

Kirklees Local Plan Submission Documents SD14

Duty to Co-operate Statement





Kirklees Local Plan

Duty to Cooperate Statement

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1. Introduction

1.1 This statement is one of several background and technical documents that have been prepared in order to inform and support the preparation of Kirklees Council's Local Plan. It specifically addresses the requirements set out in the Localism Act (2011), the National Planning Policy framework (NPPF) and National Planning Policy Guidance (NPPG) for Local Plans to be prepared in a manner that meets the Duty to Cooperate.

1.2 It sets out the arrangements established and followed for constructive, active and ongoing engagement with neighbouring authorities alongside the consultation undertaken with relevant prescribed bodies at each stage of the Local Plan's preparation. It also documents how discussions over matters raised have helped shaped the policies and site allocations within the Local Plan, and details the processes, actions, and outcomes identified and carried out by the Council in discharging its duty to cooperate.

1.3 The overall purpose of this statement is to:

- Demonstrate that appropriate processes for cooperation were established and followed.
- Outline what constructive, active and ongoing engagement with neighbouring authorities and prescribed bodies took place (i.e. when, with whom, and for what purpose).
- Identify how the Council has maximised effectiveness in respect of all the main issues.
- Acknowledge the limitations of the Duty to Co-operate process.

2. What is the Duty to Cooperate?

2.1 The duty to cooperate was created in the Localism Act 2011 (which amended the Planning and Compulsory Purchase Act 2004). It placed a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters. The duty to cooperate is not a duty to agree, however local planning authorities are expected to make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

2.2 Local planning authorities must also demonstrate how they have complied with the duty during the examination of their Local Plans. As part of this, local planning authorities need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters. If a local planning authority cannot demonstrate that it has complied with the duty then its Local Plan will not be able to progress through examination. Hence it is essential that local planning authorities can satisfy themselves that they have complied with the duty.

In summary, the duty to cooperate:

- Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas
- Requires that councils set out planning policies to address such issues
- Requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies
- Requires councils to consider joint approaches to plan making

2.3 A number of bodies need to be considered as part of the duty to cooperate process, these include bodies which are formally prescribed in legislation, but also other bodies which local authorities should have regard for.

2.4 The public bodies that are subject to duty to cooperate as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by The National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013, are:

- The Environment Agency
- The Historic Buildings and Monuments Commission for England (known as Historic England)
- Natural England
- The Mayor of London (where applicable)
- The Civil Aviation Authority
- The Homes and Communities Agency

- Clinical commissioning groups established under section 14D of the National Health Service Act 2006
- The National Health Service Commissioning Board
- The Office of Rail Regulation
- Transport for London (where applicable)
- Integrated Transport Authorities
- Highway authorities within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- The Marine Management Organisation.

2.5 These bodies are considered to play a key role in delivering local aspirations, and therefore cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters. The bodies should be proportionate in how they do this and tailor the degree of cooperation according to where they can maximise the effectiveness of plans.

2.6 Each of these bodies have been consulted as a minimum at each stage of Local Plan preparation, and where relevant have had informal opportunities to input and comment on aspects of the Local Plan approach and wording. **Not one of the said bodies considers that the council has failed to comply with the duty to co-operate.**

2.7 A separate Statement of Consultation has been prepared alongside the Local Plan. This provides an overall picture of formal consultation carried out that has included the prescribed bodies relevant to the Duty to Cooperate. It includes a detailed summary of the matters raised against each part of the Local Plan.

2.8 It should be noted that matters raised by these public bodies have been discussed further with those bodies, formally or informally, and those discussions have helped to shape the changes and content of policies and site allocations within the Local Plan.

3. Engagement Arrangements

3.1 This section outlines the formal cooperation arrangements that have been established and followed with adjoining local planning authorities and other relevant bodies in order to secure on-going cooperation, with each of these arrangements having been in place at the outset of the plan making process and continuing throughout.

3.2 The Council has engaged with a wide range of other authorities, councils or bodies that meet the above requirements.

3.3 In addition to the prescribed bodies a number of other bodies and organisations have also been above cooperated with which include the following:

- The Leeds City Region Enterprise Partnership (see paragraph 3.7)
- Yorkshire West Local Nature Partnership

The council has reflected the Yorkshire West LNP statement of principles and priorities within the Local Plan at paragraph 13.20 of the Strategy and Policies document and also discussed the South Pennine Moors Special Protection Area (SPA)/Special Area of Conservation (SAC) and West Yorkshire Wildlife Habitat Network at various DTC meetings. Furthermore YWLNP principles have been used to achieve strong policies to protect and enhance the natural environment, to avoid habitat loss and fragmentation, and to identify opportunities to improve the ecological connectivity between habitats.

Strategic and Cross Boundary Cooperation

3.4 Kirklees shares its borders with Wakefield, Barnsley, Leeds, Bradford, Calderdale, High Peak, Peak Park and Oldham Local Planning Authorities. It works directly with these bodies on matters of strategic planning. The district also falls within the Leeds City Region Local Enterprise Partnership, which allows further cooperation with neighbouring authorities and those in the wider economic area.

Leeds City Region

3.5 Kirklees is located within the Leeds City Region Local Enterprise Partnership. The Enterprise Partnership forms the functional economic area for the local area, and seeks to work with partners across the public and private sectors with the goal of stimulating growth that will create jobs and prosperity for everyone who lives, works and does business in the region.

3.6 The Enterprise Partnership also provides a forum which allows member local planning authorities to cooperate with each other, and meet their duty to

cooperate. The partnership has a number of different groups, which generally meet once every two months to assist in achieving this which includes the:

- Strategic Planning (Duty to Cooperate) Group – an officer level group which deals with detailed aspects of strategic working across the city region.
- Heads of Planning Group – a senior officer group level that oversees and approves the work of the Strategic Planning Group, and sends this work forward to the Planning Portfolio Holders group.
- Planning Portfolio Group – a group made up of cabinet spokespeople or portfolio holders with responsibility for strategic planning. The group approves the work and outcomes of the Strategic Planning Group and if necessary forwards these to the other senior and chief officer groups for approval such as the Chief Executives Board and the Leaders board.

3.7 The Leeds City Region Local Enterprise Partnership endorsed and published a Statement of Cooperation for Local Planning. The statement provides detail of the processes that all member planning authorities have agreed to adopt in order to discharge the duty to cooperate with other relevant bodies, which are also members of the city region, as Local Plans progress. A copy of the LCR Statement of Cooperation has been made available as a separate core document. As a member of the partnership, Kirklees has agreed to follow the protocols in the statement. The Leeds City Region Local Enterprise Partnership confirmed in writing on 2nd December 2016 that the Kirklees Local Plan is aligned with the Leeds City Region strategic priorities and therefore satisfies the agreed protocols. This response was endorsed by the West Yorkshire Combined Authority at their December 1st meeting.

Membership

3.8 The Leeds City Region Local Enterprise Partnership is made up of eleven planning authorities with responsibility for strategic planning matters, the membership includes:

- Barnsley Metropolitan Borough Council
- Bradford Metropolitan District Council
- Calderdale Council
- Craven District Council
- Harrogate District Council
- Kirklees Council
- Leeds City Council
- North Yorkshire County Council
- Selby District Council
- Wakefield Council
- City of York Council

West Yorkshire Combined Authority

3.9 The combined authority brings together the five West Yorkshire authorities, plus York, and the business sector, through the Leeds City Region Local Enterprise Partnership. It also incorporates the former Passenger Transport Executive (Metro). Its aim is to deliver an outstanding economy with better connectivity and amongst other work it is responsible for the preparation of the West Yorkshire Transport Strategy and helping to deliver the LCR Strategic Economic Plan.

Bi-Lateral Neighbouring Council Working Arrangements

3.10 Kirklees shares its boundaries with Leeds, Bradford, Calderdale, Wakefield, Barnsley, Peak Park, High Peak and Oldham local planning authorities. Where strategic or cross boundary issues have arisen as part of the duty to cooperate process bi-lateral discussions have taken place to understand the relevant evidence bases and whether any mitigation measures were needed to resolve these issues. These have occurred bi-laterally and where appropriate through bodies set up under the Enterprise Partnership. For Oldham Council and the Peak Park Planning Authority who are not members of the Leeds City Region, separate arrangements have been made with these to ensure that the duty is met including regular meetings, discussions and consultations over evidence base studies and strategic issues.

Discussions with Other Councils

3.11 Kirklees has also contacted a wide range of other local planning authorities and public bodies that would be directly affected by policies and proposals set out in the Local Plan.

4. Duty to Cooperate Evidence and Outcomes

Main events and milestones

- 4.1 Work on the council's Local Plan began in 2014 with the development of high level issues and options and early engagement around spatial development strategy options and the scale of growth facing Kirklees. During early 2015 the council worked on developing the strategy options further and preparing the evidence base to underpin Local Plan decision making. Once parts of the evidence were in place to start meaningful duty to co-operate activity and when it was possible to identify initial strategic issues the council began exchanging Duty to Cooperate (DTC) documentation. The council formally consulted on a Draft Local Plan between November 2015 and February 2016 during which time duty to co-operate meetings and exchanges of information and evidence continued. This process continued throughout 2016 up to the Regulation 19 consultation period (7th November – 19th December 2016), with further engagement taking place with DTC bodies leading up to submission.
- 4.2 During the early engagement stages of the Local Plan the council developed an initial table of potential cross-boundary and strategic issues which was sent to all identified Duty to Cooperate bodies in early 2015. This table was the first version of the table and was used for consultation purposes to identify whether these were the right strategic issues to identify and whether there should be any additional issues added to later versions. The initial table is set out in Appendix A.
- 4.3 As a result of further DTC discussions/meetings, continued evidence gathering, and the preparation of the council's Draft Local Plan, the tables were further revised to ensure any new strategic issues were included and that appropriate evidence could be prepared and shared. The revised tables were shared with DTC bodies shortly before the Draft Local Plan was made available for public consultation in September 2015. A copy of this table is set out in Appendix B.
- 4.4 Following further refinement of the Local Plan from its draft stage, which included assessing new site options, changes to planning policy, and consideration of new evidence during 2016 which could have raised strategic and or cross-boundary issues, the tables were updated to reflect the current position. This latest version of the table is set out in Appendix C.
- 4.5 The council will continue to meet its duty to co-operate beyond the submission of the plan to the Secretary of State, including preparing and entering into any necessary statements of common ground or memorandums of understanding in advance of the oral hearings. The council is committed to ongoing effective engagement and will monitor this activity through its Authority Monitoring Report.

Evidence of Joint Working and Shared Evidence Base

- 4.6 The council has undertaken active cooperation and constructive engagement with adjoining authorities for the purpose of seeking to establish aligned policy positions with respect to key strategic matters. This has enabled adjoining authorities to input into evidence base preparation and influence policy formulation from the outset. For the reasons set out below the council therefore considers its Local Plan to have been prepared in a collaborative context and in the spirit of the duty to cooperate.
- 4.7 Evidence has been shared with DTC bodies as appropriate and all the relevant evidence which is available has also been available at the formal consultation stages.

Strategic Flood Risk Assessment (SFRA)

- 4.8 The Calder Catchment Strategic Flood Risk Assessment (SFRA) was undertaken by JBA Consulting. This work was jointly commissioned between Kirklees Council, Calderdale Council and Wakefield Council to ensure updated flood risk assessment for the Calder Catchment. The SFRA process included working with planning, flood management and drainage officers from Calderdale and Wakefield to agree the approach and ensure consistency, and also with the Environment Agency to utilise their expertise and ensure the approach taken in the document met their requirements. The Environment Agency confirmed in writing on 25th August 2016 that they found the Calder Catchment Level 1 SFRA to be acceptable. Subsequently on 19th December 2016, the Environment Agency confirmed in writing (with respect to the duty to cooperate) that they have been consulted at various stages of the production of the local Plan, worked with the council to reach satisfactory outcomes, and are satisfied that issues they raised have been given due consideration.

Gypsy and Traveller Accommodation Assessment

- 4.9 In May 2014 Arc4 were commissioned by Kirklees Council and Calderdale Council to undertake a joint Gypsy and Traveller Accommodation Assessment to identify the housing needs of Gypsies and Travellers and Travelling Showpeople from across Kirklees and Calderdale. The output of the study was two separate GTAAs individually covering Kirklees and Calderdale. The benefit of this approach was a common methodology for undertaking the work and shared evidence base of any cross border movement of Travellers. The councils also subsequently jointly commissioned Leeds GATE to prepare the Baseline Census of Gypsies and Traveller Communities (January – February 2015) – adding to the shared evidence base. Both studies have been used to inform their respective plan policies and allocations on the basis of a mutual evidence base and methodology. The joint commission of both evidence bases has had the added benefit of delivering an efficient procurement process with cost savings.

Highways England Transport Modelling

- 4.10 There has been considerable joint working between the Council and Highways England throughout the site allocation and policy development process. This has culminated in a final suite of transport policies and other site specific considerations being agreed.
- 4.11 Highways England was consulted on all site allocation options as well as the proposed site assessment methodology. Consequently Highways England have been able to input the councils proposed site allocations into a Network Analysis Tool model and the West Yorkshire and Leeds region “meso-model” alongside neighbouring authorities’ information. This has enabled Highways England to predict the number of trips on the strategic road network that each site allocation is likely to generate. Further to this work a standard pro forma response for any sites that have the potential to significantly impact upon the strategic road network was agreed with Highways England. Site phasing information was also shared with Highways England in order to predict traffic flows at various locations on the strategic road network at certain intervals throughout the plan period.
- 4.12 This level of information sharing has enabled Highways England to prioritise certain proposed schemes within the West Yorkshire Infrastructure Study. The role of this study is to identify further mitigation schemes to be included in Highways England’s Roads Investment Strategy and additional areas for investigation that should be considered as part of their future network enhancement strategic planning.
- 4.13 The council also commissioned a district-wide transport model which predicts the overall distribution of traffic within the district at intervals throughout the plan period. This modelled various scenarios, including a ‘do something forecast’ that drew upon committed scheme information contained in Highways England’s Roads Investment Strategy. The Council shared the results of its modelling with Highways England to further substantiate the mitigation schemes proposed in the West Yorkshire Infrastructure Study.
- 4.14 In summary, Highways England have input into various versions of the Local Plan both formally through the local plan consultation stages and through regular Duty to Cooperate meetings. This has resulted in specific policies and designations relating to the strategic road network being included within the local plan and on the policies map. Further engagement took place between Highways England and the council after the publication draft consultation on matters raised within Highways England’s Regulation 19 representation. This culminated with a meeting on Monday 20th March 2017. Further to this meeting Highways England wrote to the council on 12th April 2017 to clarify their current position with regard to the Local Plan and inform the Council of their intention to retract certain aspects of their original representation.

South Pennines Wind Energy Landscape Study (October 2014)

- 4.15 The study was commissioned by five local planning authorities whose council areas lie wholly or partly within the South Pennines – namely Burnley, Calderdale, Kirklees, Rossendale and Barnsley. The study is summarised below:

“A central purpose of this study is to help promote a common understanding of and approach to wind energy development in the landscape across the South Pennines. This is especially so because the South Pennines is a unified and highly valued landscape, important scenically as an upland link between the Peak District and Yorkshire Dales National Parks, and recreationally for the countryside experience that it offers to the large nearby urban populations of West and South Yorkshire, Greater Manchester and East Lancashire. The area is also nationally and internationally important for its habitats (including extensive peat moorland and blanket bog) and for its historical and cultural influence as the seat of the industrial revolution.

The local planning authorities recognise that decisions on specific wind energy applications should be taken in a holistic manner, acknowledging wind energy effects on the wider landscape of the South Pennines (and beyond) as well as on their individual local authority areas.”

- 4.16 The study has been used to inform the policies in the local plan and the sensitivity maps from the study are included in the local plan. The study and working group has informed Appendix I – *South Pennine Memorandum of Understanding on Renewable Technologies* - of the Statement of Cooperation for Local Planning Leeds City Region.
- 4.17 In addition the baseline landscape character assessment in the wind study covering the South Pennine area has been used as a baseline evidence base from which to develop the *Kirklees District Landscape Character Assessment* (July 2015, LUC)

Regional Economic Intelligence Unit – Economic Forecasting using the REM

- 4.18 The council has worked closely with the Combined Authority Regional Econometric Intelligence Unit (REIU) to consider the council’s approaches to a range of economic scenarios, with the main outcome being to critique the work, consider alternative methods and ultimately conclude a robust position upon which to base the local plans employment needs. This work is set out in detail in the Employment technical paper but essentially considers various growth scenarios (i.e. trend information without intervention, forecasts based on the Council’s Economic Strategy, and higher job growth forecasts). This joint work has meant the Council has had access to the latest economic and sectoral breakdown evidence for the Leeds City Region, and in turn ensured that the Kirklees local plan employment needs are robust and delivered within the Leeds City region context.

Castle Hill Setting Study

- 4.19 The council has worked closely with Historic England to produce a setting study for the highly significant scheduled ancient monument at Castle Hill in Huddersfield. The study has informed the approach the Council has taken in assessing potential impacts within its immediate vicinity and from longer distance views. Whilst restricted to land within the Kirklees district, this study nevertheless represents evidence of the council working with a DTC body both constructively and actively.

Kirklees Local Plan Site Allocation Methodology and Technical Consultation

- 4.20 The council developed an initial site allocation methodology in 2015 and informed DTC bodies and other parties of this. Consequently, an in-depth technical appraisal of individual sites has been undertaken in collaboration with internal and external consultees, including DTC bodies. Further engagement took place between Historic England and the council after the publication draft consultation on matters raised within Historic England's Regulation 19 representation. This culminated with a meeting on Thursday 2nd February 2017. Further to this meeting Historic England wrote to the council on 24th February 2017 to clarify their position with respect to the Local Plan and to confirm that the process undertaken to arrive at the proposed allocations is one which they would not only endorse, but which has involved full consultation with, and considerable input from, Historic England. Further to this, and also in response to matters raised by Historic England at Regulation 19 stage, the Council commissioned a series of heritage impact assessments for allocations that Historic England considered to have an 'uncertain' heritage impact. The methodology for these was presented to Historic England alongside a selection of sample assessments. Historic England confirmed via email that both the methodology and the sample assessments were appropriate, and that the overall approach to these was excellent.

Meetings held during the Local Plan preparation period

2014:

- 4.21 Regular Leeds City Region meetings to discuss local plan progress, strategic and cross-boundary matters including the Leeds City Region Strategic Duty to Cooperate Group, Heads of Planning and Planning Portfolio Holders (which includes political representatives from each of the LCR authorities)

Table of Specific DTC Meetings and Dates	
5 February 2014	Environment Agency
15 April 2014	Highways England
8 July 2014	Highways England
11 July 2014	Wakefield Council (SHMA meeting)

12 September 2014	Calderdale Council (SHMA meeting)
22 September 2014	Barnsley Council
27 November 2014	Kirklees Health and Wellbeing Board (includes CCGs)
16 December 2014	Environment Agency

2015:

- 4.22 Regular Leeds City Region meetings to discuss local plan progress, strategic and cross-boundary matters including the Leeds City Region Strategic Duty to Cooperate Group, Heads of Planning and Planning Portfolio Holders (which includes political representatives from each of the LCR authorities)

Table of Specific DTC Meetings and Dates	
8 January 2015	Environment Agency
5 February 2015	Barnsley Council
5 February 2015	Highways England
10 February 2015	Historic England
27 February 2015	Wakefield Council
5 March 2015	Leeds City Council
17 March 2015	Calderdale Council
27 March 2015	Kirklees SHMA presentation (including DTC bodies)
30 March 2015	Calderdale Council
31 March 2015	Environment Agency
23 April 2015	Historic England
28 April 2015	Calderdale Council
20 May 2015	Wakefield (SHMA meeting)
29 June 2015	Kirklees Viability presentation (including DTC bodies)
7 July 2015	Environment Agency
14 July 2015	Bradford Council
9 September 2015	Environment Agency
1 October 2015	Wakefield Council
2 October 2015	Leeds City Council
19 October 2015	Greater Huddersfield CCG and North Kirklees CCG
20 October 2015	Sport England (not an official DTC body)
20 October 2015	Environment Agency
26 November 2015	Kirklees Health and Wellbeing Board (includes CCGs)
2 December 2015	Greater Huddersfield CCG
22 December 2015	Calderdale Council

2016/2017:

- 4.23 Regular Leeds City Region meetings to discuss local plan progress, strategic and cross-boundary matters including the Leeds City Region Strategic Duty to Cooperate Group, Heads of Planning and Planning Portfolio Holders (which includes political representatives from each of the LCR authorities)

Table of Specific DTC Meetings and Dates	
5 January 2016	Yorkshire West Local Nature Partnership
8 January 2016	Wakefield Council
4 February 2016	Calderdale Council
5 February 2016	Peak Park Authority
8 February 2016	Calderdale Council
9 March 2016	Historic England
31 March 2016	Yorkshire Wildlife Trust (part of the YWLNP)
1 April 2016	Environment Agency
20 April 2016	Highways England
20 May 2016	Calderdale Council
23 May 2016	Bradford Council
20 June 2016	Highways England
21 June 2016	Historic England
1 August 2016	Historic England
17 August 2016	Sport England (not an official DTC body)
19 August 2016	Calderdale Council
30 September 2016	Wakefield Council
4 October 2016	Leeds City Council
22 December 2016	Association of Greater Manchester Authorities
2 February 2017	Historic England
7 February 2017	Highways England
9 February 2017	Natural England
17 February 2017	Wakefield Council
13 March 2017	Barnsley Council
20 March 2017	Highways England
23 March 2017	Natural England

- 4.24 In addition to the formal meetings identified above, development of Local Plan policy and its underlying evidence base has been supplemented by on-going informal discussion and communication with relevant prescribed bodies throughout the plan preparation period. At appropriate points drafts of evidence base studies and other work have also been informally shared and commented upon.

5. Cross Boundary Cooperation by Thematic Policy Area

5.1 This section sets out the specific areas of policy where strategic issues arose that required a cooperative approach throughout the plan preparation process.

5.2 A summary of the strategic issues identified at the Publication Draft Local Plan stage is set out in the Duty to Cooperate Strategic Issues Table (October 2016) in Appendix C. The table references contained in the section below all relate to this table.

Place Shaping:

5.3 No strategic issues were identified following initial duty to cooperate work and little impact on areas outside of the Kirklees district is expected.

Delivering growth and sustainable development:

5.4 Various strategic issues have been identified and discussed in relation to the spatial development strategy, including the role and function of the green belt (particularly where it serves to separate settlements in Kirklees from settlements in adjoining local authority areas), infrastructure planning issues, and safeguarded land.

5.5 In relation to the green belt this issue is noted under references 1A, 2C and 12 in the Duty to Cooperate Strategic Issues Table (October 2016). Kirklees shares green belt with a number of local adjoining authorities including Leeds, Bradford, Calderdale, Wakefield, Barnsley and via the Peak District National Park, Oldham and High Peak. Evidence regarding the development of spatial options, the council's green belt review and outcomes and the consideration of relevant alternative site options has formed the evidence base which has been shared on this issue. The Green Belt Review and Outcomes document highlighted the methodology used for green belt review and the relative importance of the strategic green belt role and function between settlements in Kirklees and adjoining authority areas. By way of outcomes, the council has sought to avoid major green belt reductions in strategic gap areas (where possible and where justified); prioritised development options in the existing urban areas (where possible and where justified); assumed a housing and employment land windfall allowance to reduce the loss of green belt in areas close to adjoining authorities; and clearly marked the strategic green belt gaps in the final version of the council's Green Belt Review.

5.6 In relation to strategic and cross-boundary infrastructure planning this issue is noted under reference 1B, 2B, 6A, 6B, (in relation to transportation/highways), 7 (in relation to education/school place planning) and 16 (in relation to health infrastructure). These issues raise cross-boundary matters with all the adjoining authority areas. Transport/highways issues are dealt with below under the transport heading and in the strategic allocations text.

- 5.7 In the case of education and school place planning, the council has obtained school place planning data and projections from adjoining authorities and estimated the potential impacts of Local Plan policies and proposals on cross boundary school place planning and movements. The complex nature of education provision, its timing, funding and the different stages of plan making of each authority, make it difficult to predict all the potential effects over Local Plan periods. However, data suggested that it was important for the Kirklees Local Plan to confirm that in the case of significant developments close to the local authority boundaries that new schools should be provided. This situation will need to be closely monitored in conjunction with adjoining authorities to ensure that cross-boundary education provision is planned for effectively. Kirklees council is committed to doing this through its Authority Monitoring Report and ongoing partnership working between education teams in different authorities.
- 5.8 In the case of health infrastructure, the council has liaised with the council's Health and Wellbeing Board, the Greater Huddersfield Clinical Commissioning Group (which covers part of Calderdale), North Kirklees CCG, NHS England, and where significant development opportunities were being considered, health professionals working in adjoining local authorities. This has involved sharing the draft and final draft land use allocations and phasing information in order to determine the potential impacts on health infrastructure in the future. Due to the complexities of planning for future health infrastructure, evolving CCG plans and programmes, and the shorter term business plans for these agencies, it is difficult to determine medium to long term impacts. Notwithstanding, written correspondence has been received from the Health and Wellbeing Board and the CCG's confirming their support for the Local Plan policies and proposals and acknowledging that its content will be considered when developing their future investment strategies.
- 5.9 In relation to safeguarded land, this issue is noted under reference 1A. Kirklees has confirmed that it intends to ensure that its green belt boundaries are permanent in the long term and defined to an extent that will enable Kirklees District to accommodate its objectively assessed housing need towards the end of the plan period and in the early years of a subsequent plan period.

Economy:

- 5.10 In relation to the economy, the key strategic issues identified have been the functional economic market geography in which Kirklees sits, the overall scale of employment land needed in the district, and whether this would have the potential to undermine or divert investment interest from other parts of the Leeds City Region.
- 5.11 The issues in relation to the extent of the functional economic market geography are identified under reference 2D. Evidence set out in the Leeds City Region Strategic Economic Plan and the Leeds City Region Local Enterprise Partnership evidence base (agreed by all the LCR authorities) confirms that

Kirklees is part of the wider functional economic market area. This is an agreed position in terms of the duty to cooperate and is also reflected in the council's self-assessment tables in Appendix D, which show the alignment of the Local Plan policies and proposals with the LCR Strategic Economic Plan.

- 5.12 The strategic issue of overall scale of job growth and employment land required for the plan is identified under reference 2D and has been calculated using a common joint evidence base for the Leeds City Region. The Regional Econometric Model (REM) allows for individual Local Plan proposals to be tested and then to determine any wider impacts on the functional economic market area (i.e. the rest of the Leeds City Region). This is therefore a common basis for understanding Kirklees' role in its economic market area and is an agreed starting point for understanding job growth and market sector changes in terms of the duty to cooperate. Kirklees council identified early in the plan making process that land supply evidence indicated it would be possible to meet its objectively assessed needs for jobs in full and therefore it did not need to rely on other authorities to meet any shortfalls. Similarly, Kirklees has not been asked by any other authority within the functional economic market area to meet any shortfalls in terms of economic development.
- 5.13 In relation to the potential for Kirklees' economic plans to divert investment from other parts of the Leeds City Region this is identified under reference 2A. The Leeds City Region LEP has prepared evidence to show that the SEP is deliverable across the region and there is sufficient capacity within the Leeds City Region. The Leeds City region SEP and the Kirklees Economic Strategy confirms that there is particular role for advanced manufacturing in Kirklees which leaves capacity for other parts of the functional economic area to focus on other sectors of the economy. This is an agreed position in terms of the duty to cooperate.

Homes:

- 5.14 In relation to housing, the key strategic issues identified have been the housing market geography in which Kirklees sits, objectively assessed needs for housing in the district and the provision of land for travellers and travelling showpeople. The issues in relation to the housing market geography are identified under reference 1C. The methodology, assumptions and early findings were shared with adjoining authorities and other DTC bodies. Evidence set out in the council's Strategic Housing Market Assessment (SHMA) was shared with adjoining authorities at a workshop in 2015. Since then the SHMA evidence has been made available at formal consultation stages to all DTC bodies. The SHMA concludes that Kirklees is a relatively self-contained housing market area. Furthermore in order to ensure that individual local authority SHMA's can meet DTC obligations the Leeds City Region LEP has commissioned reports on the Leeds City Region housing market geography; these are consistent with the SHMA's findings. In relation to objectively assessed needs for housing in the district, this is identified under reference 1C of the table. The evidence for this figure is included in the SHMA, but demographic and jobs led

scenarios have also been tested through the use of a shared methodology across the Leeds City Region. This uses a combination of demographic profiling (Edge Analytics household projection assessments and POPGROUP) and Regional Econometric Modelling (referred to above). Basing any assumptions regarding the nature of demographic change and job growth on a common methodology helps ensure consistency with the LCR commissioned work that underpins housing delivery across the Leeds City Region and the Leeds City region Strategic Economic Plan.

- 5.15 Kirklees council identified early in the plan making process that land supply evidence indicated it would be possible to meet its objectively assessed needs for homes in full and therefore it did not need to rely on other authorities to meet any shortfalls. The Leeds City Region Housing Market Areas Interim Report (February 2016) identifies that the Kirklees/Calderdale and Kirklees/Wakefield Housing Market Area (HMA) boundaries are impermeable, but that the Kirklees/Leeds HMA boundary is permeable and the Kirklees/Bradford HMA boundary is highly permeable.
- 5.16 Minutes of the Strategic Planning (Duty to Cooperate) Group meeting on April 4th 2017 confirm the Leeds City Region Housing Market Areas Interim Report (February 2016) would help evidence the DTC approach of member authorities. This approach is that through the plan making process (and the evidence base) each local planning authority is aiming to meet their Objectively Assessed Needs within their own boundaries and that there is no expectation or any specific agreement between individual authority areas to make provision to accept an adjacent authority's housing requirement whole or in part. At this meeting it was agreed to review the report to confirm the approach by member authorities to set housing targets for their own areas with no need for cross-boundary sharing. Further to this and the findings of the Report with respect to the Kirklees and Leeds/Bradford HMA boundaries, Bradford Council confirmed in writing on 12th April 2017 that Bradford Council is planning to fully meet its own objectively assessed needs within its district and therefore it was unnecessary for Kirklees Council to consider whether any of the development needs of Bradford District were able to be met within Kirklees District. In view of this correspondence and the fact that Leeds City Council already has an adopted housing requirement which it is planning to fully meet within its district, Kirklees council does not consider that it would be prudent to give consideration to helping meet the development needs of either Leeds or Bradford Councils without being expressly asked to do so.
- 5.17 The only adjoining authorities which have approached Kirklees to ask if the district could accommodate potential shortfalls through the DTC process are Oldham (albeit indirectly via the Greater Manchester Spatial Planning Framework) and High Peak. As Kirklees does not share any overlapping housing market geography with these districts or Greater Manchester, travel to work patterns are relatively small compared to travel within Greater Manchester and other areas surrounding it, and that to deliver any additional housing

would mean additional green belt release which Greater Manchester also requires, Kirklees confirmed that it would not be minded to deliver additional homes for Greater Manchester. The Greater Manchester Spatial Planning Framework has now reached a draft stage and aims to meet its objectively assessed needs without requiring additional housing in Kirklees. This was confirmed by AGMA (Association of Greater Manchester Authorities) on 22nd December 2016 via a conference call with Kirklees and Calderdale Councils.

- 5.18 In relation to accommodation needs for travellers and travelling showpeople this is identified under reference 1D of the table. The council has worked with Calderdale Council on a joint commission which has the benefit of a shared methodology but it should be recognised that this joint working does not indicate that the two authorities are jointly planning for provision. Kirklees council identified early in the plan making process that it would be possible to meet identified needs within the district and did not need to rely on adjoining authorities to meet any shortfalls. Kirklees has not been asked to meet the shortfalls of any other adjoining authorities. Adjoining authorities have not raised any objections or strategic/cross boundary issues.

Retailing and town centres:

- 5.19 This issue is noted under reference 13 in the table. The council shared the approach and methodology of the Retail Capacity Study through the Leeds City Region duty to cooperate retail working group and made this evidence available as part of the formal consultations during the preparation of the Local Plan. As the council's approach is to focus on a 'town centre first' approach in accordance with national planning policy, no strategic issues were identified following initial duty to cooperate work and little impact on areas outside of the Kirklees district is expected.

Transport:

- 5.20 This issue is noted under reference 7 in the table. In the case of transportation/highways the council has worked closely with Highways England (including the use of shared transportation modelling and evidence affecting the strategic road network and potential new motorway infrastructure). The council has shared the outputs of the Kirklees Traffic Model and strategic site transport assessments with adjoining authorities so that any potential significant impacts on local road networks can be mitigated. It is likely that in the case of Calderdale, Leeds and Wakefield this will lead to the creation of statements of common ground and memorandums of understanding with these authorities to confirm that these mitigation measures can take place. This process is assisted in West Yorkshire through the West Yorkshire Combined Authority which ensures that transport scheme funding and investment is linked to growth proposals and easing traffic congestion and is agreed on a West Yorkshire partnership basis. A further component of the duty to cooperate evidence is set out in the self-assessment tables in Appendix D, which show the alignment of the Local Plan policies and proposals with the West Yorkshire Transport Strategy.

Design:

- 5.21 There were no strategic issues identified following initial duty to cooperate work and little impact on areas outside of the Kirklees district is expected.

Climate change:

- 5.22 In relation to the climate change theme two main strategic issues have been identified. Flood risk in the main river corridors and windfarm development.
- 5.23 In relation to flood risk this issue is noted under reference 3 of the table. The strategic issue identified relates to the potential for development in authorities within the same river corridor to have cross boundary implications either upstream or downstream in terms of increasing flood risk. Kirklees, Wakefield and Calderdale jointly fall within the Calder catchment and as indicated in the joint working section have a joint strategic flood risk assessment in place to help avoid exacerbating flood risk issues. The Environment Agency has been a key partner in this study and has confirmed its methodology and key outputs are acceptable. In terms of outputs this study has led to the development of strategic flood risk policies in the Local Plan and has ensured that the council has an agreed approach to the sequential testing of site allocations. The Local Plan does not allocate any land which would require flood risk exception testing and it contains policies to ensure that development does not increase surface water run off/exacerbate surface water flooding issues.
- 5.24 In relation to windfarm development this issue is noted under reference 8 in the table regarding cumulative visual impacts. The council has worked jointly with five local planning authorities whose council areas lie wholly or partly within the South Pennines – namely Burnley, Calderdale, Kirklees, Rossendale and Barnsley to produce the South Pennines Wind Energy Landscape Study. The study is summarised in the joint working section above.
- 5.25 The study has been used to inform the policies in the local plan and the sensitivity maps from the study are included in the Local Plan. The study and working group has informed Appendix I – *South Pennine Memorandum of Understanding on Renewable Technologies* - of the Statement of Cooperation for Local Planning Leeds City Region. In addition the baseline landscape character assessment in the wind study covering the South Pennine area has been used as a baseline evidence base from which to develop the Kirklees District Landscape Character Assessment (July 2015, LUC) . The study contains a cross boundary evidence base which allows cumulative impacts of windfarm development to be considered on a case by case basis and assisted the formulation of policies in the Local Plan.

Natural environment:

- 5.26 In relation to the natural environment theme two main strategic issues have been identified – water quality and any potential environmental impacts on any European protected environmental designations.

- 5.27 In relation to water quality this issue is identified under reference 4 in the table, which identifies the potential for new development worsening water quality downstream on certain rivers, potentially affecting areas within the Humber River Basin. The council met the Environment Agency to discuss this specific issue and any potential implications of the Water Framework Directive on the Local Plan and this had led directly to the development of a bespoke policy regarding water quality that is now included in the Local Plan.
- 5.28 In relation to the potential environmental impacts of growth from individual districts (and in combination) on European protected environmental designations, this is identified under reference 5A of the table. A number of adjoining authorities and authorities within the Peak District National Park have the potential to be affected by new development in parts of Kirklees and in other parts of West Yorkshire and Greater Manchester. The primary evidence prepared by the council to assess this issue is an appropriate assessment as part of the Habitat Regulations Assessment. This has involved agreeing a scope and overall methodology with Natural England. The conclusions of this report are set out separately, but several specific outcomes can be noted from this process including restricting the scale of overall growth in Kirklees settlements close to the edge of the South Pennines Special Protection Area and the rejection of a specific development proposal on the advice of the Peak District National Park authority. Further engagement took place between Natural England and the council after the publication draft consultation on matters raised within Natural England's Regulation 19 representation. This culminated with meetings on Thursday 9th February and 23rd March 2017. Further to these meetings Natural England wrote to the council on 3rd April 2017 to clarify their position with respect to the Local Plan and to confirm that they noted and welcomed the updates and clarifications which addressed the concerns they raised in their letter of 19th December 2016 and that Natural England is satisfied that the plan is legally compliant with the Habitats Regulations.
- 5.29 The council has also identified a wildlife habitat and strategic green infrastructure network across the district working in conjunction with West Yorkshire Ecology Service. This protects and strengthens ecological links to adjoining authorities and directly with adjoining networks where possible.

Historic environment:

- 5.30 Potential impacts on national important historic assets are identified under reference 14 of the table. The council has worked with Historic England throughout the plan making process, including working with them on specific land allocations, planning policies and also in preparing joint evidence. The Castle Hill Setting Study has been completed in partnership with Historic England and provides part of the evidence for a new heritage assets policy in the Local Plan. It has also been used to inform the selection of site allocations and will also be used to inform development management decisions. The

council is also working with adjoining authorities and Historic England where strategic land allocations span adjoining authority boundaries and have the potential to impact heritage assets.

Minerals:

- 5.31 The issues in relation to minerals are identified under reference 9 on the table. Kirklees Council is a member of the Yorkshire and Humber Aggregate Working Party (YHAWP) which, following a period of dormancy due to funding issues, resumed meeting in 2013. Since the resumption of the YHAWP a representative from Kirklees Council has regularly attended meetings organised by the Secretariat (initially Cheshire West Council and currently Urban Vision) and has contributed to the issues raised at those meetings. The issues raised have helped to inform the production of the West Yorkshire Local Aggregates Assessment (LAA). Following the resumption of the YHAWP and discussions with relevant officers, the five Mineral Planning Authorities (MPAs) making up the West Yorkshire region agreed to prepare a joint West Yorkshire LAA. The production of this LAA has been coordinated by Bradford Council but required the collection and collation of relevant data from each of the MPAs. The YHAWP has been consulted on each of LAAs produced since that time and has consulted each of its members on those LAAs.
- 5.32 The information provided in the LAA has subsequently been used to inform the emerging Kirklees Local Plan. The West Yorkshire LAA indicated that without future planning permissions permitted sand and gravel reserves would be exhausted well before the end of the plan period. In consideration of this, Kirklees has proposed a site be included in the Local Plan as an Area of Search for potential future sand and gravel extraction. The West Yorkshire LAA indicated that the permitted crushed rock reserves across the West Yorkshire area are much healthier, although the 2015 West Yorkshire LAA suggested that additional permissions would need to come forward to continue to maintain the minimum 10 year land bank beyond the plan period. However, as crushed rock is generally a by-product of block stone production and Kirklees proposes to include two new specific sites for the extraction of block stone where crushed rock production could take place, it was considered that these sites could make a contribution to the sub-regional aggregates supply and it was not therefore necessary to include any sites in the Local Plan principally for the production of crushed rock. With regard to industrial minerals Paragraph 146 of the NPPF indicates that MPAs should plan for a steady and adequate supply by co-operating with neighbouring and more distant authorities to co-ordinate the planning of industrial minerals to ensure adequate provision is made to support their likely use in industrial and manufacturing processes.
- 5.33 The five West Yorkshire MPAs continue to maintain close links with regard to minerals issues in general through the Combined West Yorkshire Authority (WYCA) which includes a lead minerals officer seconded from Bradford Council and funded by the all five MPAs. This is evidenced by the Memorandum of Understanding (MOU) which was agreed in 2015 to share resources across the

region if and when required. The lead minerals officer coordinates strategic issues relating to minerals on behalf of the WYCA and in conjunction with the five West Yorkshire MPAs has carried out a scoping exercise to look at the possibility of developing a minerals resources assessment for non-aggregate minerals (including industrial minerals) for the West Yorkshire region which could then be used to inform all five local plans. This scoping paper, agreed at Heads of Planning on 8 July 2016, concluded that the information held in relation to the main non-aggregate minerals produced in the West Yorkshire sub-region was insufficient to provide a full appraisal of all mineral types listed in the report. Further research will therefore be required to address the data gaps identified.

- 5.34 Whilst this process was under consideration each of the West Yorkshire MPAs have had to proceed to plan for non-aggregate minerals on the basis of locally derived evidence and whilst taking account of permitted reserves and the individual operator's needs when considering additional allocations for their own administrative area. However, it is recognised that cooperation on the strategic issue in relation to non-aggregate production will form part of the ongoing discussions in relation to DTC. With regard to building stone including the production of flag stones from resources within the Kirklees district, it is known that existing quarry operators supply stone to both local and national markets. However, this demand is heavily influenced by the specific characteristics of the stone and therefore it is difficult to make meaningful comparisons with regard to the levels of building stone reserves in different areas. At present, information regarding the production and supply of building stone is only available from the stone producers themselves and, whilst the supply of natural stone from the district is of more than local significance, it is considered that it would be difficult to derive any significant data through liaison with other MPAs to inform the Kirklees Local Plan.

Waste:

- 5.35 The issues in relation to waste are identified under reference 11 on the table. In preparing the Local Plan recognition was given to the need to address the requirements set out in paragraphs 15-17 of the NPPG. Prior to forecasting the projected waste arising's and identifying potential waste facility capacity gaps for the district over the plan period (2013 – 2031) the council used the Environment Agency's Waste Data and Hazardous Waste Data Interrogators to identify current waste movements between the district and other Waste Planning Authorities (WPAs). The information derived from the EA waste interrogators was then used to inform letters which were drafted and issued to each authority where a waste relationship had been identified. Each letter detailed the quantity of waste being sent, the type of waste, which facility it was being sent to, and sought confirmation from the relevant WPA on whether the waste movement could continue for the duration of the Kirklees Local Plan period (2013-2031). In analysing the responses the council was mindful of those waste movements that were of a more strategic nature. There is no formal guidance on what level of waste movement should be regarded as

strategic and this is a matter of judgement applied by individual authorities. However, the council is party to a Memorandum of Understanding (MoU) produced by the Yorkshire and Humber Waste Technical Advisory Body (YHWTAB) and there is general consensus among YHWTAB members that any waste movements above 1,000 tonnes (non-hazardous waste exported in a year) and 100 tonnes (hazardous waste exported in a year) should be considered 'strategic'.

- 5.36 As outlined above, Kirklees Council had already undertaken a consultation exercise prior to this agreement but did use YHWTAB advice to rationalise and prioritise responses. The thresholds applied reflect emerging best practice and the approach adopted throughout the country based on discussion with other authorities including through workshops on the DTC organised by the Planning Advisory Service in September 2014. With regards to the continuation of waste movements between the council and other WPAs, none confirmed that the identified 'strategic' waste movements could not continue for the duration of the plan (90 WPAs were contacted, 77 responses were received). Taking account of the evidence obtained the council has been able to plan for waste with the view that this external capacity will continue to be available for the duration of the Kirklees Local Plan. The evidence derived from the DTC letters has also been used to inform the waste studies commissioned by the council.
- 5.37 Urban Vision were appointed (November 2014) to produce the 'Waste Needs Assessment' covering, waste arising's, cross-boundary movements, growth forecasts and future capacity requirements. An update to this study was undertaken in September 2016. The findings from the Urban Vision study have been used to inform the Kirklees Local Plan's approach to policies and site allocations in relation to waste. This has resulted in the need to allocate one strategic waste site for Local Authority Collected Waste and a policy approach being formulated to support new waste treatment facilities should the need arise (as a result of the discontinuation of current 'strategic' waste movements). The Local Plan has therefore made provision for any emerging waste capacity requirements through a policy based approach. The waste needs assessment used a waste forecasting model, developed by 4Resources, to understand the implications of housing and employment growth on future waste arising's. The modelling also allowed for forecasting against various scenarios, including high to low waste arising figures and high to low recycling rates. The model is now being taken forwards at a West Yorkshire Combined Authority level to further enhance the collaborative working already being undertaken through the YHWTAB. This will ensure the DTC requirements continue to be met during the duration of the plan period and will help to inform plan reviews.
- 5.38 It should also be noted that as part of the YHWTAB group all seventeen Y&H WPAs, including Kirklees Council, have signed up to and contributed towards the Waste Position Statement. The Statement sets out some key background information about waste and waste planning in the Y&H area and, in particular,

identifies some key information that is likely to be relevant to preparation and review of waste local plans and which may affect more than one local authority area. To this extent the Statement is also intended to assist WPAs in the area to fulfil their statutory requirements under the “Duty to Cooperate” obligation in line with the regulations paragraphs 178 and 182 of the NPPF. Kirklees Council also maintain DTC communications through the monitoring of major waste planning applications. All Y&H WPAs report any major waste applications to the YHWTAB group to maintain awareness of any new waste capacity, or future loss of waste capacity, that may have cross-boundary implications. The thresholds applied have been agreed collectively by the YHWTAB and are detailed in the list for major waste applications.

Health and supporting communities:

- 5.39 Aside from cross-boundary health provision which is addressed above, no strategic issues were identified following initial duty to cooperate work and little impact on areas outside of the Kirklees district is expected.

Environmental protection:

- 5.40 Under this theme, the only strategic and or cross boundary issue identified is the management of air quality and noise, under reference 15 in the table. The council has worked jointly with a number of adjoining authorities in West Yorkshire to develop appropriate mitigation measures, including West Yorkshire Air Quality technical guidance, the development of a West Yorkshire Low Emissions Strategy which sets out the collective ambitions and objectives of the West Yorkshire local authorities, together with the West Yorkshire Combined Authority and in collaboration with Public Health England to reduce harmful emissions and improve air quality. Specific policies have been developed in the plan to mitigate air quality impacts and these issues have also been taking into account in site allocation selection.

Green belt and open space:

- 5.41 Aside from strategic and cross-boundary green belt issues which are set out above, the detailed development management approach of green belt development in the Local Plan does not generate strategic issues. Hence little impact on areas outside of the Kirklees district is expected.

Strategic Site Allocations:

- 5.42 The Local Plan contains some strategically sized allocations relatively close to adjoining authorities that have the potential to raise strategic cross boundary issues; hence such allocations have formed part of the duty to cooperate process. Sites which are considered to lead to potential cross boundary issues are set out under reference 17 of the table. Dialogue and evidence sharing to date with DTC bodies has led to bespoke mitigation measures being included in the site allocations for these sites. The main strategic issues for these sites are set out in the tables below and the council will continue to draft any necessary statements of common ground or memorandums of understanding with

relevant adjoining authorities with respect to these matters in advance of the oral hearings.

6. Conclusion

- 6.1 The Council considers that it has put in place robust mechanisms to facilitate engagement between itself and neighbouring local planning authorities during the preparation of the Local Plan. Where specific areas of Local Plan policy required cross-boundary cooperation this has been reflected within the policies and the approach of the Local Plan itself. Furthermore, where there is an element of reliance on future revisions to existing, or the preparation of new Local Plans by adjoining Local Planning Authorities, specific mechanisms have been put in place to ensure that these matters are addressed at that time. The Council is therefore satisfied that it has met the requirements of the Duty to Cooperate in accordance with the provisions of the Localism Act and the National Planning Policy Framework.
- 6.2 The council will continue to meet its duty to co-operate beyond the submission of the plan to the Secretary of State, including preparing and entering into any necessary statements of common ground or memorandums of understanding in advance of the oral hearings. The council is committed to ongoing effective engagement and will monitor this activity through its Authority Monitoring Report. The Leeds City Region LEP and West Yorkshire Combined Authority structures will also continue to provide a strong basis for further collaboration and facilitate the duty to cooperate process.
- 6.3 Despite significant efforts to ensure joint evidence preparation and the sharing of key information with DTC bodies it should be noted that each of the adjoining local authorities are at different stages of plan making, whilst certain DTC bodies are currently focussed on short term business planning. In the absence of either a regional or sub-regional spatial planning context this has led, in some cases, to difficulties with the level of information or evidence available from other parties, particularly from authorities which do not have an up-to-date Local Plan or evidence regarding potential growth locations/planned interventions in place. Ongoing joint working, along with a commitment from Kirklees council and other DTC bodies to continue to collaborate and contribute to the duty to cooperate beyond the adoption of the Local Plan will ensure that DTC bodies continue to share and make available information of mutual interest throughout forthcoming plan period.
- 6.4 Further correspondence received from Statutory Consultees since the Regulation 19 Publication Draft Local Plan Consultation period ended (see paragraphs 4.8, 4.14, 4.20 and 5.16) is enclosed within a separate core document entitled 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Appendix A

Kirklees Local Plan: Duty to Co-operate Strategic Issues Table – Early Engagement

Section 110 of the Localism Act, November 2011, imposes a duty on councils to co-operate with other councils and bodies such as the Environment Agency and the Highways Agency on planning issues that cross administrative boundaries. The duty is explained in the national planning policy framework paragraphs 178 to 181. In particular paragraph 181 states: “Local Planning Authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their local plans are submitted for examination”.

The intention of the legislation is that the duty is carried out before councils make formal decisions on plans, with those decisions taking account of the outcome of the co-operation process. The table below sets out the latest analysis of issues and proposed actions derived from the discussions held so far with relevant neighbouring LPAs and bodies since the new duty came into force. This information will be central to demonstrating that the duty has been carried out appropriately.

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
<i>Ref</i>	<i>Summary of the issue</i>	<i>Description of why it is an issue for neighbouring authorities</i>	<i>Details of the authorities affected by the issue</i>	<i>Evidence to show there is an issue (including links to source documents)</i>	<i>Details of how the issue can be overcome or managed</i>	<i>How the issue will be monitored including key indicators and trigger points</i>	Agreed actions (including who is to lead & timescale)	<i>Relevant strategic priority in para 156</i>
1 A	Scale and location of new land for homes	Impact on function of green belt	LCR Authorities - Leeds, Bradford, Calderdale,	SHLAA. Emerging Kirklees Strategic Housing Market	Robust assessment of green belt boundary in light of exceptional	Revised green belt boundary and amount of green belt lost/gained	Engage with adjoining Councils in agreeing detailed methodology for green belt review	Housing need

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	<p>Assessment.</p> <p>Emerging consideration of relevant alternative site options.</p> <p>Emerging strategic and local level green belt review.</p>	<p>circumstances, green belt role and function, material change in nature of green belt since boundary originally established.</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p> <p>Sequential approach to site selection based on use of land in urban areas first, where possible, appropriate, sustainable and deliverable.</p>	through production of Local Plan.	<p>when undertaken</p> <p>Due consideration will be given to housing windfall allowance, thereby potentially reducing the need/extent of potential Green Belt release</p> <p>An illustrative diagram(s) which showing the strategic Planning interrelationships between Kirklees & neighbouring authorities (e.g. green belt 'gaps')</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in</p>	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							making revisions under exceptional circumstances	
1B	Scale and location of new land for homes	Impact on infrastructure (Including transport, education, green and health)	Leeds, Wakefield, Calderdale, Bradford, Barnsley	Emerging Kirklees Infrastructure Delivery Plan, adjoining authorities local infrastructure plans, emerging Kirklees Transport Model, education plans, Joint Strategic Needs Assessments, Kirklees Joint Health and Wellbeing Strategy and evidence on cross-boundary strategic green corridors/networks.	Sharing of evidence and information including updates to and content of the Infrastructure Delivery plan. Ensure LCR investment plan, growth Plan, Strategic Economic Plan and WY LTP/Combined Authority proposals support strategic growth areas in Kirklees. Detailed choice and phasing of development sites in Local Plan.	Local Plan choice of sites for development and supporting infrastructure where required. Monitoring housing completions Monitoring and Updating infrastructure plan	Ongoing liaison and sharing of evidence. Need to identify and quantify specific infrastructure capacities, shortfalls and future requirements, linked to scale and phasing of development. Where necessary, joint evidence bases may need to be established, e.g. joining up of local transport models to assess cumulative effects. This will specifically include modelling work with the Highways	Housing need

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					Ongoing work with adjoining Councils in particular on transport impacts and mitigation and on education implications .		<p>Agency.</p> <p>Joint working through LCR LEP on strategic infrastructure delivery.</p> <p>Joint working and DTC activity with Public Health, Clinical Commissioning Groups, NHS.</p> <p>Joint working and DTC activity with Kirklees LNP, South Pennines LNP and Peak District LNP</p>	
1C	Scale and location of new land for homes	Scale of housing provision/Meeting others needs	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley	<p>Strategic Housing Market Assessment</p> <p>Edge Analytics – LCR and Kirklees evidence on range</p>	Plan proposes to meet Districts Objectively assessed needs to 2031 and safeguarded land beyond plan	Annual Monitoring Report (AMR) Local Plan allocations, phasing and delivery.	Review and assess when available LCR reports on objectively assessed housing need and strategic housing market	Housing need

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			Non LCR Authorities - Peak District National Park, Oldham, High Peak	of objectively assessed needs Kirklees Economic Strategy and REM. Emerging LCR housing reports on housing markets and objectively assessed need methodology	period.	5 year supply delivery housing land	areas from adjoining authorities and consider implications of forthcoming CLG household projections. Ongoing liaison with adjoining councils. Adjoining authorities which are likely to be within an overlapping housing market areas are planning to meet their own objectively assessed needs, within their district boundaries and are not planning to meet any shortfall	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							arising from neighbouring authorities.	
1D	Scale and location of new land for homes	Travellers and Travelling Show People Provision	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	West Yorkshire G & T Study 2008 Emerging Kirklees & Calderdale GTAA 2015	Updated Local Study of Need in consultation with other councils. Align with methodology and approaches within LCR where appropriate and practicable.	AMR Local Plan Rolling 5 year supply	Aim to align methodology and approaches within LCR where appropriate and practicable. Aim to meet Kirklees' objectively assessed needs for gypsy and traveller sites within the district.	
2	Scale and location of new land for employment	Potential to prejudice prospects for regeneration in neighbouring areas by diverting investment interest and infrastructure funding	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park,	Employment land study Kirklees Economic Strategy REM Retail and Leisure Studies 2014	Share evidence base as appropriate, taking into account in particular local economic strategies. Joint working through Leeds City	AMR Local Plan allocations	Ongoing work through the LCR SEP Need to considered detailed implications of site specific allocations.	Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			<p>Oldham, High Peak</p> <p>Other authorities which fall within the defined functional employment market area</p>	LCR Strategic Economic Plan	<p>Region (LCR) Strategic Economic Plan (SEP)</p> <p>Ensure LCR investment plan, growth Plan, Strategic Economic Plan and WY LTP/Combined Authority proposals support strategic growth areas in Kirklees.</p> <p>Ongoing work with adjoining Councils in particular on transport impacts and mitigation.</p> <p>Identify employment land for specific types/sectors of the economy in line with the SEP</p>			

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					and the Kirklees Economic Strategy, in particular advanced manufacturing. DTC endorsement to functional market area			
2B	Scale and location of new land for employment	Impact on infrastructure (including transport)	Leeds, Wakefield, Calderdale, Bradford, Barnsley	Emerging Kirklees Infrastructure Delivery Plan, adjoining authority's local infrastructure plans, emerging Kirklees Transport Model	Sharing of evidence and information including updates to and content of the Infrastructure Delivery plan. Ensure LCR investment plan, growth Plan, Strategic Economic Plan and WY LTP/Combined Authority	Local Plan choice of sites for development and supporting infrastructure where required. Monitoring employment completions Monitoring and Updating infrastructure plan	Ongoing liaison and sharing of evidence. Need to identify and quantify specific infrastructure capacities, shortfalls and future requirements, linked to scale and phasing of development. Where necessary, joint evidence	Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					<p>proposals support strategic growth areas in Kirklees.</p> <p>Detailed choice and phasing of development sites in Local Plan.</p> <p>Ongoing work with adjoining Councils in particular on transport impacts and mitigation and on education implications .</p>		<p>bases may need to be established, e.g. joining up of local transport models to assess cumulative effects. This will specifically include modelling work with the Highways Agency.</p> <p>Joint working through LCR LEP on strategic infrastructure delivery.</p> <p>Joint working and DTC activity with Highways Agency, and the LEP/Combined Authority.</p>	
2C	Scale and location of new land for	Impact on function of green belt	LCR Authorities - Leeds, Bradford,	SELAA. Emerging Local Plan evidence on	Robust assessment of green belt boundary in light	Revised green belt boundary and amount of green belt	Engage with adjoining Councils in agreeing detailed methodology for	Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
	employment		Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	<p>objectively assessed needs for jobs, taking into account Kirklees Economic Strategy, REM, functional economic market area and need for strategic employment locations near to the M62.</p> <p>Emerging Local Plan evidence on market demand for employment land.</p> <p>Emerging consideration of relevant alternative site options.</p> <p>Emerging strategic</p>	<p>of exceptional circumstances, green belt role and function, material change in nature of green belt since boundary originally established.</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p> <p>Sequential approach to site selection based on use of land in urban areas first, where possible, appropriate, sustainable and</p>	lost/gained through production of Local Plan.	<p>green belt review when undertaken</p> <p>An illustrative diagram(s) which showing the strategic Planning interrelationships between Kirklees & neighbouring authorities (e.g. green belt 'gaps').</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p>	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
				and local level green belt review.	deliverable, however early recognition needed that Kirklees' employment land supply evidence suggests need for strategic new employment land locations.			
3	Flood risk in main river corridors	Development increases flood risk in other areas down stream. In identifying land for development, need to avoid increasing flood risk further downstream and to assess feasibility of safeguarding	Calderdale and Wakefield	Strategic Flood Risk Assessment (SFRA) Level 1 Infrastructure Delivery plan	River Catchment plans Links with local infrastructure plans and provision of blue/green infrastructure. Local Plan site choices. Use of Sustainable Urban Drainage	SUDS approval body implementation AMR	Joint SFRA with Calderdale and Wakefield on-going which will lead to Environment Agency sign off Supporting evidence on sequential approach linked to development strategy and site allocations will be prepared. Development of	The provision of infrastructure for flood risk

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		areas to increase flood storage provision and improve defences.			Systems (SUDS) and work of SUDS approval body when in place		further evidence on any exception sites would be discussed further with affected bodies/authorities. Need to maximise up stream mitigation of flood risk, in order to minimise any downstream implications.	
4	Potential impacts of growth from individual districts and 'in-combination' impacts on European Sites	Potential adverse impact on South Pennine Moors SPA and SAC and Denby Grange Colliery Ponds SAC as a result of scale and location of new development. Impacts of public	Leeds, Calderdale, Pendle, Bradford, Harrogate, Natural England and Peak District National Park. Potential impacts relate	Appropriate Assessment.	Need for sensitive choice of sites and broad locations for development in order to reduce potential for impacts. May be need for further HRA work in relation to individual sites.	Need for better understanding of pressures for recreational use of uplands due to growth and likely increase in visitor numbers, particularly in relation to honeypot sites.	Sharing HRA work and background with LPAs and key bodies. Liaise with them in developing further data and mitigation strategy in support of Local Plan. Ongoing work with Natural England on implementation of	Conservation and enhancement of natural environment

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		use and access to the moor as well as loss of supporting habitats and feeding grounds.	primarily to South Pennine Moors SPA and SAC.		<p>Managing and monitoring access to the moors.</p> <p>Need to consider potential for identifying additional areas of habitat and/ or locations for recreation and funding mechanisms to support this.</p> <p>Potential buffer policy around SPA set out in Local Plan and methodology.</p>	<p>Joint work (involving Bradford, Kirklees and Calderdale) in relation to bird monitoring is already underway. Early work is being evaluated as part of a rolling programme and will feed into HRA work.</p>	approach.	
5A	Pressure on strategic transport network	Potential for disruption of traffic flows and capacity issues on the M62	Highways Agency	Highways Agency's modelling outputs. District Transport Assessment by SDG	LCR SEP investment Local Transport Plan (LTP) investment West Yorkshire	AMR	Work with Highways agency to update their transport modelling data and share findings.	Provision of infrastructure

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
				Ongoing local modelling	Transport Fund Plus Liaison with Highways Agency		Liaise with Highways Agency as develop detailed assessment methodology for site selection. Ongoing work as part of LCR SEP to ensure coordination of supporting strategic transport investment	
5B	Pressure on local transport network	Potential for impact on traffic flows	Calderdale, Bradford, Leeds, and Wakefield and LEP/Combined Authority	Local Plan transport model	LCR SEP investment LTP investment West Yorkshire Transport Fund Plus	AMR	Liaise with adjoining highways authorities to share corridor information and modelling as well as potential mitigation measures – linked to scale of proposed growth and site specific allocations.	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							Need to identify and quantify specific infrastructure capacities, shortfalls and future requirements, linked to scale and phasing of development. Where necessary, joint evidence bases may need to be established, e.g. joining up of local transport models to assess cumulative effects. This will specifically include modelling work with the Highways Agency.	
6	Windfarm development	Cumulative visual impact. Need to be able	Calderdale, Bradford, Craven, Burnley, Bury,	Studies relating to landscape capacity supported by a number of	A South Pennine Memorandum of Understanding on Renewable	Memorandum proposes joint working in relation to	South Pennine Renewable Energy Working Group ongoing liaison and	Climate change mitigation and

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		to assess cumulative visual impact plus potential impacts on protected bird species and to weigh these against case for renewable energy.	Lancashire, Rochdale, Pendle and Peak District National Park. Areas just outside the South Pennine Moors SAC and SPA, where wind speeds are still relatively high tend to come under greatest pressure.	authorities. Also Yorkshire and Humber Renewable Energy Study and equivalent for Lancs authorities.	Technologies exists with the authorities that form part of the South Pennine Renewable Energy Working Group.	setting up and sharing monitoring systems. Work has started on this.	sharing of information.	adaptation, conservation and enhancement of the natural and historic environment, including landscape.
7	Minerals	Importation and supply of aggregate and cut stone including supply and wider interactions	Wakefield, Barnsley, Calderdale, Bradford, Doncaster, Rotherham Leeds, Hull North Yorkshire	Local Aggregate Assessment (LAA) for West Yorkshire and equivalent for South Yorkshire.	Sub Regional liaison on minerals matters through Yorkshire and Humber Aggregates Working Party (Y&HAWP) and LCR.	Sub regional aggregates monitoring through LAA and Y&HAWP yearly report.	Liaison through the regional minerals meetings (Yorkshire and Humber Aggregates working Party) ; any issues rising under NPPF para 146.1 to be addressed through	Provision of minerals

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			Derbyshire				LAA for West Yorkshire, Y&H AWP . Liaison when developing detailed approach in Local Plan.	
8	Green Infrastructure (GI)	Agreement on importance of GI in managing and mitigating impacts of growth and on strategic corridors and assets.	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak Authorities within LCR supported	LCR GI Strategy Regional work led by Natural England Emerging green networks/corridors coming from adjoining authority Local Plans and LNPs.	Need to agree role and support for GI where strategic green belt is under particular pressure Share best practice in relation to defending green space within urban areas and applying multi-functional tests. Establish functional green networks/corridor	Application of NR standards for access to wider areas for informal recreation. Links with Habitat Regulations Work. Future Local Plan monitoring to prevent loss of functional networks.	Ongoing liaison with adjoining councils and key bodies Need to recognise the strategic & contiguous green Infrastructure links with adjoining authorities. Link to emerging Local Nature Partnerships	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. Provision of health infrastructure and other

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			Green Infrastructure Strategy Local Nature Partnerships		s, linking across local authority boundaries.			local facilities
9	Waste Management	Cross boundary movement of waste and wider implications	EA, adjoining LPAs plus others who take waste Other authorities in the UK which import waste to Kirklees and Kirklees exports waste to.	Waste arisings and waste treatment capacity update Assessment	Sought agreement of recipients of waste that they are planning to support such an approach locally.	AMR Sub regional waste liaison	Ongoing liaison with in sub region and other regional waste groups. Ongoing liaison with other authorities in the UK which import waste to Kirklees and Kirklees exports waste to.	Waste Management

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
10	Green Belt	Long term strategic function of Green belt	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	SHLAA SELAA Emerging consideration of relevant alternative site options. Emerging strategic and local level green belt review.	Ensure strategic function of green belt is maintained where revisions are made. Local Plan seeks to establish green belt boundary for full plan period but given constraints of land supply and allocate safeguarded land. Robust assessment of green belt boundary in light of exceptional circumstances, green belt role and function, material change in nature of green belt since boundary originally established.	AMR Local Plan allocations.	Ongoing liaison with other LPAs on emerging plans and implications for scale and extent of green belt in City Region. Potential urban extensions and strategic employment locations could reduce the strategic green belt gaps between Calderdale, Bradford, Leeds and Wakefield. Need to consider detailed implications via site specific proposals and allocations. Longer term Green Belt issues across the City Region need to be	Deliver homes Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					<p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p> <p>Sequential approach to site selection based on use of land in urban areas first, where possible, appropriate, sustainable and deliverable, however early recognition needed that Kirklees' employment land supply evidence suggests need for strategic new</p>		addressed as necessary via the next generation of development plans.	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					employment land locations			
11	Retail and Town Centres	Unlikely to be any significant, cross boundary implications.	Calderdale, Bradford, Leeds and Wakefield	Retail Capacity Study Others?	None needed.	AMR Local Plan policy/framework for Huddersfield and Dewsbury town centres.	None needed.	The provision of retail, leisure and other commercial development

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
12	Strategic Site Allocations	Individual large scale sites/proposals which in themselves have a direct, strategic/cross boundary impact	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	Individual site allocations evidence base Assessment of cumulative impacts of the Local Plan allocations	See above, depending on land uses.	AMR Local Plan allocations.	Individual discussions with affected local authorities.	Deliver homes Jobs and infrastructure needed

Appendix B

Kirklees Local Plan: Duty to Co-operate Strategic Issues Table – September 2015

Section 110 of the Localism Act, November 2011, imposes a duty on councils to co-operate with other councils and bodies such as the Environment Agency and the Highways Agency on planning issues that cross administrative boundaries. The duty is explained in the national planning policy framework paragraphs 178 to 181. In particular paragraph 181 states: “Local Planning Authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their local plans are submitted for examination”.

The intention of the legislation is that the duty is carried out before councils make formal decisions on plans, with those decisions taking account of the outcome of the co-operation process. The table below sets out the latest analysis of issues and proposed actions derived from the discussions held so far with relevant neighbouring LPAs and bodies since the new duty came into force. This information will be central to demonstrating that the duty has been carried out appropriately.

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
<i>Ref</i>	<i>Summary of the issue</i>	<i>Description of why it is an issue for neighbouring authorities</i>	<i>Details of the authorities affected by the issue</i>	<i>Evidence to show there is an issue (including links to source documents)</i>	<i>Details of how the issue can be overcome or managed</i>	<i>How the issue will be monitored including key indicators and trigger points</i>	<i>Agreed actions (including who is to lead & timescale)</i>	<i>Relevant strategic priority in para 156</i>
1 A	Scale and location of new land	Impact on function of green belt	LCR Authorities - Leeds,	SHLAA. Emerging Kirklees	Robust assessment of green belt	Revised green belt boundary and amount of	Engage with adjoining Councils in agreeing detailed	Housing need

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
	for homes		Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	<p>Strategic Housing Market Assessment.</p> <p>Emerging consideration of relevant alternative site options.</p> <p>Emerging strategic and local level green belt review.</p>	<p>boundary in light of exceptional circumstances, green belt role and function, material change in nature of green belt since boundary originally established.</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p> <p>Sequential approach to site selection based on use of land in urban areas first, where possible,</p>	green belt lost/gained through production of Local Plan.	<p>methodology for green belt review when undertaken</p> <p>Due consideration will be given to housing windfall allowance, thereby potentially reducing the need/extent of potential Green Belt release</p> <p>An illustrative diagram(s) which showing the strategic Planning interrelationships between Kirklees & neighbouring authorities (e.g. green belt 'gaps')</p> <p>Criteria to inform site allocations site selection to ensure</p>	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					appropriate, sustainable and deliverable.		consideration of key functions in making revisions under exceptional circumstances	
1B	Scale and location of new land for homes	Impact on infrastructure (Including transport, education, green and health)	Leeds, Wakefield, Calderdale, Bradford, Barnsley	Emerging Kirklees Infrastructure Delivery Plan, adjoining authorities local infrastructure plans, emerging Kirklees Transport Model, education plans, Joint Strategic Needs Assessments, Kirklees Joint Health and Wellbeing Strategy and evidence on cross-boundary strategic green corridors/networks.	Sharing of evidence and information including updates to and content of the Infrastructure Delivery plan. Ensure LCR investment plan, growth Plan, Strategic Economic Plan and WY LTP/Combined Authority proposals support strategic growth areas in Kirklees. Detailed choice and phasing of development sites	Local Plan choice of sites for development and supporting infrastructure where required. Monitoring housing completions Monitoring and Updating infrastructure plan	Ongoing liaison and sharing of evidence. Need to identify and quantify specific infrastructure capacities, shortfalls and future requirements, linked to scale and phasing of development. Where necessary, joint evidence bases may need to be established, e.g. joining up of local transport models to assess cumulative effects. This will specifically include	Housing need

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					<p>in Local Plan.</p> <p>Ongoing work with adjoining Councils in particular on transport impacts and mitigation and on education implications.</p>		<p>modelling work with the Highways Agency.</p> <p>Joint working through LCR LEP on strategic infrastructure delivery.</p> <p>Joint working and DTC activity with Public Health, Clinical Commissioning Groups, NHS.</p> <p>Joint working and DTC activity with Kirklees LNP, South Pennines LNP and Peak District LNP</p>	
1C	Scale and location of new land for homes	Scale of housing provision/Meeting others needs	LCR Authorities - Leeds, Bradford, Calderdale,	Strategic Housing Market Assessment Edge Analytics –	Plan proposes to meet Districts Objectively assessed needs to 2031 and	Annual Monitoring Report (AMR) Local Plan allocations,	Review and assess when available LCR reports on objectively assessed housing	Housing need

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	LCR and Kirklees evidence on range of objectively assessed needs Kirklees Economic Strategy and REM. Emerging LCR housing reports on housing markets and objectively assessed need methodology	safeguarded land beyond plan period.	phasing and delivery. 5 year supply delivery housing land	need and strategic housing market areas from adjoining authorities and consider implications of forthcoming CLG household projections. Ongoing liaison with adjoining councils. Adjoining authorities which are likely to be within an overlapping housing market areas are planning to meet their own objectively assessed needs, within their district boundaries and are	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							not planning to meet any shortfall arising from neighbouring authorities.	
1D	Scale and location of new land for homes	Travellers and Travelling Show People Provision	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	West Yorkshire G & T Study 2008 Emerging Kirklees & Calderdale GTAA 2015	Updated Local Study of Need in consultation with other councils. Align with methodology and approaches within LCR where appropriate and practicable.	AMR Local Plan Rolling 5 year supply	Aim to align methodology and approaches within LCR where appropriate and practicable. Aim to meet Kirklees' objectively assessed needs for gypsy and traveller sites within the district.	
2	Scale and location of new land for employment	Potential to prejudice prospects for regeneration in neighbouring areas by diverting investment interest and	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities -	Employment land study Kirklees Economic Strategy REM Retail and Leisure	Share evidence base as appropriate, taking into account in particular local economic strategies.	AMR Local Plan allocations	Ongoing work through the LCR SEP Need to considered detailed implications of site specific allocations.	Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		infrastructure funding	<p>Peak District National Park, Oldham, High Peak</p> <p>Other authorities which fall within the defined functional employment market area</p>	<p>Studies 2014</p> <p>LCR Strategic Economic Plan</p>	<p>Joint working through Leeds City Region (LCR) Strategic Economic Plan (SEP)</p> <p>Ensure LCR investment plan, growth Plan, Strategic Economic Plan and WY LTP/Combined Authority proposals support strategic growth areas in Kirklees.</p> <p>Ongoing work with adjoining Councils in particular on transport impacts and mitigation.</p> <p>Identify employment land for specific</p>			

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					types/sectors of the economy in line with the SEP and the Kirklees Economic Strategy, in particular advanced manufacturing. DTC endorsement to functional market area			
2B	Scale and location of new land for employment	Impact on infrastructure (including transport)	Leeds, Wakefield, Calderdale, Bradford, Barnsley	Emerging Kirklees Infrastructure Delivery Plan, adjoining authority's local infrastructure plans, emerging Kirklees Transport Model	Sharing of evidence and information including updates to and content of the Infrastructure Delivery plan. Ensure LCR investment plan, growth Plan, Strategic	Local Plan choice of sites for development and supporting infrastructure where required. Monitoring employment completions Monitoring and	Ongoing liaison and sharing of evidence. Need to identify and quantify specific infrastructure capacities, shortfalls and future requirements, linked to scale and phasing of	Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					<p>Economic Plan and WY LTP/Combined Authority proposals support strategic growth areas in Kirklees.</p> <p>Detailed choice and phasing of development sites in Local Plan.</p> <p>Ongoing work with adjoining Councils in particular on transport impacts and mitigation and on education implications .</p>	Updating infrastructure plan	<p>development. Where necessary, joint evidence bases may need to be established, e.g. joining up of local transport models to assess cumulative effects. This will specifically include modelling work with the Highways Agency.</p> <p>Joint working through LCR LEP on strategic infrastructure delivery.</p> <p>Joint working and DTC activity with Highways Agency, and the LEP/Combined Authority.</p>	
2C	Scale and	Impact on	LCR	SELAA.	Robust	Revised green	Engage with	Jobs and

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
	location of new land for employment	function of green belt	Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	<p>Emerging Local Plan evidence on objectively assessed needs for jobs, taking into account Kirklees Economic Strategy, REM, functional economic market area and need for strategic employment locations near to the M62.</p> <p>Emerging Local Plan evidence on market demand for employment land.</p> <p>Emerging consideration of relevant alternative site</p>	<p>assessment of green belt boundary in light of exceptional circumstances, green belt role and function, material change in nature of green belt since boundary originally established.</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p> <p>Sequential approach to site selection based on use of land in</p>	belt boundary and amount of green belt lost/gained through production of Local Plan.	<p>adjoining Councils in agreeing detailed methodology for green belt review when undertaken</p> <p>An illustrative diagram(s) which showing the strategic Planning interrelationships between Kirklees & neighbouring authorities (e.g. green belt 'gaps').</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p>	infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
				options. Emerging strategic and local level green belt review.	urban areas first, where possible, appropriate, sustainable and deliverable, however early recognition needed that Kirklees' employment land supply evidence suggests need for strategic new employment land locations.			
3	Flood risk in main river corridors	Development increases flood risk in other areas downstream. In identifying land for development, need to avoid increasing flood risk further	Calderdale and Wakefield	Strategic Flood Risk Assessment (SFRA) Level 1 Infrastructure Delivery plan	River Catchment plans Links with local infrastructure plans and provision of blue/green infrastructure. Local Plan site	SUDS approval body implementation AMR	Joint SFRA with Calderdale and Wakefield on-going which will lead to Environment Agency sign off Supporting evidence on sequential approach linked to development	The provision of infrastructure for flood risk

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		downstream and to assess feasibility of safeguarding areas to increase flood storage provision and improve defences.			choices. Use of Sustainable Urban Drainage Systems (SUDS) and work of SUDS approval body when in place		strategy and site allocations will be prepared. Development of further evidence on any exception sites would be discussed further with affected bodies/authorities. Need to maximise up stream mitigation of flood risk, in order to minimise any downstream implications.	
4	Water Quality	Development has the potential to worsen water quality on certain rivers in the district with the potential of increased quality	Humber River Basin	Humber River Basin Management Plan	Policies to control impact of new development with potential to worsen water quality.	AMR Environment Agency	Draft Local Plan policy aimed at controlling impacts on water quality. Site allocations in nearby vicinity of any affected rivers to ensure	Climate change mitigation and adaptation, conservation and enhancement

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		problems downstream affecting other areas. Non-compliance with the Water Framework Directive.					appropriate level of assessment is carried out before submission of plan.	of the natural and historic environment, including landscape. Conservation and enhancement of natural environment
5	Potential impacts of growth from individual districts and 'in-combination impacts on European Sites	Potential adverse impact on South Pennine Moors SPA and SAC <i>and</i> Denby Grange Colliery Ponds SAC as a result of scale and location of new development. Impacts of public use and access to the moor as well as loss of supporting	Leeds, Calderdale, Wakefield, Pendle, Bradford, Harrogate, Natural England and Peak District National Park. Potential impacts relate primarily to South Pennine Moors SPA	Appropriate Assessment.	Need for sensitive choice of sites and broad locations for development in order to reduce potential for impacts. May be need for further HRA work in relation to individual sites. Managing and monitoring access to the moors.	Need for better understanding of pressures for recreational use of uplands due to growth and likely increase in visitor numbers, particularly in relation to honeypot sites. Joint work (involving Bradford, Kirklees and	Sharing HRA work and background with LPAs and key bodies. Liaise with them in developing further data and mitigation strategy in support of Local Plan. Ongoing work with Natural England on implementation of approach.	Conservation and enhancement of natural environment

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		habitats and feeding grounds.	and SAC.		<p>Need to consider potential for identifying additional areas of habitat and/ or locations for recreation and funding mechanisms to support this.</p> <p>Potential buffer policy around SPA set out in Local Plan and methodology.</p>	Calderdale) in relation to bird monitoring is already underway. Early work is being evaluated as part of a rolling programme and will feed into HRA work.		
6A	Pressure on strategic transport network	Potential for disruption of traffic flows and capacity issues on the M62	Highways Agency	<p>Highways Agency's modelling outputs. District Transport Assessment by SDG</p> <p>Ongoing local modelling</p>	<p>LCR SEP investment</p> <p>Local Transport Plan (LTP) investment</p> <p>West Yorkshire Transport Fund Plus</p> <p>Liaison with Highways Agency</p>	AMR	<p>Work with Highways agency to update their transport modelling data and share findings.</p> <p>Liaise with Highways Agency as develop detailed assessment</p>	Provision of infrastructure

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							methodology for site selection. Ongoing work as part of LCR SEP to ensure coordination of supporting strategic transport investment	
6B	Pressure on local transport network	Potential for impact on traffic flows	Calderdale, Bradford, Leeds, and Wakefield and LEP/Combined Authority	Local Plan transport model	LCR SEP investment LTP investment West Yorkshire Transport Fund Plus	AMR	Liaise with adjoining highways authorities to share corridor information and modelling as well as potential mitigation measures – linked to scale of proposed growth and site specific allocations. Need to identify and quantify specific infrastructure	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							capacities, shortfalls and future requirements, linked to scale and phasing of development. Where necessary, joint evidence bases may need to be established, e.g. joining up of local transport models to assess cumulative effects. This will specifically include modelling work with the Highways Agency.	
7	Pressure on school places	Potential impact on Kirklees school places or adjoining authorities	Calderdale, Bradford, Leeds, Wakefield and Barnsley. More significant	Local school place planning evidence.	Effective school place planning and sharing of draft Local Plan housing and mixed use allocation sites. Planning	School Place Planning. AMR.	Ongoing liaison and sharing of information. Modelling potential impacts of new housing and mixed use allocations on	Provision of health, security, community and cultural infrastructure and other local

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			numbers of pupils potentially affected in areas adjacent to Calderdale, Leeds and Bradford boundaries.		effectively for education infrastructure in the Local Plan to meet school places for Kirklees residents.		school places. Influencing education infrastructure provision in adjoining local Authorities to plan positively for school places to meet any significant shortfalls.	facilities
8	Windfarm development	Cumulative visual impact. Need to be able to assess cumulative visual impact plus potential impacts on protected bird species and to weigh these against case for renewable	Calderdale, Wakefield, Bradford, Craven, Burnley, Bury, Lancashire, Rochdale, Pendle and Peak District National Park. Areas just outside the South Pennine	Studies relating to landscape capacity supported by a number of authorities. Also Yorkshire and Humber Renewable Energy Study and equivalent for Lancs authorities.	A South Pennine Memorandum of Understanding on Renewable Technologies exists with the authorities that form part of the South Pennine Renewable Energy Working Group.	Memorandum proposes joint working in relation to setting up and sharing monitoring systems. Work has started on this.	South Pennine Renewable Energy Working Group. Ongoing liaison and sharing of information.	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		energy.	Moors SAC and SPA, where wind speeds are still relatively high tend to come under greatest pressure.					
9	Minerals	Importation and supply of aggregate and cut stone including supply and wider interactions	Wakefield, Barnsley, Calderdale, Bradford, Doncaster, Rotherham Leeds, Hull North Yorkshire Derbyshire	Local Aggregate Assessment (LAA) for West Yorkshire and equivalent for South Yorkshire.	Sub Regional liaison on minerals matters through Yorkshire and Humber Aggregates Working Party (Y&HAWP) and LCR.	Sub regional aggregates monitoring through LAA and Y&HAWP yearly report.	Liaison through the regional minerals meetings (Yorkshire and Humber Aggregates working Party) ; any issues rising under NPPF para 146.1 to be addressed through LAA for West Yorkshire, Y&H AWP . Liaison when developing detailed approach in Local Plan.	Provision of minerals

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
10	Green Infrastructure (GI)	Agreement on importance of GI in managing and mitigating impacts of growth and on strategic corridors and assets.	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak Authorities within LCR supported Green Infrastructure Strategy Local Nature Partnerships	LCR GI Strategy Regional work led by Natural England Emerging green networks/corridors coming from adjoining authority Local Plans and LNPs.	Need to agree role and support for GI where strategic green belt is under particular pressure Share best practice in relation to defending green space within urban areas and applying multi-functional tests. Establish functional green networks/corridors, linking across local authority boundaries.	Application of NR standards for access to wider areas for informal recreation. Links with Habitat Regulations Work. Future Local Plan monitoring to prevent loss of functional networks.	Ongoing liaison with adjoining councils and key bodies Need to recognise the strategic & contiguous green Infrastructure links with adjoining authorities. Link to emerging Local Nature Partnerships	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. Provision of health infrastructure and other local facilities
11	Waste Management	Cross boundary movement of waste and wider	EA, adjoining LPAs plus others who	Waste arisings and waste treatment capacity update	Kirklees can accommodate its own municipal	AMR Sub regional waste liaison	Ongoing liaison with in sub region and other regional	Waste Management

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		implications	take waste Other authorities in the UK which import waste to Kirklees and Kirklees exports waste to.	Assessment	waste arisings within existing waste management facilities in the district. However, should adjoining authorities seek to utilise these facilities it is likely that a contingency strategy would be needed. Seek agreement of recipients of waste that they are planning to support such an approach locally.		waste groups. Ongoing liaison with other authorities in the UK which import waste to Kirklees and Kirklees exports waste to. Allocation of land for strategic waste management purposes to deal with district's municipal, hazardous and other waste streams as high up the waste hierarchy as possible. Policy for positively planning for new facilities - in particular this approach may be needed to bring forward facilities for any outstanding	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							commercial and industrial waste which cannot be accommodated on allocated land.	
12	Green Belt	Long term strategic function of Green belt	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	SHLAA SELAA Emerging consideration of relevant alternative site options. Emerging strategic and local level green belt review.	Ensure strategic function of green belt is maintained where revisions are made. Local Plan seeks to establish green belt boundary for full plan period but given constraints of land supply and allocate safeguarded land. Robust assessment of green belt boundary in light of exceptional circumstances, green belt role and function, material	AMR Local Plan allocations.	Ongoing liaison with other LPAs on emerging plans and implications for scale and extent of green belt in City Region. Potential urban extensions and strategic employment locations could reduce the strategic green belt gaps between Calderdale, Bradford, Leeds and Wakefield. Need to consider detailed implications via site specific proposals	Deliver homes Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					<p>change in nature of green belt since boundary originally established.</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p> <p>Sequential approach to site selection based on use of land in urban areas first, where possible, appropriate, sustainable and deliverable, however early recognition</p>		<p>and allocations. Longer term Green Belt issues across the City Region need to be addressed as necessary via the next generation of development plans.</p>	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					needed that Kirklees' employment land supply evidence suggests need for strategic new employment land locations.			
13	Retail and Town Centres	Unlikely to be any significant, cross boundary implications.	Calderdale, Bradford, Leeds and Wakefield	Retail Capacity Study Other Council's retail capacity evidence	None needed.	AMR Local Plan policy/framework for Huddersfield and Dewsbury town centres.	None needed.	The provision of retail, leisure and other commercial development

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
14	Impact on the historic environment	Potential adverse impact on nationally or internationally important historical assets, including potential impacts on Grade 1 and 2* listed buildings, Scheduled Monuments, Historic battlefields and registered parks/landscapes	Calderdale, Wakefield and Historic England	Heritage assessments and historic landscape evidence	Need for sensitive choice of sites and broad locations for development in order to reduce potential for impacts. Potential buffer policy around key heritage and historic landscapes set out in Local Plan and methodology.	None at this stage	None at this stage	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
15	Managing Air Quality and Noise	Exceedance of EU limits. May lead to constraints on growth due to insufficient infrastructure or barriers within planning process	Leeds, Selby, Doncaster, Barnsley, Kirklees, Wakefield, North Yorkshire	Areas adjacent to local and Strategic Road Network already approaching or exceeding European noise and air quality limits.	Plan to mitigate impact of growth or supporting infrastructure such as road improvements may not be deliverable due to environmental	None at this stage	Develop of appropriate mitigation measures through agreed West Yorkshire Air Quality technical guidance.	Climate change mitigation and adaptation, conservation and enhancement of the natural

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		post plan publication.			impacts.			and historic environment, including landscape.
16	Health Infrastructure	Potential for significant housing and economic growth to increase pressure on health infrastructure used by more than one authority area	Leeds, Bradford, Calderdale, Wakefield, Barnsley, NHS England, Public Health England, Clinical Commissioning Groups operating over LA borders	Health and Well Being Strategies, JSNA's	Alignment of strategic health infrastructure with planned growth in Local Plan.	None at this stage	Close liaison with CCGs and NHS. Modelling impacts of potential housing and mixed use allocations on health infrastructure.	Provision of health infrastructure and other local facilities
17	Strategic Site Allocations	Individual large scale sites/proposals which in themselves have a direct, strategic/cross boundary impact	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR	Individual site allocations evidence base Assessment of cumulative impacts of the Local Plan	See above, depending on land uses.	AMR Local Plan allocations.	Individual discussions with affected local authorities.	Deliver homes Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			Authorities - Peak District National Park, Oldham, High Peak	allocations				

Appendix C

Kirklees Local Plan: Duty to Co-operate Strategic Issues Table – October 2016

Section 110 of the Localism Act, November 2011, imposes a duty on councils to co-operate with other councils and bodies such as the Environment Agency and the Highways Agency on planning issues that cross administrative boundaries. The duty is explained in the national planning policy framework paragraphs 178 to 181. In particular paragraph 181 states: “Local Planning Authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their local plans are submitted for examination”.

The intention of the legislation is that the duty is carried out before councils make formal decisions on plans, with those decisions taking account of the outcome of the co-operation process.

The table below sets out the latest analysis of issues and proposed actions derived from the discussions held so far with relevant neighbouring LPAS and bodies since the new duty came into force. This information will be central to demonstrating that the duty has been carried out appropriately.

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
<i>Ref</i>	<i>Summary of the issue</i>	<i>Description of why it is an issue for neighbouring authorities</i>	<i>Details of the authorities affected by the issue</i>	<i>Evidence to show there is an issue (including links to source documents)</i>	<i>Details of how the issue can be overcome or managed</i>	<i>How the issue will be monitored including key indicators and trigger points</i>	<i>Agreed actions (including who is to lead & timescale)</i>	<i>Relevant strategic priority in para 156</i>
1 A	Scale and location of new land for homes.	Impact on function of green belt	LCR Authorities - Leeds, Bradford,	SHLAA. Kirklees Strategic Housing Market	Robust assessment of green belt boundary in light	Revised green belt boundary and amount of green belt	Engage with adjoining Councils in agreeing detailed methodology for green belt review	Housing need

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	<p>Assessment.</p> <p>Consideration of relevant alternative site options.</p> <p>Strategic and local level green belt review.</p>	<p>of exceptional circumstances, green belt role and function, material change in nature of green belt since boundary originally established.</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p> <p>Sequential approach to site selection based on use of land in urban areas first, where possible,</p>	lost/gained through production of Local Plan.	<p>when undertaken</p> <p>Due consideration will be given to housing windfall allowance, thereby potentially reducing the need/extent of potential Green Belt release</p> <p>An illustrative diagram(s) which showing the strategic Planning interrelationships between Kirklees & neighbouring authorities (e.g. green belt 'gaps')</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under</p>	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					appropriate, sustainable and deliverable.		<p>exceptional circumstances.</p> <p>The local plan has identified approximately 6000 dwellings of safeguarded land, equivalent to 28% of the land identified in housing allocations or almost 20% of the objectively assessed need for homes. This means that the Kirklees Local Plan will not need to rely on adjoining authorities to provide any shortfall in new homes towards the end of the plan period.</p>	
1B	Scale and location of new land for homes	Impact on infrastructure (Including transport, education, green and	Leeds, Wakefield, Calderdale, Bradford, Barnsley	Emerging Kirklees Infrastructure Delivery Plan, adjoining authorities local infrastructure	Sharing of evidence and information including updates to and content of the Infrastructure	Local Plan choice of sites for development and supporting infrastructure	Ongoing liaison and sharing of evidence. Need to identify and quantify specific infrastructure capacities, shortfalls	Housing need

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		health)		plans, emerging Kirklees Transport Model, education plans, Joint Strategic Needs Assessments, Kirklees Joint Health and Wellbeing Strategy and evidence on cross-boundary strategic green corridors/networks.	<p>Delivery plan.</p> <p>Ensure LCR investment plan, growth Plan, Strategic Economic Plan and WY LTP/Combined Authority proposals support strategic growth areas in Kirklees.</p> <p>Detailed choice and phasing of development sites in Local Plan.</p> <p>Ongoing work with adjoining Councils in particular on transport impacts and mitigation and on education implications.</p>	<p>where required.</p> <p>Monitoring housing completions</p> <p>Monitoring and Updating infrastructure plan</p>	<p>and future requirements, linked to scale and phasing of development. Where necessary, joint evidence bases may need to be established, e.g. joining up of local transport models to assess cumulative effects. This will specifically include modelling work with the Highways Agency.</p> <p>Joint working through LCR LEP on strategic infrastructure delivery.</p> <p>Joint working and DTC activity with Public Health, Clinical Commissioning Groups, NHS.</p> <p>Joint working and DTC activity with Kirklees</p>	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							LNP, South Pennines LNP and Peak District LNP	
1C	Scale and location of new land for homes	Scale of housing provision/Meeting other's needs. The SHMA identifies about, (but not less than) 31,140 new dwellings between 2013 and 2031 (1730 new dwellings per annum). The council has assumed a windfall allowance; taken into account committed housing figures,	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	Strategic Housing Market Assessment Edge Analytics – LCR and Kirklees evidence on range of objectively assessed needs Kirklees Economic Strategy and REM. Emerging LCR housing reports on housing markets and objectively assessed need methodology	Plan proposes to meet Districts Objectively assessed needs to 2031 and safeguarded land beyond plan period. No requests from authorities within the wider City Region housing market area to meet any meet any shortfalls. Request from Greater Manchester to see if any unmet housing needs could be accommodated in	Annual Monitoring Report (AMR) Local Plan allocations, phasing and delivery. 5 year supply delivery housing land	Review and assess when available LCR reports on objectively assessed housing need and strategic housing market areas from adjoining authorities and consider implications of forthcoming CLG household projections. Ongoing liaison with adjoining councils. Adjoining authorities which are likely to be within an overlapping housing market areas are planning to meet their own objectively assessed needs, within their district boundaries and are not	Housing need

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		<p>and losses/demolitions when determining how much land is required from new housing allocations. This results in the need for about 21,324 new dwellings from allocated land.</p> <p>The local plan has identified approximately 6000 dwellings of safeguarded land, equivalent to 28% of the land identified in housing allocations or almost 20% of the objectively assessed need</p>			<p>Kirklees. This was rejected due to green belt reasons, which also affects their spatial options for growth and relative self-containment of Kirklees housing market area which does not show significant overlap with Greater Manchester.</p>		<p>planning to meet any shortfall arising from neighbouring authorities.</p> <p>The SHMA identifies about, (but not less than) 31,140 new dwellings between 2013 and 2031 (1730 new dwellings per annum). The council has assumed a windfall allowance; taken into account committed housing figures, and losses/demolitions when determining how much land is required from new housing allocations. This results in the need for about 21,324 new dwellings from allocated land.</p> <p>The local plan has identified</p>	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		for homes.					approximately 6000 dwellings of safeguarded land, equivalent to 28% of the land identified in housing allocations or almost 20% of the objectively assessed need for homes. This means that the Kirklees Local Plan will not need to rely on adjoin authorities to provide any shortfall in new homes towards the end of the plan period.	
1D	Scale and location of new land for homes	Travellers and Travelling Show People Provision. Provision is made in the plan for 12 permanent gypsy and traveller	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park,	West Yorkshire G & T Study 2008 Emerging Kirklees & Calderdale GTAA 2015	Updated Local Study of Need in consultation with other councils. Align with methodology and approaches within LCR where appropriate and practicable.	AMR Local Plan Rolling 5 year supply	Aim to align methodology and approaches within LCR where appropriate and practicable. Aim to meet Kirklees' objectively assessed needs for gypsy and traveller sites within the district - provision	Planning for Travellers.

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		pitches, 4 travelling showperson pitches and 8 transit pitches.	Oldham, High Peak				is made in the plan for 12 permanent gypsy and traveller pitches, 4 travelling showperson pitches and 8 transit pitches.	
2A	Scale and location of new land for employment	Potential to prejudice prospects for regeneration in neighbouring areas by diverting investment interest and infrastructure funding	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak Other authorities which fall within the defined	Employment land study Kirklees Economic Strategy REM Retail and Leisure Studies 2014 LCR Strategic Economic Plan LCR Employment Land Review	Share evidence base as appropriate, taking into account in particular local economic strategies. Joint working through Leeds City Region (LCR) Strategic Economic Plan (SEP) Ensure LCR investment plan, growth Plan,	AMR Local Plan allocations	Ongoing work through the LCR SEP and LCR evidence base which indicates sufficient capacity within the LCR functional economic market area for authorities to meet job need/requirements.	Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			functional employment market area		<p>Strategic Economic Plan and WY LTP/Combined Authority proposals support strategic growth areas in Kirklees.</p> <p>Ongoing work with adjoining Councils in particular on transport impacts and mitigation.</p> <p>Identify employment land for specific types/sectors of the economy in line with the SEP and the Kirklees Economic Strategy, in particular advanced</p>			

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					manufacturing. DTC endorsement to functional market area			
2B	Scale and location of new land for employment	Impact on infrastructure (including transport)	Leeds, Wakefield, Calderdale, Bradford, Barnsley	Emerging Kirklees Infrastructure Delivery Plan, adjoining authority's local infrastructure plans, emerging Kirklees Transport Model	Sharing of evidence and information including updates to and content of the Infrastructure Delivery plan. Ensure LCR investment plan, growth Plan, Strategic Economic Plan and WY LTP/Combined Authority proposals support strategic growth areas in Kirklees.	Local Plan choice of sites for development and supporting infrastructure where required. Monitoring employment completions Monitoring and Updating infrastructure plan	Ongoing liaison and sharing of evidence. Need to identify and quantify specific infrastructure capacities, shortfalls and future requirements, linked to scale and phasing of development. Where necessary, joint evidence bases may need to be established, e.g. joining up of local transport models to assess cumulative effects. This will specifically include modelling work with the Highways Agency.	Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					<p>Detailed choice and phasing of development sites in Local Plan.</p> <p>Ongoing work with adjoining Councils in particular on transport impacts and mitigation and on education implications .</p>		<p>Joint working through LCR LEP on strategic infrastructure delivery.</p> <p>Joint working and DTC activity with Highways Agency, and the LEP/Combined Authority.</p>	
2C	Scale and location of new land for employment	Impact on function of green belt	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	SELAA. Local Plan evidence on objectively assessed needs for jobs, taking into account Kirklees Economic Strategy, REM, functional economic market area and need for	Robust assessment of green belt boundary in light of exceptional circumstances, green belt role and function, material change in nature of green belt since boundary originally	Revised green belt boundary and amount of green belt lost/gained through production of Local Plan.	<p>Engage with adjoining Councils in agreeing detailed methodology for green belt review when undertaken</p> <p>An illustrative diagram(s) which showing the strategic Planning interrelationships between Kirklees & neighbouring</p>	Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
				<p>strategic employment locations near to the M62.</p> <p>Local Plan evidence on market demand for employment land.</p> <p>Consideration of relevant alternative site options.</p> <p>Strategic and local level green belt review.</p>	<p>established.</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p> <p>Sequential approach to site selection based on use of land in urban areas first, where possible, appropriate, sustainable and deliverable, however early recognition needed that Kirklees' employment land supply evidence</p>		<p>authorities (e.g. green belt 'gaps').</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p>	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					suggests need for strategic new employment land locations.			
2D	Scale and location of new land for employment	Scale of employment land provision/Meeting other's needs. The econometric modelling and employment land review identify about, (but not less than) 165 hectares of new employment land is needed to achieve a 75% employment rate over the	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	Employment land study Kirklees Economic Strategy REM Retail and Leisure Studies LCR Strategic Economic Plan	Plan proposes to meet Districts Objectively assessed needs to 2031 in full without reliance on adjoining authorities. No requests from authorities within the wider functional economic market area to meet any shortfalls.	Annual Monitoring Report (AMR) Local Plan allocations, phasing and delivery.	Review and assess when available LCR reports on objectively assessed housing need and strategic housing market areas from adjoining authorities and consider implications of forthcoming CLG household projections. Ongoing liaison with adjoining councils. Adjoining authorities which are likely to be within the functional economic market areas are planning to meet their own objectively assessed needs, within	Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		plan period, resulting in approximately 23,000 jobs over the plan period from 2013-31.					<p>their district boundaries and are not planning to meet any shortfall arising from neighbouring authorities.</p> <p>Employment land requirement is 175 Ha, with 108 Ha needed after taking into account completions, commitments. Land has been allocated for 165 Ha, mainly on large strategic sites along the M62 corridor.</p>	
3	Flood risk in main river corridors	Development increases flood risk in other areas downstream. In identifying land for development, need to avoid increasing flood	Calderdale and Wakefield	Strategic Flood Risk Assessment (SFRA) Level 1 Infrastructure Delivery plan	River Catchment plans Links with local infrastructure plans and provision of blue/green infrastructure.	SUDS approval body implementation AMR	Joint SFRA with Calderdale and Wakefield agreed with Environment Agency sign off. Supporting evidence on sequential approach linked to development strategy and site allocations prepared.	The provision of infrastructure for flood risk

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		risk further downstream and to assess feasibility of safeguarding areas to increase flood storage provision and improve defences.			Local Plan site choices. Use of Sustainable Urban Drainage Systems (SUDS) and work of SUDS approval body when in place		No sites allocated in the Kirklees Local Plan will require exception testing. Need to maximise up stream mitigation of flood risk, in order to minimise any downstream implications – these provisions are included in relevant planning policies in the plan.	
4	Water Quality	Development has the potential to worsen water quality on certain rivers in the district with the potential of increased quality problems downstream	Humber River Basin	Humber River Basin Management Plan	Policies to control impact of new development with potential to worsen water quality.	AMR Environment Agency	Draft Local Plan policy aimed at controlling impacts on water quality. Site allocations in nearby vicinity of any affected rivers to ensure appropriate level of assessment is carried out before submission of plan.	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		affecting other areas. Non-compliance with the Water Framework Directive.						landscape. Conservation and enhancement of natural environment
5A	Potential impacts of growth from individual districts and 'in-combination impacts on European Sites	Potential adverse impact on South Pennine Moors SPA and SAC <i>and</i> Denby Grange Colliery Ponds SAC as a result of scale and location of new development. Impacts of public use and access to the moor as well as loss of supporting habitats and	Leeds, Calderdale, Wakefield, Pendle, Bradford, Harrogate, Natural England and Peak District National Park. Potential impacts relate primarily to South Pennine Moors SPA and SAC.	Appropriate Assessment. Consultation response to the Draft Local Plan from the Peak District National Park Authority objecting to a draft allocation in Meltham.	Need for sensitive choice of sites and broad locations for development in order to reduce potential for impacts. May be need for further HRA work in relation to individual sites. Managing and monitoring access to the moors. Need to consider	Need for better understanding of pressures for recreational use of uplands due to growth and likely increase in visitor numbers, particularly in relation to honeypot sites. Joint work (involving Bradford, Kirklees and Calderdale) in relation to bird monitoring is	Sharing HRA work and background with LPAs and key bodies. Liaise with them in developing further data and mitigation strategy in support of Local Plan. Ongoing work with Natural England on implementation of approach. Agreed approach on appropriate assessment of potential site allocations which could be affected by certain bird species with	Conservation and enhancement of natural environment

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		feeding grounds.			<p>potential for identifying additional areas of habitat and/ or locations for recreation and funding mechanisms to support this.</p> <p>Potential buffer policy around SPA set out in Local Plan and methodology.</p>	<p>already underway. Early work is being evaluated as part of a rolling programme and will feed into HRA work.</p>	<p>Natural England. Meltham site not allocated for housing. Scale of growth restricted in areas close to the edge of the SPA due to a range of considerations, including landscape sensitivity, green belt role and function, HRA, place shaping strategy and other sustainability considerations.</p>	
6A	Pressure on strategic transport network	Potential for disruption of traffic flows and capacity issues on the M62	Highways Agency	<p>Highways Agency's modelling outputs.</p> <p>District Transport Assessment by SDG</p> <p>Ongoing local modelling</p>	<p>LCR SEP investment</p> <p>Local Transport Plan (LTP) investment</p> <p>West Yorkshire Transport Fund Plus</p> <p>Liaison with Highways Agency</p>	AMR	<p>Work with Highways agency to update their transport modelling data and share findings.</p> <p>Liaise with Highways Agency as develop detailed assessment methodology for site selection.</p> <p>Ongoing work as part of LCR SEP to ensure</p>	Provision of infrastructure

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							coordination of supporting strategic transport investment The sites identified by Highways England as having the potential for a severe adverse impact on the SRN have text added to the site allocation text box to recognise the potential impact and ensure that appropriate mitigation is in place alongside any phasing of the development.	
6B	Pressure on local transport network	Potential for impact on traffic flows	Calderdale, Bradford, Leeds, and Wakefield and LEP/Combined Authority	Local Plan transport model	LCR SEP investment LTP investment West Yorkshire Transport Fund Plus	AMR	Liaise with adjoining highways authorities to share corridor information and modelling as well as potential mitigation measures – linked to scale of proposed growth and site specific allocations.	Provision of infrastructure

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							Need to identify and quantify specific infrastructure capacities, shortfalls and future requirements, linked to scale and phasing of development. Where necessary, joint evidence bases may need to be established, e.g. joining up of local transport models to assess cumulative effects. This will specifically include modelling work with the Highways Agency.	
7	Pressure on school places	Potential impact on Kirklees school places or adjoining authorities	Calderdale, Bradford, Leeds, Wakefield and Barnsley. More	Local school place planning evidence.	Effective school place planning and sharing of draft Local Plan housing and mixed use allocation sites.	School Place Planning. AMR.	Ongoing liaison and sharing of information. Modelling potential impacts of new housing and mixed use allocations on school	Provision of health, security, community and cultural infrastructure and

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			significant numbers of pupils potentially affected in areas adjacent to Calderdale, Leeds and Bradford boundaries.		Planning effectively for education infrastructure in the Local Plan to meet school places for Kirklees residents.		places. Influencing education infrastructure provision in adjoining local Authorities to plan positively for school places to meet any significant shortfalls. The allocation text box for sites H1747, H2089 and MX1905 include a requirement for primary/secondary school provision on site or within the locality during the plan period.	other local facilities
8	Windfarm development	Cumulative visual impact. Need to be able to assess cumulative visual impact plus potential impacts on	Calderdale, Wakefield, Bradford, Craven, Burnley, Bury, Lancashire, Rochdale, Pendle and Peak District	Studies relating to landscape capacity supported by a number of authorities. Also Yorkshire and Humber Renewable	A South Pennine Memorandum of Understanding on Renewable Technologies exists with the authorities that form part of the South Pennine	Memorandum proposes joint working in relation to setting up and sharing monitoring systems. Work has started on	South Pennine Renewable Energy Working Group. Ongoing liaison and sharing of information.	Climate change mitigation and adaptation, conservation and enhancement of the natural

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		protected bird species and to weigh these against case for renewable energy.	National Park. Areas just outside the South Pennine Moors SAC and SPA, where wind speeds are still relatively high tend to come under greatest pressure.	Energy Study and equivalent for Lancs authorities.	Renewable Energy Working Group.	this.		and historic environment, including landscape.
9	Minerals	Importation and supply of aggregate and cut stone including supply and wider interactions	Wakefield, Barnsley, Calderdale, Bradford, Doncaster, Rotherham Leeds, Hull North Yorkshire Derbyshire	Local Aggregate Assessment (LAA) for West Yorkshire and equivalent for South Yorkshire.	Sub Regional liaison on minerals matters through Yorkshire and Humber Aggregates Working Party (Y&HAWP) and LCR.	Sub regional aggregates monitoring through LAA and Y&HAWP yearly report.	Liaison through the regional minerals meetings (Yorkshire and Humber Aggregates working Party) ; any issues rising under NPPF para 146.1 to be addressed through LAA for West Yorkshire, Y&H AWP . Liaison when developing detailed	Provision of minerals

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							<p>approach in Local Plan has been achieved. Allocations identified to meet Kirklees' obligations for aggregates.</p> <p>District now also over-washed with relevant mineral safeguarding areas.</p>	
10	Green Infrastructure (GI)	Agreement on importance of GI in managing and mitigating impacts of growth and on strategic corridors and assets.	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	LCR GI Strategy Regional work led by Natural England Emerging green networks/corridors coming from adjoining authority Local Plans and LNPs.	Need to agree role and support for GI where strategic green belt is under particular pressure Share best practice in relation to defending green space within urban areas and	Application of NR standards for access to wider areas for informal recreation. Links with Habitat Regulations Work. Future Local Plan monitoring	Ongoing liaison with adjoining councils and key bodies Need to recognise the strategic & contiguous green Infrastructure links with adjoining authorities – these links are included in the green infrastructure networks in the Local Plan and link to	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. Provision of

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
			<p>Authorities within LCR supported Green Infrastructure Strategy</p> <p>Local Nature Partnerships</p>		<p>applying multi-functional tests.</p> <p>Establish functional green networks/corridors, linking across local authority boundaries.</p>	to prevent loss of functional networks.	<p>corresponding points in adjoining authorities to connect the networks, in particular for the Wildlife Habitat Network and the core walking, riding and cycling routes.</p> <p>Link to emerging Local Nature Partnerships</p>	health infrastructure and other local facilities
11	Waste Management	Cross boundary movement of waste and wider implications	<p>EA, adjoining LPAs plus others who take waste</p> <p>Other authorities in the UK which import waste to Kirklees and Kirklees exports waste to.</p>	Waste arisings and waste treatment capacity update Assessment	Kirklees can accommodate its own municipal waste arisings within existing waste management facilities in the district. However, should adjoining authorities seek to utilise these facilities it is likely	AMR Sub regional waste liaison	<p>Ongoing liaison with in sub region and other regional waste groups. Ongoing liaison with other authorities in the UK which import waste to Kirklees and Kirklees exports waste to. Allocation of land for strategic waste management purposes to deal with district's municipal, hazardous</p>	Waste Management

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					<p>that a contingency strategy would be needed. Seek agreement of recipients of waste that they are planning to support such an approach locally.</p>		<p>and other waste streams as high up the waste hierarchy as possible. Policy for positively planning for new facilities - in particular this approach may be needed to bring forward facilities for any outstanding commercial and industrial waste which cannot be accommodated on allocated land.</p>	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
12	Green Belt	Long term strategic function of Green belt	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	SHLAA SELAA Emerging consideration of relevant alternative site options. Emerging strategic and local level green belt review.	Ensure strategic function of green belt is maintained where revisions are made. Local Plan seeks to establish green belt boundary for full plan period but given constraints of land supply and allocate safeguarded land. Robust assessment of green belt boundary in light of exceptional circumstances, green belt role and function, material change in nature of green belt since boundary originally	AMR Local Plan allocations.	Ongoing liaison with other LPAs on emerging plans and implications for scale and extent of green belt in City Region. Potential urban extensions and strategic employment locations could reduce the strategic green belt gaps between Calderdale, Bradford, Leeds and Wakefield. Need to consider detailed implications via site specific proposals and allocations. Longer term Green Belt issues across the City Region need to be addressed as necessary via the next generation of development plans.	Deliver homes Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					<p>established.</p> <p>Criteria to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional circumstances.</p> <p>Sequential approach to site selection based on use of land in urban areas first, where possible, appropriate, sustainable and deliverable, however early recognition needed that Kirklees' employment land supply evidence</p>			

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
					suggests need for strategic new employment land locations.			
13	Retail and Town Centres	Unlikely to be any significant, cross boundary implications.	Calderdale, Bradford, Leeds and Wakefield	Retail Capacity Study Other Council's retail capacity evidence	None needed.	AMR Local Plan policy/framework for Huddersfield and Dewsbury town centres.	None needed.	The provision of retail, leisure and other commercial development

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
14	Impact on the historic environment	Potential adverse impact on nationally or internationally important historical assets, including potential impacts on Grade 1 and 2* listed buildings, Scheduled Monuments, Historic battlefields and registered parks/landscapes	Calderdale, Wakefield and Historic England	Heritage assessments and historic landscape evidence	<p>Need for sensitive choice of sites and broad locations for development in order to reduce potential for impacts.</p> <p>Potential buffer policy around key heritage and historic landscapes set out in Local Plan and methodology.</p>	None at this stage	<p>Heritage Impact Assessments commissioned for all allocation sites which potentially significantly affect the setting of heritage assets. Mitigation measures to be written into the plan prior to submission. Castle Hill Setting Study completed in partnership with Historic England. No allocations have been made contrary to the evidence.</p> <p>Adwalton Battlefield issues have led to the rejection of significant growth options in the Kirklees part of the site. Kirklees will need to continue to involve Leeds and Bradford councils and Historic</p>	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							England and potentially seek a statement of common ground with all three duty to co-operate bodies to ensure a consistent approach is being taken.	
15	Managing Air Quality and Noise	Exceedance of EU limits. May lead to constraints on growth due to insufficient infrastructure or barriers within planning process post plan publication.	Leeds, Selby, Doncaster, Barnsley, Kirklees, Wakefield, North Yorkshire	Areas adjacent to local and Strategic Road Network already approaching or exceeding European noise and air quality limits.	Plan to mitigate impact of growth or supporting infrastructure such as road improvements may not be deliverable due to environmental impacts.	None at this stage	Develop of appropriate mitigation measures through agreed West Yorkshire Air Quality technical guidance. Air Quality Modelling evidence prepared for Kirklees Local Plan to identify cumulative impact of planned growth on air quality.	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
16	Health Infrastructure	Potential for significant housing and economic growth to increase	Leeds, Bradford, Calderdale, Wakefield, Barnsley, NHS England, Public	Health and Well Being Strategies, JSNA's	Alignment of strategic health infrastructure with planned growth in Local Plan.	None at this stage	Close liaison with CCGs and NHS has led to agreement on scale and distribution of growth in the Local Plan and that	Provision of health infrastructure and other local facilities

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
		pressure on health infrastructure used by more than one authority area	Health England, Clinical Commissioning Groups operating over LA borders				mitigation measures for future actions to plan for health infrastructure will be addressed by the CCGs and planned for accordingly. Modelling impacts of potential housing and mixed use allocations on health infrastructure.	
17	Strategic Site Allocations	Individual large scale sites/proposals which in themselves have a direct, strategic/cross boundary impact	LCR Authorities - Leeds, Bradford, Calderdale, Wakefield, Barnsley Non LCR Authorities - Peak District National Park, Oldham, High Peak	Individual site allocations evidence base Assessment of cumulative impacts of the Local Plan allocations	See above, depending on land uses.	AMR Local Plan allocations.	Individual discussions with affected local authorities. Chidswell – sharing of evidence regarding green belt role and function, transport and education with Leeds and Wakefield councils. Likely to lead to statements of common ground/memorandums of understanding. Cooper Bridge –	Deliver homes Jobs and infrastructure needed

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							<p>sharing of evidence regarding green belt role and function, transport and heritage impact with Calderdale council and Historic England. Likely to lead to statements of common ground/memorandums of understanding.</p> <p>Bradley - sharing of evidence regarding green belt role and function, transport and education with Calderdale council. Likely to lead to statements of common ground/memorandums of understanding.</p> <p>Support from adjoining authorities to reject strategic sized proposals which would undermine the soundness of the</p>	

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
							Kirklees Local Plan or any adjoining local authority plan, which have the potential for strategic cross boundary implications which cannot reasonably be resolved.	

Appendix D

Strategic Economic Plan (SEP) and Emerging West Yorkshire Transport Strategy Self-Assessment Template

Self-Assessment – Local Plan Alignment with the Strategic Economic Plan and other relevant strategic documents

1. The SEP Vision:

- To be a globally recognised economy where good growth deliver high levels of prosperity, jobs and quality of life for everyone.

2. The strategy is based on four interconnected priorities and a central principle of ‘good growth’. The 4 SEP strategic priorities are (see P58-59 of the SEP):

- Growing Business
- Skilled People Better Jobs
- Clean Energy and Environmental Resilience
- Infrastructure for Growth

SEP ALIGNMENT (ALL LEEDS CITY REGION AUTHORITIES)

Strategic Priority	SEP Headline Initiatives	SEP reference	Plan alignment with SEP	Local Plan reference	Comments / Further information
1. Growing Business	Implement coordinated and wide ranging action to radically increase innovation	Chapter 3 Vision, Headline Initiatives (P58-60) Priority 1 (P61-66)	The Local Plan sets out the vision for Kirklees until 2031 in a sustainable way balancing economic, social and environment priorities. This demonstrates key linkages with the SEP headline initiatives, the detail is set out in the place shaping and delivering growth and sustainable	4.2 Vision Chapter 5 Place Shaping Chapter 6 delivering growth and sustainable development	The Local Plan builds on the Kirklees Economic Strategy and the Joint Health and Well-being Strategy, which in turn builds on work undertaken
	Become a global digital centre – with specialisms in data storage, analytics, digital health and tech skills				
	Boost business growth, productivity, exports and				

	<p>investment by linking businesses to support and funding, including through the LEP Growth Service, Skills Service and Trade and Investment Programme</p>		<p>development chapters. The plan includes the following Leeds City Region spatial priority areas: Chidswell, Moor Park Mirfield, Cooper Bridge, and Lindley Moor.</p> <p>It allocates land for 31,140 new homes, allocates 165 ha of land for employment purposes which will help deliver 23,000 jobs, and protects mineral resources within the district. The allocated sites are in prime locations that provide large areas of undeveloped land that are well placed to take advantage of established business corridors with good access to the workforce and motorway junctions.</p> <p>The Plan also protects existing social, economic and environmental assets such as open space, areas of high ecological value, defines and protects the districts town centres, as well as protecting many other areas. The policies within the plan set out a presumption in favour of sustainable development that seeks to accelerate economic</p>	<p>PLP 1 PLP 2 PLP 3 PLP 4 PLP 8 PLP 9 PLP 10 PLP 13 PLP 24</p>	<p>at the Leeds City Region level.</p> <p>A Local Plan Employment Technical Paper will provide further detailed information.</p>
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			growth and attract inward investment.		
2. Skilled people, better jobs	Deliver a ' more jobs, better jobs' programme to widen employment, skills, apprenticeships and progression opportunities, linked to NEET-free goals	Chapter 3 Vision, Headline Initiatives (P58-60) Priority 2 (67-70)	The Local Plan seeks to deliver 23,000 jobs over the plan period including the provision of the allocation of 165 ha of employment land and the identification of Priority Employment Areas. Policies ensure a town centre first approach is taken to main town centre uses.	4.2 Vision Chapter 7 Economy PLP 2 PLP 3 PLP 8 PLP 9 PLP 10 PLP 13 PLP49	The Local Plan builds on the Kirklees Economic Strategy and the Joint Health and Well-being Strategy, which in turn builds on work undertaken at the Leeds City Region level. A Local Plan Employment Technical Paper will provide further detailed information
	Devise and deliver a programme of action to increase high level skills and close the gap to UK average		The Local Plan encourages the development of new jobs, supporting the skilled and flexible communities and workforce through policy PLP9. Recognising and utilising the educational facilities across the district, most notably provided by Kirklees College and the University of Huddersfield		
3. Clean energy and environmental resilience	Targeted investments and innovation to make the city region a leading edge centre for zero carbon energy	Chapter 3 Vision, Headline Initiatives (P58-60) Priority 3 (P71-74)	The Local Plan supports delivery of low carbon decentralised energy, and energy efficiency by supporting the delivery of renewable and low carbon energy, by the masterplanning of new	PLP 5 PLP 24 PLP 26 PLP 47	

			development sites, and by the consideration of low carbon technologies in the design of new developments. It also includes a policy for when freestanding renewable and low carbon proposals come forward.		
	Make climate change adaptation and high quality Green Infrastructure integral to improving the City Region economy and its Spatial Priority Areas		The Local Plan supports delivery of low carbon decentralised energy, and energy efficiency by supporting the delivery of renewable and low carbon energy, by the masterplanning of new development sites, and by the consideration of low carbon technologies in the design of new developments.	PLP 5 PLP24 PLP 26 PLP 47	A Local Plan Renewable and Low Carbon Technical Paper provides further detailed information.
4. Infrastructure for growth	Deliver 30+ West Yorkshire Plus Transport Fund schemes and make progress towards a single 'metro style' public transport network , connected to major national/northern schemes such as HS2 and Northern Powerhouse Rail	Chapter 3 Vision, Headline Initiatives (P58-60) Priority 4 (P75-85)	The Local Plan sets out policies which support the delivery of new infrastructure and the masterplanning of sites to ensure that new infrastructure is provided across the district. The Local Plan sets out policies to deliver strategic transport infrastructure, including sustainable travel and a core walking and cycling routes.	PLP 4 PLP 5 PLP 11 PLP 19 PLP 20 PLP 21 PLP 23 PLP 27 PLP 28 PLP 29 PLP 30	A Local Plan Infrastructure Technical Paper and Housing Technical Paper provide further detailed information alongside the Infrastructure Delivery Plan.
	Develop and regenerate, supporting employment, quality environments and the building of 10,000-13,000 new homes per year		The council is also preparing the Community Infrastructure Levy	PLP 31 PLP 32	A Local Plan Infrastructure

	<p>Develop and integrated Flood Risk Reduction Programme incorporating flood defences, green infrastructure and resilient development</p>		<p>Draft Charging Schedule and the IDP.</p> <p>The Local Plan allocates land for 31,140 new homes over the plan period which will significantly increase the level of land available for homes across the district, and aid in accelerating housing growth across the district. The Local Plan sets out a policies which seeks to deliver 20% of affordable homes on new developments, and also includes a number of Council owned sites where there is potential for an increased affordable housing provision. Alongside supporting existing businesses and new employment opportunities through designating priority employment areas and the allocation of land to support the creation of 23,000 new jobs.</p> <p>The local plan is supported by an SFRA and will be supported by a flood risk sequential test, and where appropriate an exception test. No new housing is proposed in flood zone 3. The local plan</p>	<p>PLP 61 PLP 62 PLP 63</p>	<p>Technical Paper and Housing Technical Paper provide further detailed information alongside the Infrastructure Delivery Plan A Local Plan Infrastructure Technical Paper and Housing Technical Paper provide further detailed information alongside the Infrastructure Delivery Plan</p>
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			<p>includes a climate change chapter (chapter 12), which includes a policy on flood risk (PLP27) which aims to direct development to direct development to areas at the lowest probability of flooding, the drainage policy (PLP28) has a presumption that SuDS will be used to minimise surface water run-off.</p> <p>The local plan also includes policies in relation to the strategic GI network(PLP31) landscape (PLP32) and biodiversity and geodiversity (PLP30), and policies to protect open spaces in the urban area – urban greenspace (PLP61), local greenspace (PLP62) and the provision of new open space (PLP63).</p>		
Spatial Priority Areas	Urban Growth Centres	Priority 4 Infrastructure for Growth (P75-81)	<p>Huddersfield</p> <p>The local plan prioritises Huddersfield as a location for significant growth (approx. 7,000 dwellings) in its Spatial</p>	Publication Draft Strategies and Policies - 6.1 Spatial Development Strategy	

			Development Strategy	Publication Draft Allocations and Designations – Huddersfield site allocations	
	Housing Growth Area		<p>North Kirklees Growth Zone</p> <p>The local plan prioritises Dewsbury as a location for significant growth (approximately 5,000 dwellings) in its Spatial Development Strategy</p>	<p>Publication Draft Strategies and Policies - 6.1 Spatial Development Strategy</p> <p>Publication Draft Allocations and Designations – North Kirklees site allocations</p>	
	Employment Growth Area (incl. mixed use employment sites and EZs)		<p>SEP1:</p> <p>Cooper Bridge</p> <p>The local plan allocates Cooper Bridge as a 33ha employment allocation</p> <p>Chidswell</p> <p>The local plan allocates Chidswell as a mixed use allocation, including</p>	<p>Publication Draft Strategies and Policies - 6.1 Spatial Development Strategy</p> <p>Publication Draft Allocations and Designations – Site allocations – Cooper Bridge</p>	

			<p>35ha of employment land</p> <p>SEP2:</p> <p>Lindley Moor East, Lindley Moor West and Moor Park Mirfield (Kirklees)</p> <p>The local plan allocates mixed use allocations with a proportion of employment land assumed at Lindley Moor (8ha) and Slipper Lane, Mirfield (6ha)</p>	<p>(Local Plan ref: E1932c)</p> <p>Chidswell (Local Plan ref: MX1905)</p> <p>Lindley Moor (Local Plan ref: MX1911)</p> <p>Slipper Lane, Mirfield (Local Plan ref: MX1929)</p>	
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WEST YORKSHIRE TRANSPORT STRATEGY ALIGNMENT (WY AUTHORITIES ONLY)

NB: This section should be considered in conjunction with the Combined Authority’s consultation draft West Yorkshire Transport Strategy available at: <http://www.westyorks-ca.gov.uk/transport-strategy/>. The final West Yorkshire Transport Strategy is expected to be adopted in early 2017. This Self-Assessment Template will be updated at that point.

LTP3 Core Themes	LTP 3 Ambition	LTP reference	Plan alignment with LTP	Local Plan reference	Comments / Further information
Transport Assets	To ensure effective management of transport assets to gain maximum value for money and meet the Plan’s objectives.	Chapter 4 Transport Assets (P48 - 52) Proposal 1 - 5	<p>The Publication Draft Local Plan includes policies which seek to reduce the need to travel where possible, and provide appropriate infrastructure to support the scale of development proposed. By way of an example strategic housing allocation at South Dewsbury (Ref H2089) will support improvements to the train station and other train station improvements are also identified throughout the District.</p> <p>The creation of an integrated cycle and walking network has been created with the requirement to link development sites, existing routes that require ongoing maintenance, proposed routes which link in with the needs local cycle user groups and indicative routes where further work is needed to establish a defined route.</p>	<p>4.2 Vision 4.5 Strategic Objectives 6.1 Spatial development strategy</p> <p>PLP 3 PLP 19 PLP 20 PLP 21 PLP 22 PLP 23 TS9 TS10</p>	A local plan Transport Technical Paper provides further detailed information, alongside the Infrastructure Delivery Plan and the supporting documents under the transport and infrastructure heading.
Travel Choices	To encourage more sustainable travel choices by managing demand for car travel and enabling people	Chapter 4 Travel Choices (P53 - 60) Proposal 6 - 12	The Publication draft Local Plan includes substantial growth in urban areas across the district. Policies on design and master-planning will ensure that sustainable public transport solutions are fully considered as part of new	<p>4.2 Vision 4.5 Strategic Objectives 6.1 Spatial development</p>	A local plan Transport Technical Paper provides further detailed

	to make informed choices that meet their needs.		developments and facilities are co-ordinated with the bus/rail provision provided across the district.	strategy PLP 3 PLP 4 PLP20 PLP 23 TS5 TS7 TS9 TS10	information, alongside the Infrastructure Delivery Plan and the supporting documents under the transport and infrastructure heading.
Connectivity	To deliver an integrated, reliable transport system that enables people and goods to move around as efficiently and safely.	Chapter 4 Connectivity (P61 - 70) Proposal 13 - 22	The Publication Draft Local Plan sets out policies to deliver strategic transport infrastructure, for all modes, including sustainable travel, core road and bus routes and a core walking and cycling route.	4.2 Vision 4.5 Strategic Objectives 6.1 Spatial development strategy PLP 3 PLP 4 PLP 19 PLP 20 PLP 21 PLP 22 PLP 23 TS5 TS6 TS7 TS8 TS9 TS10	A local plan Transport Technical Paper provides further detailed information, alongside the Infrastructure Delivery Plan and the supporting documents under the transport and infrastructure heading.

Enhancements	To make targeted technological and structural enhancements to the transport system for greater capacity and performance.	Chapter 4 Enhancements (P70 - 75) Proposal 23 - 26	The Publication Draft Local Plan includes design policies to ensure that future developments exploit new technologies such as electric cars ensuring charging points are provided on new developments and also include cycle storage facilities	4.2 Vision 4.5 Strategic Objectives 6.1 Spatial development strategy PLP 3 PLP 19 PLP 20 PLP 21 PLP 23	A local plan Transport Technical Paper provides further detailed information, alongside the Infrastructure Delivery Plan and the supporting documents under the transport and infrastructure heading.
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