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# **Adopted Kirklees Local Plan**

## **Sustainability Appraisal Post-Adoption Statement**

Prepared by LUC  
March 2019

**Project Title:** Sustainability Appraisal/Strategic Environmental Assessment of Kirklees Local Plan

**Client:** Kirklees Council

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Planning & EIA  
Design  
Landscape Planning  
Landscape Management  
Ecology  
GIS & Visualisation

LUC LONDON  
43 Chalton Street  
London  
NW1 1JD  
T +44 (0)20 7383 5784  
[london@landuse.co.uk](mailto:london@landuse.co.uk)

Offices also in:  
Bristol  
Edinburgh  
Glasgow  
Lancaster  
Manchester



Land Use Consultants Ltd  
Registered in England  
Registered number: 2549296  
Registered Office:  
43 Chalton Street  
London NW1 1JD  
LUC uses 100% recycled paper

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# 1 Introduction

- 1.1 Kirklees Council adopted the Kirklees Local Plan on 27<sup>th</sup> February 2019. The Kirklees Local Plan comprises two documents – Strategy and Policies (Submission Document SD1) and Allocations and Designations (Submission Document SD2).
- 1.2 During the preparation of the Kirklees Local Plan the Council was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA Reports published alongside the different versions of the Kirklees Local Plan during its development.
- 1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires the Council to make the final SA Report available alongside the Adopted Local Plan. The SA Report for Kirklees’ Publication Draft Local Plan was prepared in October 2016, which incorporates the proposed changes to the Local Plan that were consulted on between November 2015 and January 2016 during the Draft Local Plan stage. Alongside the full SA Report two further documents were published. These were an Erratum Notice (November 2016) which presented amendments to the SA findings for five site options (three for residential development and two for safeguarded land) and an SA Addendum (April 2017) to consider further information relating to one comment received from a statutory environmental consultee (Historic England) and findings for three site options in the Publication Draft Local Plan.
- 1.4 A second Addendum to the SA Report was produced with respect to the proposed Main Modifications to the Publication Draft Local Plan (August 2018) following the examination of the Local Plan by a Government appointed Inspector. The Main Modifications were contained in two documents relating to document SD1 – Strategy and Policies of the Plan and document SD2 – Allocations and Designations.
- 1.5 The final SA Report for the adopted Kirklees Local Plan therefore comprises the following documents:
  - Publication Draft Kirklees Local Plan Sustainability Appraisal Report (LUC, October 2016);
  - Publication Draft Kirklees Local Plan Sustainability Appraisal Report – Erratum (LUC, November 2016);
  - Publication Draft Kirklees Local Plan Sustainability Appraisal Report – Addendum (LUC, April 2017); and
  - Kirklees Local Plan: Second Sustainability Appraisal Addendum relating to the proposed Main Modifications (LUC, August 2018).

## Requirement for the Adoption Statement

- 1.6 In addition to the requirement in Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) for publishing the final SA Report alongside the Adopted Local Plan, the SEA Regulations<sup>1</sup> also require a number of steps to be taken upon adoption of a local plan (in this case the Kirklees Local Plan). Specifically, SEA Regulation 16 sets out the post-adoption procedures for the SEA and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an ‘SEA adoption statement’, and inform the public and consultation bodies about the availability of these

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<sup>1</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 - SI No. 1633.

documents. The consultation bodies are Historic England, Natural England and the Environment Agency. The SEA adoption statement must explain:

- How environmental (and sustainability) considerations have been integrated into the plan.
- How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
- How the opinions expressed by the public, consultation bodies and (where appropriate) other European Member States during consultation on the plan and the Environmental/SA Report have been taken into account.
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan.

1.7 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the Kirklees Local Plan. The document is structured according to the SEA Regulation requirements listed above:

- **Section 2** summarises how environmental considerations have been integrated into the plan by explaining who carried out the SA/SEA and what assessment framework was used.
- **Section 3** summarises the links between the plan-making and SA/SEA processes and how the SA/SEA recommendations were taken into account.
- **Section 4** summarises the consultation opinions provided on the SA/SEA at each stage and describes what changes were made to the SA/SEA process in response to these comments.
- **Section 5** describes the alternatives/options considered as part of the Local Plan preparation process and why certain options were chosen.
- **Section 6** describes how the significant sustainability/environmental impacts of the Local Plan will be monitored.

## 2 How environmental and sustainability considerations have been integrated into the Kirklees Local Plan

- 2.1 The SA (incorporating SEA) of the Kirklees Local Plan was commenced by LUC in March 2015. LUC has subsequently undertaken all further stages of the SA for the Local Plan. LUC has also prepared this SA Adoption Statement.
- 2.2 The purpose of the SA was to assist the Council in preparing the Local Plan by identifying the key sustainability/environmental issues facing the plan area, to predict what would be the likely effects of the Local Plan on these issues, and to put forward recommendations to improve the Local Plan. The aim was to ensure that the Local Plan has as many positive effects as possible and that any negative effects are avoided or mitigated as far as reasonably possible when the policies are implemented and result in new development within Kirklees.
- 2.3 The SA was undertaken iteratively, such that at each stage of the Local Plan's preparation an assessment of the sustainability and environmental effects of the options for the Local Plan and subsequently its policies were made. SA Reports were produced to describe the approach taken, identify the likely effects, and put forward recommendations to avoid or minimise negative effects identified or to enhance potential positive effects. In this way, environmental and sustainability considerations were integrated into the Local Plan as it was developed.
- 2.4 The way in which the environmental and sustainability effects of the Local Plan were described, analysed and compared was through the use of a set of SA objectives. The SA objectives for the Local Plan were developed by LUC during the Scoping stage of the SA process. A set of SA objectives for the Kirklees Core Strategy which were originally presented in the 2008 SA Scoping Report for the withdrawn Core Strategy were used as the starting point for the SA framework for the new Local Plan. A number of amendments were made to these SA objectives in light of a review of relevant European, national and regional policies, plans and programmes and the objectives they contained. The resulting SA 'framework' comprised 19 sustainability objectives that were used to decide whether the Local Plan would be likely to achieve each objective.
- 2.5 The SA framework for the Local Plan was originally presented in the March 2015 SA Scoping Report which was prepared on behalf of the Council by LUC and included a set of SA objectives covering all of the SEA topics listed in Schedule 2 of the SEA Regulations. This SA framework was the main tool used at each stage of the SA for assessing the likely effects of the options and policies for the Local Plan. Using the same SA framework ensured that alternatives were assessed in a comparable way at each stage of developing the Kirklees Local Plan.
- 2.6 **Table 2.1** below presents the SA framework for the Kirklees Local Plan. The final column shows how the 'SEA topics' (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were all covered by at least one of the SA objectives.

**Table 2.1 SA Framework for the Kirklees Local Plan**

SA Objective	SEA topic(s) covered by objective
1. Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	Population
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	Population
3. Ensure education facilities are available to all.	Population
4. Improve the health of local people and ensure that they can access the health and social care they need.	Population Human health

SA Objective	SEA topic(s) covered by objective
5. Protect local amenity including avoiding noise and light pollution.	Population Human health
6. Retain and enhance access to local services and facilities.	Population
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	Population
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	Population
9. Ensure all people are able to live in a decent home which meets their needs.	Population
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	Air
11. Secure the efficient and prudent use of land.	Soil
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	Landscape
13. Conserve and enhance the historic environment, heritage assets and their settings.	Cultural heritage including architectural and archaeological heritage Material assets
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	Biodiversity Flora Fauna
15. Reduce air, water and soil pollution.	Soil Water Air
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	Material assets
17. Increase prevention, re-use, recovery and recycling of waste close to source.	Material assets
18. Increase efficiency in water, energy and raw material use.	Water Material Assets
19. Reduce the contribution that the District makes to climate change.	Climatic Factors

2.7 In addition to the use of the SA framework to assess the potential effects of Local Plan objectives, site options and policies as they were drafted, environmental and sustainability considerations were integrated into the Local Plan through close working between LUC and Council officers drafting the plan. Early draft sections of the Local Plan, including draft policies, were sent to LUC for appraisal and the SA team engaged with Council officers during the process of carrying out the SA of the emerging Local Plan. This included the production of internal summary notes of the SA findings prior to production of the full SA Report for the Draft Local Plan.

Finally, the Local Plan was also required to be subject to Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species (Amendment) Regulations 2012<sup>2</sup>. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Kirklees Local Plan was undertaken separately from the SA but the findings of the HRA Reports informed the SA process where possible, particularly in relation to judging the potential effects on SA objective 14: maximise opportunities to protect and enhance biodiversity and geodiversity.

<sup>2</sup> Statutory Instrument 2012 No. 1927.



### 3 How the Environmental/SA Report has been taken into account

- 3.1 As already stated, the SA process for the Kirklees Local Plan was undertaken iteratively, such that an assessment of the sustainability and environmental effects was made at each stage of the Local Plan's development.
- 3.2 With respect to the SA of site options, the SA findings were described by LUC in internal summary notes to the Council, so that the information could be taken into account as the Council decided which sites to select for inclusion in the Draft Local Plan and which to reject.
- 3.3 SA Reports were produced to describe the approach taken and the potential effects identified, and to put forward recommendations to avoid or minimise negative effects or enhance positive effects. Council officers preparing the Local Plan took the SA findings and recommendations into account while making changes to the Plan. For example, paragraphs 12.157 and 12.159 of the SA Report of the Publication Draft Local Plan lists the recommendations of the SA of the Draft Local Plan, and describes how these recommendations were addressed by the Council in the Publication Draft Local Plan.
- 3.4 **Table 3.1** overleaf shows how preparation of the SA Reports (which included the Environmental Report requirements) corresponded with each stage of the Local Plan preparation, and how any recommendations made in the SA were taken into account.

**Table 3.1 Iterations of the Kirklees Local Plan and accompanying SA Work**

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
<p>An 'Early Engagement Report' relating to the new Local Plan was consulted on between April and May 2014. The report set out information about what would be included in the Local Plan and when and how it would be prepared.</p> <p>A further engagement exercise was carried out between November and December 2014.</p>	<p>SA Scoping Report (March 2015) for the Kirklees Local Plan produced by LUC on behalf of Kirklees Council</p>	<p>The scoping stage of the SA was undertaken by LUC and involved compiling information about the social, economic and environmental baseline for the plan area as well as the policy context and key sustainability issues. The SA framework was then developed, setting out the SA objectives against which plan options initially, and subsequently policies, would be appraised. A period of consultation on a draft version of the SA Scoping Report was undertaken with the three statutory consultees (Natural England, Historic England and the Environment Agency).</p>
<p>Kirklees Draft Local Plan (November 2015)</p>	<p>SA Report for the Draft Kirklees Local Plan (September 2015) produced by LUC on behalf of Kirklees Council; and</p> <p>Draft Kirklees Local Plan: SA Report Erratum Notice (January 2016).</p>	<p>The SA Report for the Draft Kirklees Local Plan was produced by the LUC on behalf of Kirklees Council in September 2015. A complementary public consultation process was also undertaken on the SA Report and Draft Local Plan.</p> <p>The SA Report for the Draft Kirklees Local Plan sets out the findings of the appraisal of options and emerging options, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that mitigate negative effects and maximise the benefits of the plan when drafted in full. It also described the Council's reasons for selecting or rejecting site options at this stage in the preparation of the Local Plan.</p> <p>The SA Report for the Draft Local Plan included a number of recommendations at Chapter 12. These reflected the findings of the SA which were presented to Kirklees Council in the form of summary SA notes prior to preparation of the full SA Report. The recommendations related to four mixed use sites and four Traveller sites which were identified as lying with areas of high flood risk (flood zone 2 or 3) and therefore should not be allocated unless the sequential test can be met and a number of recommendations relating to the specific wording of draft policies. The majority of the recommendations</p>

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
		<p>resulted in updates to the approach taken forward through the Draft Local Plan following the Council's receipt of LUC's internal summary note. Only two recommendations relating to the wording of policies which addressed Huddersfield Town Centre and Dewsbury Town Centre and proposals for mineral extraction respectively, did not result in amendments to the Local Plan. These two recommendations were carried forward to the Publication Local Plan, although it was noted at the publication stage that these issues were covered by other development management style policies in the Local Plan.</p> <p>Following the publication of the SA Report for Draft Local Plan and prior to the commencement on SA work for the next stage of the Local Plan an Erratum Notice (January 2016) was produced by LUC. This explained that it had become apparent that in a very small number of cases an incorrect site address description was used to label SA matrices in Annex 2 of the September 2015 SA Report. However, the site codes used were correct as were the land areas that had been subject to SA and therefore these few errors were not considered to undermine the robustness of the SA process.</p>
<p>Publication Draft Kirklees Local Plan (November 2016)</p>	<p>SA Report for the Publication Draft Kirklees Local Plan (October 2016) produced by LUC on behalf of Kirklees Council;</p> <p>Publication Draft Kirklees Local Plan SA Report – Erratum (November 2016) produced by LUC on behalf of Kirklees Council; and</p> <p>Publication Draft Kirklees Local Plan Sustainability Appraisal Report – Addendum (April 2017) produced by LUC on behalf of Kirklees Council.</p>	<p>The reasonable alternative site and policy options, as well as the policies and site allocations presented in the Publication Draft Local Plan in November 2016 by the Council, were subject to a detailed appraisal against the SA objectives. In general, the policy approaches and site options that were taken forward in the Local Plan were those that performed more positively or at least as well against the SA objectives than the rejected options, although in a small number of cases other planning considerations determined that other options should be taken forward.</p> <p>The Publication Draft version of the Local Plan proposed a substantial amount of housing, employment and other development across Kirklees to meet the future needs of the District; therefore the October 2016 SA Report identified the potential for significant negative effects on many of the environmental objectives including biodiversity, cultural heritage and the landscape. However, the Publication Draft Local Plan also included a wide range of development management-style policies that aim to protect and enhance the economic, social and environmental conditions of the District. The SA concluded that these should go a long way towards mitigating the potential negative effects of the overall scale of development proposed, although some significant effects are likely to remain. Paragraphs 12.157 and 12.159 of the 2016 SA Report lists the recommendations of the SA of the Draft Local Plan, and describes how these recommendations were addressed by the Council in the Publication Draft Local Plan.</p> <p>The SA Report was updated through the production of an erratum and an addendum in November 2016 April 2017 respectively. The erratum updated the findings of the SA Report in relation to small errors identified for three residential sites options and two safeguarded land site options. The addendum responded to one of the statutory environmental consultees' (Historic England) comments on the October 2016 SA Report and also presented updated SA findings for three site options.</p>

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
Publication Draft Kirklees Local Plan – Proposed Focussed Changes (July 2017)	Kirklees Local Plan: Second Sustainability Appraisal Addendum relating to the proposed Main Modifications (August 2018) produced by LUC on behalf of Kirklees Council	The Main Modifications to the Local Plan was subject to SA by LUC and the findings were presented in the Second SA Addendum published in August 2018. This second SA Addendum presented an appraisal of the proposed Main Modifications and considered their implications for the SA findings reported previously. The second SA Addendum represented an appraisal of the Local Plan as proposed to be modified, updating the findings presented in the October 2016 SA Report, the November 2016 Erratum Notice and the April 2017 SA Addendum. The likely significant effects of the Main Modifications to the Local Plan (both positive and negative) were clearly described. The Second SA Addendum found that the proposed modifications resulted in a small number of changes to the SA scores previously identified for the Local Plan, but did not result in changes to the cumulative effects of the Local Plan that were previously described in the SA Report for the Publication Local Plan.

## 4 How opinions of consultation bodies and the public have been taken into account

- 4.1 At each stage of the Local Plan's development, an SA Report was published alongside the Local Plan for consultation with the public and the consultation bodies specifically referred to in the SEA Regulations i.e. Historic England, the Environment Agency and Natural England. The SEA Regulations require the SEA Adoption Statement to summarise how any opinions expressed by the public and the consultation bodies in relation the SEA have been taken into account.
- 4.2 The Local Plan consultation stages and responses received relating to the SA documents are summarised below.

### SA Scoping (2014-2015)

- 4.3 The SA Scoping Report was produced by LUC following the early engagement on the new Local Plan, and consultation took place between March and April 2015 with the statutory consultees (Natural England, the Environment Agency and English Heritage (now Historic England)).
- 4.4 A draft of the Scoping Report was provided to the statutory consultees before the document was finalised. This provided an opportunity for consultees to comment on a number of issues, including whether the objectives in the SA framework provided a reasonable framework for assessing the likely significant effects of the Local Plan and whether the review of relevant plans, policies and programmes (the PPP review) and baseline information were appropriate and complete.
- 4.5 Consultation responses were received from all three of the statutory consultees. In general comments related to wording of SA objectives and the key sustainability issues for Kirklees, as well as references to additional baseline information and relevant PPP review information that should be included. These comments were addressed in the final iteration of the SA Scoping Report as shown in the final column of the consultation response table in Appendix 1 of the final SA Scoping Report. The final Scoping Report also appraised the Local Plan Draft Vision and Objectives and the options for the Kirklees Local Plan Spatial Framework against the SA objectives.

### Draft Local Plan (2015)

- 4.6 The Draft Local Plan was produced by the Council and underwent a period of public consultation from November to December 2015, accompanied by the SA Report for the Draft Kirklees Local Plan (September 2015). The consultation responses which related to the SA Report for the Draft Local Plan were published in Appendix 1 of the SA Report for the Publication Draft Kirklees Local Plan SA Report, including how the matters raised were addressed by the SA. Responses covered issues such as the suitability of the SA framework and SA objectives; concern or disagreement over individual sites and policies considered as part of the SA process; the methodology used for the SA Report (including use of the "heat mapping" work made available by the Council to support the SA process); issues relating to reasons for the selection of site options taken forward for allocation in the Local Plan; and the accessibility of the SA Report considering its length and the level of detail provided.

## Publication Draft Local Plan (2016)

- 4.7 The Publication Draft Local Plan underwent public consultation from November to December 2016, with the SA Report for the Publication Draft Local Plan (October 2016) published alongside. All responses collected that were 'duly made' were submitted to the Government for consideration by the Planning Inspector. Consultation responses for the SA for the Publication Draft Local Plan were analysed. Consultation comments focused primarily on the methodology of the SA (including comments relating to the 'heat mapping' work undertaken on behalf of the Council which informed a number of SA objectives), the evidence base that was used to inform the SA, and comments relating to the appraisal of specific sites either allocated or not allocated in the Publication Draft Local Plan. The consultation responses were published online and made available to the Inspector during the examination.
- 4.8 The SA Report for the Publication Draft Local Plan was updated by the production of the Publication Draft Local Plan: Sustainability Appraisal Report Erratum Notice in November 2016.
- 4.9 An Addendum to the Publication SA Report was also produced in April 2017 to update the appraisal findings relating to three site options (two for residential and one for safeguarded land which was previously omitted from the SA Report in error) in the Publication Draft Local Plan. This document was also produced to consider further information relating to one comment received on the Publication SA Report from a statutory environmental consultee (Historic England). The comment related to the suitability of appraisal work undertaken to inform SA objective 13: historic environment for the site options considered for allocation through the SA Report. In response to Historic England's concerns, the Council commissioned further HIA work for a targeted number of allocated sites in relation to the historic environment. The SA Addendum work subsequently updated the SA scores for sites which had previously been recorded as having an uncertain effect in this regard.

## Main Modifications 2018

- 4.10 The Main Modifications underwent public consultation from August 2018 to October 2018.
- 4.11 All comments made on the Main Modifications and accompanying SA Report (Second Sustainability Appraisal Addendum (August 2018)) were sent to the Inspector for consideration.

## 5 Why the adopted Local Plan was chosen in light of reasonable alternatives

- 5.1 The options or reasonable alternatives considered during the development of the Kirklees Local Plan included the overall spatial strategy for the District and potential sites for new housing development, mixed use development, employment development, open space, Traveller accommodation, mineral operations and waste. There have been a number of stages in developing, appraising and refining the plan options, as summarised below.

### 'Early Engagement Report' (2014-2015)

- 5.2 An 'Early Engagement Report' relating to the new Local Plan was consulted on between April and May 2014. This report set out information about what would be included in the Local Plan and when and how it would be prepared. It also presented a draft vision and strategic objectives which were taken from the withdrawn Core Strategy. As part of this early stage of the process the Council invited comments on how the draft vision and strategic objectives might be amended for inclusion in the new Local Plan.
- 5.3 A further engagement exercise was carried out between November and December in 2014. The engagement document that was consulted on included options for how Kirklees Council might decide where new development could go. Three options for the spatial framework for the Local Plan were presented in the engagement document in late 2014, and were subject to SA during the preparation of the SA Scoping Report (March 2015) with the findings described in Chapter 6 of that document. The three options appraised as part of the SA Scoping Report were:
- Approach 1: Allocating development based on the size of settlements;
  - Approach 2: Allocating development based on an area's character, its constraints and opportunities; and
  - Approach 3: Allocating development based on an area's character and the size of its settlements
- 5.4 These options were also presented in the SA Report for the Draft Local Plan, with one option (Approach 3) taken forward and developed into the more detailed Spatial Development Strategy for the Local Plan. The decision to take forward Approach 3 was in keeping with the messages from the consultation on the early engagement document given that it would in effect reflect elements of both Approach 1 and Approach 2. This approach would not result in a restrictive, inflexible (and undeliverable) settlement hierarchy approach. Instead, the approach combines the evidence of the Council's settlement appraisal (including the role, function and services they provide), together with the evidence in the Green Belt Review and other considerations such as place shaping constraints/opportunities, the need to protect urban green spaces and existing and planned infrastructure.
- 5.5 At the Draft Local Plan stage the decision to take forward Approach 3 (considered at the stage of the SA Scoping Report) was reemphasised to represent a balance between the advantages of focussing most development in the largest settlements and the need to ensure that it is located in the most appropriate locations that are most able to accommodate growth, taking into account factors other than settlement size.
- 5.6 The SA Scoping Report also presented the appraisal of the draft vision and strategic objectives. The vision and strategic objectives which were appraised as part of the SA Scoping Report presented 10 strategic objectives which were found to have generally positive effects. However, the effects of Objective 1: Economic growth and diversification, Objective 3: Transport links and Objective 4: Housing were noted to be more uncertain. Effects relating to local character and the

historic environment in particular were identified as being uncertain given that these objectives were supportive of the delivery of new development and infrastructure to support growth over the plan period. The specific effects in relation to these issues for the strategic objectives in question were noted to be dependent upon how these objectives were to be implemented. The vision and strategic objectives were also presented in the SA Report for the Draft Local Plan (September 2015) with only a small number of changes being incorporated.

## Draft Local Plan (2015)

- 5.7 The findings of the SA Scoping Report (summarised above) as well as appraisal of various site and policy options (summarised below) contributed to the development of the Draft Kirklees Local Plan. Prior to the publication of the SA findings in the September 2015 SA Report for the Draft Local Plan, these findings were presented to Kirklees Council in the form of an internal summary note, so that the information could be taken into account as the Council decided which sites and policy options to select for inclusion in the Draft Local Plan and which to reject.

### Vision and strategic objectives for the Kirklees Local Plan

- 5.8 As previously described, the vision and strategic objectives appraised as part of the SA Scoping Report were included for appraisal in the SA report for the Draft Local Plan. A small number of changes were made to the Vision, however the strategic objectives remained the same. The SA findings presented in the SA Scoping Report were updated to reflect the changes made to the Vision since the publication of that document. In general the effects recorded as part of the SA Scoping Report remained the same when updated as part of the appraisal work for the SA report for the Draft Local Plan Local.

### Delivering Growth and Sustainable Development

- 5.9 Chapter 4 of the Draft Local Plan (November 2015): Delivering Growth and Sustainable Development presented the Council's approach to contributing to the achievement of sustainable development in Kirklees. This included the spatial development strategy and a number of other overarching policies set out to facilitate the achievement of this aim.

#### *Spatial development strategy*

- 5.10 The SA Report for the Draft Local Plan presented the findings in relation to the three options considered for the spatial development strategy for Kirklees in Chapter 11. The two reasonable alternatives considered were to allocate development based on the size of settlements and to allocate development based on an area's character, its constraints and opportunities. The spatial development strategy taken forward was identified through the appraisal work to represent a balance between the advantages of focussing most development in the largest settlements and the need to ensure development it is located in the most appropriate locations that are most able to accommodate growth, taking into account factors other than settlement size. The SA findings supported the approach taken for the spatial development strategy in the Local Plan although it did not have as many positive effects as the first reasonable alternative it also had fewer negative effects.

#### *Infrastructure planning*

- 5.11 Three policy options were considered in relation to the approach for providing infrastructure required to support new development in Kirklees. The Council discounted the reasonable alternatives of doing nothing and setting more prescriptive requirements and standards through policy. The approach taken forward performed more favourably than the two alternatives, given that it would ensure infrastructure is provided to support residential and commercial developments, thereby avoiding existing infrastructure becoming overloaded while also avoiding the potential for specified standards becoming inappropriate over time as a result of changing circumstances.

#### *Masterplanning sites*

- 5.12 One reasonable alternative for the policy approach to the details which masterplans for developments are expected to achieve in the District was appraised. The policy approach taken



forward was found to have more positive effects when compared to the approach of not including a policy and relying on the guidance of the NPPF. The alternative approach would result in criteria for masterplans not being set out in the Local Plan and therefore some opportunities to promote sustainable development may be lost.

#### *Safeguarded land*

- 5.13 As part of the policy approach in the Draft Local Plan the Council considered safeguarding land for residential and employment development over the long-term and restricting most other types of development proposals in those areas and the reasonable alternative of allowing some safeguarded land to be brought forward during the Plan period as a contingency. This approach was discounted given that it could undermine the delivery of allocated sites and lead to over-development in certain areas. The SA findings in relation to these options supported the approach taken forward. Both options were identified as likely to have a significant positive effect in relation to employment, economy and housing. The reasonable alternative considered was however identified as likely to have a negative effect in terms of a number of social and environmental objectives given that it may result in development coming forward at less appropriate and accessible areas. It was identified that the most appropriate sites are likely to be those that are allocated following the detailed assessment process they have been through.

#### *Efficient and effective use of land and buildings*

- 5.14 To ensure that land and buildings are efficiently made use of in Kirklees, the Council considered policy which detailed criteria to promote this aim through the Draft Local Plan. The SA Report for the Draft Local Plan presented four reasonable alternatives for including criteria relating efficient land use in the District. The four alternative approaches to the draft policy included in the Draft Local Plan were to:
- Do nothing and rely on the NPPF.
  - Set a higher housing density level.
  - Set a lower housing density level.
  - Set a minimum target for the amount of development that takes place on brownfield land.
- 5.15 The Council decided to discount the reasonable alternative options considered as relying on national policy would not provide enough detail to enable the assessment of planning applications and setting a target for development on brownfield land would not be effective given that there have been relatively few brownfield development site options available historically in Kirklees. The housing density level taken forward represents an appropriate balance between past delivery rates and the need to make efficient use of land and buildings. The options of setting a higher or lower density level were also therefore rejected as inappropriate. The SA findings for the draft policy in the Draft Local Plan supported this approach, with more positive effects being identified for this approach than for the reasonable alternative options.

#### *Additional policy options*

- 5.16 The Council's approach to delivering growth and sustainable development also included a number of additional policies relating to the presumption in favour of sustainable development; and location of new development. For these policies no reasonable alternatives were considered given that the potential alternatives would be inconsistent with national policy, had been covered as part of appraisal of alternatives for other policy options or would be inconsistent with Local Plan principles for sustainable development.

#### **Economy**

- 5.17 Chapter 6 of the Draft Local Plan: Economy presented the Council's approach to meeting the development needs of business and supporting economic growth in Kirklees. This included the approach to supporting a specific level of employment provision over the plan period as well other policies which address the safeguarding of employment land, developing skilled communities and supporting the rural economy, which are discussed below.

### *Employment provision*

- 5.18 The SA Report for the Draft Local Plan presented the findings in relation to the three options considered for the level of employment provision for Kirklees over the plan period at Chapter 11. The level of provision set out in the Draft Local Plan policy over the plan period (32,194 jobs from 2013-2031) was the objectively assessed need derived from a number of scenarios based on various employment rates utilising the Regional Econometric Model and an interpretation of the Kirklees Economic Strategy. This level of provision was found to have slightly more positive effects than the two reasonable alternatives considered. These were to support a lower level of employment provision (19,326 jobs) or higher level of employment provision (43,722 jobs) over the plan period. The option of supporting a higher level employment provision was identified as having more significant negative effects in relation to use of land, local character, the historic environment and biodiversity. Both of the alternatives considered were expected to have less positive effects in relation to housing and transport given that the policy taken forward for the Local Plan was drafted to be in line with the level of housing provision selected for the Local Plan.

### *Additional policy options*

- 5.19 Chapter 6 of the Draft Plan also included policy relating to safeguarding employment land and premises. The reasonable alternative of a more flexible approach which responds purely to market forces was discounted given that such an approach would not sufficiently control the protection of employment land and could compromise the supply of land to meet commercial needs in Kirklees. The SA findings for these policy options found that the reasonable alternative performed less positively in terms of the SA objectives for employment and economy. As employment land was to be given protection from alternative uses through the draft policy in the Draft Local Plan within the Priority Employment Areas which are noted to be very accessible to a high number of residents, positive effects were identified in relation to this preferred approach with regards to sustainable transport, air pollution and climate change.
- 5.20 The Council considered two options for a strategy to developing skilled communities in the District. The reasonable alternative considered was not to seek any contributions for local employment opportunities, training or skills. This reasonable alternative was not taken forward given that it was judged not to provide support to the achievement of the Kirklees Economic Strategy. The policy taken forward for the Local Plan was also appraised as having more significant positive effects than the reasonable alternative option considered particularly in relation to employment, economy and education.
- 5.21 The Draft Local Plan also included draft policy to help support the rural economy in Kirklees. The policy sought to support proposals that would benefit the rural economy, including tourism-related proposals, farm diversification, farm shops, cafes, tea rooms and other appropriate proposals. Two reasonable alternatives were considered as part of the SA Report for the Draft Local Plan; namely no Local Plan policy and to rely on national policy, and to include a more specific policy. The reasonable alternatives were rejected firstly given that relying on national policy would mean that a lack of clarity in terms of local decision making would result. Furthermore a more specific policy approach would be too restrictive and could prevent proposals being considered on their own merits. The sustainability findings for the three options were supportive of the selection of the policy taken forward given that it scored more positively in relation to employment and economy in particular.

### **Homes**

- 5.22 Chapter 7 of the Draft Local Plan: Homes presented the Council's approach to meeting the full objectively assessed needs for market and affordable housing in the market area. This included the approach to supporting a specific level of housing provision over the plan period as well other policies which address housing mix, affordable housing and accommodation for Travellers, which are discussed below.

### *Housing provision*

- 5.23 Findings for the three options considered for the level of housing provision for Kirklees over the plan period were presented in the SA Report for the Draft Local Plan in Chapter 11. The level of housing set out in the Draft Local Plan policy (1,630 dwellings per annum from 2013-2031) was the recommended objectively assessed need set out in the Strategic Housing Market Assessment

(SHMA). The reasonable alternatives considered as part of the SA Report for Draft Local Plan were to make provision for the lowest housing growth scenario from the SHMA (1,069 dwellings per annum) and for the highest housing growth scenario from the SHMA (2,191 dwellings per annum). The approach taken forward was chosen given that it was based on the recommended objectively assessed employment need figure with consideration for work undertaken to identify a number of scenarios based on demographic information and jobs-led scenarios. The recommended OAN was considered likely to have slightly more positive effects than the reasonable alternatives and therefore the findings of the SA Report supported the selection of this approach. All three options were identified as likely to have a positive effect in relation to housing, with the Draft Local Plan policy and the higher housing provision likely to be most significant. The draft policy in the Draft Local Plan and the lower housing provision were appraised as likely to have less significantly negative effects in relation to use of land, local character, historic environment and biodiversity, while the Draft Local Plan and the higher employment figure were appraised as likely to have a positive effect in relation to transport.

#### *Additional policy options*

- 5.24 Further policies in relation to housing mix and affordability and accommodation for Travellers were also included in Chapter 6 of the Draft Local Plan. Four reasonable alternatives to the Council's preferred approach to ensuring housing developments meet the housing needs of all people and that demand for affordable housing is met were appraised as part of the SA Report. These were to require a higher percentage of affordable housing, a lower percentage of affordable housing provision, set differing affordable housing targets for different areas of Kirklees and require affordable housing to be met as a percentage of floorspace rather than units. The policy taken forward in the Draft Local Plan was considered most appropriate to meet the overall affordable housing requirement in Kirklees. Furthermore no evidence was available to support the delivery of differing levels of affordable housing provision at different parts of Kirklees and the draft policy in the Draft Local Plan was considered less likely to compromise or slow down the delivery of affordable housing. The draft policy in the Draft Local Plan also performed more favourably in the SA Report than the reasonable alternatives considered. The draft policy was appraised as having more significantly positive effects particularly in relation to housing.
- 5.25 Only one reasonable alternative to the Council's approach to meeting the accommodation needs of Travellers in Kirklees was appraised and this was to include a criteria-based policy for the selection of sites. The reasonable alternative was discounted given that it could be too prescriptive and could result in duplication of other Local Plan policies. Furthermore the policy approach taken forward in the Draft Local Plan was found to have more positive sustainability effects than the alternative option. Allocating sites through the Local Plan is likely to help to provide certainty in terms of supporting the delivery development to support the accommodation of Travellers when compared to alternative of requiring sites to meet a prescriptive set out criteria.

#### **Remaining chapters of the Draft Local Plan**

- 5.26 Beyond the more overarching policies of the initial chapters of the Draft Local Plan, the latter chapters of the Draft Local Plan (Chapters 8 to 17) presented more thematic and development management style policy options. These included policies relating to town centre development, transport, design, the natural and built historic environment, health and the Green Belt. Many of these policies were set out to address a range of social and environmental issues which might result due to new development in Kirklees.
- 5.27 Alternatives were considered for many of these policies. Where no alternatives were considered it was generally the case that an alternative to the draft policy taken forward would be inconsistent with national policy. The policy options taken forward as part of the Draft Local were mostly found to perform more strongly in sustainability terms than the reasonable alternatives considered.

#### **Identification and Appraisal of Site Options**

- 5.28 The Council identified site options to be appraised as part of the SA Report through a number of sources including a Call for Sites process, a review of Council assets, existing UDP allocations and existing UDP Provisional Open Land. The Council identified those sites that were deliverable and

(in the case of site options for built development) were developable, and these were also considered to be 'reasonable' options for the purposes of the SA.

- 5.29 As part of the SA Report for the Draft Local Plan a total of 859 reasonable alternative residential site options, 88 reasonable alternative employment site options and 29 reasonable alternative mixed use site options were appraised by LUC on behalf of the Council. A further 551 reasonable alternative open space site options, 37 reasonable alternative Traveller site options, 37 reasonable alternative minerals site options and one reasonable waste site option were appraised by Kirklees Council officers and reported on in the SA Report for the Draft Local Plan.
- 5.30 The Council took into account the findings of the SA which were initially presented in the form of an internal SA summary note, as well as other relevant factors when deciding which site options to include in the Allocations and Designations document (SD2) which formed part of the Draft Local Plan. For the site options, the Council prepared a Rejected Site Options Report (November 2015)<sup>3</sup> which explains the reasons why sites that have not been allocated in the Local Plan were rejected.
- 5.31 The Rejected Sites Options Report demonstrates how the decision-making process was informed by the Council's red/amber/green assessment of the site options in relation to topics including transport, public health, flood/drainage, biodiversity, historic environment, etc. As well as sites being rejected for scoring poorly in those assessments, other sites were rejected based on reasons such as the site overlapping with an allocated site, the land now being developed or the landowner being unwilling. These reasons are documented in detail in the Rejected Site Options Report.

## Publication Local Plan (2016)

- 5.32 The policies presented in the Publication Draft Local Plan (November 2016) were developed taking into consideration the consultation responses received and the SA findings from the work carried out in relation to the Scoping and Draft Local Plan phases.
- 5.33 Following the Draft Local Plan phase a number of new reasonable alternative site options were identified by the Council and subject to SA. Furthermore a small number of site options that were previously considered as reasonable alternatives were discounted from the SA process as they were no longer considered by the Council to be reasonable options for various reasons, which were set out in the SA Report. No new reasonable alternative policy options were identified and appraised following on from the Draft Local Plan phase.
- 5.34 Chapter 11 of the SA Report for the Publication Draft Local Plan (October 2016) presented which of the options considered during the preparation of the Local Plan were taken forward for inclusion in the Publication Draft Local Plan. The findings of the SA of the preferred policy approach and accompanying reasonable alternatives were also presented in this chapter. This chapter also presented the reasons for selecting the preferred policy approach included in the Publication Draft Local Plan.
- 5.35 Similarly, Chapters 4, 5, 6, 7, 8, 9 and 10 of the SA Report presented the SA findings in respect to the residential, employment, mixed use, open space, Traveller, mineral and waste site options considered. The number of residential site options considered as part of the SA Report for Publication Draft Local Plan increased to 982, the number of employment site options considered increased to 108, the number of mixed use site options increased to 36, the number of open space site options considered increased to 603 and the number of mineral site options considered increased to 49. One of the Traveller site options previously considered was discounted as a reasonable alternative at this stage meaning that the total number of site options considered fell to 36. There was no change in the number of waste sites considered.
- 5.36 Appendix 5 in the SA Report for the Publication Draft Local Plan presented an audit trail of all site options considered at each stage of the Local Plan preparation process and an explanation of the Council's reasons for selecting or rejecting each one.

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<sup>3</sup> Kirklees Council (November 2015) Draft Local Plan: Rejected Site Options Report

- 5.37 The findings of the SA Report for the Publication Local Plan were updated through the production of the SA Erratum Notice (November 2016) and the SA Addendum (April 2017) as previously explained.

## Main Modifications (2018)

- 5.38 The Main Modifications document (August 2018) set out changes to the Publication Draft Local Plan which the inspector considered necessary to make the plan sound and/or legally compliant. These changes included amendments to some site allocations and designations, as well as changes to policy wording and supporting text. As such the Main Modifications SA Addendum (August 2018) built on the findings of the SA Report for the Publication Draft Local Plan Report. In document SD1 (Strategy and Policies document) the changes as a result of the Main Modifications proposed related to policies:
- PLP4: Providing Infrastructure;
  - PLP13: Town Centre Uses;
  - PLP36: Proposals for Mineral Extraction;
  - PLP50: Sport and Physical Activity; and
  - PLP59: Infilling and Redevelopment of Brownfield Sites.
- 5.39 A number of changes to SA findings previously reported in the SA Report for Publication Draft Local Plan were reported in the Main Modifications SA Addendum as a result these amendments. In general the sustainability effects were assessed as being more overtly positive.
- 5.40 Although these changes to SA scores were reported as a result of the Main Modifications to document SD1, only a small number would reduce or remove positive effects previously identified. Furthermore the resulting changes to the SA findings were adjusted to not result in fundamental changes to the cumulative effects of the Local Plan as described in the Publication Draft SA Report.
- 5.41 In document SD2 (Allocations and Designations) the changes included the deletion of the following types of sites:
- One employment site;
  - 12 residential sites (although two of these are modified as a combined site);
  - One mixed use site;
  - 21 safeguarded land sites; and
  - Three urban green space allocations.
- 5.42 Some modifications were also included in relation to sites which were previously subject to SA as reasonable alternative options but were rejected for inclusion in the Publication Draft Local Plan and sites which were modified and were not previously subject to SA in their updated form. Some of these sites were revised areas of site options appraised previously, or sites that were previously proposed for one type of development but were subsequently proposed to be included as another type of allocation. These modifications related to two employment sites, one mixed use site, one mineral site and 16 residential sites. The above changes affected only a small proportion of the total sites allocated within document SD2. As such no likely changes to the cumulative effects of the allocations as described in the SA Report for the Publication Draft Local Plan were identified.
- 5.43 In addition to changing some of the site allocations, the proposed modifications to SD2 introduced 11 new policies. The policies did not themselves introduce any new proposals into the Local Plan; rather they related to allocations that were already included in the Local Plan and appraised either through the SA of site options or the SA of other policies in SD1.
- 5.44 As these new policies essentially just introduced the different types of allocated sites listed in SD2 (which were appraised through the SA of the site options) and explained that proposals will need to accord with the development principles set out in the relevant site boxes, the new policies were

judged not to result in changes to the cumulative effects of the Local Plan that were previously described in the SA Report for the Publication Local Plan.



## 6 How will the environmental and sustainability effects of the Local Plan be monitored?

- 6.1 The SEA Regulations require that "*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*" (Regulation 17), and that the environmental report should provide information on "*a description of the measures envisaged concerning monitoring*" (Schedule 2).
- 6.2 The Government's latest SA Guidance in the National Planning Practice Guidance<sup>4</sup> states that details of the proposals for monitoring the significant effects of implementing the adopted Local Plan should be included in the Sustainability Appraisal report, the Post-Adoption Statement (i.e. this document) or in the Local Plan itself.
- 6.3 A number of the strategic and development management policies in the Local Plan and the associated site allocations could have potential significant effects (both positive and negative) on the SA objectives. Therefore, it is recommended that monitoring is undertaken to determine whether these effects do indeed occur due to implementation of the Local Plan, and in order to seek to remedy them.
- 6.4 **Table 6.1** puts forward a proposed monitoring framework for monitoring the likely significant effects of implementing the adopted Local Plan. These reflect the indicators proposed within the monitoring framework for the Local Plan itself as the data collected will also be relevant to understanding sustainability effects in many instances. The monitoring table was previously presented in Chapter 13 of the Publication SA Report but has now been updated to reflect the final set of monitoring indicators included in the adopted Local Plan where relevant.

**Table 6.1 Proposed monitoring indicators for monitoring the effects of the Kirklees Local Plan on the SA objectives**

SA objectives for which potential significant effects have been identified	Suggested indicators (indicators have mostly been taken from the monitoring framework presented in the Adopted Local Plan)
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	<ul style="list-style-type: none"> <li>• Total amount of additional employment floor space – by type (B1, B2, B8).</li> <li>• Loss of employment land.</li> <li>• Take up of employment land.</li> <li>• Amount of potential employment land available – by type – Total with Planning permission.</li> <li>• Amount of potential employment land available – by type – remaining allocations (without planning permission).</li> <li>• Number of planning applications approved supporting existing and new employment</li> </ul>
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	<ul style="list-style-type: none"> <li>• Total amount of additional employment floor space – by type (B1, B2, B8).</li> <li>• Loss of employment land.</li> <li>• Take up of employment land.</li> <li>• Amount of potential employment land available – by type – Total with Planning permission.</li> <li>• Number of planning applications approved supporting existing and new employment.</li> </ul>

<sup>4</sup> Ministry of Housing, Communities & Local Government (February 2015) Strategic environmental assessment and sustainability appraisal (Paragraph 025 Reference ID: 11-025-20140306)



SA objectives for which potential significant effects have been identified	Suggested indicators (indicators have mostly been taken from the monitoring framework presented in the Adopted Local Plan)
3. Ensure education facilities are available to all.	<ul style="list-style-type: none"> <li>• New education and/or training facilities permitted (sqm).</li> <li>• Educational attainment.</li> <li>• Number of apprenticeship schemes or training programmes secured where the development meets threshold requirements.</li> </ul>
4. Improve the health of local people and ensure that they can access the health and social care they need.	<ul style="list-style-type: none"> <li>• New health care facilities permitted (sqm).</li> <li>• Average life expectancy.</li> </ul>
5. Protect local amenity including avoiding noise and light pollution.	<ul style="list-style-type: none"> <li>• Number of planning applications refused for noise reasons.</li> <li>• Number of noise pollution incidents reports annually.</li> </ul>
6. Retain and enhance access to local services and facilities.	<ul style="list-style-type: none"> <li>• Amount of new and loss of community facilities (sqm).</li> <li>• Number of retail proposals permitted outside of the defined primary shopping areas in hierarchy of centres.</li> <li>• Total amount of occupied ground floor floorspace in Convenience, Comparison, Retail Service, Financial and Business Service and Leisure Service sectors within town centres.</li> <li>• Number of outlets and amount of ground floor floorspace in retail use in primary shopping frontages in principal and town centres.</li> <li>• Number of residential completions within town centre boundaries.</li> <li>• Total amount of Leisure Services within town centres.</li> <li>• Total amount of additional leisure floorspace completed.</li> <li>• Huddersfield Town Centre – Total amount of additional development in main town centre uses, residential and education facilities.</li> <li>• Dewsbury Town Centre – Total amount of additional development in main town centre uses and residential units.</li> <li>• Total amount of additional convenience and comparison retail floorspace completed.</li> </ul>
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	<ul style="list-style-type: none"> <li>• <i>N/A – no significant positive or negative effects identified from the Publication Draft Local Plan.</i></li> </ul>
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	<ul style="list-style-type: none"> <li>• Sites with Green Flag status.</li> <li>• Amount of new or improved open space, sport or recreation facilities secured through planning applications.</li> <li>• Amount of urban green space (hectares) lost to development and protected through the refusal of planning permission.</li> <li>• Number of sites designated as Local Green Space.</li> <li>• Area of new open space delivered through development.</li> <li>• Supply of outdoor sports facilities protected from development and amount of new and improved outdoor sports facilities.</li> <li>• Amount of development approved in the Green Belt associated with outdoor sport, outdoor recreation</li> </ul>

SA objectives for which potential significant effects have been identified	Suggested indicators (indicators have mostly been taken from the monitoring framework presented in the Adopted Local Plan)
	and cemeteries.
9. Ensure all people are able to live in a decent home which meets their needs.	<ul style="list-style-type: none"> <li>• Net additional dwellings.</li> <li>• Gross affordable housing completions split by affordable rent, social rented and intermediate.</li> <li>• Net additional pitches (Gypsy and Traveller and Travelling Showpeople). Number of permitted pitches/schemes.</li> <li>• New and converted dwellings on previously developed land.</li> <li>• Demonstration of a five year supply of deliverable housing capacity.</li> <li>• Demonstration of a five year supply of deliverable Gypsy and Traveller and Travelling Showpeople capacity.</li> <li>• Housing completions by property type (detached, semi-detached, flats etc.) and number of bedrooms.</li> </ul>
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	<ul style="list-style-type: none"> <li>• Number of road casualties.</li> <li>• Number of planning permissions where travel plans secured.</li> <li>• Frequency of bus services in the District's villages.</li> <li>• Low carbon trips.</li> <li>• Progress of transport schemes as prioritised within the Infrastructure Delivery Plan. Amount of S106 and CIL monies received and spent.</li> <li>• Number of private car parks and parking spaces approved compared with Council provision.</li> <li>• Numbers of long stay and short stay town centre parking spaces and data on charges.</li> <li>• Increase in investment in core walking and cycle routes via S106 or CIL.</li> </ul>
11. Secure the efficient and prudent use of land.	<ul style="list-style-type: none"> <li>• Number of potentially contaminated land sites remediated through the planning process.</li> <li>• Number of new sites determined as contaminated.</li> <li>• Total amount of additional floor space on previously developed land by type.</li> <li>• Percentage of new housing completions that are less than 35 dwellings per hectare.</li> <li>• Number of redevelopment or infill proposals approved on brownfield sites in the Green Belt.</li> <li>• The amount of development approved associated with the re- use or conversion of buildings in the Green Belt.</li> </ul>
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	<ul style="list-style-type: none"> <li>• Percentage of new development taking place on brownfield land.</li> <li>• Landscape – Number of planning permissions granted contrary to policy.</li> </ul>
13. Conserve and enhance the historic environment, heritage assets and their settings.	<ul style="list-style-type: none"> <li>• Number of designated heritage assets considered at risk.</li> <li>• No of applications approved contrary to advice from relevant statutory bodies.</li> <li>• Loss of sites of archaeological importance including Scheduled Monuments.</li> <li>• Loss/additions to designated/non-designated heritage assets.</li> </ul>
14. Maximise opportunities to protect and enhance biodiversity and	<ul style="list-style-type: none"> <li>• Number of sites and total area of land designated or protected for biodiversity and geological importance,</li> </ul>

SA objectives for which potential significant effects have been identified	Suggested indicators (indicators have mostly been taken from the monitoring framework presented in the Adopted Local Plan)
geodiversity.	<ul style="list-style-type: none"> <li>including international, national and locally designated sites; ancient woodland and habitats of principal importance.</li> <li>• Net amount of new strategic green infrastructure.</li> <li>• Trees - Number of planning permissions granted contrary to policy</li> </ul>
15. Reduce air, water and soil pollution.	<ul style="list-style-type: none"> <li>• Number of complaints of pollution.</li> <li>• Number of planning permissions granted contrary to sustained objection of the Environment Agency on water quality grounds.</li> <li>• All proposals involving a water body to have an approved future management plan including S106 agreement where appropriate.</li> <li>• Number of planning applications refused for air quality reasons.</li> <li>• Number of new Air Quality Management Areas or Areas of concern for Poor Air Quality.</li> </ul>
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	<ul style="list-style-type: none"> <li>• Number of planning permissions granted contrary to sustained objection of the Environment Agency on flood risk grounds.</li> </ul>
17. Increase prevention, re-use, recovery and recycling of waste close to source.	<ul style="list-style-type: none"> <li>• Amount and percentage of Local Authority Collective Waste (LACW) arising and managed by management type.</li> <li>• Percentage of Local Authority Collective Waste (LACW) landfilled.</li> <li>• Percentage of household waste sent for reuse, recycling and composting.</li> <li>• Number of planning permissions granted for new waste management facilities.</li> <li>• Waste management facilities lost to other uses contrary to policy.</li> </ul>
18. Increase efficiency in water, energy and raw material use.	<ul style="list-style-type: none"> <li>• Permissions granted contrary to policy for non-mineral uses on a safeguarded minerals infrastructure site.</li> <li>• Permissions granted for non-mineral development in a Mineral Safeguarding Area (MSA) contrary to policy.</li> <li>• Number of planning permissions where the mineral has been successfully extracted prior to development.</li> <li>• The amount of mineral extraction per annum by operator.</li> <li>• The amount of mineral subject to permitted reserves.</li> <li>• The amount of aggregate production per annum.</li> <li>• Number of mineral sites successfully restored.</li> <li>• The percentage of planning permissions granted for the extraction of minerals which allow for the use of inert waste in their restoration.</li> <li>• Number of planning permissions granted for exploration and appraisal of hydrocarbons.</li> <li>• Number of planning permissions granted for production of hydrocarbons.</li> <li>• The amount of renewable energy generation by</li> </ul>

SA objectives for which potential significant effects have been identified	Suggested indicators (indicators have mostly been taken from the monitoring framework presented in the Adopted Local Plan)
	installed capacity and type.
19. Reduce the contribution that the District makes to climate change.	<ul style="list-style-type: none"> <li>• The amount of renewable energy generation by installed capacity and type.</li> </ul>

LUC  
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