



Our Ref: General 40b – Planning Conformity/final responses/local development frameworks/Hull,
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Patrick Auterson
Head of Planning Service
Kirklees Metropolitan Council
PO Box B93
Civic Centre 3
Huddersfield
HD1 2JR

Dear Patrick

Local Development Framework (LDF) – Core Strategy: Options Consultation

The Regional Planning Body welcomes the opportunity to comment on the Kirklees Core Strategy – Options Consultation document and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Regional Planning Body's response to the consultation document is a set of comments aimed at highlighting where issues related to general conformity with the Regional Spatial Strategy might arise. When the DPD is published prior to being submitted to the Secretary of State a formal Regional Planning Body view on its general conformity with the Regional Spatial Strategy will need to be requested (Regulation 29, 2008).

The following comments are made in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008. The Yorkshire and Humber Plan aims to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.

Key Points on the Core Strategy: Options Consultation

Below is a summary of the main points the Regional Planning Body wishes to raise with regards to the Core Strategy: Options Consultation document. **Annex A** provides further detail for each of these issues.

1. There is a need to set out the requirement for the Core Strategy to be in general conformity with the RSS.
2. Welcome paragraphs 2.1 – 2.21 that clearly explain and highlight the evidence base studies that have fed into the development of the spatial options.
3. Suggest that it would be more beneficial to use the RSS (2008) net housing figure instead of gross.
4. Encouraged that in generating the spatial options of the Core Strategy document the RSS (2008) was taken as a starting point.
5. Concern that Options 3 and 4 might not deliver the outcomes of the RSS.
6. Note that the Regional Planning Body would seek to ensure that green belt releases took place in the context of a strategic review of the West Yorkshire Green Belt as a whole
7. Support for the proposed use of Previously Developed Land
8. Pleased to see that the issue of affordable housing has been covered in this Options document.
9. Encouraged that the issue of Gypsies and Travellers is covered in Policy 2.3.
10. Welcome the reflection of flood risk in Policy 10.1.
11. Welcome references made in paragraphs 5.30-5.34 to the accessibility criteria set out in RSS (2008).
12. Note that the Core Strategy does not set any local targets to secure greater use of decentralised and renewable or low-carbon energy in new developments.

I trust that the comments provided here, and expanded on in Annex A, are helpful to you as you continue to prepare the Core Strategy for submission. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy. Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your Core Strategy and to commenting on the final document in due course.

Yours sincerely



Jenny Poxon
Head of Service, Planning Delivery and Conformity

Please note: from 1 April 2009 officers supporting the work of the Joint Regional Board, the new Regional Planning Body, will work in LGYH; please amend your contact databases accordingly

Annex A

General Comments

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

So that both parts of the Development Plan are working together, we feel that it is important that DPDs:

1. Ensure the outcomes/objectives of the RSS are achieved and implemented
2. Build upon policies of the RSS to reflect local circumstances, in light of a local evidence base

The Planning Inspectorate published *Local Development Frameworks: Lessons Learnt Examining Development Plan Documents* in June 2007. The aim of this guidance for local planning authorities is to focus on lessons learnt from examining Core Strategies. The advice states that 'the Core Strategy should be clear and coherent in developing national and regional policy to provide a strategy specific to the local area (i.e. providing local distinctiveness) and giving spatial expression to the Community Strategy'. It then goes further on to state that 'policies in an LDF should be locally distinctive'.

Given the above, **paragraph 1.8** could more clearly state the need for both general conformity and local distinctiveness.

The Regional Planning Body (RPB) welcomes references made throughout the document to RSS (May 2008) and welcomes the regional planning policy context that is set out throughout the document. **Paragraph 3.3** provides a clear overview of what RSS policy means for the District in terms of the provision of new homes, provision of employment land, and settlement hierarchy.

Background Information

The RPB welcomes **paragraphs 2.1 – 2.21** that clearly explain and highlight the evidence-base studies, which have fed into developing the spatial options of the Core Strategy.

Scale of Development

Paragraph 2.4 states that the RSS housing requirement for Kirklees is 36,820 dwellings from 2004-2026. Table 12.3 in RSS (2008) sets an indicative gross build rate of 36,820 dwellings between 2004-2026. Policy H1 of RSS (2008) states that plans, strategies, programmes and investment decisions should ensure the delivery of the annual net additions to the dwelling stock set out in Table 12.1 in locations that accord with the Core Approach. Table 12.1 in RSS (2008) sets an annual average net addition to the dwelling stock in Kirklees of 1060 units between 2004-2008 and 1700 units between 2008-2026. This figure makes a total of 34,840 net dwellings from 2004-2026. The RSS takes a net approach because of the uncertainty surrounding the calculation of gross housing figures particularly in the longer term.

The RPB would suggest that in developing the Core Strategy document further it would be beneficial to use the RSS (2008) net housing figure as the start point for the calculation of the district housing requirement and for monitoring purposes as this will

18 King Street, Wakefield, WF1 2SQ

Tel: 01924 331631 Fax: 01924 331559 Website: www.lgyh.gov.uk

aid consistent monitoring of the implementation of both the LDF and the RSS. It should also be noted that this figure is a 'floor' and not a ceiling target.

In relation to providing sufficient land for employment, the Knight Frank study has provided a useful local assessment. In further preparation of the Core Strategy it will be useful to discuss the latest economic forecasting with Yorkshire Forward.

Spatial Options

Policies in RSS (2008) seek to focus development on the region's town and city centres. The Core Approach (Policies YH1-YH9) makes clear that most new development, and high trip generating uses, should be focused on Regional Cities and Sub-Regional Cities and Towns and that away from these sufficient development should be permitted in Principal Towns to enable them to fulfil their role as service centres.

The RPB is encouraged that in generating the Spatial Options of the Core Strategy document the RSS (2008) was taken as a starting point. **Paragraph 4.3** correctly highlights that RSS (2008) identifies Huddersfield as a Sub Regional Town and Dewsbury, Batley and Holmfirth as Principal Towns. This is in line with Policy LCR1 of RSS (2008), which supports enhancing the role of Huddersfield as a Sub Regional Town so to capitalise on its strengths and potential. Policy LCR1 of RSS (2008) also provides for strengthening the service centre roles of the Principal Towns (of which Dewsbury, Batley and Holmfirth are identified).

Policy 1.1 sets out the appropriate role and function of settlements in each of the 6 tiers of the settlement hierarchy. The RPB supports tier 1 that provides for Huddersfield being the prime focus for housing, employment, shopping, leisure, further and higher education, health and cultural activities and facilities. We are also supportive of tier 2, which reflects the roles of Dewsbury, Batley and Holmfirth as Principal Towns.

From the descriptions given, it would seem that the 'tier 3' settlements - Heckmondwike, Cleckheaton, Mirfield and Birstall – are also proposed to take on roles of 'Principal Towns'. RSS Policy YH5 and its accompanying text (see paragraph 2.40) suggests that in particular circumstances (including those in West Yorkshire), further Principal Towns from those listed in the RSS might need to be identified where they will help to support the delivery of the Core Approach and fulfil other criteria. If these settlements are being proposed as Principal Towns it would be more helpful to spell this out, include a summary of the evidence that supports their elevation to Principal Town and plan positively for their role to develop in this way.

In a similar fashion, it might help to consider how tier 4 and 5 settlements should be 'branded' to reflect positive planning for their future roles rather than these places being seen as 'over expanding' relative to their role and/or simply being allocated development for which there is insufficient capacity in higher order settlements.

In terms of the four proposed Spatial Options, it is clear that Options 1 and 2 more directly reflect the Core Approach of RSS (2008). It is unfortunate that Option 1 does not have a positive objective (other than to follow Government guidelines) as, in helping to deliver the outcomes of the RSS it would in many ways be seeking to achieve a combination of the objectives given for the other options.

In line with the RPB comments on previous draft documents (July 2006), there is a concern that too much focus on development in the south of the District (Option 3) and a lack of focus on the need to regenerate Dewsbury (Option 4) would undermine the delivery of RSS outcomes.

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Brownfield Land

The RPB welcomes **paragraph 4.6**, which states that approximately 14,100 (which is 65%) of new homes within the built-up area will be developed on brownfield land. It is worth noting that Policy H2 of RSS (2008) includes a regional target for 65% of housing development to be on previously developed land and through conversions of existing buildings. The RPB is also encouraged that the sequential approach to development as set out in Policy YH7 of RSS (2008) has been followed.

Green Belt review

We have offered comments previously on the need for any green belt review to be carried out in the context of a strategic review of the West Yorkshire Green Belt (correspondence 1 October 2008). Policy YH9 of RSS (2008) states that "A strategic review of the West Yorkshire Green Belt may be required to deliver housing growth as set out in Table 12.1 in locations that deliver the Core Approach and the strategic patterns of development set out in policy LCRE1."

Affordable Housing

We are pleased to see that the issue of affordable housing has been covered in this Options document. The Regional Housing Strategy 2005 identifies affordable housing need in the Kirklees district as being 'medium'. Policy H4 of RSS states that LDFs should set targets for the amount of affordable housing to be provided. Provisional estimates of the proportion of new housing that may need to be affordable in Kirklees is between 30-40%. It would be helpful if this document made reference to these provisional estimates set out in Policy H4 and further evidence from the regional and any local Strategic Housing Market Assessment.

Housing mix

The RPB is encouraged that the issue of housing mix is covered in this Options document. **Policy 2.5** identifies that housing proposals will need to provide an appropriate mix of house types, sizes and tenures, in accordance with information provided by the Strategic Housing Market Assessment.

Policy H5 in RSS (2008) emphasises the need for the current mix of housing in the Region to change so that it better supports the creation of more sustainable communities. The Policy recommends that plans, strategies, investment decisions and programmes should ensure the provision of homes for a mix that reflects the needs of the area, including homes for families with children, single persons, and older persons, to create sustainable communities

Gypsy and Travellers

The RPB is encouraged that the issue of Gypsies and Travellers is covered in **Policy 2.3**. The RSS (2008) recommends that the region needs to make additional provision to meet the needs of Gypsies and Travellers to address a shortfall of at least 255 pitches. Policy H6 states that in the West Yorkshire district at least 86 pitches will be required by 2010 to address the shortfall in the region. Policy H6 also requires local authorities to carry out an assessment of the needs of Gypsies and Travellers by May 2008.

Policy H6 was therefore set as an interim policy until all local authorities had carried out their own local assessments. The estimates set out in Policy H6 will be superseded by the findings of local Gypsy and Traveller and Travelling Showpeople accommodation assessments, which are expected to conclude that greater numbers of additional pitches will be required.

The RPB welcomes the reference made in **paragraph 2.9** to the *West Yorkshire Gypsy and Traveller Accommodation Assessment (May 2008)* which estimates a need in Kirklees for 13 extra residential pitches (including 2 transit) between 2008 and 2015, and 8 pitches between 2016 and 2026.

The RPB has commissioned consultants to review the local accommodation assessments that have been carried out by local authorities. How this work is taken forward will need to be discussed with local authorities in the context of carrying forward work on the RSS 2009 Update whilst the preparation of the Integrated Regional Strategy commences.

Flood Risk

The RPB welcomes the reflection of flood risk in **Policy 10.1**. The RPB is also encouraged that **paragraph 5.133** makes reference to the Kirklees Strategic Flood Risk Assessment which identifies flood risk zones 1, 2, 3a and 3b. This will be an important tool in helping to determine how the Core Strategy will be delivered.

Accessibility

The RPB welcomes the references made in **paragraphs 5.30-5.34** to the accessibility criteria set out in RSS (2008). **Paragraph 5.31 and 5.32** rightly make reference to Tables 13.8 and 13.9 of RSS (2008) which set the accessibility criteria. Table 13.8 and 13.9 provide guidance for developments in terms of accessibility to employment and social infrastructure uses.

Renewable Energy

Policy ENV5 states the Region will maximise improvements to energy efficiency and increase renewable energy capacity. **Paragraph 5.156** rightly makes reference to the RSS (2008) targets for installed grid connected renewable energy capacity within the region, of 708MW by 2010 and 1862MW by 2021. Policy ENV5 of RSS (2008) sets West Yorkshire a target of at least 88MW by 2010 and 295MW by 2021 for installed grid connected renewable capacity. Table 10.2 recommends a renewable energy target in Kirklees of 11MW to 2010 and 48MW to 2021.

Policy ENV5B also states that plans, strategies, investment decisions and programmes should promote and secure greater use of decentralised and renewable or low-carbon energy in new developments, including through Development Plan Documents setting ambitious but viable proportions of the energy supply for new developments to be required to come from such sources. It is worth noting that Policy ENV5B also suggests that in advance of local targets being set in DPDs, new developments of more than 10 dwellings or 1000 sq m of non-residential floor space should secure at least 10% of their energy from decentralised and renewable or low-carbon sources. At present the Core Strategy does not set any local targets to secure greater use of decentralised and renewable or low-carbon energy in new developments.