

# Kirklees Local Plan Early Engagement Report

## 1. Introduction

Kirklees council is undertaking early engagement on the preparation of a Local Plan following the withdrawal of its core strategy in October 2013. We are inviting comments on the vision, objectives and priorities for the plan in order to shape its development. The previous core strategy vision and strategic objectives can be found in Appendix 1 to help inform suggestions about how these should be changed and what other information should be included.

This document sets the context for the way forward and should be read in conjunction with the council's Local Plan early engagement questionnaire.

The Local Plan will form the main planning policy document for Kirklees and will set out how the district will develop over the next 15-20 years. It will identify site allocations for specific types of development and planning policies that will be used to assess planning applications. For this reason, it is important that the plan is robust, based on up to date evidence and helps to deliver locally assessed needs.

The decision to move to a Local Plan was based on:

- the government's preference for production of Local Plans;
- guidance in the National Planning Policy Framework (NPPF) and national planning practice guidance (NPPG);
- implications of recent decisions of planning inspectors and the Secretary of State on planning appeals and on Local Development Framework (LDF) proposals across the country; and
- further consideration of the duty to co-operate requirements in the 2011 Localism Act.

## How to comment

Copies of this background paper and the questionnaire are available on the council's website: [www.kirklees.gov.uk/localplan](http://www.kirklees.gov.uk/localplan)

### **Please return questionnaires before 5pm, 30<sup>th</sup> May 2014:**

- **By email** to: [local.development@kirklees.gov.uk](mailto:local.development@kirklees.gov.uk)
- **By post** to: Planning Policy Group, PO Box B93, Civic Centre 3, Off Market Street, Huddersfield, HD1 2JR
- **In person** to: Civic Centre 3 Reception (side entrance), Huddersfield (Mon-Fri 10am-4pm)

Paper copies are available from:

Civic Centre 3 (side entrance) Huddersfield (Mon-Fri 10am-4pm)  
Batley Town Hall  
Batley Library  
Birstall Library and Information Centre

Cleckheaton Town Hall  
Dewsbury Town Hall  
Dewsbury Library  
Heckmondwike Library and Information Centre  
Holmfirth Library and Information Centre  
Marsden Library and Information Centre  
Meltham Library and Information Centre  
Mirfield Library and Information Centre  
Skelmanthorpe Library and Information Centre

## **Proposed timeline for producing the Local Plan**

This document and the questionnaire form the first opportunity to engage in the Local Plan process. Further opportunities for early engagement will be outlined on the council's website.

## **The content of the Local Plan**

The Kirklees Local Plan should set the vision and strategic priorities for development in the district over the next 15-20 years and should allocate land for development and identify land to be protected from development.

Key parameters that will shape the Local Plan preparation include:

- National Planning Policy Framework
  - The plan is positively prepared i.e. based on a strategy which seeks to meet objectively assessed need.
  - The plan is based on robust and credible evidence - The NPPF, paragraph 158, requires that the Local Plan is based upon *up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects for the area*. The evidence prepared for the core strategy is being reviewed and updated and will be published alongside the Local Plan on the council's website. Key evidence will include:
    - Strategic Housing Land Availability Assessment (SHLAA)
    - Strategic Housing Market Assessment (SHMA)
    - Strategic Employment Land Availability Assessment (SELAA)
    - Open Space Study
    - Green Belt Review
    - Retail Capacity Study
    - Sustainability Appraisal.
  - The plan is both viable and deliverable.
  - The plan is the most appropriate when considered against the reasonable alternatives.
  - The plan is set within the environmental capacity of the area e.g. EU protected habitats, flood risk, green belt.

- Duty to cooperate – the council must demonstrate that it has engaged constructively, actively and on an ongoing basis with its adjoining authorities and prescribed bodies (Environment Agency, Highways Agency etc )on planning issues that cross administrative boundaries.
- Engagement (including the Council’s Statement of Community Involvement (SCI)) – requirement for statutory and informal consultation.
- Links with other Council corporate plans and priorities including: Economic Strategy, Health and Well-being Strategy.

When the plan is submitted for examination, the evidence on soundness and legal compliance needs to demonstrate compliance with all the elements summarised above, if it cannot the council should not submit the plan.

The Local Plan will differ from the core strategy in the level of detail it contains. The core strategy set out how much new development there should be, broadly where it should be provided and policies to ensure that the strategy would be delivered in a sustainable way. It did not include specific site allocations.

The Local Plan will set out:

- A spatial strategy – providing for development in the right place to meet defined needs.
- Objectively assessed development needs particularly for housing and employment –specifying the number of new homes and jobs to be provided, based on robust and up to date evidence. Housing and employment targets should seek to meet 100% of local needs unless there are compelling reasons consistent with NPPF guidance that justify less development than necessary to meet these needs and one or more neighbouring councils have agreed to accommodate the shortfall.
- Policies - these will be of two types: core policies which help to deliver the spatial strategy, and development management policies that will provide the basis for determining planning applications.
- Site allocations - showing land to be developed for residential, employment, retail and other uses, identified on a map.
- Designations - showing land to be protected from development and land subject to other policies in the plan.
- Infrastructure provision – to support the delivery of the proposed development.
- A monitoring framework – setting out the performance measures that will show how successfully the plan’s objectives and proposals are being delivered over time.

The plan will contain detailed proposals for town centres using “insets” showing specific policy areas and allocations in greater detail than elsewhere. In the case of Huddersfield town centre the inset will replace the separate area action plan previously proposed to be prepared after completion of the core strategy.

## 2. How will the core strategy shape the Local Plan?

The core strategy was developed over a number of years and included several consultation stages. The final stage took place between 20<sup>th</sup> September 2012 and 2<sup>nd</sup> November 2012. The comments made at this stage were analysed and made available to the examining inspector when the core strategy was submitted for examination in April 2013. This information will be used to help shape the Local Plan.

The document summarising these comments: **Summary of main issues raised at the representation stage (April 2013)** can be found on the council's website using the following link:  
<http://www.kirklees.gov.uk/business/regeneration/ldf/ldfCoreStrategyStages.aspx>

Following the decision to withdraw the Core Strategy over 6000 individuals, community groups, businesses and other organisations on the Council's contact list were informed and asked to suggest whether and how the core strategy's priorities should be revised in the new plan. The responses received from this exercise will also be considered as part of shaping the Local Plan.

The comments can be found on the council's website using the following link:  
<http://www.kirklees.gov.uk/business/regeneration/ldf/ldfCoreStrategy.aspx>

There have been significant changes since the core strategy vision and strategic objectives were developed. In moving to the Local Plan the vision and objectives need to be reconsidered in the light of:

- Changes to government guidance.
- Representations received on the proposed submission core strategy.
- Changes in the economic, social and environmental circumstances in Kirklees and the Leeds city region.
- New and emerging council plans and priorities.

## 3. Achieving sustainable development

The NPPF, paragraph 6, states that the purpose of the planning system, including local plans, is to contribute to the achievement of sustainable development by performing a number of roles as follows:

***an economic role*** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

***a social role*** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

***an environmental role*** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Local Plan proposals must be subject to sustainability appraisal, a process which aims to balance the potential social, economic and environmental impacts of a plan. The sustainability appraisal will consider the potential impacts of Local Plan policies and proposals through the use of a sustainability appraisal framework. The framework sets objectives, indicators and targets across a range of social, environmental and economic factors, and is used as a baseline against which the potential impacts of policy options can be identified. This appraisal must meet the requirements of the EU Strategic Environmental Assessment (SEA) Directive.

The plan must also consider its potential effect upon European protected species and habitats to accord with the Habitats Regulations 2010.

#### **4. Call for Sites**

As part of this consultation, the council is also undertaking a “call for sites” exercise, to enable developers, landowners, public and private bodies and individuals to bring to the council’s attention potential development opportunities for allocation in the Local Plan, or potential sites / areas for protection. The call for sites form is available on the council’s website.

#### **5. Next steps**

All responses will be analysed and fed into the Local Plan preparation process. A summary of responses will be published on the Kirklees website. The contact details of respondents will be recorded and if they wish, will be kept informed about our future stages of Local Plan production.

## Appendix 1 – Proposed submission core strategy vision and strategic objectives

### Vision

3.2 The vision looks forward to what Kirklees should be like in the future if the needs and aspirations of those who live in, work in or visit Kirklees are to be met whilst also retaining the characteristics that make it attractive and distinctive:

- All Kirklees residents have convenient and safe access to jobs, shops and services, education, good community facilities and open spaces. They enjoy the benefits of proximity to Leeds and other cities and towns outside Kirklees and can use good quality and uncongested transport connections. People can travel on a well maintained transport network which provides convenient and affordable public transport.
- A diverse and resilient local economy, with strong manufacturing, low carbon and creative sectors, offers residents well paid job opportunities and contributes to the prosperity of the Leeds City Region.
- Huddersfield and the north Kirklees towns are attractive places for business growth, taking advantage of a well educated and skilled workforce. Pleasant town centres, with a distinctive heritage and character, provide a focus for shopping and leisure facilities which attract both residents and tourists and other visitors.
- The small towns and villages of south Kirklees have a diverse economy, taking advantage of the area's attraction for tourists and other visitors, capable of providing local employment opportunities and helping communities to thrive.
- The varying needs for adaptable and affordable housing of good quality are met through a range of housing opportunities. Housing is in good condition, contributing to residents' health and wellbeing.
- Sensitive and targeted development has helped to reduce inequalities between neighbourhoods in health, income, education and skills.
- Older areas, mainly in the larger towns and particularly in south Dewsbury, where housing and industrial and commercial premises were unsuited to modern needs, have been transformed, with vacant buildings and brownfield land brought back into use.
- A network of accessible open spaces, woodland, watercourses, footpaths and cycleways threads through urban areas and connects to open countryside. This "green infrastructure" encourages people to walk and cycle and to participate in sport and outdoor recreation and provides opportunities for local food growing, so that people find it easy to have healthier lifestyles.

The distinctive and contrasting landscapes and legacy of historic buildings within and around Kirklees' towns and villages have been safeguarded and enhanced. Wildlife flourishes and important habitats, particularly those of European importance, have been enhanced.

There has been significant progress in mitigating and adapting to climate change. People travel less by car, helping to improve air quality, and buildings are more energy efficient, with reduced energy costs. Potential for energy generation from renewable and low carbon sources has been realised and the exposure of built-up areas to flood risk has been reduced.

## **Strategic objectives**

3.3 The strategic objectives summarise the measures needed to deliver the vision. All the proposals in the core strategy should be consistent with one or more of these objectives:

1. To protect and enhance the characteristics of the built and natural environment which define local distinctiveness and make Kirklees attractive to live and work in and to visit.
2. To support the growth and diversification of the Kirklees economy.
3. To improve transport links within and between Kirklees towns and with neighbouring towns and cities, giving priority to public transport, to commercial traffic and to cycling and walking.
4. To strengthen the role of town centres, particularly Huddersfield, Dewsbury and Batley, so that they are the focus for the development of offices, shopping and leisure facilities which complement their historic character.
5. To provide new homes which meet the needs of the community, offering a range of size, tenure and affordability, with good access to employment, shops and services.
6. To tackle inequalities in income, health, education by ensuring that new housing, jobs and services are well related to areas of deprivation.
7. To promote the use of brownfield land to meet development needs and support the regeneration of urban areas.
8. To protect and improve green infrastructure so that residents have access to good quality open spaces that provide opportunities for sport and recreation and for wildlife to flourish.
9. To promote development that helps to mitigate climate change and is adapted so that potential impacts from climate change are reduced.