



Growth Delivery Statement

KIRKLEES COUNCIL

April 2017

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Executive Summary

- 1.1 The purpose of this report is to assess the deliverability of the Kirklees Local Plan to inform the anticipated Examination in Public (EiP) of the Plan. The report provides an evaluation of the deliverability of the overall level of need, the spatial approach to development, the land identified for development, and the infrastructure required to support the level of, and locations for growth. Accordingly, this report assessed the growth proposals in the Local Plan against National Planning Policy Framework requirements regarding deliverability.

Local Plan Growth Proposals

- 1.2 An overall requirement to provide 31,140 homes during the plan period (2013-31) is identified in the Local Plan.
- 1.3 The Local Plan seeks to deliver 23,000 jobs over the plan period to meet objectively assessed jobs need, equating to a land requirement of 175 hectares, 108 hectares of which is to be additional employment land.
- 1.4 Development in the Kirklees district is to be concentrated in the northern half on the district under the local plan growth proposals, particularly in Huddersfield and Dewsbury.

Rational for the Growth Proposals

- 1.5 The table below sets out how Kirklees Council have calculated the housing figures to be allocated through the local plan:

Housing supply sources/allowances	Explanation	Amount to be added/subtracted to reach the requirement for new housing allocations
Housing requirement (from the Strategic Housing Market Assessment)	The amount of housing required over the plan period (1,730 x 18 years)	31,140
Net housing completions (2013/14 - 2014/15)	New homes built in the first two years of the Local Plan period	-1,702
Sites with planning permission at 01/04/2015 (that are not also proposed as allocations in the local plan)	The total capacity of sites with planning permission is 7,135 homes but to avoid double counting with allocations, this table only shows the capacity with planning permissions for new homes where sites are not proposed as allocations in Local Plan.	-5111
10% lapse rate on planning permissions not allocated in the Local	To provide contingency where some planning permissions may not be delivered	+511

Plan		
Windfall allowance	An allowance of 450 per annum (2020-31 only)	-4,950
Allowance for houses lost through demolition / change of use / conversion	90 per annum, projecting forward the trend from the last five years (2014-31)	+1,440
Sub-total of land to be allocated in the Local Plan	Total derived from above rows	21,328

1.6 The overall employment land target, and how it will be met is summarised in the following table:

Meeting the Employment Land Requirement	Hectares
Employment land requirement (based on REIU work)	175
Completions - employment land take-up (since 1 st April 2013)	-15
Commitments - on land not allocated for employment or mixed use	-15
Supply from previous permissions - on land not allocated for employment or mixed use	-3
10% flexibility allowance	+14
Potential supply from PEAs	-48
Amount of additional employment land required	108
Amount of land allocated (net)	167

1.7 The strategy reflects the varying character of the Kirklees district whilst enabling the delivery of objectively assessed needs in full.

1.8 Whilst the Council is keen to focus on brownfield sites, urban extensions are required to provide

sufficient land and infrastructure to accommodate needs, whilst enabling masterplanning to facilitate co-ordinated delivery.

Justification of Growth Proposals

1.9 An indicative assessment of the economic and financial benefits arising from the implementation of the Local Plan is included in this report.

1.10 The table below summarises the potential economic impacts identified in the assessment:

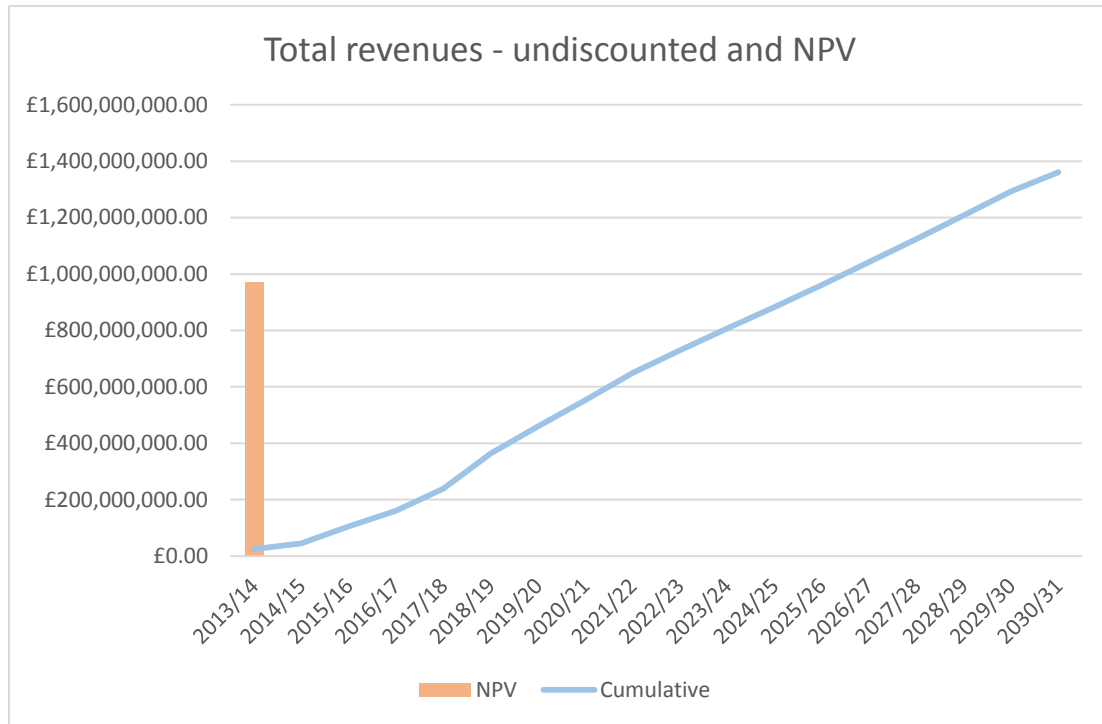
Employment related benefits	
New gross jobs	23,197
New net additional jobs at the Kirklees spatial scale	12,190
Gross additional GVA at the Kirklees level	£ 3,116,354,135
Net additional GVA at the Kirklees spatial scale	£ 1,637,577,766
Discounted net additional GVA at the Kirklees spatial scale	£ 1,182,328,069
Construction job benefits	
Gross Construction Job Years	65,269
Net Additional Construction Job Years	34,297

1.11 There are a number of financial benefits that will accrue from the delivery of the Local Plan which can be categorised in terms of:

- Private sector investment; and
- Revenue benefits to the Local Authority that be captured and reinvested in service delivery and infrastructure.

1.12 In respect of private sector investment, we have estimated the Gross Development Value of development through the application of appraisal assumptions consistent with that set out in the Local Plan and CIL Viability Study. The effect of applying these benchmarks to the quantum of homes and floorspace is to generate an overall sum of over £5.8billion undiscounted over the period 2013/14-2030/31. Discounted at 3.5% over the life of the plan this figure reduces to £4.4billion.

1.13 In terms of the revenue benefits to the public sector, there are a wider range of incomes accruing from development, including Council tax, business rates, New Homes Bonus, CIL and affordable housing commuted sums. These incentives have been modelled against the Local Plan growth proposals. The graph below provides an overall cumulative revenue position indicating that over the entire period that the Local Plan could generate in the order of £1.36billion of value for public sector investment. It also shows a Net Present Value, discounted at 3.5% of circa £1billion.



Key deliverability issues and challenges

Is the quantity of growth deliverable?

- 1.14 The quantity of growth proposed in the Kirklees Local Plan presents an uplift from historically achieved delivery rates. The ability to deliver this growth is broadly dependent upon the following determining factors: occupier demand; land supply; and delivery capacity and mechanisms.
- 1.15 The increased rate of housing delivery proposed in the Kirklees Local Plan will be supported by the focus on employment growth in the Kirklees Local Plan, and vice versa.
- 1.16 One of the most significant factors that supports the step-up in delivery rates is the improved quantity and viability of land that is proposed to be released for development in the plan period compared with the previous monitoring years.
- 1.17 In terms of economic development, the ability to incorporate a range of unit sizes and business accommodation will also help to make growth in the region more resilient, particularly if units are developed in a flexible, open floorplate format, which is often the case with modern commercial units.
- 1.18 It is beyond the scope of a statutory development plan to try to tackle the structural issues associated within the housing industry as a whole, however evidence shows that Kirklees is an attractive location to a wide range of national and regional house builders.
- 1.19 The government is exploring funding mechanisms and policy changes with a view to boosting the delivery of homes. It is considered that these measures are likely to support development coming forward at a faster rate on brownfield sites as well as greenfield sites.
- 1.20 It is considered that the Council's spatial strategy will support self-build housing, as a result of minimising development costs through locating the majority of housing allocations nearby to existing infrastructure, whilst retaining flexibility for sites of a range of sizes within settlements across the district.

Is the Spatial Distribution of Growth Deliverable?

- 1.21 The approach to the Spatial Strategy in the Kirklees Local Plan has led to development being focussed on locations which support viable delivery of development, and which help to foster the integrated delivery of housing and economic growth proposals.
- 1.22 Growth is more generally focussed in the northern side of the district, which provides the following benefits:
- Proximity to larger housing markets (e.g. Huddersfield and Dewsbury);
 - Accessibility to labour markets (i.e. Manchester or Leeds via the M62 and by rail);
 - Utilisation of existing infrastructure;
 - New employment sites in prime locations supported by residential growth within the same part of the Kirklees district.

Is the supply of land proposed to meet growth deliverable?

- 1.23 The process which the Council has taken to the distribution of growth has led to sites being selected for development which are in suitable and attractive locations for development.
- 1.24 The Council has engaged with landowners and developers in the preparation of the Local Plan to ensure that the sites for development are readily available, and that they have the ability to deliver the growth proposals allocated to their site(s) within the plan period, in accordance with the agreed phasing of development delivery.
- 1.25 The viability of the sites chosen for development has been assessed through the Local Plan and Community Infrastructure Levy Viability Study 2015.
- 1.26 During the site selection process, the constraints on each site were assessed, and those sites where constraints could be overcome to deliver viable development have been chosen, having regard to comments received during consultation on the Local Plan. Deliverable sites with more significant constraints have been phased for delivery at a later stage during the plan period to acknowledge viability considerations.
- 1.27 The existing, undeveloped Unitary Development Plan (UDP) employment allocations have been assessed to determine their continued suitability through the site allocations process.

Are the strategic allocations realistically deliverable taking into consideration their likely site development and infrastructure costs and timescales?

- 1.28 Viability studies have been prepared to assess the following residential led strategic allocations:
- Land north of Bradley Road, Bradley, Huddersfield (two allocations assessed as single site) – 1958 units;
 - Land to the south of Ravensthorpe Road / Lees Hall Road, Dewsbury - 2,310 units;
 - Land north of Blackmoorfoot Road, Crosland Moor, Huddersfield – 441 dwellings, 44,258 sq. m of employment floor space; and
 - Land east of 932-1110 Leeds Road, Shaw Cross/Woodkirk, Dewsbury, 1535 homes.
- 1.29 The results indicated that all of the sites were viable and deliverable, incorporating allowances for the policy standards of the Local Plan. The report acknowledged that there remains a degree of uncertainty given unknowns in relation to certain elements of site infrastructure costs at this early

stage in the development process. However, allowances were made for such costs and the report also underlined the ability for variations in land prices to absorb the effects of any additional unforeseen abnormal cost items.

Is the infrastructure required to support growth deliverable and viable?

- 1.30 Infrastructure provision has been considered at various stages in the development of the Kirklees Local Plan. Infrastructure providers have been contacted directly relating to specific site options, and their responses have been taken into account when selecting the sites to be allocated for development in the local plan.
- 1.31 The approach to the spatial strategy has led to development allocations being focussed on areas which have good access to existing strategic infrastructure, enhancing the deliverability of the infrastructure required to support growth, and the viability of development sites in the process.
- 1.32 The Local Plan's Infrastructure Delivery Plan provides a comprehensive appraisal of the current provision of infrastructure, and what investment will be required to support the growth promoted by the local plan. The local plan also includes policies to ensure that the relevant infrastructure can be delivered to support future growth.

Is the cumulative burden of all policy requirements and standards (including affordable housing) viable?

- 1.33 The Kirklees Local Plan and CIL Viability Report (October 2015) assessed the viability of the Local Plan's policy standards. It included a screening of all the policies to determine those that had the potential to impact on development cost / value and modelled the effects of those judged to have such impacts. The impacts of the policies have been tested through the Viability Addendum 2016 document. The results demonstrated that the policy standards were viable across the District. The only locations in which viability was marginal was the lower value locations however it concluded that changes in market conditions through the Local Plan period together with variations to the way that planning standards could be applied would insulate the effects on viability.
- 1.34 It is considered that those policies which have implications for the overall level of growth in the district will have a positive effect as a result of the benefits of the spatial strategy, and the flexible approach which has been taken to the framework of Place Shaping Principles to guide development in different areas of the district. It is also considered that the individual and cumulative effect of local plan policy expectations will not necessarily harm the viability and deliverability of individual sites, due to the flexible wording and application of the policies, and as the council has been cognisant of on-site constraints during the formulation of the local plan, including when establishing the development capacity of sites.

Risk management strategy

- 1.35 We set out below a series of ways in which it is recommended Kirklees can support the delivery process. We outline specific measures that are already either underway or committed under a number of key headings, as summarised below:
- Robust monitoring of the delivery of the growth proposals in the local plan, against the local plan targets through the elements which make the Annual Monitoring Report. Where under-delivery is identified, the Council will pursue measures to address the shortfall.
 - Contingency planning and release of windfall development, as there is potential for additional windfall developments to supplement the District's land supply, through the life of the Local Plan.

- Flexibility in the way that planning policies are implemented, on a 'subject to viability' basis to ensure that they do not put the scale or pace of delivery at risk.
- Bespoke planning strategies to support the delivery of large scale and complex sites, in partnership with owners/developers.
- Securing external funding opportunities, continuing the Council's excellent track record in securing external funding support for regeneration and growth.
- Use of Council land and property assets to facilitate early delivery, providing considerable potential to support delivery given that the Council is a major land and property owner within the Kirklees district.
- Development and implementation of regeneration and growth strategies for key target locations (e.g. North Kirklees Growth Zone and Huddersfield town centre).
- Development of innovative funding and delivery mechanisms to accelerate delivery.
- Close market engagement (developers and investors).

Conclusion

- 1.36 It is considered that the Kirklees Local Plan is realistically deliverable given the scale and distribution of development proposed, and the individual and cumulative impacts of the various policies and standards set out in the Local Plan.
- 1.37 The growth targets in the Local Plan represent an increase upon previous delivery rates, in terms of housing as well as employment. It is considered that the addition of new suitable sites for development in attractive locations will provide a step change for the delivery of housing and employment development in the district, through increasing capacity and providing a range of sites which are attractive to the market.
- 1.38 The spatial strategy which has been incorporated has concentrated growth proposals to the most suitable and deliverable locations within the district. It is considered that the concentration of development in the northern part of the district will assist the delivery of the housing and economic goals for the district in an integrated manner, providing the added benefit of interconnected growth, through access to labour markets, access to skilled workers, and interconnectivity between centres for growth within the district and beyond, increasing the attractiveness of sites for development.
- 1.39 The sites which have been selected for development have been guided to suitable and deliverable locations as a result of the spatial strategy approach, and have been tested against technical and deliverability considerations during their selection process, with site capacity having regard to on-site constraints.
- 1.40 It is considered that local plan policies will not individually or cumulatively prevent the growth proposals in the Local Plan from being delivered.
- 1.41 The Council have engaged with landowners and developers through the local plan process, to ascertain the availability and achievability of the development sites proposed in the local plan.
- 1.42 The spatial strategy approach facilitates the utilisation of existing strategic infrastructure in the district to support development, and assessments have been carried out to demonstrate that the required infrastructure to support growth is deliverable, in consultation with key infrastructure providers. Policies are also include in the local plan to ensure that the necessary infrastructure comes forward alongside development with a view to ensuring sustained delivery of the local plan growth proposals

throughout the local plan period (2013-31).

- 1.43 Whilst it is recognised that the Local Plan is not immune from risks, it is considered that the Council and its partners can put in place appropriate delivery management and risk mitigation measures to support the delivery process.
- 1.44 Accordingly, it is considered that growth proposals in the local plan are deliverable, and that the supply of land proposed for development is available, suitable and achievable. Therefore it is considered that the local plan proposals meet the requirements of the National Planning Policy Framework regarding deliverability.

1.0 Introduction

Purpose and Scope

- 1.1 The purpose of this report is to assess the deliverability of the Kirklees Local Plan to inform the anticipated Examination in Public (EiP) of the Plan. The report provides an evaluation of the deliverability of the overall level of need, the spatial approach to development, the land identified for development, and the infrastructure required to support the level of, and locations for growth.

Relevant National Planning Policy Framework Policy

- 1.2 The National Planning Policy Framework (NPPF) sets out that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6). It is identified that in order to achieve economic sustainability, planning has the role of ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation, along with supporting infrastructure (paragraph 7).
- 1.3 The NPPF stipulates that a local planning authority should submit a plan for examination which it considers is “sound”, being: positively prepared, justified, effective, and consistent with national policy. In order to be justified, it is stipulated that local plans should present the most appropriate strategy (paragraph 182).
- 1.4 The NPPF emphasises that plans should be deliverable, and that pursuing sustainable development requires careful attention to viability and costs in plan making (paragraph 173). Further to this, it is stated that local plans should be aspirational but realistic (paragraph 154), and that there should be a reasonable prospect that planned infrastructure is deliverable in a timely fashion (paragraph 177).
- 1.5 In producing plans, the NPPF requires local planning authorities to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of market and economic signals (paragraph 158). It is added that local authorities should identify and address barriers to investment (paragraph 160), and that they should use their evidence base to assess the sufficiency of existing and future land available for economic development to meet the identified needs (paragraphs 160 & 161).
- 1.6 The NPPF emphasises that in order to be appropriate, the cumulative impacts of plan standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle” (paragraph 174).

2.0 Summary of Local Plan Growth Proposals

Quantity of Development

Homes

- 2.1 An overall requirement to provide 31,140 homes during the plan period (2013-31) is identified. The Council's approach to the phasing of housing delivery is set out in the Housing Delivery table which is included in the Local Plan Strategies and Policies document.

Jobs

- 2.2 The local plan seeks to deliver 23,000 jobs over the plan period from 2013-31 to meet the objectively assessed jobs need, equating to a land requirement of 175 hectares, 108 hectares of which is to be additional employment land.
- 2.3 A breakdown of the jobs and land requirement by sector is included in the Local Plan Strategies and Policies document. It is identified in the Employment Technical Paper, which supports the local plan, that the greatest impact on land requirement is derived from the manufacturing, wholesale and transport and storage sectors, which collectively account for 132 hectares of the total land requirement.

Spatial Distribution

- 2.4 Development in the Kirklees district is to be concentrated in the northern half on the district under the local plan growth proposals, particularly in Huddersfield and Dewsbury, as shown in the 'Housing Allocation Capacity by Local Plan Settlement' table appended to the Housing Technical Paper.
- 2.5 The spatial development strategy for the Kirklees Local Plan has taken into account the spatial vision, strategic objectives and the place shaping agenda for Kirklees to provide a strategy which has combined them together.
- 2.6 The distribution of development across the district has been carried out using an approach which takes into account the level of services and facilities within existing settlements, as well as a place based approach considering the role and function of settlements, in order to provide the flexibility needed to respond to the distinct characteristics of different areas within the Kirklees district.
- 2.7 Through this strategy, the majority of the growth (particularly residential) is to be met in the main urban areas of Huddersfield and Dewsbury, with a more flexible approach applied to the distribution of development elsewhere in the district. The strategy reflects the varying character of the Kirklees district whilst enabling the delivery of objectively assessed needs in full.
- 2.8 Alongside this the Local Plan proposes to allocate prime new employment land along the M62 Corridor, and in the Dearne Valley where easier access can be achieved to the M1. The major allocations for employment development are included in the Local Plan Strategies and Policies document.
- 2.9 There is a focus on mixed use sites in the Kirklees Local Plan, where land use mix can be more flexible, responsive, viable, and allow for more sustainable development and place shaping.
- 2.10 The distribution of jobs and homes in the plan is therefore guided by these place bound principles and the strategy has not set distinct targets for sub-areas, settlements or wards.
- 2.11 Local employment needs are to be met where demand exists in priority employment areas, as well as employment and mixed use allocations in or on the edge of existing settlements, and with good access to the strategic road network in order to provide a refreshed stock of employment sites to meet modern

business needs.

2.12 The approach to the distribution of growth proposals described above is broadly reflected in the hierarchy of town centres (local plan policy PLP 13) included in the local plan. The town centre hierarchy is as follows:

- Principle Town Centres: Huddersfield and Dewsbury.
- Town Centres: Batley, Cleckheaton, Holmfirth and Heckmondwike.
- District Centres: Almondbury, Birstall, Denby Dale, Honley, Kirkburton, Lindley, Marsden, Marsh, Meltham, Milnsbridge, Mirfield, Moldgreen, Ravensthorpe, Skelmanthorpe and Slaithwaite.
- Local Centres: 61 in total, set out in the Local Plan Allocations and Designations document.

2.13 These locations will be the focus of development for Town Centre uses. Town Centre delivery Studies as well as a Retail Capacity Study have been produced to further inform the deliverability of the growth proposals for Town Centre uses.

Strategic Sites

2.14 This section sets out the strategic housing and employment sites in the local plan, including sites which will make a significant contribution to delivering the growth proposals in the local plan.

Table 2.1: Strategic Site Proposals

Site	Developable Area (Ha)	Indicative Capacity (sq. m)
Land north and west of the Three Nuns Pub and the former Cooper Bridge Waste Water Treatment Works, Leeds Road, Mirfield	35.18	162,187
Land to the north and west of The Royds, Whitechapel Road, Cleckheaton (Site ref. E1831)	24.57	41,020
Land to the east of Park Mill, Wakefield Road, Clayton West, Huddersfield.	14.89	59,044
Former North Brierley Waste Water Treatment Works, Cliff Hollins Lane, Cleckheaton.	7.61	46,451
Land north of Bradley Road, Bradley, Huddersfield	56.37	1,577 dwellings
Land north of Bradley Road, Bradley, Huddersfield (Site ref. H351)	11.97	381 dwellings
Land to the south of Ravensthorpe Road/Lees Hall Road, Dewsbury (Site Reference H2089)	161.37	2,310 within the plan period, with potential for a further 1,690 beyond the plan period.
Land north of Blackmoorfoot Road, Crosland Moor, Huddersfield	25.3	441 dwellings; and 44,258 sq. m employment floorspace

Land south of Lindley Moor Road, Lindley, Huddersfield (EZ site)	25.46	533 dwellings; and 53,125 sq. m employment floorspace.
Land east of 932-1110 Leeds Road, Shaw Cross/Woodkirk, Dewsbury	114.59	1,535 dwellings; and 122,500 sq. m employment floorspace.

Policy Requirements and Standards

- 2.15 This section sets out the key policies in the local plan which may have an impact upon development viability and deliverability, with a view to identifying the individual and cumulative effects of policies and standards. A comprehensive review of the impact of local plan policies on the delivery of growth during the plan period is included at Section 5 of this report.

Direct Impact upon Site Viability and Deliverability

- 2.16 It is considered that the following policies could have a direct influence on site viability and deliverability:

- PLP 3 – Location of New Development
- PLP 4 – Infrastructure
- PLP7 – Efficient and Effective Use of Land and Buildings
- PLP 9 – Communities and Workforce
- PLP11 – Housing Mix and Affordable Housing
- PLP20 – Sustainable Travel
- PLP24 – Design
- PLP27 – Flood Risk
- PLP28 – Drainage
- PLP30 – Biodiversity and Geodiversity
- PLP31 – Strategic Green Infrastructure Network
- PLP32 – Landscape
- PLP33 – Trees
- PLP34 – Water Environment
- PLP35 – Historic Environment
- PLP47 – Health
- PLP49 – Education and Healthcare
- PLP50 – Sport and Physical Activity
- PLP51 – Air Quality
- PLP52 – Environmental Quality

- PLP53 – Land Contamination & Stability
- PLP61 – Urban Green Space
- PLP62 – Local Green Space
- PLP63 – Open Space

3.0 Rationale for the Growth Proposals

3.1 This section sets out the rationale for the development of the growth proposals in the Kirklees Local Plan, in order to demonstrate the options which have been considered, and how the most appropriate strategy has been defined.

Quantity of Development

Homes

3.2 The Publication Draft Local Plan housing requirement has used the most up to date national household projections (2014-based) as a starting point. Following analysis of this information and consideration of economic assumptions, the local plan housing requirement is **31,140 homes** over the plan period from 2013-31 which will meet identified needs. This equates to an annual housing requirement of **1,730 new homes** per annum. As this is based on up-to-date demographic evidence it takes account any need arising from shortfalls in delivery against previous targets.

3.3 The table below sets out how Kirklees Council have calculated the housing figures to be allocated through the local plan:

Table 3.1: Approach to assessing need

Housing supply sources/allowances	Explanation	Amount to be added/subtracted to reach the requirement for new housing allocations
Housing requirement (from the Strategic Housing Market Assessment)	The amount of housing required over the plan period (1,730 x 18 years)	31,140
Net housing completions (2013/14 - 2014/15)	New homes built in the first two years of the Local Plan period	-1,702
Sites with planning permission at 01/04/2015 (that are not also proposed as allocations in the local plan)	The total capacity of sites with planning permission is 7,135 homes but to avoid double counting with allocations, this table only shows the capacity with planning permissions for new homes where sites are not proposed as allocations in Local Plan.	-5111
10% lapse rate on planning permissions not allocated in the Local Plan	To provide contingency where some planning permissions may not be delivered	+511
Windfall allowance	An allowance of 450 per annum (2020-31 only)	-4,950

Allowance for houses lost through demolition / change of use / conversion	90 per annum, projecting forward the trend from the last five years (2014-31)	+1,440
Sub-total of land to be allocated in the Local Plan	Total derived from above rows	21,328

3.4 Of the land selected for allocations, there are 2,024 dwellings on these sites with planning permission so these are not included in the table above to avoid double counting. The Council will also support self-build housing, as set out in local plan policy PLP11.

Employment

3.5 The need for approximately 23,200 jobs, and the resultant land requirement of 175 ha for employment development, has been derived having regard to an objective assessment of need for jobs within the Kirklees district, whilst taking account of the role of the district within the wider Leeds City Region, and the growth proposals in the Strategic Economic Plan as well as the Kirklees Economic Strategy. The process for establishing the growth proposals is summarised in the Figure 1 from the Employment Technical Paper which supports the Local Plan.

3.6 The overall employment land target, and how it will be met is summarised in the following table:

Table 3.2: Employment land needs

Meeting the Employment Land Requirement	Hectares
Employment land requirement (based on REIU work)	175
Completions - employment land take-up (since 1 st April 2013)	-15
Commitments - on land not allocated for employment or mixed use	-15
Supply from previous permissions - on land not allocated for employment or mixed use	-3
10% flexibility allowance	+14
Potential supply from PEAs	-48
Amount of additional employment land required	108

Amount of land allocated (net)	167
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3.7 As part of the assessment for the additional land required to meet employment development needs in the district, the suitability and capacity of existing employment sites has also been assessed. This has resulted in the designation of Priority Employment Areas. The process is set out in the Employment Technical Paper.

Spatial Distribution

3.8 In developing the spatial strategy for the Kirklees Local Plan, at the early engagement stage the Council confirmed the following key drivers behind the strategy:

- Deliver the objectives of the council's Economic Strategy and Joint Health and Wellbeing Strategy.
- Ensure sufficient land is found for new homes, jobs, shopping, facilities for sport and leisure, minerals and waste management, and that this land is in locations where we can expect development to be delivered.
- Minimise the adverse impact of development on the natural and historic environment, and on local character.
- Recognise that development in some areas and circumstances is challenging, and that if we pursue this there should be a reasonable prospect of improving critical infrastructure.

3.9 Three options were then considered to underline the Spatial Strategy, as follows:

1. Allocating development based upon the size of settlements;
2. Allocating development based on the area's character, constraints and opportunities; or
3. Allocating development based on an area's character and the size of its settlements.

3.10 Option 3 was accepted as the Council's preferred option in the Draft Local Plan.

3.11 The reasons for the decision are as follows (by option):

1. This option would be based upon a settlement hierarchy, and was rejected because it could fail to support the redevelopment of brownfield sites elsewhere in the district, and the ability to meet local housing needs in mid-sized and smaller sized settlements. Furthermore the local plan site allocation assessment has shown that it would not be possible to justify this approach in terms of a deliverable land supply, due to the development constraints around certain higher order settlements in the settlement hierarchy.
2. This option would be based upon the place shaping principles of the local plan. The option was rejected because it could lead to development being focussed to locations which have poor access to services and require a greater amount of infrastructure investment which may not be viable, and overall objectively assessed needs for the Local Plan could not be met as the settlements and locations capable of growth collectively would not have sufficient deliverable and developable land supply, and would lead to unsustainable patterns of development (e.g. concentrations in smaller settlements).
3. This option has been chosen because it combines the supporting evidence to produce the most appropriate solution for the Kirklees district. Focusing development in Huddersfield, Dewsbury

and the North Kirklees area maximises access to the strategic road network and key east/west public transportation networks. This approach also helps to bring forward most new housing development closer to the main strategic employment locations identified along the M62 corridor, providing viable, sustainable and deliverable sites for housing and employment development.

- 3.12 The Kirklees Local Plan seeks to analyse and 'place-shape' the District when considering the spatial distribution of development options, and a Settlement Appraisal has been carried out to this effect.
- 3.13 The Settlement Appraisal process has taken into account the interdisciplinary nature of the sustainability indicators (derived from the evidence base supporting the local plan). The settlements have been assessed individually and have been arranged by the four sub-areas (Huddersfield, Dewsbury and Mirfield, Batley and Spen, and Kirklees Rural) with a view to establishing place shaping principles to guide development proposals as opposed to guiding the distribution of growth proposals in the local plan.
- 3.14 The Settlement Appraisal includes an assessment of the following economic, social and environmental sustainability indicators per settlement:
- Local Profile;
 - Accessibility; and
 - Local Services.
- 3.15 This approach provides a measure for comparing and assessing settlements in terms of their sustainability, accessibility and their suitability to accommodate future growth. This data has been supplemented using local knowledge gained through the consultation on the local plan. The data also provides a measure for the suitability of settlements to support viable and deliverable sites for development.
- 3.16 A detailed description of the information which has informed the development of this process is included in the Settlement Appraisal Technical Paper.
- 3.17 The approach to the spatial strategy has resulted in a spread of development across the district's settlements, but with the majority of new growth being planned to take place in Huddersfield, Dewsbury and in the north Kirklees area, taking advantage of existing and proposed transport infrastructure investments. This approach is justified by the Kirklees Economic Strategy and the settlement appraisal evidence.
- 3.18 Whilst the council is keen to focus on brownfield sites, urban extensions are required to provide sufficient land to accommodate needs. Urban extensions provide the chance for detailed masterplanning to ensure sufficient infrastructure is in place to deliver the planned level of growth. A major consideration in the location of such opportunities, particularly those for employment, is the identification of strategic employment and mixed-use sites identified in the Leeds City Region Strategic Economic Plan and proximity to the M62 and the M1.

Strategic Site Allocations

- 3.19 The sites for consideration in the local plan have been sourced through three main processes:
- Call for Sites;
 - Council Asset Review; and
 - Existing UDP Allocations

- 3.20 Sites submitted for development were assessed through the SHLAA 2014, and have since been assessed through the local plan production process. In considering the site options submitted to the Local Plan, Kirklees Council have taken the following approach to considering which sites to include and which to exclude.
- 3.21 Where development site options fall within existing settlements in close proximity to local services and facilities, and reflect the opportunities or constraints within the sub area, the Council has accepted the site option, subject to any technical constraints that cannot be mitigated. Preference has been given to suitable brownfield sites for inclusion in the local plan.
- 3.22 Where brownfield sites are not available, suitable sites have been identified in the following order of priority:
1. Suitable greenfield sites within settlements;
 2. Suitable extensions to settlements where exceptional circumstances can be demonstrated to release land from the green belt; and
 3. Detached green belt sites (where exceptional circumstances can be demonstrated).
- 3.23 An in-depth technical appraisal of individual accepted sites has been undertaken, working with internal and external consultees to inform the assessments. Any supporting information provided by the landowner or their agent has also been considered. The technical appraisal considered the following elements:
- Transport
 - Flood Risk and Drainage
 - Environmental Health
 - Biodiversity
 - Historic Environment
 - Open Space
 - Education
 - Green Belt
 - Overall Site Assessment (for proposals in the green belt)
 - Public Health
 - Ground stability and topography
 - National Grid buffer areas
 - Kirklees District Landscape Character Assessment 2015
- 3.24 The decision whether to accept or reject each option has been based on a cumulative judgement of technical assessments, and consultee responses about each site during the previous phases of consultation on the local plan.

Assessing Capacity - Housing Sites

- 3.25 When indicating the housing capacity of sites, standard development density of 35 dwellings per hectare has been applied, to provide a reasonable estimate whilst recognising that different sites have

differing characteristics.

Assessing Capacity - Employment Sites

3.26 In order to calculate the employment floorspace capacity of a site, a standard ratio of area/employment type has been applied unless there is specific evidence to indicate otherwise. The assumptions which have been used per site are as follows (by use class):

- B1a = 10%
- B1b = 10%
- B1c = 10%
- B2 = 10%
- B8 = 60%

Assessing Capacity - Mixed Use

3.27 The capacity of mixed use sites has been estimated using a 50/50 ratio of housing to employment provision, unless there is specific evidence to indicate otherwise. The capacity for housing and employment on each portion of a given site has been calculated in the same way as for sites wholly proposed for housing or employment.

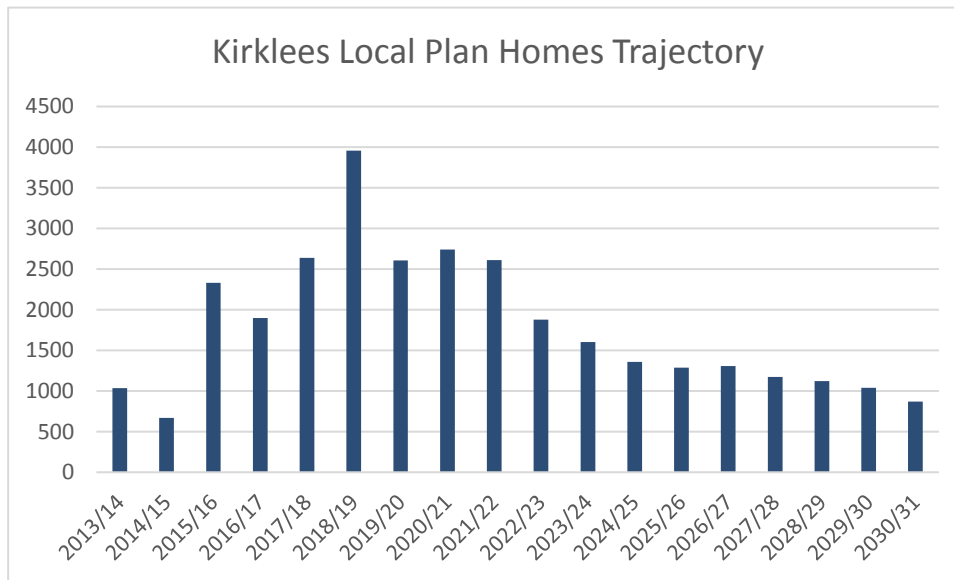
Assessing Capacity – All Sites

3.28 In all cases the estimated capacity is based on the remaining developable area of a site once any constrained areas have been removed.

4.0 Justification of Growth Proposals

- 4.1 This section of the report outlines the benefits of the growth proposals of the Local Plan. It provides an indicative assessment of the economic and financial benefits arising from the implementation of the Local Plan.
- 4.2 It is based on the proposals of the Local Plan. In respect of homes, the total figure of 32,125 dwellings has been modelled, based on the time period 2013/14 to 2030/31, as illustrated below:

Figure 4.1: Local Plan Housing Trajectory



- 4.3 In respect of employment land, the floor space requirements identified in the Employment Technical Paper have been applied. This comprises 698,542 sq. m (7.5million sq. ft.) of industrial floor space and 163,280 sq. m (1.76million sq. ft.) of office floor space. No trajectory of this floor space is provided in the Local Plan and therefore a proportionate distribution per annum has been allowed for.

Economic Benefits

Assessment of the potential economic impact of Local Plan delivery

- 4.4 Kirklees is a key economic driver of the wider Leeds City Region economy and Local Plan delivery will therefore have wider economic benefits beyond the Borough, although these have not been captured as part of this analysis.
- 4.5 This section focuses upon the potential economic benefits associated with the proposed new employment and housing and identifies benefits relating to the following:
- New gross/net additional permanent FTE jobs
 - Net additional Gross Value Added (GVA) associated with these
 - New gross/net additional construction jobs

- 4.6 Each of these is discussed in further detail below:

New gross jobs

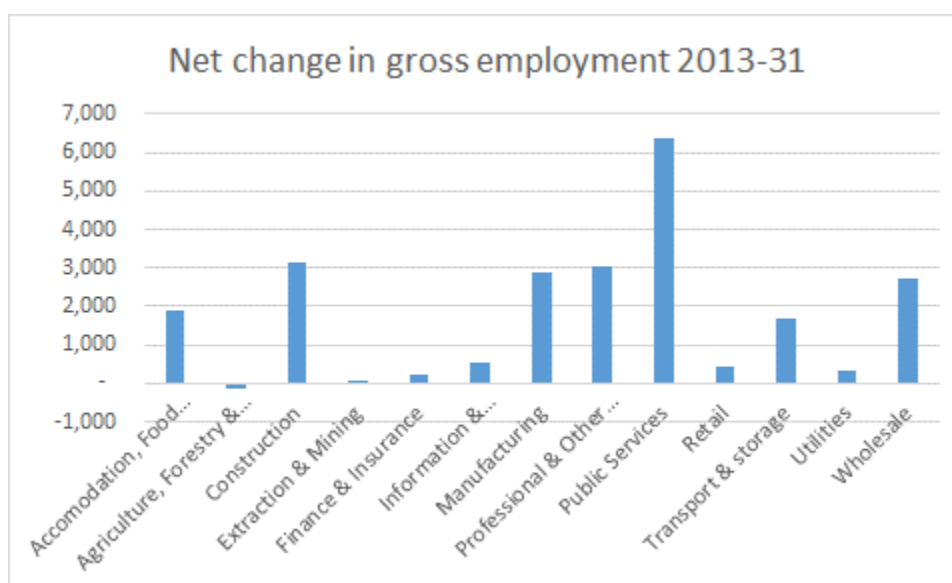
- 4.7 Gross job forecasts by broad SIC Category at the Kirklees Borough spatial scale were obtained from the Regional Econometric Model (REM, 2016). A summary of this is presented below in table 4.1:

Table 4.1: Employment Change by Sector 2013-31 (REM, 2016)

Industry Name	2013	2031	Net change
Accomodation, Food Services & Recreation	7,462	9,356	1,894
Agriculture, Forestry & Fishing	402	285	- 117
Construction	7,182	10,302	3,120
Extraction & Mining	167	238	71
Finance & Insurance	1,819	2,064	245
Information & communication	2,499	3,047	547
Manufacturing	24,722	27,591	2,869
Professional & Other Private Services	17,332	20,370	3,038
Public Services	35,760	42,136	6,376
Retail	12,112	12,519	407
Transport & storage	6,949	8,643	1,694
Utilities	1,279	1,590	311
Wholesale	12,848	15,591	2,743
Industry Total	130,534	153,731	23,197

4.8 This highlights the potential for 23,197 additional new gross jobs in the Kirklees Borough between 2013 and 2031. A graph illustrating this further is presented below in Figure 4.1:

Figure 4.2: Net change in gross employment 2013-31 (REM, 2016)



- 4.9 This highlights the potential for the most significant employment growth to occur in sectors including public services, professional services, manufacturing, construction and wholesale retail. The only sector forecast to experience employment decline is agriculture, forestry and fishing.

New net additional jobs

- 4.10 It is important to consider the net additional economic impacts of the Local Plan and in doing so account for factors of additionality including leakage, displacement and multiplier effects. The following additionality factors have been applied in accordance with the HCA Additionality Guide (4th Edition, 2014) and this all assumes a 'local' Kirklees area of impact:

Table 4.2: Additionality Assumptions (HCA, 2014)

Leakage	
Low	10%
Medium	25%
High	50%
Displacement	
Low	25%
Medium	50%
High	75%
Multiplier	
B1 Office	0.29
B2/B8	0.29
Recreation	0.38
Retailing	0.21

- 4.11 Table 4.3 below identifies how these additionality assumptions were applied to each employment sector, reflecting the likely variations across these given the existing economic base and the propensity for these factors to apply across the various sectors.

Table 4.3: Additionality assumptions by broad sector (C&W assumptions)

Sector	Leakage	Displacement	Multiplier
Accommodation, Food Services & Recreation	10%	75%	0.38
Agriculture, Forestry & Fishing	10%	25%	0.29
Construction	25%	50%	0.29
Extraction & Mining	10%	25%	0.29
Finance & Insurance	25%	25%	0.29
Information & communication	25%	25%	0.29
Manufacturing	25%	25%	0.29
Professional & Other Private Services	25%	25%	0.29
Public Services	25%	50%	0.29
Retail	10%	75%	0.21
Transport & storage	10%	50%	0.29
Utilities	25%	50%	0.29
Wholesale	10%	75%	0.21

- 4.12 An additionality analysis was then undertaken applying the above in relation to the gross employment figures across all sectors for the years 2013 and 2031. This enabled us to establish an average gross

to net additional ratio across all sectors and years of 0.525 which was then applied to the gross employment projections by sector by year. This enabled the calculation of the below net additional employment impact estimations for 2013 and 2031, identifying a net increase of 12,190 net additional jobs over the Local Plan period:

Table 4.4: Net change in net additional jobs 2013-31

Industry	2013	2031	Net change
Accommodation, Food Services & Recreation	3,921	4,917	995
Agriculture, Forestry & Fishing	211	150	-62
Construction	3,774	5,413	1,640
Extraction & Mining	88	125	37
Finance & Insurance	956	1,085	128
Information & communication	1,313	1,601	288
Manufacturing	12,991	14,499	1,508
Professional & Other Private Services	9,108	10,704	1,596
Public Services	18,791	22,142	3,350
Retail	6,365	6,578	214
Transport & storage	3,651	4,542	890
Utilities	672	836	163
Wholesale	6,751	8,193	1,441
Industry Total	68,593	80,783	12,190

Gross Value Added (GVA)

- 4.13 Based on 2014 REM data at the Kirklees level, GVA output data by industry was obtained along with FTE job projections by sector. This enabled us to estimate GVA per worker by industry by year. This was applied to the 2016 based REM gross employment projections for Kirklees by industry sector by year. The table below identifies the gross GVA impacts resulting from this:

Table 4.5: Net change in gross GVA output 2013-2031

Industry	2013	2031	Net change
Accommodation, Food Services & Recreation	£ 207,668,803	£ 260,999,498	£ 53,330,695
Agriculture, Forestry & Fishing	£ 11,112,964	£ 9,519,304	-£ 1,593,659
Construction	£ 395,151,205	£ 626,383,711	£ 231,232,506
Extraction & Mining	£ 3,771,509	£ 4,031,072	£ 259,563
Finance & Insurance	£ 150,566,787	£ 251,513,143	£ 100,946,355
Information & communication	£ 165,714,951	£ 236,289,656	£ 70,574,705
Manufacturing	£ 1,229,907,405	£ 1,950,967,993	£ 721,060,588
Professional & Other Private Services	£ 1,127,018,649	£ 1,843,634,579	£ 716,615,929
Public Services	£ 1,424,513,348	£ 1,982,235,514	£ 557,722,165
Retail	£ 449,566,134	£ 655,402,360	£ 205,836,226
Transport & storage (£ 263,645,437	£ 422,151,075	£ 158,505,638
Utilities	£ 146,532,291	£ 223,063,750	£ 76,531,459
Wholesale	£ 581,730,784	£ 807,062,748	£ 225,331,964
TOTAL	£ 6,156,900,267	£ 9,273,254,402	£ 3,116,354,135

- 4.14 This identifies the potential for c. £3.1bn of additional cumulative undiscounted gross GVA to 2031 based on the assumptions applied.
- 4.15 Table 4.6 below identifies the net change in net additional GVA based on the application of the net additional employment estimates by sector:

Table 4.6: Net Change in Net Additional GVA

Industry	2013	2031	Net change
Accommodation, Food Services & Recreation (Broad Sector)	£ 109,125,536	£ 137,149,681	£ 28,024,145
Agriculture, Forestry & Fishing (Broad Sector)	£ 5,839,626	£ 5,002,192	-£ 837,434
Construction (Broad Sector)	£ 207,643,547	£ 329,151,307	£ 121,507,760
Extraction & Mining (Broad Sector)	£ 1,981,847	£ 2,118,242	£ 136,395
Finance & Insurance (Broad Sector)	£ 79,119,642	£ 132,164,803	£ 53,045,161
Information & communication (Broad Sector)	£ 87,079,680	£ 124,165,185	£ 37,085,505
Manufacturing (Broad Sector)	£ 646,290,163	£ 1,025,192,154	£ 378,901,991
Professional & Other Private Services (Broad Sector)	£ 592,224,312	£ 968,790,729	£ 376,566,418
Public Services (Broad Sector)	£ 748,551,444	£ 1,041,622,570	£ 293,071,127
Retail	£ 236,237,434	£ 344,399,990	£ 108,162,555
Transport & storage (Broad Sector)	£ 138,540,066	£ 221,831,404	£ 83,291,339
Utilities (Broad Sector)	£ 76,999,600	£ 117,215,253	£ 40,215,653
Wholesale	£ 305,687,145	£ 424,094,296	£ 118,407,151
TOTAL	£ 3,235,320,040	£ 4,872,897,807	£ 1,637,577,766

- 4.16 This identifies the potential for c. £1.6bn of additional cumulative undiscounted net additional GVA to 2031 based on the assumptions applied.
- 4.17 Applying the HM Treasury recommended 3.5% discount rate across the 2013-2031 period, this results in a cumulative discounted net additional GVA impact of c. £1.2bn. Note that all monetised GVA benefits have been modelled over the 19 year period to 2031 and no persistence of benefits beyond this is assumed. Given the nature of this exercise, no benefit decay is assumed.

Construction employment

- 4.18 An estimation of the potential scale of construction sector employment that could be supported by the proposed levels of new build employment and residential floorspace has been made. The following inputs to this were applied based on the Local Plan forecasts:
- New industrial floorspace – 698,542 sqm
 - New office floorspace – 163,280 sqm
 - New residential units – 32,125
- 4.19 Construction job estimates can be made based on construction costs applied to the above quantum of development. The following broad construction costs have been assumed:
- New industrial floorspace – £480/sqm
 - New office floorspace – £1,516/sqm
 - New residential units - £86,760/unit
- 4.20 An additional 5% strategic infrastructure cost allowance is also assumed in addition to the above. Based on the HCA's Calculating Cost Per Job Best Practice Note (2015) and the construction labour co-efficients within this, the following headline construction job impacts between 2013 and 2031 can be estimated:
- Gross construction job years – 65,269

- Net additional construction job years – 34,299 (based on the same net additionality assumptions as above).

4.21 Clearly, there could be some overlap with the estimated growth in construction jobs already outlined above within this and this should be considered in this context. The REM forecasts an additional 3,120 gross construction jobs by 2031 which could equate to around 31,000 gross construction job years. This analysis demonstrates that there could be a further c.30,000 gross construction job years (or c.18,000 net additional construction job years) supported by the additional new development proposed through the Local Plan period.

Summary

4.22 The below summarises the above reported potential economic impacts:

Table 4.7: Employment Benefits

Employment related benefits	
New gross jobs	23,197
New net additional jobs at the Kirklees spatial scale	12,190
Gross additional GVA at the Kirklees level	£ 3,116,354,135
Net additional GVA at the Kirklees spatial scale	£ 1,637,577,766
Discounted net additional GVA at the Kirklees spatial scale	£ 1,182,328,069
Construction job benefits	
Gross Construction Job Years	65,269
Net Additional Construction Job Years	34,297

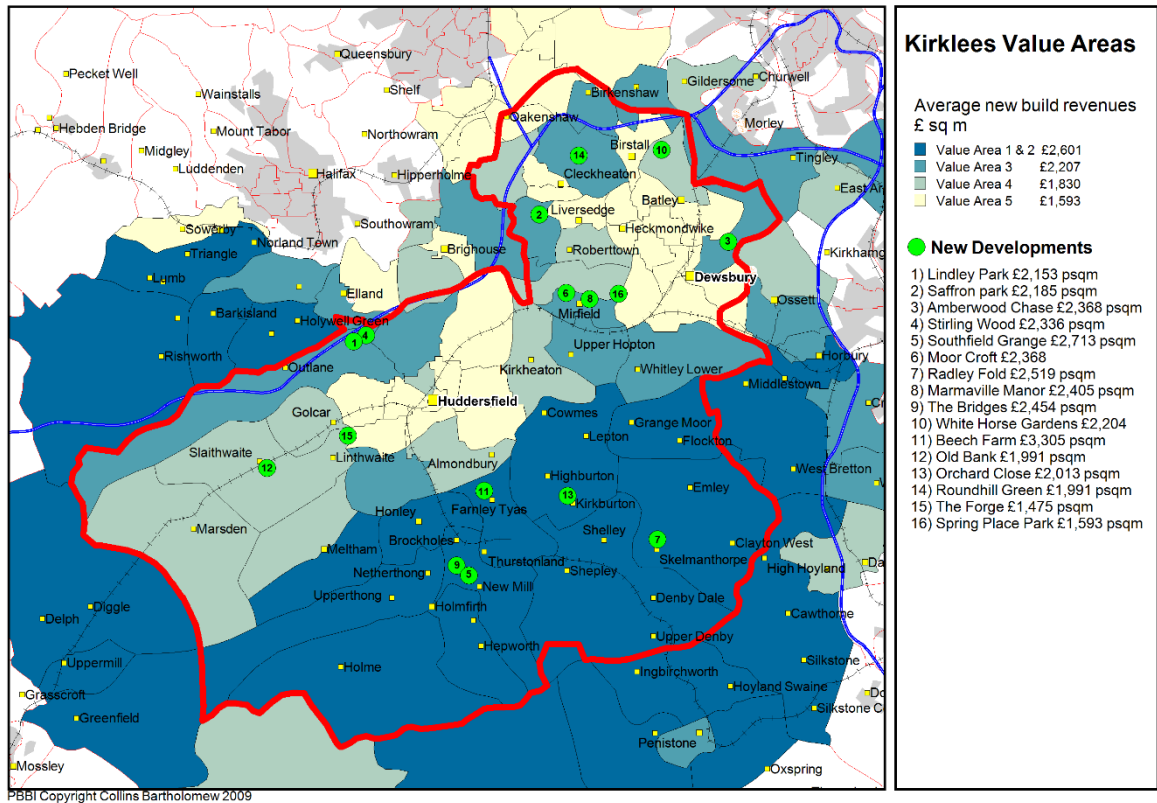
Financial Benefits

4.23 There are a number of financial benefits that will accrue from the delivery of the Local Plan which can be categorised in terms of:

- Private sector investment
- Revenue benefits to the Local Authority that be captured and reinvested in service delivery and infrastructure

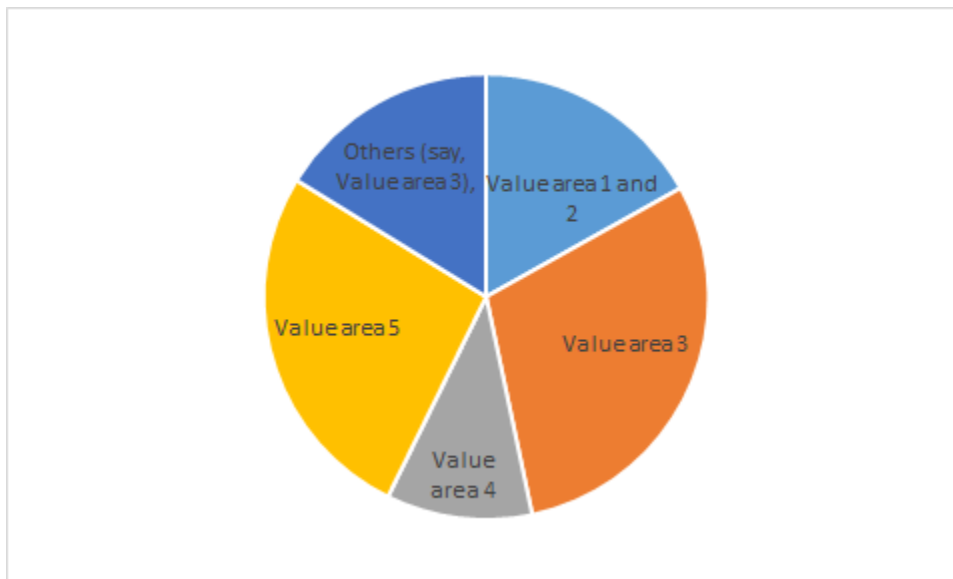
4.24 In order to establish a reasonable estimate of these benefits, we have reviewed the geographical distribution of the proposed housing sites and attributed them to a number of value areas. These value areas are those that have been utilised for the Local Plan and CIL Viability Evidence base, as illustrated below:

Figure 4.3: Value Areas



4.25 For some dwellings there is no stated geographical basis (such as windfall) and therefore the mid value category of Value Area 3 has been assumed. The distribution of dwelling numbers on this basis is follows:

Figure 4.4: Distribution of dwellings by Value Area



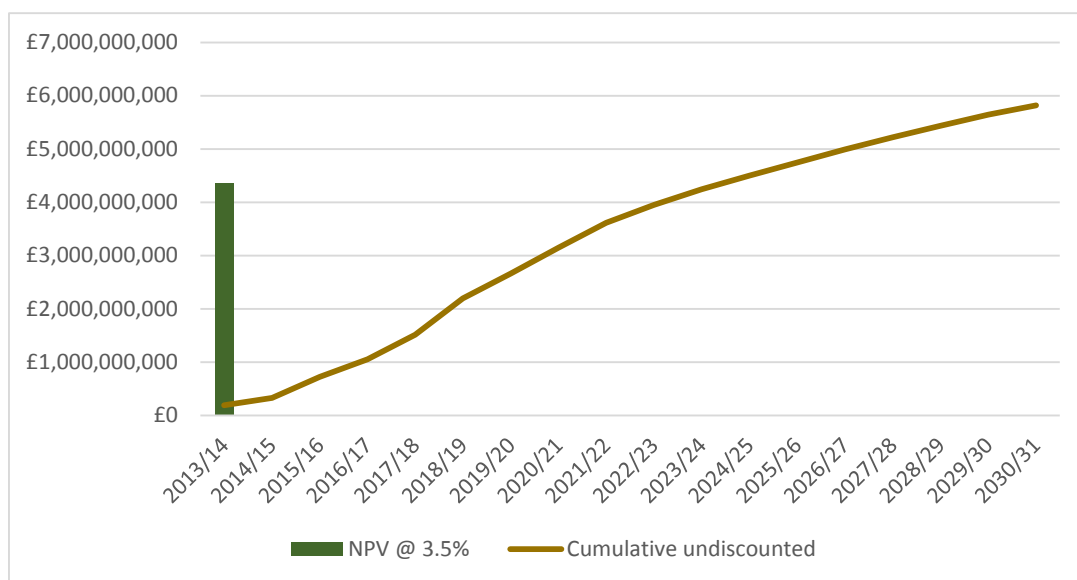
4.26 In respect of private sector investment, we have estimated the Gross Development Value of

development through the application of appraisal assumptions consistent with that set out in the Local Plan and CIL Viability Study. For homes the following capital sales values have been applied to the average size of a 3 bed house of 90 sq. m net sales area:

- Value areas 1 & 2 = £2475 per sq. m
- Value area 3 = £2153 per sq. m
- Value area 4 = £1884 per sq. m
- Value area 5 = £1614 per sq. m

- 4.27 A 50% discount to the above market values have been applied to those properties anticipated to be affordable (20% of all properties).
- 4.28 In respect of commercial investment values, for the industrial floor space a rent of £45.64 per sq. m has been capitalised at a yield of 6.75% and discounted for purchaser's costs to generate a net capital value of £633 per sq. m. For office floor space a rental value of £106.79 per sq. m has been capitalised at 8.5% and discounted for purchasers' costs to create a capital value of £1176 per sq. m.
- 4.29 The effect of applying these benchmarks to the quantum of homes and floor space is to generate an overall sum of over £5.8billion undiscounted over the period 2013/14-2030/31. Discounted at 3.5% over the life of the plan this figure reduces to £4.4billion.

Figure 4.5: Private Sector Investment from homes and industrial/office floor space



- 4.30 In terms of the revenue benefits to the public sector the following income sources have been modelled:
- Council tax – a figure of £1430 per dwelling has been assumed based on the approximate average for a Band C property across the District
 - New Homes Bonus – a figure equivalent to the national average for a Band D property has been assumed for a period of four years, reflecting the revised New Homes Bonus proposals following the Government's recent 2016 consultation. The national average Council tax value of a band D property for 2016/17 has been applied which is £1530, plus the supplement for affordable homes of £350.
 - Business Rates – business rates have been modelled assuming rateable values consistent with the market values used in the Local Plan and CIL Viability Evidence at the current large Uniform Business Rate multiplier of 49.7%. 100% retention of these incomes is assumed subject to a

reset every ten years¹.

- Community Infrastructure Levy (CIL) – the CIL contributions are based on the Residential charging rates set out in the Draft Charging Schedule applied to market floor area only. The rate has been applied to an average dwelling size of 90 sq. m. No distinction has been made for the higher rates on smaller sites.
- Affordable Housing monetised value – a notional value has been ascribed to affordable housing based on 20% of units being affordable on all sites, assuming that the commuted sum is the equivalent cost to the developer of providing the units on site (therefore the open market value less the affordable value of the property). Transfer values are assumed to be 50% of open market value. A discount of 10% has been applied to allow for small sites on which no affordable housing would be required.

4.31 The figure below illustrates the total potential revenues by source. The graph shows the gradual growth of cumulative/recurrent sources of revenue such as Council tax, together with one off incomes such as CIL and Affordable Housing Commuted sums. These figures represent the gross potential incomes that could arise through the Local Plan’s delivery.

Figure 4.6 Potential Council Revenues

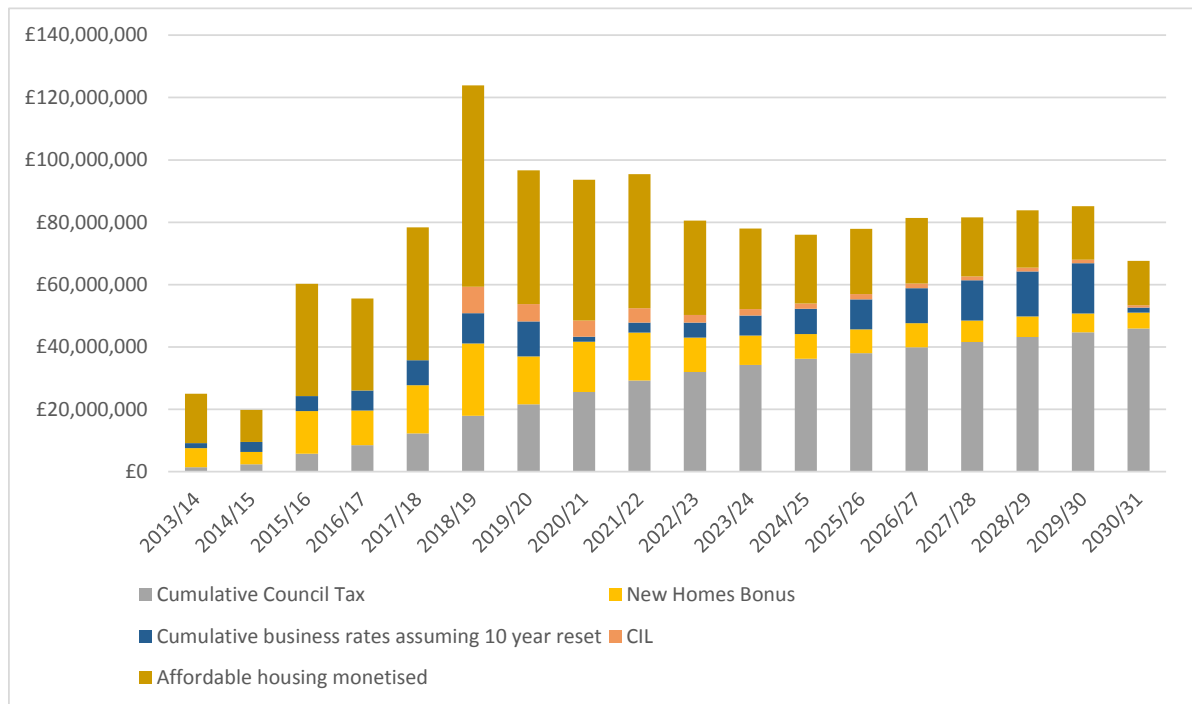
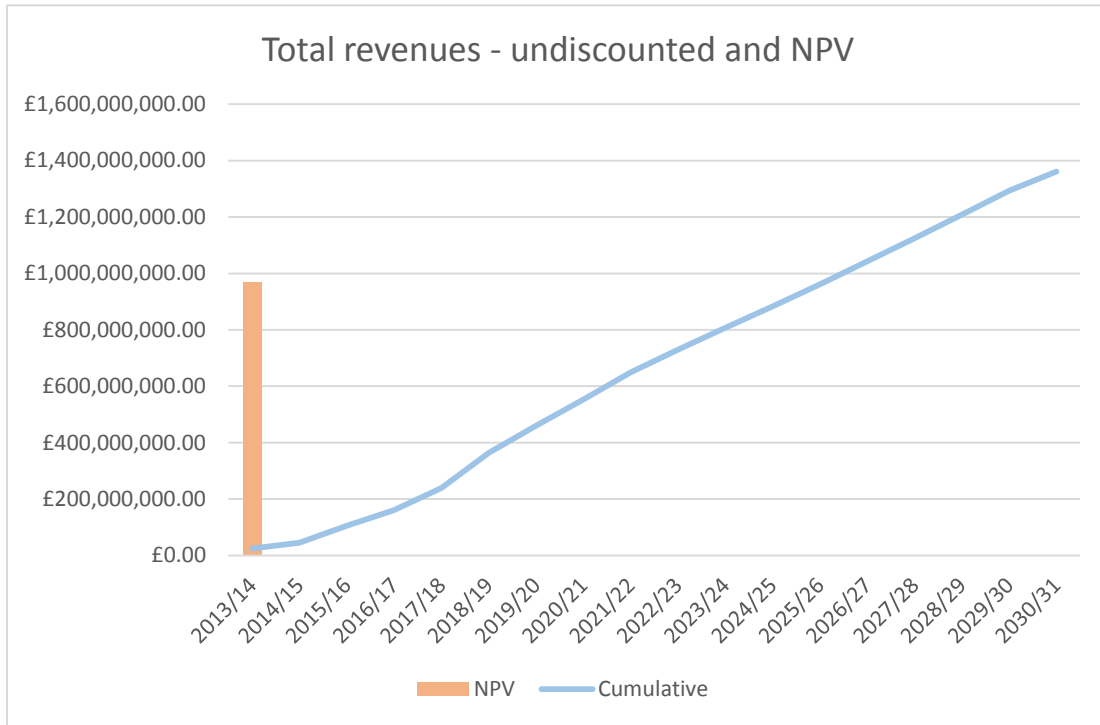


Figure 4.7 below provides an overall cumulative revenue position indicating that over the entire period

¹ The precise mechanics of the 100% business rate retention provisions is yet to be fully determined however the figures are indented as illustrative only. The reset has been assumed to occur at 2020 and 2030.

that the Local Plan could generate in the order of £1.36billion of value for public sector investment. It also shows a Net Present Value, discounted at 3.5% of circa £1billion. We stress that these figures are gross indicators of the income generation potential of the Local Plan – the actual income generated may vary in practice.

Figure 4.7: Total Potential Revenues



NB. The actual revenues accruing from development are likely to vary from the projections set out above according to variations in delivery rate and future legislation which could affect the sources of income modelled.

5.0 Key Deliverability Issues and Challenges

- 5.1 This section assesses the deliverability of the growth proposals, and how they are to be achieved, in the Kirklees Local Plan.

Is the Quantity of Growth Deliverable?

- 5.2 The quantity of growth proposed in the Kirklees Local Plan presents an uplift from historically achieved delivery rates. The annual housing requirement for the local plan has been identified as 1,730 homes per annum, which represents an uplift from the 1,261 homes annual average between the 2004/05 and 2013/14 monitoring years. The total number of jobs in the district is targeted to rise by 23,000 between 2013 and 2031 (from 130,533 to 153,730).

- 5.3 The ability to deliver this growth is broadly dependent upon the following determining factors: occupier demand; land supply; and delivery capacity and mechanisms.

Occupier demand

- 5.4 In respect of housing requirements, the Local Plan housing trajectory and phasing table included in the Strategies and Policies show that the Local Plan housing requirement will be met during the plan period. The Local Plan identifies housing allocations with a capacity of 21,919, compared to the requirement for 21,328.

- 5.5 In terms of demand, the housing need for Kirklees has been established through an update to the Strategic Housing Market Assessment in 2016, to take account of the 2014-based CLG household projections, updated contextual information and updated economic assumptions, in accordance with the delivery of the objectives of the Kirklees Economic Strategy.

- 5.6 The SHMA identifies the district's objectively assessed housing needs by determining the housing market area and the need within that area.

- 5.7 The 2016 revision to the SHMA brings together relevant evidence on the demand for housing within the district, taking account of the Leeds City Region context and exploring further issues to provide analysis of the Kirklees housing market area. This includes consideration of land prices, house prices and rates of change, household migration and search patterns, and other contextual data in accordance with planning guidance.

- 5.8 As acknowledged by the SHMA (paragraph 8.23), there is a need to continue to satisfy household aspirations, in particular the development of detached and semi-detached houses and a range of property sizes to offset identified market imbalances. It is stated that a detailed analysis of the current and future profile of households would suggest there are three key dwelling types required across Kirklees: 3 bedroom houses, 4+ bedroom houses, and 1-2 bedroom houses in addition to the ongoing development of other property types and sizes.

- 5.9 In terms of employment land demand, the requirements set out in the Local Plan are derived from analysis of economic forecasts in the Regional Econometric Model (REM), which have been converted into floor space and land requirements, together with consideration of historic delivery rates. The Local Plan seeks to deliver 23,000 jobs over the plan period from 2013-31 to meet the objectively assessed needs for jobs, equating to a land requirement of 175 hectares, 108 hectares of which is to be additional employment land.

- 5.10 The increased rate of housing delivery proposed in the Kirklees Local Plan will be supported by the focus on employment growth in the Kirklees Local Plan, and will in turn assist in the delivery of the economic aspirations for the district through providing critical mass which will increase the

attractiveness of the area for inward investors for employment development as a result providing access to a greater workforce. This is supported by the findings of an employer's survey in the region, and the Kirklees Economic Strategy also recognises the role of housing growth in supporting economic development.

- 5.11 Planning effectively for economic growth will create further opportunities for meeting housing needs. In order to ensure the inclusion of viable employment sites to meet the identified employment needs, the local plan has not sought to protect employment land that may not meet the needs of modern business operations, increasing the potential for such land to be re-developed for housing.

Land Supply

- 5.12 One of the most significant factors that supports the step-up in delivery rates is the improved quantity and viability of land that is proposed to be released for development in the plan period compared with the previous monitoring years. There was a more limited quantity of land released for development in the previous monitoring period as a result of the former development plan (Kirklees UDP) only allocating sufficient land for the period 1999 to 2006.
- 5.13 The identification of land for development in the Kirklees UDP was also carried out with a more narrow focus on delivering development on brownfield sites within urban areas as distinct from the proposed Local Plan which proposes large scale land releases in accessible locations, providing a game changer in terms of the quantity, quality and range of sites available for development. The lack of availability of greenfield sites for development, under the UDP allocations, is reflected by the fact that a significant proportion of the new homes which have been built between 2004 and 2015 have been built on brownfield land, as highlighted in the Housing Technical Paper.
- 5.14 An increased rate of delivery of development on employment land is anticipated as a result of major new sites for employment development in prime locations (particularly along the M62 Corridor and in the Dearne Valley). The Leeds City Region Strategic Economic Plan 2014 includes the Chidswell site as a locational priority for unlocking land for employment development, and the Lindley Moor East, Lindley Moor West, and Moor Park Mirfield Enterprise Zones sites in the Kirklees district have been added as priorities in the SEP refresh 2016.
- 5.15 It is considered that the addition of major employment sites in prime locations (e.g. at motorway junctions), along with the targeted support for the employment development will lead to an increased rate of delivery from previous years. This will create attractive sites for modern employment development, meeting an identified need at a local and regional level. The sites will be attractive because of their accessibility, profile from key access routes, and their size and flexibility, allowing for the development of a range of unit sizes along with supporting uses which will add to the attractiveness of the sites. The ability to incorporate a range of unit sizes and business accommodation will also help to make growth in the region more resilient, particularly if units are developed in a flexible, open floorplate format, which is often the case with modern commercial units.
- 5.16 Evidence from the Kirklees Employer's Survey 2013 within the district supports the conclusions above, suggesting that the key locational criteria to meet the needs of businesses which would be willing to occupy larger sites include:
- Proximity to the major road network (including motorway junctions);
 - Avoidance of congestion;
 - Further land/ expansion opportunities;
 - Access to workforce;

- Parking provision; and
- An attractive environment.

5.17 The capacity of existing employment sites to deliver jobs growth in the plan period has also been assessed in the production of the Local Plan, ensuring that sufficient land is identified elsewhere to provide a sufficient supply of viable sites, and with a view to maximising the output from existing land. The approach is set out in the Priority Employment Areas Methodology Paper.

Delivery Capacity

5.18 Much has been made at the national level regarding the challenges facing the house building industry as symbolised by the headlines accompanying the publication of the Housing White Paper. It is beyond the scope of a statutory development plan to try to tackle the structural issues associated within the industry as a whole.

5.19 Evidence shows that Kirklees is an attractive location to a wide range of national and regional house builders. All the following house builders are active through existing/recent schemes or in promoting sites through the Local Plan:

- Barratt David Wilson Homes
- Jones Homes
- Taylor Wimpey
- Redrow
- Miller Homes
- Ben Bailey Homes
- Keepmoat Homes

5.20 The government is exploring funding mechanisms and policy changes with a view to boosting the delivery of homes on brownfield sites. For instance, the Housing White Paper has announced the introduction of a £1.2 billion Starter Homes Land Fund to unlock brownfield land for development featuring starter homes, and section 150 of the Housing and Planning Act 2016 requires local authorities to maintain Brownfield Registers of sites, which could lead to sites gaining Permission in Principle, the details of which are due to be confirmed in secondary legislation during 2017. It is considered that these measures are likely to support development coming forward at a faster rate on brownfield sites.

5.21 Reflecting the demand for new sites for development which are to be provided through the local plan, it has been assumed that most of the housing requirement for the early years of the local plan will be delivered from housing allocations and sites which already have planning permission. As such, the local plan only includes a windfall allowance for the final 11 years of the plan period (2020-2031) and has been included in the land requirement calculations. This represents half of the past delivery on windfall sites to reflect the impacts of new allocations, but also recognising that sites less than 0.4 ha will continue to deliver housing as well as larger sites where circumstances change over the plan period.

5.22 Additional housing capacity made through bringing empty homes back into use will provide further flexibility in meeting the housing requirement.

5.23 Policy PLP11 supports self-build housing, which will assist further in the timely delivery of housing

within the plan period, on sites of a range of sizes. It is considered that the Council's spatial strategy will support self-build housing, as a result of minimising development costs through locating the majority of housing allocations nearby to existing infrastructure, whilst retaining flexibility for sites of a range of sizes within settlements across the district.

Is the Spatial Distribution of Growth Deliverable?

- 5.24 The approach which has been taken to the spatial distribution of growth in the Kirklees district combines an assessment of the size and role of settlements with their suitability to support growth, drawing upon the evidence base supporting the local plan, to identify the most appropriate and deliverable areas for development.
- 5.25 This approach has led to development being focussed to locations which support viable delivery. The main settlements within the district (primarily Huddersfield and Dewsbury) have been identified as the focus for growth.
- 5.26 Growth is more generally focussed in the northern side of the district, which provides the following benefits:
- Proximity to larger housing markets (e.g. Huddersfield and Dewsbury);
 - Accessibility to labour markets (i.e. Manchester or Leeds via the M62 and by rail);
 - Utilisation of existing infrastructure;
 - New employment sites in prime locations supported by residential growth within the same part of the Kirklees district.
- 5.27 This approach has led to development being focussed to viable and attractive locations, where housing and economic growth can support one another, whilst helping to minimise development costs through utilising existing strategic infrastructure. Thus it is considered that the spatial strategy will help to foster the integrated delivery of the housing and employment growth proposals.
- 5.28 It is considered that the concentration of growth in the northern side of the district will provide enhanced benefits in terms of agglomeration, and interconnectivity between housing and employment markets. Settlements such as Huddersfield and Dewsbury in the northern halves of the district provide larger markets, with a greater amount of existing supporting services and businesses, which are more interconnected as a result of proximity to strategic infrastructure. Therefore it is considered that the spatial approach to development will help to foster integrated and interconnected growth within the Kirklees district, as well as the wider area within the Leeds City Region.
- 5.29 The attractiveness of the northern side of the district for housing development is reflected in the 'Kirklees: Housing Completions by Electoral Ward (2010 to 2015)' map which supports the SHMA. As shown on the map, the areas with the highest number of completions have been around existing settlements and/or strategic infrastructure links.
- 5.30 The attractiveness of the northern side of the district for employment development is reflected by the take up of employment land between the 2005/06 monitoring year, and the 2013/14 monitoring year, as expressed in the Kirklees Market Strength Assessment 2015, with the areas of greatest take-up of employment land lying in the northern half of the district, in areas which have good access to the strategic road network.
- 5.31 The Employment Technical Paper which supports the local plan concludes that some large flat sites, with good access to the motorway junctions and proximity to a skilled workforce will be required in order to deliver the growth objectives.

- 5.32 The Kirklees Market Strength Assessment 2015 highlights that North Kirklees is perceived to have the greatest and most established concentration of employment uses in the district, especially industrial. Therefore concentrating development in the northern half of the district will provide access to a skilled workforce, a key requirement in order to meet business needs, as shown by the findings of the employer's survey for the district.
- 5.33 It is added in the Kirklees Market Strength Assessment that proximity to the M62/key motorway junctions presents the greatest opportunity to attract strategic demand and therefore national and regional occupiers. The assessment also highlights that proximity to the M62 is often stated as the number one requirement of an occupier (5 miles/5 minutes distance is seen as the limit for some occupiers).
- 5.34 The 2015 assessment also highlights that: accessibility to/from the various key settlements and good onward access via the M62 or other routes is an influencing factor; that the Leeds Road corridor is a key driver; and that the eastern part of the North Kirklees market zone benefits from its proximity to the M1.
- 5.35 It is highlighted in the 2015 assessment that South Kirklees is considerably more rural in nature, with a more limited workforce catchment and poorer strategic access. It is added that the perception from the market is that it caters for local demand, smaller scale businesses, and smaller operational requirements. The assessment concludes that South Kirklees is less likely to attract strategic demand and national or regional occupiers.

Is the Supply of Land Proposed to Meet Growth Deliverable?

- 5.36 The sites included in the Kirklees Local Plan have been selected having regard to their availability, the suitability of their location, and their achievability within the local plan period.
- 5.37 The process which the Council has taken to the distribution of growth has led to sites being selected for development which are in suitable and attractive locations for development. Each site included in the Kirklees Local Plan has been assessed against its compatibility with the spatial strategy for the district, which seeks to guide development to the most suitable and deliverable locations.
- 5.38 The Council has engaged with landowners and developers in the preparation of the Local Plan to ensure that the sites for development are readily available, and that they have the ability to deliver the growth proposals allocated to their site(s) with the plan period, in accordance with the agreed phasing of development delivery.
- 5.39 The viability of the sites chosen for development has been assessed through the Local Plan and Community Infrastructure Levy Viability Study 2015.
- 5.40 A developer engagement workshop was also carried out with local house builders, developers, planning agents and architects in June 2015 to provide local evidence, and refine the viability assumptions in the Local Plan and CIL Viability Study 2015. The workshop was followed by a questionnaire which was used to further test and refines the assumptions evidence base.
- 5.41 During the site selection process, the constraints on each site were assessed, and those sites where constraints could be overcome to deliver viable development have been chosen. Deliverable sites with more significant constraints have been phased for delivery at a later stage during the plan period to acknowledge viability considerations.
- 5.42 The location of sites allows for the utilisation of existing strategic infrastructure, helping to minimise development costs. In certain cases, there has been a need to allocate large strategic sites which provide new infrastructure in order to support the level of growth required for the district. The inclusion

of such sites in suitable areas, with good access to strategic transport links, will assist in ensuring sustained delivery of development through the provision of viable new infrastructure.

- 5.43 Where sites have been proposed as housing allocations in the Publication Draft Local Plan, an assessment has been made that constraints will be overcome but this may mean delivery later in the plan period. For example, sites currently in operational use for industry or specified by the land owner as unavailable until a later phase of the Local Plan have been phased accordingly.
- 5.44 The capacity of sites for development indicated in the local plan has taken on-site constraints into account.
- 5.45 The existing, undeveloped Unitary Development Plan (UDP) employment allocations have been assessed to determine their continued suitability through the site allocations process. The conclusion of this exercise has helped to rationalise the current supply, and ensure that the supply which is retained is fit for purpose, whilst also identifying new site opportunities that will help deliver the strategic priorities for the Kirklees economy.

Are the strategic allocations realistically deliverable taking into consideration their likely site development and infrastructure costs and timescales?

- 5.46 Viability studies have been prepared to assess the following residential led strategic allocations:
- Land north of Bradley Road, Bradley, Huddersfield (two allocations assessed as single site) – 1958 units
 - Land to the south of Ravensthorpe Road / Lees Hall Road, Dewsbury - 2,310 units
 - Land north of Blackmoorfoot Road, Crosland Moor, Huddersfield – 441 dwellings, 44,258 sq. m of employment floor space
 - Land east of 932-1110 Leeds Road, Shaw Cross/Woodkirk, Dewsbury, 1535 homes
- 5.47 Appraisals of the early phases of these sites was originally prepared in the Local Plan and CIL Viability Report dated October 2015, and then subsequently with the benefit of more refined scheme information in the Kirklees Local Plan and Viability Addendum (September 2016). The viability appraisals in the Addendum document were produced in industry-standard Argus Developer software based on a period by period cashflow setting out projections of sale revenue against allowances for land, infrastructure and abnormal costs, S106, build costs, professional fees, contingencies, sales, marketing and legal fees, finance and profit. The appraisals included affordable housing in accordance with the Local Plan policy of 20% and also an allowance for the proposed CIL rate in the Draft Charging Schedule.
- 5.48 The results indicated that all of the sites were viable and deliverable incorporating allowances for the policy standards of the Local Plan. The report acknowledged that there remains a degree of uncertainty given unknowns in relation to certain elements of site infrastructure costs at this early stage in the development process. However, allowances were made for such costs and the report also underlined the ability for variations in land prices to absorb the effects of any additional unforeseen abnormal cost items.

Is the infrastructure required to support growth deliverable and viable?

- 5.49 Infrastructure provision has been considered at various stages in the development of the Kirklees Local Plan. Infrastructure providers have been contacted directly relating to specific site options, and their responses have been taken into account when selecting the sites to be allocated for development in the local plan.

- 5.50 The key infrastructure providers have undertaken an assessment of the local plan development site options as part of the site assessment process, and provided information about each site's individual impact. The infrastructure providers are listed in the Infrastructure Technical Paper.
- 5.51 The Infrastructure Delivery Plan provides a comprehensive appraisal of the current provision of infrastructure, and what investment will be required to support the growth promoted by the local plan. The local plan also includes policies to ensure that the relevant infrastructure can be delivered to support future growth. The identification of requirements for infrastructure investment has been supported by the Transport Model Technical Paper, which sets out a cumulative assessment of the transport implications of the growth proposals in the local plan.
- 5.52 The viability of infrastructure to support growth in the district is assisted by the approach to the spatial strategy in the local plan, which involves an assessment of the suitability of settlements to accommodate growth, through the settlement appraisal, drawing upon other supporting evidence. This has led to development allocations being focussed to areas which have good access to existing strategic infrastructure, enhancing the deliverability of the infrastructure required to support growth, and the viability of development sites in the process.

Is the cumulative burden of all policy requirements and standards (including affordable housing) viable?

- 5.53 The Kirklees Local Plan and CIL Viability Report (October 2015) assessed the viability of the Local Plan's policy standards. It included a screening of all the policies to determine those that had the potential to impact on development cost / value and modelled the effects of those judged to have such impacts. This report was based on the Draft version of the Local Plan, however there were minimum changes in respect in terms of viability impacts in the submission version of the Local Plan and therefore the Viability Addendum document (dated September 2016) made suitable allowances to cater for those policy standards set out in the submission version of the Local Plan. A table is provided below that provides an updated review of the current policies and where appropriate, demonstrates how the impact of each standard has been tested.

Policy ref.	Policy Description	Direct impact upon development cost / value	Impact	Comments
PLP 3	Location of New Development	Yes	Requires development in certain locations of District	Tested through sampling of schemes across District
PLP 4	Requirement on developers to contribute to infrastructure costs	Yes	Cost impact on development but level will depend on individual circumstance	This has been modelled in appraisals through allowances for S106 costs, abnormal development costs and Community Infrastructure Levy (illustrated as a headroom figure)
PLP 7	Efficient and effective use of land and buildings	Yes	Developments required to deliver a minimum density of 35 dwellings per hectare.	Modelled as standard density in area wide model and site specific appraisals
PLP 11	Housing Mix and Affordable Housing	Yes	Developments in excess of 10 dwellings should provide 20% of homes as affordable	Modelled in viability appraisals
PLP 20	Sustainable Travel	Yes	An increased level of financial obligations in the form of Travel Plans and public transport contributions, where justified.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals
PLP 24	Design	Yes	Development briefs, design codes and masterplans should be used to secure high quality, green, accessible, inclusive and safe design, where applicable.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals

PLP 27	Flood Risk	Yes	Flood risk assessment plus mitigation where appropriate	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals
PLP 28	Drainage	Yes	SUDS required	<p>The costs of assessing the requirements for SUDS will be borne out of professional fees.</p> <p>The policy, and the required run-off rate is responsive to local conditions, and will ensure that sites remain attractive for development throughout the plan period.</p> <p>This approach will spread the cost of drainage mitigation measures between developments, avoiding the scenario where a single developer needs to carry out excessive mitigation measures to achieve an attractive development.</p>
PLP 30	Biodiversity and Geodiversity	Yes	In certain circumstances developments will be required to mitigate impacts on ecology	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals
PLP 31	Strategic Green Infrastructure Network	Yes	Developments are required to retain or replace green infrastructure, when located within or adjacent to green infrastructure corridors.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals
PLP 33	Trees	Yes	Developments are required to retain or re-provide valuable or important trees.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals

PLP 34	Conserving and enhancing the water environment	Yes	Requires developments to conserve and enhance watercourses, water quality and the ecological value of the water environment.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals
PLP 35	Historic environment	Yes	Requires developments to preserve and enhance historic assets, and to respect local character.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals
PLP 47	Healthy, active and safe lifestyles	Yes	Requires Health Impact Assessments to be carried out for all proposals that are likely to have a significant impact on health and wellbeing.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals
PLP 49	Educational and health care needs	Yes	Requires contributions towards education and health facilities.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals. CIL calculated.
PLP 50	Sport and physical activity	Yes	Seeks to protect, enhance and support new sports and leisure facilities	The Council only require mitigation, enhancement and re provision where developments have direct implications for sports and leisure facilities. Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals. CIL calculated.

PLP 51	Protection and improvement of local air quality	Yes	Requires all developments to demonstrate that they are not likely to result in an unacceptable increase in air pollution.	Allowance in professional fees on all appraisals
PLP 52	Protection and improvement of environmental quality	Yes	States that, where possible, all new development should improve the existing environment.	The wording of the policy is flexible, and not realistically considered likely to undermine viability. Allowances for abnormal costs could insulate development from the effects of this standard.
PLP 53	Contaminated and unstable land	Yes	Requires the submission of contamination assessments and/or land stability assessments, on contaminated and unstable land.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals.
PLP 61	Urban green space	Yes	Requires that any development on urban green space enhances, re-provides or demonstrates that the urban green space is no longer required.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals.
PLP 63	New open space	Yes	Seeks to secure well-designed, new and improved open space, sport and recreation facilities.	Allowance for professional fees in all appraisals. Allowances of S106 of £1,000 per unit on residential development appraisals. Allowance for abnormal development costs on all appraisals.

Table 5.1: Assessment of Policy Impact

- 5.54 The impacts of the policies have been tested through the Viability Addendum document. The results demonstrated that the policy standards were viable across the District. The only locations in which viability was marginal was the lower value locations however it concluded that changes in market conditions through the Local Plan period together with variations to the way that planning standards could be applied would insulate the effects on viability.
- 5.55 As highlighted in the table above, it is considered that those policies which have implications for the overall level of growth in the district will have a positive effect as a result of the positive benefits of the

spatial strategy, and the flexible approach which has been taken to the framework of Place Shaping Principles to guide development in different area of the district.

- 5.56 It is considered that the individual and cumulative effect of local plan policy expectations will not necessarily harm the viability and deliverability of individual sites, due to the flexible wording and application of the polices, and as the council has been cognisant of on-site constraints during the formulation of the local plan, including when establishing the development capacity of sites.

6.0 Risk Management Strategy

6.1 The deliverability of any Local Plan is not without risk and we set out below a series of ways in which it is recommended Kirklees can support the delivery process. We outline specific measures that are already either underway or committed under a number of key headings.

Robust monitoring

6.2 Kirklees Council will monitor the delivery of the growth proposals in the local plan, against the local plan targets through the elements which make the Annual Monitoring Report. Where under-delivery is identified, the Council will pursue measures to address the shortfall.

6.3 Such measures could include:

- Reducing the level of obligations on stalled development sites (e.g. affordable housing).
- The use of windfall sites where appropriate.
- Excluding sites from CIL, or expanding the Section 123 list

6.4 Ongoing review of market conditions will also hope to inform the Council's understanding of the deliverability of certain policies such as affordable housing and CIL and may respond to adjust such requirements where required.

Contingency planning and release of windfall development

6.5 The Council has been conservative in its estimates of the level of windfall land releases that are likely to emerge by estimating a level below that which has recently been realised. The Council considers these assumptions to be justified however, there is potential for additional windfall developments to supplement the District's land supply through the life of the Local Plan. Cushman and Wakefield recently assessed the additional windfall potential of both Huddersfield and Dewsbury town centres for additional sites. These studies are available as part of the Local Plan evidence base.

Flexibility in the way that planning policies are implemented

6.6 The Council should implement all its planning standards and policies in a way that is flexible and has regard to the unique circumstances which can impact on deliverability and viability. Policies should be implemented on a 'subject to viability' basis to ensure that they do not put the scale or pace of delivery at risk and the Council should take suitably robust commercial advice to inform their judgements relating to viability matters.

Bespoke planning strategies to support the delivery of large scale and complex sites

6.7 It is recommended that bespoke planning strategies are put in place for the strategic site allocations and other large complex sites in partnership with owners / developers. The planning strategy should determine the individual needs of each site and consider timing, the possible role of Supplementary Planning Documents or even Local Development Orders and the approach taken to infrastructure delivery and planning standards and obligations. Measures to support the viability process might include:

- Deferring delivery of certain planning obligations such as affordable housing until later in the programme
- Commuting affordable housing requirements off site
- Exploring the role of 'roof tax' arrangements which mitigate impacts on cashflow of the need for

large scale infrastructure items early in the delivery process

- Project management and brokerage where multiple land owner and multi-agency stakeholders need to be aligned
- Securing funding for strategic infrastructure and development from external funding providers, drawing in opportunities presented by HCA for funding infrastructure and accelerating construction and development.

Securing external funding opportunities

- 6.8 The Council has established an excellent track record in securing external funding support for regeneration and growth and considers that this will continue and form a key part of the Local Plan's delivery. Within the recently updated Strategic Economic Plan for the Leeds City Region, both Huddersfield and Dewsbury are identified as spatial priorities for growth alongside Strategic site Chidswell and the North Kirklees Growth Zone (see below). It also has three Enterprise Zone sites within the district which form part of the M62 Corridor Enterprise Zone. It is therefore reasonable to expect that funding opportunities will flow from the various programmes such as Local Growth Fund, West Yorkshire Transport Fund and HCA's plethora of financial support mechanisms.

Use of Council land and property assets to facilitate early delivery

- 6.9 The Council is a major land and property owner within Kirklees and it proposes to use its surplus estate to support the delivery of development and growth. Examples of sites include the majority of the Strategic Allocation at Bradley and also a significant part of the Strategic Allocation at Dewsbury Riverside. It also has substantial surplus land interests in other locations that are considered will help to deliver growth objectives, such as the Southgate site on the edge of Huddersfield town centre.
- 6.10 The fact that the Council owns so much land and property puts it in a strong position to control the delivery process, also to use its assets to support viability and deliverability if required through, for example disposal on ground rents or deferred land payments (both of which assist viability for developers by removing the need for upfront land payments).

Development and implementation of regeneration and growth strategies for key target locations

- 6.11 The Council is devising strategies for a number of major priority areas. These include the North Kirklees Growth Zone and Huddersfield town centre. The North Kirklees Growth Zone is an initiative which is gathering a significant level of momentum having become established as a Leeds City Region spatial growth priority. The Growth Zone is intended to provide a number of mechanisms and initiatives that will facilitate growth, supporting the large scale growth proposals (including Dewsbury Riverside and Chidswell) and enabling investment into Dewsbury town centre. Among the initiatives proposed are the infrastructure unlocking projects for the large scale sites and delivery of mixed housing initiative in Dewsbury town centre. The Council is actively considering ring fencing of business rates and council tax incomes alongside proceeds from land sales, CIL and New Bonus to reinvest in to infrastructure and regeneration projects that support growth.

Development of innovative funding and delivery mechanisms to accelerate delivery

- 6.12 Alongside the above strategies are recommendations for innovative delivery and funding mechanisms. These include:
- Infrastructure and investment fund – as noted above the Council is exploring the potential for establishing an investment fund based on ring fencing a proportion of the proceeds outlined in

Chapter four. This will include proceeds from Council owned sites, income from Council tax and business rates, New Homes Bonus, CIL, commuted affordable housing sums.

- Innovative use of Council land and property assets – as stated above the Council is a major land and property owner and can use its interests to leverage delivery and help support viability through, for example, deferred land payments of ground lease disposals which assist developer cashflow by removing up front land payments.
- Direct investment – the increasing role of the public sector in sharing development and investment risk is an aspect that the Council are currently exploring both in relation to housing schemes (for example, drawing on the HCA's Accelerated Construction programme) and commercial schemes, for example on Enterprise Zone sites. Forward purchase, direct delivery and 'put' options that underwrite developer's risk are measures that have been successfully deployed in other locations which the Council may wish to consider.

Close market engagement

- 6.13 In addition to the above it is recommended that the Council maintains close dialogue with developers and investors through the life of the Local Plan. This will enable the Council to closely monitor market conditions and the appetite of developers and investors, to ensure that Local Plan policies are deliverable, and to enable risk management / mitigation to be put in place to accelerate delivery.

7. Conclusion

- 7.1 In conclusion, it is considered that the Kirklees Local Plan is realistically deliverable given the scale and distribution of development proposed and the cumulative impact of the various policies and standards set out in the Local Plan.
- 7.2 The growth targets in the Local Plan represent an increase upon previous delivery rates, in terms of housing as well as employment. It is however considered that the addition of new suitable sites for development in attractive locations will provide a step change for the delivery of housing and employment development in the district, through increasing capacity and providing a range of sites which are attractive to the modern market. The demand for housing and employment development in the district, and in particular the demand for new sites to allow for an expanded range of development formats, is reflected in the supporting evidence base for the Kirklees Local Plan as well as the Strategic Economic Plan for the Leeds City Region. It is therefore considered that the Local Plan meets the requirements of NPPF paragraph 158, through responding the market and economic signals, and paragraph 154 through being aspirational but realistic.
- 7.3 The spatial strategy which has been incorporated has concentrated development to the most suitable and deliverable locations within the district. The concentration of development into the northern part of the district will provide access to larger markets and the existing strategic infrastructure network. It is considered that this concentration will assist the delivery of the housing and economic goals for district in an integrated manner, providing the added benefit of interconnected growth, through access to labour markets, access to skilled workers, and interconnectivity between centres for growth within the district and beyond, increasing the attractiveness of sites for development. It is therefore considered that the local plan meets the requirements of NPPF paragraph 158, through delivering housing and economic growth in an integrated manner, and paragraph 182 through providing the most appropriate strategy when considered against reasonable alternatives.
- 7.4 The sites which have been selected for development have been guided to suitable and deliverable locations as a result of the spatial strategy approach, and have been tested against technical and deliverability considerations during their selection process, with site capacity having regard to on-site constraints. The policies in the local plan which place requirements on development sites incorporate flexibility and application to local circumstances, and allow for consideration of viability issues, therefore it is considered that the policies will not individually or cumulatively prevent the growth proposals in the local plan from being delivered. For these reasons, it is concluded that the local plan complies with NPPF paragraph 173 through addressing deliverability and viability issues when planning for sites to meet the growth aspirations.
- 7.5 The Council have engaged with landowners and developers through the local plan process, to ascertain the availability and achievability of the development sites proposed in the local plan.
- 7.6 The spatial strategy approach facilitates the utilisation of existing strategic infrastructure in the district to support development, and assessments have been carried out to demonstrate that the required infrastructure to support growth is deliverable, in consultation with key infrastructure providers. Policies are also include in the local plan to ensure that the necessary infrastructure comes forward alongside development with a view to ensuring sustained delivery of the local plan growth proposals throughout the local plan period (2013-31). Therefore it is considered that the local plan meets the requirements of NPPF paragraph 177, through providing a reasonable prospect that the necessary infrastructure will be delivered in a timely fashion.
- 7.7 Whilst it is recognised that the Local Plan is not immune from risks, it is considered that the Council and its partners can put in place appropriate delivery management and risk mitigation measures to

support the delivery process.

- 7.8 Accordingly, it is considered that growth proposals in the local plan are deliverable, and that the supply of land proposed for development is available, suitable and achievable.