would also have negative effects.
- 1.134 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor negative and minor positive)** effect on amenity, and the minor negative effect would be short-term.

### SA objective 6: Retain and enhance access to local services and facilities

- 1.135 As described above in relation to education and health, the population growth that will result from the development of 1,630 new homes per year in Kirklees over the Draft Local Plan period could place pressure on existing services and facilities. However, the Draft Local Plan makes provision for the protection and enhancement of community services and facilities to address growing demand through DLP49: Community Services and Facilities, and DLP3: Providing Infrastructure requires such essential infrastructure to be in place before the associated development comes forward.
- 1.136 The spatial development strategy for the Draft Local Plan seeks to direct most development to the larger urban centres which will mean that people are more easily able to access the existing services and facilities that are concentrated there. However, it is recognised that this would result in the loss of opportunities that may otherwise exist to stimulate the provision of new services and facilities in other parts of the District.
- 1.137 All development sites that were considered for inclusion in the Draft Local Plan have been appraised in relation to their level of access to services and facilities and the SA findings have been taken into account by the Council in identifying the sites that are now allocated. A mixture of positive and negative effects on access to services were identified in relation to the allocated sites (based on the assumptions that were applied in the appraisal), although the appraisal of site options could not take into account any new provision that may be made, as this has not been identified in the Draft Local Plan at this stage.
- 1.138 Improvements to the transport network, particularly sustainable transport links, will also provide improved access to services.
- 1.139 Overall, the Draft Local Plan is therefore considered to have a cumulative **minor positive** effect on access to services and facilities.

### SA objective 7: Make our communities safer by reducing crime, anti-social behaviour and the fear of crime

- 1.140 Relatively few of the policies in the Draft Local Plan will have a direct effect on levels of crime and safety although DLP25: Design refers seeks to minimise the risk of crime through appropriate design and the policies relating to development at Huddersfield and Dewsbury town centres (DLP17 and DLP18) seek to create safe and welcoming destinations.
- 1.141 The effects of allocated sites on crime cannot be assessed at this stage as they will depend on factors such as the design of the development and the incorporation of lighting, rather than the location of sites. However, all development would be subject to the criterion included in DLP25: Design referred to above.
- 1.142 Overall, the Draft Local Plan is therefore considered to have a cumulative **negligible** effect on crime and safety.

### SA objective 8: Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage

- 1.143 The Draft Local Plan makes significant provision for retaining and enhancing the amount of open space within Kirklees, in particular through the allocation of sites for urban and local green space. Those sites have been appraised in relation to their proximity to residential and employment development and all were found to be accessible from those areas.
- 1.144 Policies in the Health and Supporting Communities section of the Draft Local Plan seek to protect existing sport and recreation facilities and provide new facilities to support the growing population, in particular DLP58: Facilities for Outdoor Sport, Outdoor Recreation and Cemeteries. In addition, some of the sustainable transport measures in the Draft Local Plan can have benefits in terms of recreation, in particular measures to enhance the network of walking and cycling routes (DLP24: Core Walking and Cycling Network).
- 1.145 The residential, employment, mixed use and Traveller sites that were considered for inclusion in the Draft Local Plan have been appraised in relation to their access to recreation facilities and open space and the SA findings have been taken into account by the Council in identifying the sites that are now allocated. Almost all of the allocated residential and Traveller sites would have

significant positive effects on access to recreation, although in many cases this was part of a mixed effect overall due to a feature such as a Public Right of Way being included in the site boundary. If these features are retained as part of the developments, there would be no negative effect associated with their loss.

- 1.146 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on access to recreation facilities and open space.

#### **SA objective 9: Ensure all people are able to live in a decent home which meets their needs**

- 1.147 The Local Plan provides for the development of 1,630 new homes per year in Kirklees to meet the objectively assessed housing need determined through the Strategic Housing Market Assessment. This figure is balanced with the planned level of employment growth to avoid a situation of over or under-delivery of housing.
- 1.148 A total of 194 sites have been allocated in the Allocations and Designations document for residential development. These sites have been subject to SA along with 665 reasonable alternative options and the Council considers them to be the most appropriate sites for meeting housing needs while minimising the potential adverse impacts of development. In addition, some housing will be delivered on the allocated Mixed use sites, and two Traveller sites have been allocated to meet their specific housing need.
- 1.149 The Housing policies in the Draft Local Plan seek to ensure that a range of housing types is provided as well as an appropriate level of affordable housing (DLP11: Affordability and Mix of Housing). This will help to ensure that the development of new homes meets specific local needs. Provision is also made for Traveller sites (DLP12: Accommodation for Travellers). The Draft Local Plan includes a number of development management-style policies seeking to ensure that all new development is of high quality design and construction, in particular DLP25: Design. This will help to ensure that new housing is of decent quality.
- 1.150 While some of the policies seeking to protect the green belt, employment land, waste facilities etc. could potentially restrict housing development, enough land is still allocated in the Draft Local Plan to meet the objectively assessed housing need.
- 1.151 While a large amount of residential development throughout the District could potentially result in the loss of greenfield land and impacts on the landscape, biodiversity and cultural heritage there are a range of development management-style policies in the Draft Local Plan relating to these and other environmental issues that should help to mitigate the potential effects of development. In particular, DLP5: Efficient and Effective use of Land and Buildings, DLP25: Design, DLP31: Biodiversity and Geodiversity, DLP33: Landscape and DLP52: Protection and Improvement of Environmental Quality will all apply to new employment development on the allocated sites.
- 1.152 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on housing.

#### **SA objective 10: Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport**

- 1.153 The Draft Local Plan includes a number of policies seeking to improve sustainable transport links in Kirklees. While some policies would improve the highway network (in particular DLP19: Strategic Transport Infrastructure), which could be seen to encourage and facilitate car use, they are underpinned by the wider aim to encourage sustainable transport use. Several policies in the Draft Local Plan also make reference to improving road safety including DLP13: Town Centre Uses, DLP15: Residential in Town Centres Policy and DLP23: Highways and Access.
- 1.154 The spatial development strategy seeks to direct most development to the larger urban areas where public transport links are relatively good and where there will be opportunities to walk and cycle day to day. The residential and employment site allocations set out in the Allocations and Designations document have been appraised in relation to the extent to which they allow for the use of sustainable transport and most were found to have either minor or significant positive effects.

1.155 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on sustainable transport.

#### **SA objective 11: Secure the efficient and prudent use of land**

- 1.156 The Draft Local Plan seeks to direct development towards brownfield land use where possible, particularly DLP6: Efficient and Effective use of Land and Buildings. While the Draft Local Plan does not set a particular target for the amount of development on brownfield land, this approach may not be deliverable due to the relatively low availability of brownfield sites in the District historically.
- 1.157 Focussing town centre and retail uses in the identified town centre and shopping areas (DLP13: Town Centre Uses and DLP14: Shopping Frontages) will help to avoid development on out of centre greenfield sites.
- 1.158 The large amount of housing and employment development proposed through the Draft Local Plan will inevitably result in the loss of greenfield land, particularly because most of the allocated sites are on greenfield land. In addition, a number of the allocated sites could have significant negative effects on this SA objective due to the loss of higher grade agricultural land that would occur.
- 1.159 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and significant negative)** effect on the efficient use of land.

#### **SA objective 12: Protect and enhance the character of Kirklees and the quality of the landscape and townscape**

- 1.160 The large amount of residential and employment development that will result from the Draft Local Plan could impact upon the landscape character in Kirklees, particularly near sensitive areas including the Peak District National Park in the south.
- 1.161 However, the allocated development sites have all been assessed for their likely effects on the landscape. A small number of allocated housing and employment sites are within approximately 500m of the National Park and it will be important to ensure that their design and layout is appropriate to avoid adverse impacts on that nationally protected landscape.
- 1.162 All potential negative effects are uncertain at this strategic level of assessment as they will depend largely on the design and layout of development and the incorporation of mitigation such as screening. There is significant mitigation for landscape-related impacts built into the Draft Local Plan, including through DLP33: Landscape and relevant criteria in a number of the more subject-specific policies. In addition, policies in the Draft Local Plan seeking to achieve high quality design in all development (DLP25: Design) will ensure that new development conserves and enhances the townscape.
- 1.163 The Draft Local Plan also allocates sites for open space (urban and local green space) which will help to conserve and enhance the setting of built development and its appearance in the wider landscape and townscape.
- 1.164 Overall, the Draft Local Plan is therefore considered to have a cumulative **minor negative** effect on the landscape and townscape although this is **uncertain** until detailed proposals for the allocated sites are known, and it is recognised that the Draft Local Plan includes several policies that should help to ensure that appropriate design measures are incorporated into new developments.

#### **SA objective 13: Conserve and enhance the historic environment, heritage assets and their settings**

- 1.165 The large amount of residential, employment and other development proposed through the Draft Local Plan could have negative effects on heritage assets and their settings, including the listed buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas which are distributed broadly throughout the District.
- 1.166 The allocated sites have all been assessed for their likely effects on the historic environment, with judgements about the likelihood of effects being taken directly from information provided to

Kirklees Council from Historic England. Only a small number of the allocated sites were found to have potential minor negative effects, with no significant negative effects identified.

- 1.167 All potential negative effects resulting from development are uncertain at this strategic level of assessment as they will depend largely on the design of development and the materials used. There is significant mitigation for impacts on cultural heritage built into the Draft Local Plan, including through DLP36: Historic Environment and relevant criteria in a number of the more subject-specific policies. In addition, policies in the Draft Local Plan seeking to achieve high quality design in all development (DLP25: Design) will ensure that new development conserves and enhances the setting of nearby heritage assets. New high quality development can have positive effects on heritage assets and their settings by improving the appearance of the built environment and townscape.
- 1.168 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and minor negative)** effect on the historic environment and the minor negative effect is currently **uncertain** until detailed proposals for the allocated sites are known.

#### **SA objective 14: Maximise opportunities to protect and enhance biodiversity and geodiversity**

- 1.169 The large amount of residential and employment development that will result from the Draft Local Plan could impact upon sensitive biodiversity and geodiversity in the District as a result of habitat loss, direct disturbance or indirect disturbance from air noise, light or water pollution. In particular, the sensitive European sites (South Pennine Moors SPA and SAC) in the south west of the District could be adversely affected by development in that area.
- 1.170 The allocated sites have all been assessed for their likely effects on biodiversity and geodiversity. While a number of sites have been identified as having potential negative effects, this is purely based on their proximity to biodiversity and geodiversity designations at this strategic level of assessment and it may be possible to implement mitigation measures that reduce or avoid these effects. The findings of the Habitats Regulations Assessment, which is being undertaken separately, will also be taken into account.
- 1.171 All potential negative effects are uncertain at this strategic level of assessment as they will depend largely on the design of development and the incorporation of mitigation such as green infrastructure. There is significant mitigation for biodiversity-related impacts built into the Draft Local Plan, including through DLP31: Biodiversity and Geodiversity and through relevant criteria in a number of the more subject-specific policies.
- 1.172 The Local Plan also allocates sites for open space (urban and local green space) which will help to provide habitat and avoid habitat fragmentation as a result of extensive development in Kirklees.
- 1.173 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and minor negative)** effect on biodiversity and geodiversity and the minor negative effect is currently **uncertain** until detailed proposals for the allocated sites are known.

#### **SA objective 15: Reduce air, water and soil pollution**

- 1.174 The large amount of development proposed through the Draft Local Plan could result in air pollution from increased vehicle traffic; however as described above under SA objective 10, the Draft Local Plan includes various policies and measures seeking to reduce car use and provide improved opportunities for walking and cycling. In particular, DLP24: Core Walking and Cycling Network seeks to ensure that developments are linked to the walking and cycle network.
- 1.175 DLP51: Protection and Improvement of Local Air Quality specifically seeks to address this issue and DLP35: Conserving and Enhancing the Water Environment should help to mitigate the potential impacts of development on water quality. DLP3: Providing Infrastructure will ensure that the infrastructure required to support new development, including improvements to wastewater treatment works, will be in place before the development proceeds.
- 1.176 Overall, the Draft Local Plan is therefore considered to have a cumulative **negligible** effect on air, water and soil quality.

**SA objective 16: Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people**

- 1.177 The large amount of development proposed through the Draft Local Plan could increase flood risk as a result of the loss of greenfield land to impermeable surfaces and therefore increased runoff and reduced infiltration. The allocated sites have been assessed in relation to their effects on flood risk. The earlier SA work recommended that a number of sites in high flood risk zones should not be allocated if the sequential test set out in national planning practice guidance could not be met (i.e. that there are other suitable sites in lower flood risk zones). None of these recommended sites have been allocated on in the Draft Local Plan.
- 1.178 The Draft Local Plan seeks to reduce the risk of flooding through DLP28: Flood Risk which directs development to the areas at lowest risk from flooding and requires the use of SuDS, and DLP29: Drainage. In addition, the allocation of local and urban green space will help to mitigate flood risk by maintaining areas of permeable land. A number of the criteria-based policies also make reference to reducing flood risk and incorporating SuDS including DLP23: Highways and Access.
- 1.179 However, due to the numerous minor negative effects identified in relation to the allocated housing, mixed use and employment sites, the Draft Local Plan is considered to have a cumulative **minor negative** effect on flood risk.

**SA objective 17: Increase prevention, re-use, recovery and recycling of waste close to source**

- 1.180 The scale of development proposed through the Draft Local Plan will inevitably result in an increase in waste generation in Kirklees, particularly because many of the sites allocated for development are on greenfield land where there may be limited opportunities to reuse existing buildings and materials. However, effects in terms of levels of recycling will depend on onsite waste management practices which cannot be determined at this stage.
- 1.181 The policies in the Waste section of the Draft Local Plan provide for the retention of waste facilities to enable waste to be managed locally, reducing the need to export waste over longer distances, and also encourage waste to be managed in accordance with the waste hierarchy. DLP25: Design also requires development proposals to incorporate adequate facilities to allow occupiers to separate and store waste for recycling and recovery.
- 1.182 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and minor negative)** effect on waste.

**SA objective 18: Increase efficiency in water, energy and raw material use**

- 1.183 The scale of development proposed through the Draft Local Plan means that an increase in the consumption of energy, water, minerals and other natural resources is inevitably expected. This is not influenced by the location of allocated development sites, but by onsite practices used which cannot be known at this stage. However, the Draft Local Plan seeks to promote efficient energy consumption by supporting renewable energy development in appropriate locations (DLP27: Renewable and Low Carbon Energy). In addition, DLP35: Conserving and Enhancing the Water Environment requires developments to manage water demand and improve water efficiency through appropriate water conservation techniques including rainwater harvesting and grey-water recycling. The minerals policies in the Draft Local Plan seek to safeguard minerals resources and avoid sterilisation.
- 1.184 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and minor negative)** effect on the efficient use of water, energy and raw materials.

**SA objective 19: Reduce the contribution that the District makes to climate change**

- 1.185 An overall increase in greenhouse gas emissions from vehicle traffic and commercial activity will inevitably result from the overall scale of employment and residential development proposed through the Draft Local Plan. However, the Draft Local Plan includes a number of policies which seek to mitigate the potential impacts of increased vehicle traffic on local roads, in particular DLP20: Sustainable Travel and Demand Management and DLP24: Core Walking and Cycle Network. These policies should help to ensure that emissions from increased traffic are minimised

and that opportunities to make use of walking, cycling and public transport are higher. The allocated sites have been assessed in relation to their impacts on sustainable transport use, as described under SA objective 10 above.

- 1.186 The Draft Local Plan provides support for appropriate renewable energy development through DLP27: Renewable and Low Carbon Energy, and criteria that encourage actions to mitigate climate change are featured in several of the criteria-based policies.
- 1.187 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and minor negative)** effect on climate change.

## Monitoring

- 1.188 The SEA Regulations require that monitoring is undertaken in relation to the significant effects of implementing the Plan in question. **Table 11** below sets out a number of suggested indicators for monitoring the potential significant sustainability effects of implementing the Draft Kirklees Local Plan. Note that the indicators proposed are included as suggestions, and reflect the indicators proposed within the monitoring framework for the Draft Local Plan itself as the data collected will also be relevant to understanding sustainability effects in many instances.
- 1.189 Due to the early stage of the Draft Local Plan, monitoring indicators have been proposed in relation to all of the SA objectives although significant effects have not currently been identified in relation to every SA objective.

**Table 11: Monitoring Indicators for the Kirklees Local Plan**

SA objectives	Proposed monitoring indicators
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	<ul style="list-style-type: none"> <li>Total amount of additional employment floor space – by type (B1, B2, B8).</li> <li>Amount of employment land lost to residential development.</li> </ul>
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	<ul style="list-style-type: none"> <li>Total amount of additional employment floor space – by type (B1, B2, B8).</li> <li>Amount of employment land lost to residential development.</li> </ul>
3. Ensure education facilities are available to all.	<ul style="list-style-type: none"> <li>New education and/or training facilities permitted (sqm).</li> <li>Educational attainment.</li> </ul>
4. Improve the health of local people and ensure that they can access the health and social care they need.	<ul style="list-style-type: none"> <li>New health care facilities permitted (sqm).</li> <li>Average life expectancy.</li> </ul>
5. Protect local amenity including avoiding noise and light pollution.	<ul style="list-style-type: none"> <li>Number of planning applications refused for noise reasons.</li> <li>Number of noise pollution incidents reports annually.</li> </ul>
6. Retain and enhance access to local services and facilities.	<ul style="list-style-type: none"> <li>Amount of new and loss of community facilities (sqm).</li> <li>Number of retail proposals permitted outside of the defined primary shopping areas in hierarchy of centres.</li> </ul>
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	<ul style="list-style-type: none"> <li>Number of crimes reported annually in the District.</li> </ul>
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	<ul style="list-style-type: none"> <li>Sites with Green Flag status.</li> <li>Net increase in local green space.</li> <li>Area of new open space delivered through development.</li> </ul>

SA objectives	Proposed monitoring indicators
9. Ensure all people are able to live in a decent home which meets their needs.	<ul style="list-style-type: none"> <li>• Number of net additional residential units.</li> <li>• Gross affordable housing completions split by affordable rent, social rented and intermediate.</li> <li>• Number of permitted Traveller pitches/schemes.</li> <li>• New and converted dwellings on previously developed land.</li> </ul>
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	<ul style="list-style-type: none"> <li>• Number of road casualties.</li> <li>• Number of planning permissions where travel plans secured.</li> <li>• Frequency of bus services in the District's villages.</li> </ul>
11. Secure the efficient and prudent use of land.	<ul style="list-style-type: none"> <li>• Number of potentially contaminated land sites remediated through the planning process.</li> <li>• Percentage of new development taking place on brownfield land.</li> </ul>
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	<ul style="list-style-type: none"> <li>• Percentage of new development taking place on brownfield land.</li> </ul>
13. Conserve and enhance the historic environment, heritage assets and their settings.	<ul style="list-style-type: none"> <li>• Number of heritage assets within the District on the 'Heritage at Risk Register'.</li> <li>• No of applications approved contrary to advice from relevant statutory bodies.</li> </ul>
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	<ul style="list-style-type: none"> <li>• Change in areas and populations of biodiversity importance, including (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional significance (changes arising from development, management and planning agreements, in hectares and numbers of priority species type).</li> </ul>
15. Reduce air, water and soil pollution.	<ul style="list-style-type: none"> <li>• Number of planning applications refused for air quality reasons.</li> <li>• Number of planning permissions granted contrary to sustained objection of the Environment Agency on water quality grounds.</li> <li>• Number of declared Air Quality Management Areas (AQMAs) in the District.</li> </ul>
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	<ul style="list-style-type: none"> <li>• Number of planning permissions granted contrary to sustained objection of the Environment Agency on flood risk grounds.</li> </ul>
17. Increase prevention, re-use, recovery and recycling of waste close to source.	<ul style="list-style-type: none"> <li>• Percentage of municipal waste landfilled.</li> <li>• Percentage of household waste sent for reuse, recycling and composting.</li> <li>• Number of planning permissions granted for new waste management facilities.</li> </ul>
18. Increase efficiency in water, energy and raw material use.	<ul style="list-style-type: none"> <li>• Permissions granted for non-mineral uses on a safeguarded minerals infrastructure site.</li> <li>• Number of planning permissions where the mineral has been successfully extracted prior to development.</li> <li>• The amount of renewable energy generation by installed capacity and type.</li> </ul>
19. Reduce the contribution that the District makes to climate change.	<ul style="list-style-type: none"> <li>• The amount of renewable energy generation by installed capacity and type.</li> </ul>

## Conclusions and Next Steps

- 1.190 The reasonable alternative policy and site options as well as the proposed draft policies and site allocations for the Draft Kirklees Local Plan have been subject to a detailed appraisal against the SA objectives which were developed at the Scoping stage of the SA process. The emerging Draft Local Plan proposes a large amount of housing, employment and other development across Kirklees; therefore the SA has identified potential positive effects in relation to meeting social and economic needs and aspirations in the District, but also negative effects on many of the environmental objectives including biodiversity, cultural heritage, landscape and loss of agricultural land.
- 1.191 However, the Draft Local Plan also includes a wide range of draft development management style policies, aiming to protect and enhance the economic, social and environmental conditions of the District. These should go a long way towards mitigating the potential negative effects of the overall scale of development proposed.

## Next Steps

- 1.192 The full SA Report and this Non-Technical Summary will be available for consultation alongside the Draft Local Plan between November and December 2015
- 1.193 Following this consultation the responses will be reviewed and addressed as appropriate. The findings of the SA and the outcomes of the consultation will be taken into account by the Council as it prepares the next iteration of the Local Plan. The SA will then be updated to reflect any changes made to the policies and site allocations in that version of the Local Plan and further consideration will be given to potential mitigation measures as well as the approach to monitoring the likely significant effects of the plan.

LUC  
September 2015