

Kirklees Local Plan Examination

Stage 3 – Policy hearings

MATTERS, ISSUES AND QUESTIONS (MIQs)

Council Response

Matter 25 – Monitoring

- 1.1 This statement sets out the council's responses in relation to the Inspector's matters and issues – Matter 25 Monitoring. All of the documents referred to in this statement are referenced within the statement.
- 1.2 The modifications proposed in this document have been provided to assist with the discussions at the hearings for this matter and have not been subject to sustainability appraisal testing or public consultation. Should it be necessary to make any of the modifications these will be added to the full schedule of modifications to the Local Plan which will be made available for comment and subject to sustainability appraisal at a later stage of the Examination in Public, subject to the delegated powers agreed by the council's Cabinet.

Issue – Does the Plan set out a robust monitoring framework?

[Appendix 2]

- a) Should the monitoring indicator relating to housing completions include a spatial element, relating to delivery by sub-areas/settlements?
- 1.3 The council believe that the current monitoring indicator provides sufficient information to determine whether the plan is successfully meeting the housing requirement following adoption of the Local Plan. This is because the Local Plan does not set a housing target for each sub-area or settlement and the whole of Kirklees is a housing market area for the purposes of the Local Plan. In the same way, the five year supply calculation for Kirklees is undertaken on a district-wide basis.
- b) Should the Plan include a monitoring indicator which identifies the loss of heritage assets, in addition to archaeological remains/Scheduled Ancient Monuments?
- 1.4 Yes. A proposed modification is outlined below.

Proposed Modification:

Page	Relevant part of the Plan	Tracked change	Reason for change
	Appendix 2	Insert new monitoring indicator to read: <i><u>PLP35c Loss/additions to designated/non-designated heritage sites</u></i>	Clarification

c) Should the Plan include a monitoring indicator which identifies total additional comparison and convenience retail floorspace and leisure floorspace in the borough (regardless of location)?

1.5 Monitoring indicator PLP13a focuses on the provision of main town centre uses within town centres and therefore the health of town centres as highlighted in PPG (NE2, Paragraph: 005 Reference ID: 2b-005-20140306). Through the annual monitoring report it was the council's intention to provide the latest position on retail need in the district taking account of retail planning permissions that have been granted. This could be extended to provide information on retail and leisure completions including new retail development that has taken place through permitted development rights. The following modification is proposed to provide more comprehensive monitoring data on retail and leisure development in the district.

Proposed modification:

Page	Relevant part of the Plan	Tracked change					Reason for change
220	Appendix 2 Monitoring Framework	Insert text					Clarification
		ID	Policy	Delivery Agencies	Indicator Name	Target / Trend	
		<i>PLP 13 b</i>	<i>Town Centre uses</i>	<i>Council, developers, RSLs, local businesses, inward investors</i>	<i>Total amount of additional convenience and comparison retail floorspace completed</i>	<i>Positive trend</i>	
		<i>PLP 13 c</i>	<i>Town Centre uses</i>	<i>Council, developers, RSLs, local businesses, inward investors</i>	<i>Total amount of additional leisure floorspace completed</i>	<i>Positive trend</i>	

d) How will the indicator relating to 'low carbon trips' (page 221 of the Plan) be assessed?

1.6 The target PLP20a "Low Carbon Trips" has a target of an increase in the proportion of sustainable modes of travel. The West Yorkshire Districts already have a monitoring regime in place to monitor this indicator. Document CR7 "West Yorkshire Single Transport Plan", Combined Authority (2016), pp 98-99 shows the two main indicators used to measure low carbon trips: "Mode Share" and "Emission of CO₂ from transport". The following text details the assessment methodology

1. Mode share is measured primarily by the number of car journeys by West Yorkshire people per year and is a statistic reproduced directly from the National Travel Survey; and

2. Increasing the use of sustainable modes will help towards reducing carbon emissions, however, changes in vehicle efficiency and engine design will also have a significant impact. Emissions of CO₂ from transport on local roads (motorways are excluded) is monitored using data provided by the Department for Energy and Climate Change (DECC).

1.7 In addition there are a number of other data sources that contribute to the supporting indicators mentioned on page 100 of document CR7 that can also be used to measure the number of low carbon trips being undertaken. The table below lists them, their source and frequency of collection:

Supporting Indicator name	Data Source	Collection Frequency
Annual Bus Patronage	Calculated bus patronage using ticket machine data and proxies for services where data is not available	Yearly
Area wide traffic flows (16 hr weekday)	West Yorkshire-wide Automatic Traffic Count Programme	Yearly
Morning peak weekday mode share on radial routes approaching Huddersfield Town Centre	Kirklees Council procured mode split counts	Yearly
Average morning peak period car occupancy on radial routes approaching Huddersfield Town Centre	Kirklees Council procured mode split counts	Yearly
Proportion of residents who walk for at least 10 minutes at a given frequency	Active People Survey (Sport England) for Kirklees	Yearly
Proportion of residents who cycle any length or purpose at any given frequency	Active People Survey (Sport England) for Kirklees	Yearly

1.8 In summary there is not one single assessment of low carbon trips, rather there is a basket of indicators, using either existing data or data collected by Kirklees as part of its West Yorkshire Local Transport Plan monitoring regime that when viewed together can be used to extrapolate a trend in the proportion of journeys being undertaken by sustainable modes of transport.

e) How will the indicator relating to design criteria (page 221 of the Plan) be assessed?

1.9 It is considered that to provide a clearer method of measuring the effectiveness of the policy, the monitoring indicator could be modified to better take account of the use of the policy in the decision making process and the success of the Council in defending decisions at appeal stage. Should a modification be needed to clarify the council's approach to monitoring the following could be considered:

Proposed Modification:

Page	Para/table/box	Tracked change	Reason for change
221	PLP24a	<p>Indicator name: <i><u>Percentage of appropriate planning applications taking account of design criteria</u></i> <i><u>Number of appeals upheld on appeals made against the refusal of planning permission on design grounds</u></i></p> <p>Target / Trend: 100% <i><u>None</u></i></p>	Clarification