



Kirklees Publication Draft Local Plan

Technical Paper: Retailing and town centres

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1. INTRODUCTION

- 1.1 The following is a technical paper prepared in support of the Kirklees Publication Draft Local Plan. It summaries the national and local planning context for retail and main town centre uses, and provides a summary of the evidence used to formulate the policies and designations within the Local Plan.
- 1.2 Within Kirklees 82 different centres of varying scale have been identified as part of the Local Plan from Principal Town Centres which support the wider shopping functions of the district, to Local Centres which support a local need for top up shopping and local services.
- 1.3 Town centres sit at the heart of local communities in Kirklees, and provide a range of services to serve local people, visitors, businesses and organisations. They provide places to shop, do business, work, enjoy leisure time and live. Successful town centres assist in supporting growth and investment within the district, meeting retail, employment, service and leisure needs.
- 1.4 This paper explains the evidence and processes used to formulate the following elements of the Retailing and Town Centres chapter:
 - Hierarchy of centres
 - Town Centre Boundaries, Areas and Frontages
 - Principal Town, Town and District Centre Boundaries
 - Local Centre Annotations
 - Primary Shopping Areas
 - Shopping Frontages Primary and Secondary
 - New Centres
 - Sequential approach
 - Thresholds
 - Non-urban areas and the threshold of 150 sq m
 - Impact Assessments
 - Residential Use in Town Centres
 - Food and Drink and Evening Economy
 - Huddersfield Town Centre
 - Dewsbury Town Centre

2. NATIONAL PLANNING CONTEXT

National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF) forms the national planning policy for England, and sets out a presumption in favour of sustainable development. It details that there are three dimensions to sustainable development, economic, social and environmental. Retailing and town centres, play a key role in achieving all three of these key dimensions as town centres form places for people to shop, live, work and visit, providing important cultural destinations, and also places where business can prosper and be successful.
- 2.2 The NPPF includes a specific chapter on 'town centres' entitled '*Ensuring the vitality of town centres.*' This chapter details the requirements for town centre development in Local Plans. National Planning Policy Guidance (NPPG) provides further guidance on town centres.
- 2.3 National planning policy states that Local Planning Authorities should plan positively for town centres and take a town centre first approach for main town centre uses.
- 2.4 Paragraph 23 of the NPPF is key policy guidance and states:

23. Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, Local Planning authorities should:

- *recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;*
- *define a network and hierarchy of centres that is resilient to anticipated future economic changes;*
- *define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;*
- *promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;*
- *retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;*
- *allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local Planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;*
- *allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for*

meeting the identified needs in other accessible locations that are well connected to the town centre;

- *set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;*
- *recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and*
- *where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.*

2.5 For the purposes of the Kirklees Publication Draft Local Plan, the definition of a town centre is taken from Annex 2 of the NPPF which states a town centre is an:

Area defined on the local authority's proposal map, including the primary shopping area and areas predominately occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out of centre developments, comprising or including main town centre uses, do not constitute town centres.

2.6 Main town centre uses are also defined in the Annex 2 of the NPPF which states:

Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

2.7 Annex 2 of the NPPF provides further definitions which are relevant for town centres and retail development, such definitions are provided for primary shopping areas, primary and secondary shopping frontages, edge of centre and out of town centre. The NPPF requires a town centre first approach for new town centre uses, and provides guidance on when sequential test and impact assessments are required.

National Planning Policy Guidance (NPPG)

2.8 National Planning Policy Guidance (NPPG) provides detailed guidance which sits alongside the policies of the NPPF guiding practical interpretation. It also provides additional detail on the assessment of the health of town centres and how the sequential test and impact assessments should be implemented.

Other National Planning Context

- 2.9 Outside of the policies and guidance in the NPPF and NPPG much work has been done by the Government to consider issues related to town centres, and town centre uses. The Portas Review was completed in 2011 and assessed the ‘future of our high streets’ making a number of recommendations. These recommendations along with other relaxations in the planning system have led the Government to make a number of changes to Permitted Development Rights to encourage flexible changes of uses within town centres. This included encouraging additional residential units within other main town centre uses by the change of use of offices to residential. The Government has also published ‘The Future of High Streets’ which has built on work from the Portas review detailing the steps taken to address issues raised. The Government have undertaken research into the Policy Implications of Recent Trends in the High-street/Retail Sector Research by the Department for Business Innovation & Skills.
- 2.10 It is also acknowledged that many other studies on the future of high streets have been undertaken by a wide variety of bodies that include the British Retail Consortium, Economic and Social Research Council, Association of Town Centre Management and Manchester Metropolitan University.

Superseded Policy

- 2.11 Superseded policy guidance in the form of Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4), and its associated practice guidance ‘Planning for Town Centres’, have also been considered. Whilst it is acknowledged that these two pieces of policy guidance have now been superseded by the NPPF and NPPG, they still provide useful guidance on elements of town centre and retail policy development where the NPPF and NPPG are silent. Such elements include the determination of definitions such as town centre boundaries and different scales of centres, as set out in the hierarchy of centres.

3 LOCAL CONTEXT

- 3.1 At a local level, a broad depth of evidence has been gathered to formulate the town centre policies and designations. Town centres, and town centre uses play an important role in the delivery of the Kirklees Economic Strategy, and the Kirklees Joint Health and Wellbeing Strategy.
- 3.2 At a local level the Town Centre Audit Programme (TCAP) ensures that there is detailed monitoring of town centres within the district and information is held on occupancy rates, the number and size of units, and uses. A summary of this information is published each year in the Annual Monitoring Report.
- 3.3 A retail capacity and leisure study has been carried out by consultants White Young Green (WYG) on behalf of the council to provide specific details on retail and leisure needs across the district. An up to date assessment of retail needs and capacity in the Kirklees Local Plan period to 2031 has been produced by WYG in a Retail Capacity Study Update 2016. In addition, WYG have visited all town and district centres within Kirklees, and have provided evidence regarding the definition of town centre boundaries, primary shopping areas, and primary and secondary shopping frontages.
- 3.4 Information on office need has also been assessed in the employment land market demand study undertaken by GVA. Further detail on this is provided in the Employment Technical Paper.
- 3.5 The above information and that set out below is available to view online at the Publication Draft Local Plan webpages.

Town Centre Audit Programme

- 3.6 The Town Centre Audit Programme (TCAP) forms the Council's own annual or bi-annual assessment of principal town, town, district and local centres within Kirklees. It monitors shop unit occupancy rates, usage and gross retail floorspace. Pedestrian footfall is monitored in principal town centres each year and town centres bi-annually providing a "snapshot" of the volume and pattern of movement of shoppers and visitors. Annual and bi-annual monitoring of footfall allows trends to be assessed. In 2014, the programme was revised to use GOAD categories for monitoring uses within centres, rather than the council's own categories previously used. The TCAP has also started to record an estimated calculation of gross ground floor floorspace for all units recorded and average unit size based on data held. It is the intention that this information will form the basis of monitoring for the local plan. The programme has carried out assessments within study boundaries of existing centres, which have long been established to capture retail, leisure and financial and business service uses both within existing centres, but also those on the edge of centres.
- 3.7 The programme has been supplemented by further work carried out by White Young Green (WYG) in 2014 as part of their work for the retail capacity study. WYG

assessed all town and district centres within Kirklees carrying out visits to principal town, town and district centres. They independently categorised each of the units within the established study boundaries into GOAD categories as well as proposing centre boundaries for primary shopping areas, and primary and secondary shopping frontages as detailed below in section 4.2. The study boundaries and proposed WYG centre boundaries can be seen in Appendix B. A separate document of maps in Local Plan supporting documents methodology and technical papers available to view on the council's website.

- 3.8 It is acknowledged that the TCAP is an annual monitoring programme, therefore figures can vary year on year, and the data represents a snapshot in time. However, it provides an opportunity to undertake trend analysis to monitor the health and vitality of town centres. The last complete set of data which the council holds dates from 2014, and a summary of this data is provided in Appendix A. The data demonstrates that within the proposed local plan boundaries of the 21 principal town, town and district centres within Kirklees there is in the order of 300,000 square metres of main town centre uses floorspace provided for uses generally falling within the A use classes. It is acknowledged that floorspace totals and vacancy rates shown in the TCAP differ from those in the health check assessment of Retail Capacity Study carried out by WYG, this is in part due to updated information from 2014 occupancy monitoring and different boundary definitions.
- 3.9 The annual monitoring report currently reports the TCAP data using study boundaries. It is acknowledged that the TCAP reporting will need to be revised to ensure that the monitoring of town centres across the district reflects the boundaries which will be finalised in the Local Plan.

Retail Capacity Study

- 3.10 As part of the Publication Draft Local Plan evidence base a Retail Capacity Study was undertaken by consultants White Young Green (WYG) on behalf of the council, and published in 2014. The Study provided an assessment of retail needs across Kirklees and conducted extensive market research and analysis carrying out household surveys within a defined study area. The study area is broadly reflective of the Kirklees Local Authority boundary but extends beyond it to the north, west and east.
- 3.11 The Study conducted a health check of the six town centres within the district as well as an in depth assessment of current and future spending needs, the current shopping patterns and market share of centres, the comparison of current and forecast turnover with existing floorspace and the identification of future capacity and need for new retail floorspace.
- 3.12 The Study details that Kirklees retains a high market share of both main (66.6%) and top up convenience (70.2%) shopping within the district, with the highest spend retention in the central parts of the district. Kirklees is surrounded by a number of large town and city centres which include Halifax, Bradford, Leeds, Wakefield and Barnsley, with the centres of Sheffield and Manchester located further afield.

Therefore there is a strong draw to these centres for communities on the edge of the district, and for spending on higher value items in the comparison goods sector.

- 3.13 In May 2016, WYG was commissioned to provide an update of the principal findings of the 2014 study. The update includes a section on current and emerging retail trends which highlights inter alia that the growth in online sales is having an impact upon traditional high streets and the need for new tangible retail floorspace. However, increased expenditure growth with multi channelling retail strategies provides an opportunity for town centres to widen their audience in the future and retain ground.
- 3.14 The study update estimates that at 2016 the resident population of the study area generates approx. £1.15 billion pounds in convenience goods expenditure for the district, which is expected to rise to £1.23 billion by 2031 or an increase of 7.1%. In the comparison goods sector, it is estimated that the study area currently generates £1.60 billion in expenditure, and this is estimated to rise by 71% to £2.75 billion by 2031.
- 3.15 The study update identifies that at 2016 there is a quantitative need for convenience goods floorspace in Kirklees of between 4,400 square metres and 6,800 square metres. This need is estimated to rise to between 5,700 square metres to 8,900 square metres by 2021, and between 7,300 and 11,400 square metres in 2026, and between 8,900 square meters and 13,800 square metres in 2031.
- 3.16 In terms of the comparison goods sector, the household survey identifies that Kirklees claims 60.9% market share of comparison goods expenditure and at 2016 it is estimated that £1.12 billion is claimed by comparison goods floorspace. The methodology is based on the assumption that existing facilities are trading in line with expectation at 2016 and therefore trading 'at equilibrium'. It is considered that there would be a surplus of expenditure of £ 89.58 million by 2021, a sharp increase to £ 232.29 million by 2026 and then to £414.66 million by 2031. After taking account of existing commitments, this equates to a quantitative need for comparison goods net floorspace of between 4,500 square metres and 9,100 square metres at 2021 increasing to between 42,500 square metres and 85,000 square metres at 2031.
- 3.17 The study update also sets out identified quantitative capacity for additional convenience and comparison goods floorspace within each of the study zones shown in appendix 1 of the report. Where there is a quantitative need identified within a zone a portion of that need could be provided within adjacent zones particularly in respect of convenience goods floorspace.
- 3.18 It should be noted that the retail need set out above represents a snapshot in time based on existing commitments identified at the time of the study. It is acknowledged that some of the commitments listed in the study may not come forward in part due to the continued changes in shopping habits. In addition, there are inherent uncertainties in predicting the economy's performance over time and

estimates beyond ten years should be viewed with some caution, a reassessment should be undertaken in the next five years.

- 3.19 Therefore it is acknowledged that needs identified above may change over the plan period depending on the requirements of the market, and it is important that policies in the publication draft Local Plan are sufficiently flexible. Given this requirement to be sufficiently flexible and the evidence on need, it has not been considered appropriate to allocate land for retail development through the local plan but instead provide a strong town centre first approach through policy.

Leisure and Recreational Uses

- 3.20 Leisure and recreational uses represent important town centre uses. Such uses are more intensive in nature to other recreational uses, and can include leisure centres, health and fitness clubs, theatres, music venues, bingo halls, cinemas, ten pin bowling lanes etc. Kirklees Leisure Study (2014) has assessed the leisure needs for the district, and has concluded that there is no significant leisure and recreation deficiency within the district.
- 3.21 The highest market share of leisure uses secured from within the district represents indoor sports and health fitness facilities which secure 76% of the Kirklees market, with cinemas next at 73.1%, followed by bingo halls at 62.4% bars, pubs and nightclubs at 58.6%, restaurants at 56%, ten pin bowling at 47.8% and finally arts and cultural facilities such as theatres, galleries and museums at 19.4%.
- 3.22 The Leisure Study has considered existing provision against national averages which highlights that over the plan period there is potential for some expansion in the health and fitness sector, a potential opportunity for a new cinema, and potential opportunities for improvements in the ten pin bowling sector. The number of bingo halls is also less than the national average. The Leisure Study considers that the market would be able to address opportunities for shortfalls in provision, and it is not considered necessary to allocate land for any further provision. Therefore the publication draft local plan provides a strong town centre first approach for leisure and recreational uses through policy.

Kirklees Market Strength Assessment, Bilfinger GVA, September 2015 (Office Accommodation)

- 3.23 Office accommodation represents an important town centre use, and demand for office accommodation across the district has been considered as part of the employment Market Strength Assessment. The assessment states that Kirklees has a diverse office sector with a range of office formats available to suit market need.
- 3.24 Huddersfield is considered to be the principal location within the district to provide office accommodation with facilities available in Huddersfield Town Centre, with out of town provision at Pennine Business Park. Other facilities are also available in

different localities in the district such as Batley, Cleckheaton, Dewsbury, with smaller scale provision across other parts.

- 3.25 In terms of availability it has been identified that as of 16th April 2015 there were 17 B1 office properties available to buy and 93 properties available to let in Kirklees with a combined floorspace in the order of 80,000 sq.m, with average rent achieved of £100 per sq.m (£9.50 per sq.ft).
- 3.26 In light of the available level of office space within Kirklees it is not deemed appropriate to allocate land within the town centres for office use. Therefore the Publication Draft Local Plan provides a strong town centre first approach through policy. It is noted that for Huddersfield an extant permission exists for new office accommodation at St George's Warehouse New North Parade, and there is an extant outline permission which includes office space for the Waterfront development between Manchester Road and the River Colne.

Kirklees Economic Strategy

- 3.27 The Kirklees Economic Strategy sets out a vision for Kirklees to be recognised as the best place to do business in the north of England, and be where people prosper and flourish in all of our communities. To achieve this vision five priorities have been set out, of which town centres and town centre developments play an important part in delivering four of the five priorities, these are set out below.

- **Innovation and enterprising businesses:** championing creativity, entrepreneurship and resilience
- **Workforce, skills and employment:** extending opportunities and powering business success
- **Infrastructure:** making it easier for businesses to succeed and for people to access work
- **Quality places:** locations of choice for people, business and investment

- 3.28 Town centres play an important role in delivering these priorities as they provide a mix of uses, and spaces for people to live, work, visit and do business. The strategy recognises the importance of Dewsbury and its town centre and calls for transformational change for Dewsbury building on its strategic location within close proximity to Leeds. The strategy seeks to revitalise Huddersfield town centre through an enhanced independent retail, cultural and leisure offer, with mixed use developments and next generation digital connectivity. These aspirations are also reflected in the Leeds City Region Strategic Economic Plan.

- 3.29 The strategy highlights opportunities which exist within town centres across the district to improve opportunities for employment and businesses to grow. The strategy seeks to build on other key assets of the district such as its strategic location between Manchester, Leeds and Sheffield and attractive town centres. The strategy highlights the potential town centres have in providing space for a range of uses including residential, leisure, shopping, and office space.

Kirklees Joint Health and Wellbeing Strategy

- 3.30 The Kirklees Joint Health and Wellbeing Strategy sets an overall vision that, *No matter where they live, people in Kirklees live their lives confidently, in better health, for longer and experience less inequality.*
- 3.31 Town centres play an important role in delivering this overall vision as they are places where people live, work, visit, and do business. They provide a range of uses which can influence people's lifestyles, which can in turn directly impact on their health. Having successful town centres is important to deliver the health and wellbeing strategy.

Other Work

- 3.32 A variety of other work has been carried out across the district over recent years in relation to town centre uses, and town centre development. As this work continues, the local plan will help facilitate a joint approach to achieving the aspirations for the district.
- 3.33 Within Dewsbury, the Strategic Framework Document was developed a number of years ago and provided a great range of ideas which could be used to transform the town centre. This was refreshed in 2015. This document along with the Dewsbury Design Guide and the Dewsbury Townscape Heritage Initiative, have started to deliver some improvements to the town centre. Work remains ongoing to implement principles highlighted in the Strategic Framework.
- 3.34 Within Huddersfield, the 'Huddersfield Partnership' is a not for profit organisation that works to facilitate the development of Huddersfield as a town, by working with Kirklees Council, local businesses and communities to ensure that together Huddersfield can be a great and safe place to live, work and do business. Work with the partnership, town centre manager and other stakeholders continues, and the policies in the local plan will build on this existing work.

4. DESIGNATIONS

4.1. Hierarchy of Centres

4.1.1 The shopping centre hierarchy which is set out in the Town Centre Uses Policy has been formulated to meet the requirements of paragraph 23 of the NPPF which requires local planning authorities to “define a network and hierarchy of centres that is resilient to anticipated future economic changes”.

4.1.2 Within Kirklees 82 different centres have been formally identified which are of varying different scales. The centres have been divided into the following categories:

Centre Level	Number in the District
Principal Town Centre	2
Town Centre	4
District Centre	15
Local Centre	61

4.1.3 As set out previously, town centres are defined in Annex 2 of the NPPF, however no definition is provided in the NPPF or NPPG to differentiate between centres of different size. Whilst some guidance is provided in relation to the definitions for primary shopping areas, primary and secondary shopping frontages, there is no further commentary on defining the hierarchy. In light of this, it is therefore considered appropriate to use wider evidence and guidance to inform the definitions of centres within the hierarchy.

4.1.4 Previously used planning guidance in the form of Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) Annex B, provided definitions of what forms a town, district and local centre, and these are considered to be useful definitions. These are set out below:

- **Town centre** - Town Centres will usually be the second level of centres after city centres and, in many cases, they will be the principal centre or centres in a local authority’s area. In rural areas they are likely to be market towns and other centres of similar size and role which function as important service centres, providing a range of facilities and services for extensive rural catchment areas. In planning the future of town centres, Local Planning authorities should consider the function of different parts of the centre and how these contribute to its overall vitality and viability.
- **District centre** - District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.

- **Local centre** - Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre.

4.1.5 The three different sizes of centres set out above are broadly considered appropriate for Kirklees given the types of centres which exist in the district. It is however considered appropriate to differentiate between the two largest town centres of Dewsbury and Huddersfield and the town centres of Batley, Cleckheaton, Heckmondwike and Holmfirth. Dewsbury and Huddersfield are materially larger in terms of floorspace and units than other defined town centres, and perform important wider town centre functions for both the northern and southern part of the district, both in terms of administrative, retail, leisure and office functions.

4.1.6 Centres across the district have been categorised by the different levels in the hierarchy considering a wide range of factors, to ensure that they are proportionate to the function in which they perform. The following factors have been considered:

- The written definitions in the Delivery of Services table within the Town Centre Uses Policy.
- The mix of uses provided in the centre based on GOAD sectors and classifications.
- The number of units and the amount of floorspace in each centre.
- The role and function the centre plays within its locality, including its location within the council's district committee areas.

4.1.7 The above criteria have been considered as a whole, which is particularly important when considering the position of smaller centres in their category. For example, Holmfirth whilst the smallest town centre in terms of floorspace plays an important role and function for the Holme Valley, and the surrounding area. The town provides a wide range of uses both within the defined town centre boundary and on the edge of the town centre both in terms of retail, but also leisure, administration and services.

At district centre level, it is acknowledged that some centres such as Denby Dale and Kirkburton have significantly lower levels of floorspace than many other district centres such as Mirfield and Ravensthorpe. These smaller centres may also have less floorspace than some local centres in the urban area such as Aspley in Huddersfield. However these smaller centres play a significantly more important role when considered within their district committee area context. The surrounding population of these smaller district centres have more limited access to higher order centres and their associated level of service provision; as such these smaller centres provide the key services in their location.

4.1.8 Denby Dale and Kirkburton are located in 'Kirklees Rural,' where settlements are generally well separated by open countryside, and where local topography helps to define settlement patterns, and increases distances between centres. It is therefore important to recognise that smaller centres in these areas are recognised as having

higher importance, than some local centres of a similar or large size that are located in the urban area. Local centres within urban areas are often located in closer proximity to other larger centres, and often provide a reduce range of uses, even if the floorspaces are larger.

4.1.9 Lindley has been included as district centre for the first time representing a move from a local centre as previously defined in the Annual Monitoring Report. Lindley was not surveyed by WYG in relation to their work to define boundaries, however the centre has been surveyed as part of the TCAP on a regular basis, and there is a detailed record of the uses provided in the centre. Given this evidence and the criteria set out above, Lindley is considered to play an important role to local residents, and provides a variety of uses which is reflective of other district centres in Kirklees.

4.1.10 Within the Kirklees District there are a number of out of centre retail parks which play an important role in the retail offer. These include Great Northern Street Retail Park, Leeds Road Retail Park and Birstall Shopping Park. They were permitted to predominately sell bulky goods such as furniture, DIY, gardening and electrical goods which generally required larger retail units that were available within town centres. In addition, town centre units often did not enable an easy car collection. However, it is acknowledged that in the last few years some retail units on out of centre retail parks now sell general convenience and comparison goods. Notwithstanding, out of centre retail parks have not been recognised as town centres or included within the shopping centre hierarchy for Kirklees as set out in the Town Centre Uses policy. Out of Town retail parks do not perform the role and function of traditional town centres which provide a comprehensive mix of retail, service and leisure uses. Many of the larger town centres in Kirklees also incorporate traditional buildings and public services such as town halls and libraries. The emphasis of National Planning Policy is to ensure the vitality of town centres recognising town centres as the heart of communities.

4.2 Town Centre Boundaries, Areas and Frontages

- 4.2.1 A number of boundaries have been designated to apply policy that is in the retail and town centres chapter of the Publication Draft Local Plan, and to meet the requirements of paragraph 23 of the NPPF which requires Local Planning authorities to *“define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.”*
- 4.2.2 The following have been defined:
- Principal Town, Town and District Centre Boundaries
 - Local Centre Annotations
 - Primary Shopping Areas
 - Primary Shopping Frontages
 - Secondary Shopping Frontages
- 4.2.3 White Young Green (WYG) were commissioned as part of the evidence base for the draft Local Plan to assess all of the town and district centres within the District carrying out visits to principal town, town and district centres as defined in the hierarchy of centres. As part of this work they recorded the uses within each of these centres within an agreed study boundary. The uses were recorded in GOAD categories, and this information was used to define the different boundaries set out above. This information can be seen in Appendix B, entitled WYG Centre GOAD Maps April/May 2014, a separate document of maps in Local Plan supporting documents methodology and technical papers available to view on the council’s website.
- 4.2.4 To establish the above boundaries evidence provided by WYG has been used in conjunction with information contained in the TCAP, the Councils Land Use Property Gazetteer, planning history and local knowledge of each centre. Policies and guidance in the NPPF and NPPG has provided a framework to define the boundaries, and previously used guidance in Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4), and the Planning for Town Centres Practice Guidance, which whilst now superseded by the NPPF and NPPG has also been used as it is considered that they provide beneficial guidance on these issues.

Town Centre Boundaries

- 4.2.5 To define the town centre boundaries within the district, the definition set out in Annex 2 of the NPPF has been used, which defines a town centre as:
- ‘Area defined on the local authority’s proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.’*

4.2.6 Further guidance on a town centre was provided in PPS4 which stated a town centre is:

Defined centre, including the primary shopping area and areas of predominantly leisure, business and other main town centre uses with or adjacent to the primary shopping area. The extent of the town centre boundary should be defined on the proposals map.

4.2.7 The above definitions clearly state that town centres should include primary shopping areas, and areas for other main town centre uses, such as leisure and office. Paragraph 6.13 of Planning for Town Centres provided further guidance in relation to wider town centre boundaries and in this regard acknowledged that:

It may be appropriate to define other areas within the town centre but outside the Primary Shopping Area where specific uses are encouraged e.g. specialist retail, offices, bars/restaurants etc. To ensure that such uses are able to benefit from the centre's accessibility by alternative means of transport (and facilitate linked trips), it is important to ensure the town centre boundary is not drawn too widely.

4.2.8 In light of the above guidance and the evidence presented by WYG, the town centre boundaries proposed by WYG have been accepted in all but one instance. The centre boundaries for Principal Town and Town Centres include designated primary shopping areas and primary and secondary shopping frontages as well as areas for other main town centre uses. For district centres primary shopping areas and primary and secondary shopping frontages have not been identified for reasons set out in paragraphs 4.2.11 to 4.2.14 below.

4.2.9 The one alteration represents an enlargement of the Huddersfield Town Centre boundary to include two mixed use options of Southgate and Trinity Street. The boundary has been enlarged to include the two mixed use site allocations given the strategic location of the sites on key gateway entrances into the town centre, and their connectivity to the town centre. The Southgate site is located within approximately 165 metres of the primary shopping area, and the Trinity Street site within 300 metres. The sites therefore allow for the potential future expansion of Huddersfield Town Centre into an edge of centre location for any retail proposal subject to sequential test and impact assessment as required, or an in centre location for all other main town centre uses if the market dictates that such uses are viable.

4.2.10 Whilst the evidence in the Retail Capacity Study and update, Leisure or Office Study does not recommend that main town centre uses are proactively planned over the plan period, both sites are large development opportunities close to the primary shopping area of the town centre with no current use/occupier and will likely be developed over the plan period. It is also acknowledged that the sites may come forward for a range of other uses, which may not include main town centre uses, however, as previously stated, the gateway nature of the sites' locations are

considered to be important, and there is potential to improve connections with the town centre and its retail core.

District Centre Boundaries

- 4.2.11 With regard to the district centres, the district centre boundaries proposed by WYG have been accepted in all but one instance. It is not considered that these centres accommodate such a range of non-retail uses that there is a requirement to identify a separate primary shopping area, or primary or secondary shopping frontages. This approach is consistent with the advice previously set out in PPS4 which stated that smaller centres may not accommodate substantial leisure and business areas and that, as a consequence, the town centre boundary may not differ from the primary shopping area.
- 4.2.12 It is considered that this is a sensible approach to smaller centres, given that there are fewer different land uses and less need to maintain a purely retail focus to a centre's core (given that such centres will also often be anchored by their service offer). Guidance in paragraph 6.13 of Planning for Town Centres is also noted, which suggests that centre boundaries should not be drawn too widely. This is particularly true if the centre boundary is to comprise of the primary shopping area for the purposes of the sequential approach to retail development, as this will benefit from a tightly defined area in order to ensure that any retail development is delivered in a sustainable location close to the centre's core.
- 4.2.13 Accordingly, with regard to district centres, tight boundaries have been shown which incorporate the greatest concentrations of main town centre uses. Where additional main town centre uses are separated from the 'core' by distance or by physical barrier, it is generally considered that these are out of centre and are not included within the boundary.
- 4.2.14 The one alteration to the district centre boundaries proposed by WYG is for Slaithwaite to include the recently opened Aldi supermarket which was granted planning permission under 2013/91459. The supermarket is now considered to be located in the centre of Slaithwaite, and including such developments in district centres is considered to be consistent with the approach at other centres such as Milnsbridge, Mirfield and Marsh.

Local Centre Annotations

- 4.2.15 The hierarchy of centres has identified 61 local centres within the district, all of which perform an important local function providing top up shopping and local services. These centres vary in size from small compact to those with shops and services intermixed with residential units. Given the nature of these centres it is not considered appropriate to define a centre boundary as such a boundary would not be reflective of the characteristics of these centres. It is however considered important to acknowledge the central point of the each of the local centres, and these have been indicated as a blue circle on the Policies Map.

Primary Shopping Area

4.2.16 As set out in the Shopping Frontages Policy, primary shopping areas have been separately defined for Principal Town and Town Centres. The District Centre boundary will form the primary shopping area for District Centres. Primary shopping areas are defined in Annex 2 of the NPPF which states:

Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

4.2.17 To define the primary shopping areas within the centres of Kirklees, the evidence presented by WYG has been combined with the information held in the TCAP. The proposed WYG boundaries have been accepted as these represent the highest proportion of retail uses for each of the centres.

4.2.18 The primary shopping areas have taken account of uses within the area, rental levels and pedestrian flow, as these are considered to be factors that are of some consequence in the identification of primary frontages. In this regard, observations were noted when WYG surveyed the centres and consideration to the proliferation of national multiple stores throughout a centre, was noted as these generally act as a broad indication of prime rental areas.

4.2.19 In defining primary shopping areas a tight, defensible area has been selected as this is considered to correspond with the definition provided at Annex 2 of the NPPF in that only those secondary frontages which are 'adjoining' and 'closely related' to the primary frontages are included. It should be remembered that the identification of a site outside the primary shopping area does not mean that it will not be suitable to accommodate retail development; it just affords the greater control over the type of development which may come forward in practice.

Shopping Frontages

4.2.20 As set out in the Shopping Frontages Policy, Primary and secondary shopping frontages have been defined for Principal Town and Town Centres. Primary and secondary frontages are defined in Annex 2 of the NPPF which is set out below:

Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods.

Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

4.2.21 The above definitions clearly state that primary frontages should include a high proportion of retail uses, which may include food, drinks, clothing and household goods, it considered that such frontages will focus around retailers selling tangible goods. It is considered that such a differentiation between 'goods' and 'services' is

implied by the reference in the NPPF definition to the sale of 'food, drinks, clothing and household goods'.

- 4.2.22 Accordingly, given the definitions, it is considered that primary frontages will typically be occupied by a majority (minimum 60% to 70%) of A1 retailers selling tangible selling goods at ground floor level. Secondary frontages provide greater scope for a wider variety of uses, but it is still anticipated that at least 40% of frontages will typically be in A1 retail use at ground floor level.
- 4.2.23 It is not considered that frontages can solely be defined with reference to the proportion of units in particular uses.
- 4.2.24 The secondary frontages set out by WYG have all been accepted; however the Council have chosen to add some additional secondary frontages for Huddersfield and remove some for Dewsbury.
- 4.2.25 For Huddersfield the additional secondary frontages have been included for the shopping arcades of Market Walk, Imperial Arcade and Bryan Arcade. These have been included due to their unique distinctiveness and important role they play in providing a range of smaller scale units for independent retailers or businesses. Additional secondary frontages have also been included on the northern side of Westgate given the large retail offer provided in that location by a new large independent fashion store.
- 4.2.26 Secondary frontages proposed by WYG in the Daisy Hill area of Dewsbury have not been taken forward, given the mix of units in these frontages, planning applications for alternative uses in this area, the degree of vacancy in this area, and across the wider Dewsbury Town Centre. This approach is considered to allow additional flexibility for alternative uses to occur within Dewsbury Town Centre such as residential, which has been previously identified in documents such as the Dewsbury Strategic Framework.
- 4.2.27 The primary and secondary frontages across the district have been divided into different sections for implementation purposes, and to ensure that appropriate assessment can be made through the development management process.

4.3 New Centres

- 4.3.1 Part A of the Town Centre Uses policy sets the support for formation of new centres brought about by significant residential growth or where there are deficiencies in the existing network of centres.
- 4.3.2 The policy has been formulated in response to the level of housing proposed in the Publication Draft Local Plan and in particular with reference to the proposed larger site allocations at Bradley Park, Chidswell, and South Dewsbury. These allocations would represent significant urban extensions to parts of the district.
- 4.3.3 Given the scale of these allocations it is feasible that a need may arise for the formation of a new local centre, or new main town centre facilities. Currently there is no identified need for such a centre, but it is considered appropriate to allow flexibility in the future.
- 4.3.4 It is also acknowledged that certain parts of the district are underrepresented in terms of local centre provision and a need may arise for new provision over the plan period. The policy therefore allows some flexibility for such a need if it were to arise.
- 4.3.5 The provision of any such new local centre would need to be appropriately demonstrated in a planning application, detailing the catchment area which it would serve, a sequential test and any impact on adjacent centres.

4.4 Sequential Test

- 4.4.1 Part B of the Town Centre Uses Policy sets out the council's requirements for a sequential test for main town centre uses, as required by paragraph 24 of the NPPF, which states:
'Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.'
- 4.4.2 The policy wording reflects the requirements set out in paragraph 24 but also provides further clarification on matters such as boundaries to be considered and information required for the sequential test. The NPPG sets out that; *Local Plans should contain policies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Plan.* Part B of the Town Centre Uses Policy aims to achieve this.
- 4.4.3 The sequential test boundary for retail development has been defined as the primary shopping area for principle town and town centres. For district centres, the centre

boundary which represents the extent of the primary shopping area as set out previously, will form the sequential test boundary for retail development. Such boundaries have been selected as these are considered to represent the core retail areas of centres across the district and where retail development should be focused. Furthermore, it is acknowledged that principal town and town centre boundaries are wider than solely the primary shopping area to allow other functions to occur within these centres such as leisure, office and residential.

4.4.4 The sequential test boundary for all other main town centre uses will form the defined centre boundary. The reference to edge of centre and out of centre locations in section B refers to all proposals for main town centre uses outside of the defined centres boundary.

4.4.5 Part B also sets out criteria which proposals should have to demonstrate in a sequential test. The criteria for the sequential test have been included in the policy to aid applicants in submissions, and the assessment of the sequential test. The wording allows a degree of flexibility depending on the scale of proposal to ensure that the sequential test is appropriate to what is proposed.

4.5 Thresholds

Non urban areas and the threshold of 150 sqm

- 4.5.1 Part B of the Town Centre Uses Policy sets out a locally set threshold for offices and small scale proposals in non-urban areas. This requirement has been introduced into the policy to accord with paragraph 25 of the NPPF which states the; '*... sequential approach should not be applied to applications for small scale rural offices or other small scale rural development*'.
- 4.5.2 There is no definition provided in the NPPF or NPPG as to what constitutes small scale, and therefore it is considered appropriate to set a clear floorspace threshold in square metres to remove any ambiguity in the policy wording.
- 4.5.3 To set the threshold, recently introduced permitted development rights in the Town and Country Planning (General Permitted Development) (England) Order 2015 have been considered. In particular Part R was reviewed which grants permitted development rights to allow the conversion of agricultural buildings to flexible commercial uses. Part R was chosen as the majority of agricultural buildings will be located in "rural areas", which will meet with the Council definition of 'non-urban'.
- 4.5.4 Part R is broadly divided into two types schemes below 150 square metres and those between 150-500 square metres. Proposals below 150 square metres can take place without any need for prior notification subject to other conditions of Part R. Schemes up to 500 square metres however require an assessment of highways, noise, contamination and flood risks of a site by the Local Planning Authority.
- 4.5.5 Given the unrestricted allowance of 150 square metres, it is considered that this represents an appropriate threshold set by National Government where any impact arising from a rural development would be non-material.
- 4.5.6 It is also considered that this would account for a relatively modest rural enterprise to establish themselves without onerous requirements for a sequential test. For example, 150 square metres of floorspace would allow for the formation of a relatively modest farm shop selling goods directly produced on the farm or allow a small scale office enterprise to establish around an existing use.

Impact Assessments

- 4.5.7 Part C of the Town Centre Uses Policy sets out a local threshold for impact assessments for retail, leisure and office development. The locally set threshold has been defined to meet the requirement of paragraph 26 of the NPPF which states that; '*When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m)*'.

- 4.5.8 The district currently relies on the nationally set threshold of 2,500 sqm for impact assessments as detailed in the NPPF, and a lower threshold of 750 sqm taken from SPG: Large New Stores. These thresholds whilst being beneficial for large scale developments, fail to ensure that the impact of small or medium size schemes are sufficiently assessed. It is therefore considered important to provide up to date locally set thresholds which are reflective of the characteristics of Kirklees.
- 4.5.9 The NPPG states that the purpose is to ensure that over time (up to five years, ten years for major schemes) proposals in out of centre or edge of centre locations do not have a significantly adverse impact on existing centres. Impact assessments will need to assess all town centres that may be affected, these may not necessarily just be those closest to the proposal, and may be in neighbouring authority areas. Impact assessments will be necessary for schemes which come forward for a mix of uses or which include elements for main town centre uses.
- 4.5.10 As identified in the Retail Capacity Study and study update, a blanket threshold is not considered to be appropriate for all types of centres across the district. The location of a main town centre use and its proximity to an existing centre(s) is key in assessing its impact. For example, a 300 sq.m convenience store will be likely to have a greater impact on a small centre than it would have on a much larger town centre.
- 4.5.11 The threshold limits ensure that proposals for larger scale store developments are appropriately located within the district where there is a demonstrated need, and where the impact on adjacent centres would be acceptable. The tiered approach also ensures that smaller scale developments which would impact on a smaller scale centre are appropriately assessed. The policy provides certainty to the areas which the threshold limits apply, with 800 metres considered to be an achievable walking distance which will broadly correlate with the potential walk-in catchment of smaller centres.
- 4.5.12 Impact assessments shall be produced in accordance with relevant good practice guidance. The scope of supplementary documentation accompanying an application addressing impact should be proportionate to the scale of development being proposed.
- 4.5.13 For example, it would be expected that a more modest submission would be required to justify a 300 sq.m convenience store compared to the relative requirement in support of a large superstore. Furthermore, there may also well be occasions when it is evident, (without undertaking a detailed assessment of trade diversion impact), that a new out-of-centre development with a gross floorspace of just over 200 sq.m, would not result in a impact of the 'significantly adverse' which may merit the refusal of a planning application. On such occasions, impact will be able to be dealt with proportionally.
- 4.5.14 The extent and content of an impact assessment will be agreed with the Local Planning Authority at pre application stage to ensure that an appropriate level of information is submitted with a planning application.

4.5.15 Mezzanine floors have been included the requirement for an impact assessment as mezzanines of over 200 square metres require planning permission, and could impact significantly on a local centre.

4.6 Residential Use in Town Centres

- 4.6.1 As set out in the Residential Use in Town Centres Policy, residential uses within town centre are broadly supported, subject to the considerations of a set of criteria. The policy seeks to address specific circumstances which have arisen in parts of the district over recent years, changes to permitted development rights, the potential for residential uses to play an important role in regenerating town centres, and to meet one of the requirements of paragraph 23 of the NPPF which states that local planning authorities should; *'recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites'*.
- 4.6.2 Within Huddersfield in particular there has been a significant increase in the provision of student accommodation both within and on the edge of Huddersfield town centre. The provision of new student accommodation has led to the reuse of empty or underused buildings within the town centre, and has started to increase activity within the town centre outside normal shopping/working hours.
- 4.6.3 Within Dewsbury, residential accommodation has been highlighted as potentially being a key contributor to the regeneration of the town centre as set out in the Dewsbury – Strategic Development Framework document. The document highlighted the potential to provide a residential quarter to increase activity and spending within the town centre. Whilst it has not been considered appropriate to allocate a residential quarter for Dewsbury within the Publication Draft Local Plan, this approach may be considered in the future in additional work.
- 4.6.4 The council gained central government funding to bring 'empty clusters' of dwellings or buildings back into residential use in Huddersfield and Dewsbury. The council successfully delivered projects in both towns changing previously used commercial space into affordable dwellings. These initiatives whilst relatively small scale highlight the potential for residential opportunities in town centres across the district, and the policy seeks to support further initiatives by both public and private sector.
- 4.6.5 The policy also supports the government's more flexible approach to the planning process, highlighted by permitted development rights set out in Class O of the Town and Country Planning (General Permitted Development) (England) Order 2015, which allows the change of use of office to residential accommodation subject to a prior notification process.
- 4.6.6 The provision of increased residential uses within the town centres would also compliment requirements set out in the Town Centre Uses policies which seeks to ensure that centres *'provide a range of uses to support the daytime and evening economy.'*

4.7 Food and Drink and the Evening Economy

- 4.7.1 A policy on food and drink and evening economy has been included as part of the Publication Draft Local Plan to reflect the aims and objectives of the Kirklees Joint Health and Wellbeing Strategy, and the requirements of the Publication Draft Local Plan Policy on healthy, active and safe lifestyles. Furthermore, a recently published report by the Royal Society for Public Health entitled 'Health on the High Street,' raised concerns regarding certain uses within towns and city centres across the UK.
- 4.7.2 The policy sets out broad support for food, drink and licensed entertainment but introduces a set of criteria to assess these uses against, as such uses can have the potential to have detrimental impacts on town centres. The impacts can sometimes reduce opportunities for other main town centre uses to establish in centres, or lead to detrimental impacts to surrounding uses through the over concentration of certain developments. The town centre policies within the Publication Draft Local Plan support the diversification of centres within the district, such as policies encouraging residential development, and opportunities to redevelop or regenerate the principal town centres of Huddersfield and Dewsbury.
- 4.7.3 The criteria to assess food and drink uses and the evening economy for designated centres across the district is therefore considered important when new proposals with the potential to offer a greater diversification of uses are introduced to existing centres.

4.8 Huddersfield Town Centre

- 4.8.1 A policy has been included specifically for Huddersfield Town Centre to reflect the important role it plays in Kirklees, and in particular for the southern part of the district. The centre has been defined as a Principal Town Centre in the shopping centre hierarchy within the Town Centre Uses policy. Huddersfield Town Centre provides the greatest amount of floorspace for main town centre uses, providing in the order of 124,000 square metres of floorspace over 700 plus units as at 2014.
- 4.8.2 The Kirklees Economic Strategy has set a priority to revitalise Huddersfield Town Centre with more cultural, leisure and independent retail attractions with the aim of increasing pedestrian footfall, and the vitality of the town centre. The Employment Land Market Demand Study also highlighted Huddersfield as being the principal location for office development within the district, and the town centre is ranked in the top 5% of UK Shopping Centres being in the top 100.
- 4.8.3 Huddersfield Town Centre also benefits from the University of Huddersfield which is located on the edge of the town centre at their Queensgate Campus. The University has approximately 23,000 students and employs around 2,000 people, and has invested significantly over recent years with new facilities including new landmark gateway buildings. Continued and improved linkages between the town centre and the University will be important to support the success of both the town centre and the University.
- 4.8.4 The policy seeks to achieve the aims of the Economic Strategy and acknowledge its importance, whilst also building on other policies within the Publication Draft Local Plan.

4.9 Dewsbury Town Centre

- 4.9.1 A specific policy has been included for Dewsbury to recognise the importance of the town centre for the north of the district, and to reflect its designation as a Principal Town Centre in the shopping centre hierarchy in the Town Centre Uses policy. It is acknowledged that the town centre has suffered in recent years with vacancy rates increasing.
- 4.9.2 NPPF paragraph 23 states that, *'where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity'*. The inclusion of a specific policy for Dewsbury Town Centre seeks to take a positive, proactive approach and acknowledges that the transformation of Dewsbury has been identified as a key priority in the Kirklees Economic Strategy.
- 4.9.3 Much work has been undertaken over recent years to support a new vision for the town centre and encourage economic activity, with the publication of the Dewsbury Strategic Framework, Dewsbury Design Guide and the Dewsbury Townscape Heritage Initiative. This policy seeks to provide a broad planning policy framework to support the delivery of this ongoing work, recognise and highlight the key architectural and cultural assets within the town centre, and ensure that connections to the town centre are improved when new developments come forward on the edge of the centre.
- 4.9.4 Dewsbury Town Centre was a case study example in a research paper by the Department for Business Innovation and Skills which highlighted the challenges Dewsbury town centre faced. The lack of an up to date and flexible planning approach was highlighted as a key issue for the town, and the specific policy seeks to address this shortfall.

Appendix A Hierarchy of Town Centres

Table 1: Hierarchy of centres including floorspace and units

Centre level	Centre	Number of Units	Total Ground Floor Unit Floorspace sqm	Average unit size sqm
Principal Town Centre	Huddersfield	702	123,844	176
	Dewsbury	317	42,180	133
Town Centre	Batley	128	24,277	190
	Heckmondwike	111	18,864	170
	Cleckheaton	157	17,075	109
	Holmfirth	136	12,535	92
District Centre	Mirfield	88	11,709	133
	Ravensthorpe	64	8,211	128
	Birstall	60	4,947	82
	Marsh	63	4,935	78
	Milnsbridge	56	4,915	88
	Lindley	51	4,349	85
	Slaithwaite	54	3,927	73
	Moldgreen	37	3,627	98
	Meltham	37	3,554	96
	Honley	33	3,042	92
	Marsden	32	2,470	77
	Skelmanthorpe	30	2,303	77
	Almondbury	27	2,147	80
	Kirkburton	27	2,009	74
	Denby Dale	21	1,364	65
Local Centres (61)	128,000*			

* Approximate total floorspace across all local centres

- The information set out in the table above focuses on the key town centres uses of convenience, comparison, retail service, leisure service, financial and business service and associated vacant units. The floorspace figures in the table are approximate based on an indicative gross ground floorspace.
- The figures in the table are on the basis of the draft local plan town centre boundaries.

- There are other uses within the town centre such as residential and office that are not included in the figures above.
- The occurrence of residential and office uses within the centres has been considered when establishing the centre hierarchy.

The local centres are set out in the table below:

Table 2: Local Centres (ordered by name)

Local centres	
1.	Aspley, Huddersfield
2.	Batley Carr, Batley
3.	Batley Road, Healey
4.	Berry Brow
5.	Birchcliffe
6.	Birkby
7.	Birkenshaw
8.	Blackmoorfoot Rd, Crosland Moor
9.	Brockholes, Holmfirth
10.	Chickenley
11.	Copthorn Gdns/Keldergate, Huddersfield
12.	Crosland Moor
13.	Cross Bank, Carlinghow
14.	Earlsheaton
15.	Edge Top Road, Thornhill
16.	Fartown Bar, Huddersfield
17.	Golcar
18.	Gomersal
19.	Greenside, Mirfield
20.	Halifax Rd, Dewsbury
21.	Hillhouse, Huddersfield
22.	James St, Golcar
23.	Kirkheaton
24.	Lepton
25.	Linthwaite
26.	Littleton, Liversedge
27.	Lockwood
28.	Long Lane, Dalton
29.	Lower Hopton
30.	Lower Staincliffe
31.	Manchester Rd/Longroyd Lane, Huddersfield
32.	Moorend, Cleckheaton

33.	Mount Pleasant, Batley
34.	Mount St, Milnsbridge
35.	Netherton
36.	New Hey Rd/Acre St, Huddersfield
37.	New Mill
38.	Newsome
39.	Oakenshaw
40.	Old Bank Road
41.	Paddock
42.	Paddock Foot, Huddersfield
43.	Rawthorpe
44.	Roberttown
45.	Salendine Nook
46.	Savile Town
47.	Scholes, Cleckheaton
48.	Scissett
49.	Sheepridge
50.	Shepley
51.	Six Lane Ends, Heckmondwike
52.	Slaithwaite Road, Thornhill Lees
53.	Staincliffe
54.	The Knowl, Mirfield
55.	Thornhill Lees, Dewsbury
56.	Thornhill, Dewsbury
57.	Thornton Lodge, Huddersfield
58.	Trinity Street, Huddesfield
59.	Wakefield Rd, Earlsheaton
60.	Wakefield Rd/Dalton Green Lane, Huddersfield
61.	Waterloo

Glossary

Annual Monitoring Report (AMR) – Assesses the implementation of the Local Development Scheme and the extent to which policies in the Local Development Documents are being successfully implemented.

Convenience Goods - Convenience goods relate to everyday essential items including confectionary, food, drinks, newspapers and magazines.

Comparison Goods- Comparison goods relate to items not obtained on a frequent basis, these include clothing, footwear, household and recreational goods.

District Committee Areas – Kirklees Council has divided the district into four district committee areas, which are as follows:

- Batley and Spennings
- Dewsbury and Mirfield
- Huddersfield
- Kirklees Rural

GOAD Categories – Classes used to define main town centre uses for the purpose of monitoring town centre health and vitality published in a map or table form.

GOAD sectors are divided into the following:

- Convenience
- Comparison
- Retail Service
- Leisure Service
- Financial & Business Service
- Office
- Vacant outlets

Kirklees Market Strength Assessment (Office Accommodation) – an assessment of demand for office accommodation across the district.

Land Use Property Gazetteer – a database of addresses within the district, which includes information on the businesses/uses which operate at the premises.

Leisure Study – an assessment of the built form leisure needs for the district

Mixed use options – development allocations proposed in the Publication Draft Local Plan for a mix of uses, which could include leisure, retail, commercial and residential uses.

NPPF – National Planning Policy Framework – National Government planning policies for England

NPPG - National Planning Policy Guidance – National Government guidance on the National Planning Policy Framework

PPS4 - Planning Policy Statement 4: Planning for Sustainable Economic Growth – Previously used planning policy now superseded by the NPPF and NPPG.

Retail Capacity Study – an assessment of retail needs across the Kirklees District

Town Centre Audit Programme (TCAP) – Kirklees Council annual or bi-annual assessment of the health of town, district and local centres within Kirklees incorporating unit occupancy and retail floorspace.

Town and Country Planning (General Permitted Development) (England) Order 2015 – National planning legislation which details what forms of development can take place without the need for a formal planning permission.

WYG – White Young Green – Planning Consultants who carried out the Retail Capacity Study, Retail Capacity 2016 update and Leisure Study.