

Kirklees Local Plan and CIL Examination

Initial note from the Inspector to the Council

25 May 2017

Thank you for sending through the Kirklees Local Plan and CIL submission documents. I am still at an early stage in my preparation and reading. However, I have a number of initial questions for the Council on which clarification would be appreciated. This will help me to determine how best the Examination should proceed, and to better focus my Matters, Issues and Questions (MIQs). It also includes several requests for further information. As my preparation develops I may have further initial questions of this nature.

The document reference numbers in this note are based on the Programme Officer's post-submission numbering system.

Potential timescales for the hearings

1. The Council initially indicated that July may be a suitable date for the commencement of the hearing sessions. However, taking account of the scope of the Plan and the significant number of representations made, I consider there will be insufficient time to allow for preparation prior to this date. I understand that an alternative start date of the week commencing 2nd October 2017 has been discussed with the Programme Officer. It would be appreciated if the Council could confirm their views on this date and whether it is realistic from your perspective.
2. If the hearings commence in October I would need to issue the MIQs in early July, as I am not available to work on this examination during much of late July and August. This would mean hearing statements being prepared over the Summer period. However, it would be possible to provide an extended response period, covering perhaps 6-7 weeks, if the Council considers this would be appropriate and overcomes any issues regarding the timing.
3. The Plan covers a wide range of issues and contains a significant number of site allocations. Accordingly, given the breadth of evidence that needs to be covered, I suggest it could be prudent to run the hearings in a series of stages. The first stage, potentially covering the weeks of 2nd and 9th October, could focus on strategic matters (such as the spatial development strategy, housing and employment needs, housing and employment land supply, and the approach to Green Belt releases). I would then suggest a short gap, with a second stage of hearings starting in early-mid November. Further tranches will be necessary. I am still in the process of reading the documentation, and will therefore aim to contact you shortly regarding options and potential timescales for stages 3+. However, in the interim, if you have any initial thoughts on this matter, please do not hesitate to let me know via the Programme Officer.

Scope of the Plan

4. The diagram on page 11 of the Publication Draft Local Plan (PDLP) refers to Area Action Plans (AAPs) as well as Neighbourhood Plans. Could the Council: i) clarify

whether it intends to produce any AAPs or further development plan documents; ii) provide an up to date list of adopted and emerging Neighbourhood Plans in Kirklees.

Policies Map

5. I would find it very useful if the Council could supply me with a printed copy of an A1 scale PDLP Policies Map which covers the whole borough on one sheet. At this scale I appreciate that some of the PDLP designations may be hard to discern. However, as a minimum could I request that the housing, employment and mixed use allocations and Green Belt are shown on the OS base. Would it also be possible to clearly annotate which of the allocations are Green Belt releases? Map 4 in the Green Belt Review Supporting Document (page 26) (BP25) provides a useful overview but is very small scale.

Document updates

6. The Council's Examination library includes a number of documents that appear to have been produced since the PDLP was published for consultation. This includes the Habitats Regulations Assessment (March 2017) (SD10), Duty to Cooperate Statement (April 2017) (SD14) and various Green Belt documents (April 2017) (SD19-21). Can the Council confirm whether consultation has been undertaken or is planned on any new or updated documents?
7. Paragraphs 1.32 and 10.7 of the PDLP refer to an emerging Transport Strategy for West Yorkshire (draft version dated July 2016 – CR8). Can the Council confirm when the final version is expected?

Housing and employment land delivery

8. I note that the housing trajectory in the PDLP employs completions data from 2014/15. Has the Council since updated its trajectory and five year supply calculations to take account of data from 2015/16? What implications does this work have for the Council's housing supply figures, as set out in Table 5 of the PDLP?
9. Similarly, the employment land work in the PDLP uses completions data from 2014/15. Have the calculations been updated to take account of data from 2015/16? What implications does this work have for the Council's employment land requirements, as set out in Table 3 in the PDLP?
10. A windfall estimate is included in the housing supply calculations, commencing from 2020/21. Can the Council confirm the extent to which this rate is based on small site provision? A breakdown of annual historical windfall data for small and large sites is also requested.
11. The table in Appendix 3 of the PDLP provides an overview of phasing estimates for delivery of the housing allocation sites. Can the Council point me to the background evidence/information on planning application progress and delivery timescales, which has been used to inform these estimates? A number of the sites are projected to commence delivery in 2016/17 and 2017/18 (including strategic allocations on land north of Bradley Road, Huddersfield H1747 and land south of Ravensthorpe Road, Dewsbury H2089), and in these cases I assume progress has been made with planning applications and site/infrastructure delivery?

12. It would be appreciated if the Council could provide me with a summary list of the allocation sites which incorporate housing (e.g. housing and mixed use schemes). This should ideally be in four tables, each relating to a different sub-area, with sites listed in the same order as in Part 2 of the PDL. The list should include the following details:

- Site reference number
- Site address
- Housing capacity (and capacity for other uses where relevant)
- Net site area
- Whether the site is in current Green Belt or not
- Whether the site already has full planning permission

Spatial development strategy

13. The section on place-shaping in the PDL provides an overview of opportunities and challenges to growth for each sub-area. Moving beyond this, has the Council developed a vision and spatial strategy for each of the sub-areas?

14. Can the Council confirm the total proportion of housing growth over the Plan period that will be focused in each sub-area? (taking account of any changes in relation to paragraph 8 above). A detailed breakdown of the sources of supply would also be useful, including the number of dwellings from allocations (both from sites within and outside the Green Belt), outstanding permissions and completions in each sub-area.

15. Can the Council clarify how new employment development will be spatially distributed over the Plan period, by economic sub-area and by settlement? (taking account of any changes in relation to paragraph 9 above). A detailed breakdown by type of source would also be useful, including allocations (Green Belt and non-Green Belt), loss of sites (from the Priority Employment Sites study), outstanding permissions and completions.

16. Can the Council confirm the extent to which B1 sites and the needs of B1 use were taken into account when assessing employment sites in the Council's Priority Employment Areas study?

Site allocation process and Green Belt releases

17. Paragraph 3.3 in the Council's Green Belt Review Supporting document (BP25) indicates that about 10,000 dwellings can be accommodated on allocations within existing urban areas. Can the Council confirm if this figure includes sites within the built-up area of settlements plus sites on the edge of settlements that are not currently in the Green Belt?

18. Can the Council clarify the degree to which the assessment of capacity within existing urban areas (e.g. land outside the Green Belt) was comprehensive? Did it include a thorough assessment of all potential sites? Or did it focus on sites identified through a call for sites/Council land/other sources? To what extent has the assessment captured potential urban sites identified in the SHLAA, the Council's Brownfield Land Register, and the Council's Priority Employment Areas Study?

19. The Accepted Site Options Technical Appraisal document (BP29) draws together the results of the Green Belt Review and the technical appraisal of the selected allocation sites. However, evidence relating to locational sustainability and sustainable development is set out separately, in the Sustainability Appraisal. As such it is difficult for me to understand how sustainable development requirements and the need to promote sustainable patterns of development have been taken into account in decisions on site options in the Green Belt, in accordance with paragraphs 84 and 85 in the NPPF. Can I therefore request that the available information is drawn together in one document, which sets out an overview of the assessment results and a summary of why each site was selected. It would also be useful if a site map (A4 or smaller) could be attached to each summary sheet, showing the extent of proposed land release from the Green Belt.

Safeguarded land

20. The Accepted Site Options Technical Appraisal document indicates that a significant number of safeguarded sites are located within existing settlements and are therefore outside the Green Belt. It would be appreciated if the Council could clarify why it has sought to safeguard land outside the Green Belt, and how this approach accords with national guidance.

21. Paragraph 5.1 in the Council's Local Plan Methodology Statement Part 2 (BP23) indicates that safeguarded sites are those where the assessment has shown they are unlikely to deliver new homes within the Plan period. Is the Council able to point me to evidence which shows that constraints can be overcome and that sites which are not deliverable/developable are capable of coming forward beyond 2031?

Urban Green Space

22. Can the Council confirm whether the allocated Urban Green Spaces are sites which provide an open space/sporting/recreational function for the local community? As such are agricultural fields with no public access excluded?

It would be appreciated if you could provide me with a response to the most straightforward matters by noon on **Friday 2nd June 2017**, and a timetable for the production of the more detailed items.

If you have any questions or queries, please do not hesitate to contact me via the Programme Officer. Thank you for your assistance.

Katie Child

Inspector/Examiner