

# Kirklees Local Plan

Joint response by

- Holmfirth Transition Towns (HoTT)
- Huddersfield Friends of the Earth
- Marsden & Slaithwaite Transition Towns (MaSTT)

## 1: Do you think our vision for Kirklees is right?

It is a good start. We particularly like the following sections:

- improve transport links...giving priority to public transport ..and to cycling and walking
- tackle inequality and give all residents the opportunity of a healthy lifestyle..
- protect and improve green infrastructure so that residents have good access to good quality open spaces, sport and recreation opportunities, and for wildlife to flourish.
- promote development that helps to mitigate climate change, and development which is adapted so that the potential impact from climate change is reduced.
- facilitate the sustainable use and management of minerals and waste

However we feel that the plan is **not nearly ambitious enough** in terms of taking the urgent action on reducing carbon emissions that is needed to prevent catastrophic climate change and the protection of our natural resources. The plan needs to aim for a significant and measurable reduction in greenhouse gas emissions.

## 2: Is there anything we have missed that should be included?

# Urgent climate action

Kirklees Local Plan needs to include an ambitious policy on climate change that adopts proactive strategies to mitigate and adapt to climate change. It is a core planning principle that local plans should support the 'transition to a low carbon future'. The National Planning Policy Framework (2012) says in Paragraph 93, "Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions".

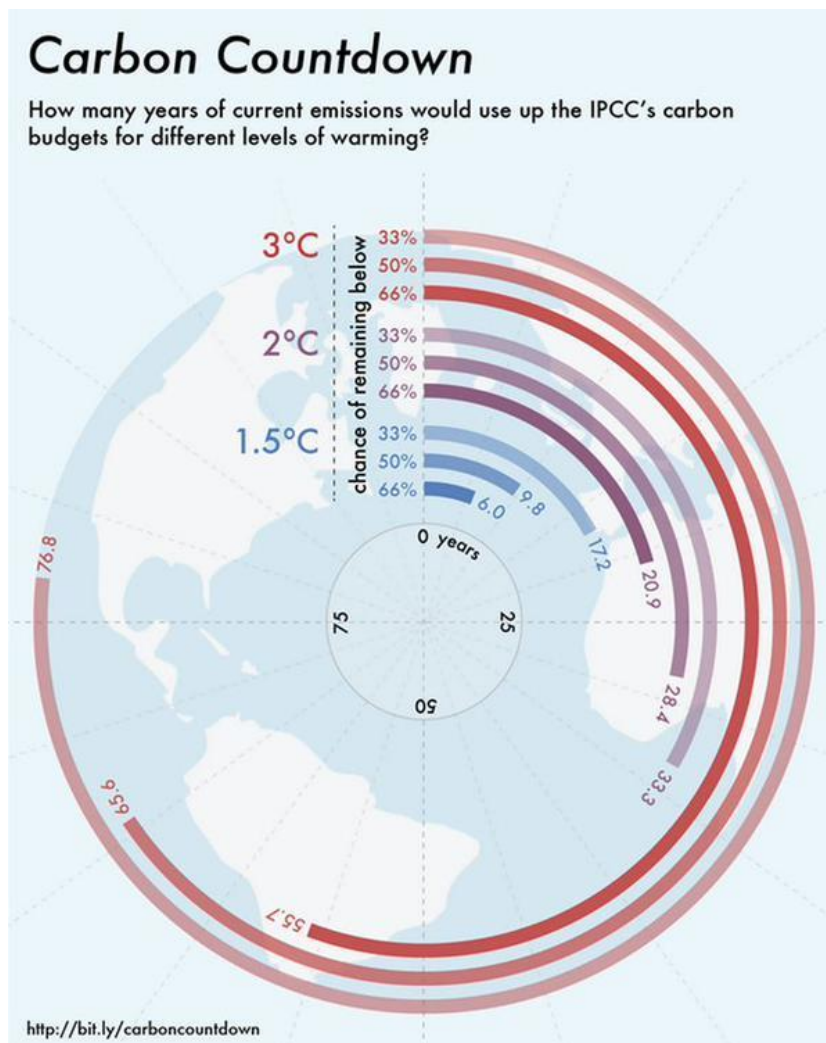
[See also TCPA's Planning for Climate Change report

<http://www.tcpa.org.uk/pages/planning-for-climate-change-guidance-for-local-authorities-2012.html>]

The IPCC (Intergovernmental Panel on Climate Change) has just issued its 'final warning' - saying that unless urgent action is taken NOW, the planet is facing catastrophic and irreversible climate change by the end of this century

<http://www.independent.co.uk/environment/climate-change/scientific-evidence-proves-climate-change-is-manmade-un-experts-conclude-9833748.html>

The next 15 years will be critical to make the urgent collective efforts needed to reduce CO<sub>2</sub> emissions.



Source: <http://bit.ly/carboncountdown>

## Kirklees existing carbon targets

Kirklees annual CO2 emissions are over 2.6 million tonnes each year (Defra, 2006). These total emissions are recorded within three sectors: industrial and commercial, domestic and transport.

Kirklees has signed up to the LGA Climate Local framework and has set the following carbon reduction targets:

- - To reduce carbon emissions arising from Council activities by 40% by 2020, from a 2005/6 baseline, and
  - To reduce carbon emissions across Kirklees by 40% by 2020, from a 2005/6 baseline, in line with UK targets.

The most recent data shows that:

- the Council has reduced its emissions by 19% by 2012/13.
- District emissions were reduced by 22% by 2011

[http://www.kirklees.gov.uk/you-kmc/deliveringServices/pdf/climateLocalUpdate2013\\_2014.pdf](http://www.kirklees.gov.uk/you-kmc/deliveringServices/pdf/climateLocalUpdate2013_2014.pdf)

## Setting ambitious targets

The UK's Climate Change Act sets a target to cut carbon emissions by at least 80% by 2050, with a minimum reduction of 26% by 2020. The European Council has endorsed the EU aim to reduce greenhouse gas emissions with to 80 – 95% in 2050 as part of reducing global emissions by half in 2050. -

We think that Kirklees should go beyond that, following the example of Denmark which has set even more progressive targets. See more at: <http://www.rtcc.org/2014/02/13/danish-parties-back-40-carbon-reduction-target/#sthash.KYrlneJk.dpuf>

We believe that Kirklees Council should show pioneering climate leadership by phasing out carbon pollution to zero by 2050, setting annual targets in the achievement of that aim.

We would suggest the following targets:

- Cut CO2 emissions throughout the district by **at least** 3% each year. This follows on from previous targets set by Kirklees Local Area Agreement coordinated by the Kirklees Partnership.

- Commit to 100% clean energy by 2050 (entire energy supply including electricity, heating, industry and transport)
- Commit to 100% clean energy by 2035 (energy supply including electricity, heating, industry not including transport)

This approach would work well within the current Plan's aims to ensure a 'healthy and prosperous future'. However, we believe the vision should be amended to the following:

- Addressing the urgent threat of climate change and making the transition to a low carbon economy
- Healthy people and communities enjoying a good quality of life
- A thriving sustainable economy that meets our needs without living beyond our resources

There is no economy on a dead planet and we believe that the urgent need to address climate change and protect natural resources needs to be a central plank of the Kirklees Local Plan. This would also be in line with the urgency outlined in Kirklees Council's recent endorsement of the 'Tipping Point Declaration'.

<https://kirkleescampaignagainstclimatechange.files.wordpress.com/2014/10/tipping-point-declaration-motion-to-kirklees-council.pdf>

We need an economic transformation on the scale of that witnessed during WW2, which will require cross-party co-operation and action within Kirklees Council and nationally. Kirklees should spearhead a powerful local authority response to climate change which would have a massive ripple effect nationally and internationally and help boost a thriving local green economy. .

## **Funding**

We recognise that Kirklees Council is currently extremely financially stretched and facing severe budget cuts and we appreciate that some of the policy suggestions below may seem impossible due to lack of funding. However, there will be no council and no liveable planet unless we take the necessary urgent action on climate change. Many of the ideas suggested below will help boost a local green economy and will generate their own income streams. Other areas may need innovative approaches to funding (such as those used to fund the Warm Zone project) and also schemes like crowd-funding, setting up social enterprises and community energy co-operatives and sharing resources using the Comoodle approach ([www.comoodle.com](http://www.comoodle.com)). Environment groups can work in partnership with the council, developing volunteer networks to help enable the radical carbon reduction plan needed. Strategies focused on relieving fuel poverty and creating warmer more energy efficient homes will have knock-on financial benefits in other ways.

Specifically we would suggest the following policies within Kirklees Local Plan

## Core strategy

The UK Sustainable Development Strategy 'Securing the Future' sets out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly

We suggest the following text be included in the core strategy of the Local Plan:

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development and the definition of Sustainable Development set out in the UK Strategy, Securing the Future as living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

The Council will always work proactively with applicants and the community jointly to find solutions which mean that proposals can be approved wherever possible, in order to secure development that as a whole, improves together the economic, social and environmental conditions in the area, and in particular tackles climate change.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) and with the principles of sustainable development, and which have benefited from meaningful public participation, will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will take into account: a) sustainable development; b) specific policies in that Framework indicate that development should be restricted; and c) local considerations indicate that the development should be restricted.

## Economy

Kirklees' vision needs to explicitly acknowledge the need to focus on promoting indigenous investment by local firms – where the potential for quality employment is arguably considerably larger than that achievable by attracting inward investment. Such a focus can, in turn, strengthen existing centres and support a dispersed pattern of economic activity with short distance commuting. While inward investment can be beneficial it should not be pursued in ways that require large scale/long distance movement of motor traffic.

It is worth recognising that strong local environmental policies e.g. on carbon reduction can be a significant stimulus to local development of green industry – itself an economic growth sector in the medium to long term. This is seen in the development of cities such as Freiburg – now one of the most prosperous in Europe.

[More information: <http://www.ecotippingpoints.org/our-stories/indepth/germany-freiburg-sustainability-transportation-energy-green-economy.html>]

# Energy

We propose a council-led energy strategy with a clear route, time-frame and implementation plan to a zero carbon Kirklees by 2050. This would require both radical reductions in energy demand within Kirklees and the development of local renewable energy sources.

## **Frack-free policy**

To mitigate climate change, and given that 80% of existing known fossil fuel reserves need to stay in the ground to prevent catastrophic global temperature rises, Kirklees Council should not consider fracking [shale gas exploration or hydraulic fracturing] and exploration of new fossil fuel sources of energy to be an appropriate part of its strategy.

The Council should adopt the following policy:

- This Council notes that it has a responsibility to tackle climate change.
- This Council acknowledges that exploration of unconventional fossil fuel undermines action on climate change and diverts resources away from investment in a safe and secure renewable energy future.
- This Council notes that there are possible significant adverse effects from shale gas exploration and exploitation, including water contamination and air pollution, and that, in line with the precautionary principle, applications for shale gas development should be refused.
- This Council calls for a moratorium on shale gas exploration within the UK.

## Renewable energy

- Local development plans should reflect clear targets on renewable energy generation based on the European commitment of 20% to come from renewable sources by 2020
- Kirklees should aim to meet 100% of its energy needs from renewable energy sources by 2035 (including electricity, heating, industry not including transport)
- Acknowledging the social and economic benefits of community owned renewable energy generation, proposals which demonstrate ownership by and led by local communities will be actively encouraged and supported.
- Communities will be encouraged through the local and neighbourhood planning processes to consider sites for appropriate renewable energy installations. Where communities wish to bring such schemes forward utilising a community ownership model the authority will support and facilitate this as appropriate through the planning process.
- Given the need for widespread deployment and the benefits of community owned schemes in delivering local decentralised energy supplies therefore contributing to the sustainable development of their locality - there will be a presumption in favour of supporting such development within the authority area.
- The local plan should identify suitable sites for wind, solar and hydro energy projects. Other options such as large scale interseasonal heat storage, district heating via CHP, solar boosted GSHP schemes, biogas, and energy from refuse should be researched. The Council should be at the forefront, looking outwards for appropriate developing technologies.
- Community renewable energy cooperatives should be encouraged and promoted, enabling rapid growth of renewable energy resources within Kirklees.
- The Council should establish policies which give positive weight to renewable and low carbon energy initiatives which have clear evidence of local community involvement and leadership ( ref the guidance in para 17 below, of the DCLG, July 2013 'Planning practise guidance for renewable and low-carbon energy' ):

### ***What is the role for community led renewable energy initiatives?***

*17. Community initiatives are likely to play an increasingly important role and should be encouraged as a way of providing positive local benefit from renewable energy development. Further information for communities interested in developing their own initiatives is provided by the Department of Energy and Climate Change. Local planning authorities may wish to establish policies which give positive weight to renewable and low carbon energy initiatives which have clear evidence of local community involvement and leadership.*

Kirklees local plan should also include strategic policies requiring 'that those producing neighbourhood plans or Community right to build Orders will need to

*consider, when developing, proposals that address renewable energy development'* (see Para 18 below DCLG, July 2013 'Planning practise guidance for renewable and low-carbon energy')

*18. Neighbourhood plans are an opportunity for communities to plan for community led renewable energy developments. Neighbourhood Development Orders and Community Right to Build Orders can be used to grant planning permission for renewable energy development. To support community based initiatives a local planning authority should set out clearly any strategic policies that those producing neighbourhood plans or Orders will need to consider when developing proposals that address renewable energy development. Local planning authorities should also share relevant evidence that may assist those producing a neighbourhood plan or Order, as part of their duty to advise or assist. As part of a neighbourhood plan, communities can also look at developing a community energy plan to underpin the neighbourhood plan.*

The 2012 National Planning Policy Framework calls on local planning authorities to 'support community-led initiatives for renewable and low carbon energy....' in para 97:

*"To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. They should:*

- have a positive strategy to promote energy from renewable and low carbon sources;*
- design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;*
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;*
- support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and*
- identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers. "*

- All new housing & buildings should be required to have renewable technologies (if appropriate to the site).
- The council should actively promote, lead on and find partners for funding schemes that support community energy initiatives. As budgets are tight the council should look at innovative funding sources such as Crowdfunding and the Green Investment Bank's community scale renewable lending programme



announced 7<sup>th</sup> November 2014. The council should seek partners with a view to creating new funding opportunities.

See Oldham Council 's 'Generation Oldham' initiative: -

<http://oldhamcouncil.wordpress.com/2014/12/10/generation-oldham-a-community-approach-to-green-energy/>.

Rochdale Council is developing a wind energy programme which promotes use of council-owned land and private/public partnerships.

<http://democracy.rochdale.gov.uk/documents/s17777/Rochdale%20Wind%20Energy%20Strategy%20Appendix%202.pdf>

Stockport Council is supporting the development of two community hydro schemes on council owned land.

<http://www.stockport.gov.uk/services/environment/sustainability/renewable-energy>

The Highways Agency is working with the M40 Chilterns Environmental Group to trial Photo Voltaic Noise Barriers. Kirklees has potential on large stretches of south-facing M62 towards the Leeds City boundary.

<http://www.m40-chilterns.org.uk/docs/photo-voltaic-barriers-on-m40.pdf>

- Funding mechanisms for renewable energy should be developed (eg interest free / low interest loans for schools and community projects to help with initial outlay). See Friends of the Earth's Run on Sun campaign for more information on funding mechanisms for community energy:

<https://www.foe.co.uk/page/about-run-on-sun>

- The council could seriously begin to look at local energy generation in a decentralised energy system of ownership and operation in a similar model to the one that is being developed in Germany where the growing activism of municipal energy companies (remember Huddersfield used to have its own town gas generation!) and citizens energy cooperatives lend political and social dynamism to the country's energy transformation. This activism means that much of the technical foundation for a decentralised low-carbon system is being established.

<http://www.oxfordenergy.org/wpcms/wp-content/uploads/2012/06/SP-261.pdf>

<http://energytransition.de/2014/06/remunicipalization-of-hamburg-grid/>

### **Funding mechanisms to reduce fuel poverty & increase energy efficiency**

We would ask that Kirklees look at the example of Nottingham council who are setting up their own not for profit energy supply company in order to provide a

better deal for the community, combat fuel poverty and provide funds to reinvest in renewable supply projects.

Whereas the big six all have all set up their pricing structure so that the more energy you use, the cheaper energy gets per unit, there are *alternative models* for pricing structures that are designed to help lift people out of fuel poverty and encourage energy conservation measures. Rising block tariffs and variable VAT rates are both pricing structures that do this. For the majority of people currently in fuel poverty, these tariffs will help lower their bills. There will also be some situations where people on a low income have a higher than average energy use and extra fuel poverty measures need to be in place.

For high energy users, the per unit price of energy is proportionally higher which gives a better payback for energy efficiency and lifestyle changes. As price per unit is not the only consideration people take into account when looking at suppliers, there will be some people for whom a well run, sustainable community energy supplier is worth having slightly higher bills than staying with the big six.

# Housing

## General comments

Housing accounts for 25% of all UK CO2 emissions. Addressing the energy efficiency of both new and existing buildings is a key part of reducing carbon emissions, while also eliminating fuel poverty and improving quality of life and reducing health and social problems.

Setting high standards of thermal efficiency for new housing and stipulating the incorporation of renewable energy in Kirklees would avoid long term locking-in of high carbon emissions and mitigate the effects of future rises in energy prices.

The availability of a range of housing tenures, including affordable housing reflecting the needs of the local population, should obviously be a key part of Kirklees' Local Plan.

The location and accessibility of new housing to active travel and public transport networks is also key to tackling climate change as well as enabling green infrastructure to develop and thrive.

## New homes & buildings

Passivhaus is the leading international low energy, design standard. Over 37,000 buildings have been designed, built and tested to this standard worldwide. Passivhaus is based on energy efficient 'fabric first' principles which can create buildings using 90% less energy than typical UK housing stock. More information: <http://www.passivhaustrust.org.uk/>

The city of Brussels is making the Passivhaus standard mandatory for all new builds as well as all retrofits as of January 2015. We would suggest the following targets for Kirklees:

- From 2020 (or sooner) a requirement that all new build housing and buildings on Kirklees owned land or built for Kirklees to be built to the Passivhaus standard
- From 2020 (or sooner) we suggest that Kirklees require that the Passivhaus standard should be implemented for all new buildings.

There is considerable local expertise in Passivhaus construction which can be drawn upon to make Kirklees a leader in this field. Developing Passivhaus expertise and skills within the area will help boost a thriving local green economy and offer training and employment opportunities for young people within Kirklees.

*Please note, a recent UK Government change to the Merton Rule (Planning and Energy Act) has removed the ability of Councils to require additional energy efficiency measures in non-council controlled new buildings. However this may be overturned or revised and there may be other ways to incentivise Passivhaus developments through local planning policy. More information: [http://en.wikipedia.org/wiki/The\\_Merton\\_Rule](http://en.wikipedia.org/wiki/The_Merton_Rule)*

Passivhaus has considerable advantages over the Code for Sustainable Homes:

- The Passivhaus Trust is currently campaigning that the UK Government should recognise Passivhaus specifies a more stringent fabric standard (15kWh/m<sup>2</sup>.year and 0.6m<sup>3</sup>/hr.m<sup>2</sup> air tightness) as its core criterion
- Passivhaus also includes an energy consumption criteria for total home energy use of 120kWh/m<sup>2</sup>.year.
- The design is led by PHPP calculation software as opposed to SAP which informs CSH homes. PHPP is demonstrably more accurate at predicting actual energy use as built.
- Airtightness needs to be tested on site to confirm this standard is met which is not a requirement for CSH or building regulations.

- No concessions are made in PHPP for extra add ons that can and should be used in addition to good fabric design and construction.

Put simply, a CSH level 6 house can be a good design, but poorly constructed and use add on technologies to meet the CSH accreditation. A Passivhaus has to be designed and constructed and tested to far higher standards than CSH level 6 and also has the option of utilising the same add on renewables.

The Passivhaus Trust is currently campaigning that that the Passivhaus Standard is an exemplary method for meeting the forthcoming Near Zero Energy Buildings target .

<http://www.passivhaustrust.org.uk/UserFiles/File/Policy%20papers/Draft%20Policy%20Statement%20v2%20REV%20D.pdf>wable technologies to take it to a far better overall standard.

### **Passivhaus & cost**

Exeter Council has now fully embraced the 'business case' for Passivhaus and is building all new council buildings (housing, leisure centres etc) to the Passivhaus standard.

<http://apps.exeter.gov.uk/dnRSS/ShowMediaReleases.aspx?ID=1670>

Passivhaus does not need to cost much more to build than standard construction, indeed Wolverhampton Council has built 3 Passivhaus schools at no extra cost.

<http://www.elementalsolutions.co.uk/passivhaus-schools/>

With experience and mass implementation the costs will go down dramatically. In Germany the extra costs of building Passivhaus are usually around 5%. Lifetime costs of the building in use quickly ensure there is payback for initial extra outlay.

<http://www.encraft.co.uk/viewpoints/technical-insight-whole-life-costs-of-passivhaus/>

## **Existing homes**

### **Current progress**

Kirklees has made a commitment to aim to provide affordable warmth and tackle fuel poverty in homes

- Kirklees Council has led the way with energy efficiency measures through its pioneering Warm Zone scheme which tackled the 'low hanging fruit' of loft and cavity wall insulation measures.
- The Kirklees Energy Saver (KES) scheme has successfully completed with ~400 private sector homes receiving energy improvements.
- Kirklees Neighbourhood Housing has completed a range of projects to improve the thermal efficiency of 2,250 Council Homes.
- Support to vulnerable households has been maintained through work with Mears Home Improvements: 61 home energy visits have been undertaken, and 190 homes have received one or more energy efficiency measures.
- Kirklees' Affordable Warmth scheme, providing funding for draught proofing for vulnerable people, continues to be implemented in the Holme Valley.
- Work is continuing in respect of procuring an ECO and Green Deal Provider through the Leeds City Region despite radical changes and reductions in ECO funding announced at the end of 2013.

**Despite the success of such schemes the scale of fuel poverty in private sector housing in Kirklees is huge and addressing it remains incredibly challenging.**

### **The next 15 years**

Kirklees should set a target to achieve radical energy savings by 2030.

- Kirklees should undertake a trial 'deep retrofit' of typical local housing stock (e.g. terraced housing). This should be based upon Passivhaus principles and knowledge of Passivhaus approaches to retrofit. The AECB CarbonLite retrofit programme aims to offer expert advice, guidance and research on best practice for refurbishment projects. <http://www.aecb.net/publications/aecb-carbonlite-retrofit-programme-clr/>
- This should be followed by mass implementation and rollout within Kirklees. All housing tenures should be included and the plan should be set within the time frame that is needed to meet the overall Kirklees energy target.
- There needs to be a policy to create "action plans" for each individual house. This would detail what measures are required to bring the house up to the relevant standard and taking into account maintenance and redecorating. This would ensure that any work done on Kirklees housing in the future either improves the energy performance of the house or paves the way for it and does not obstruct planned improvement works.
- Renovation strategies for all housing types within Kirklees should be developed so that over the course of the next 15 years, no opportunities for improving the fabric of existing houses are passed by due to lack of time, knowledge or financial support. The current situation where re-plastering or re-decorating happens without any upgrade of the thermal performance of housing is no longer a viable option.

- The council should actively promote local advice schemes, which are easy to find out about and easy to understand, on energy efficiency measures and renewables uptake. Householders need to be confident about the quality and impartiality of advice they are receiving on the complexities of their energy efficiency strategies.
- The planning department needs to play a role in providing guidance on how to thermally upgrade properties at the same time as improving the character of the area. External wall insulation, window and door details and raising the heights of roofs are examples of where planning could become proactive in support of improvements that are sensitive to both thermal performance and local character. Kirklees should be prepared to relax some of their current planning controls affecting older properties and listed buildings so that external insulation and double or triple glazing can be undertaken to prevent heat loss and improve energy efficiency.
- The skills and knowledge required for this type of work currently exist in Kirklees and the opportunities for training and employment are huge. We urge the council to make full use of this knowledge base.
- Oldham Council's new Generation Oldham initiative is a good example of a local strategy to address fuel poverty, *'while also supporting young people into training and employment opportunities, and engaging with local 'green' businesses to ensure this crucial sector of the economy can see strong growth in the future'*.
- The Passivhaus Trust is currently campaigning for the UK Government to allocate a percentage of ECO funding to trial deep retrofit projects including the Passivhaus retrofit standard - EnerPHit as a refurbishment good practice target. This would need to sit alongside, and inform a National Refurbishment Strategy that achieves deep retrofit for a majority of UK buildings i.e. a reduction in the quantity of energy used for heating and cooling of at least 75% and a reduction in CO2 emissions of more than 90%

<http://www.passivhaustrust.org.uk/UserFiles/File/Policy%20papers/Draft%20Policy%20Statement%20v2%20REV%20D.pdf>

#### Other relevant local initiatives

Carbon Coop Manchester <http://carbon.coop/>

Yorkshire Energy Services <http://www.yorkshireenergyservices.co.uk/>

Warmer Homes project - MASTT <http://www.greenbuildingstore.co.uk/page--warmer-homes.html>

## **Land use**

The local plan as it stands seems to lack consensus on the provision of land for housing. We support efforts to probe this deeply and to avoid release of large areas for inappropriate housing development at high cost to the environment. We would advocate the use of brownfield sites wherever possible for any new developments.

## **Layout & design**

Layout of housing and common spaces for residents' use can enhance community cohesion.

When considering new developments attention needs to be paid to community cohesion and well-integrated design of mixed tenure housing (so that social and affordable housing is not marginalised within a development). Kirklees should consider promoting a planning approach favourable to community co-housing schemes, which share resources and facilities sustainably.

# **Retail development**

All proposals for retail development will be capped at most 3,000 m<sup>2</sup> of net retail floor space in retail outlets.

Of existing retail and planned retail space in the area, at least 50% of all retail floor space is to be allocated for occupation by independent retailers and SMEs.

# **Road building**

Road-building will be regarded as the option of last resort as a solution to transport problems. Support will not be given to any road-building proposal unless it can be demonstrated that all other possible options, including non-road-building options and making more efficient use of existing infrastructure, have been fully considered and it has been concluded that these do not provide an adequate solution. The local plan will not commit to supporting any specific infrastructure project where this support might prejudice the outcome of a full Environmental Impact Assessment.

# Land & natural resources

We depend upon our local natural resources for our wellbeing and for our essential life support systems and survival. This should be reflected in the Local Plan.

## **Soil**

There needs to be a coherent sustainable land management strategy to prevent soil erosion and degradation, enable local sustainable food production and to make the land resilient in the face of potential floods, droughts and other threats.

Suitable land should be designated across the borough for local food growing and preserved for this purpose. This will contribute to Kirklees carbon emissions targets by reducing food miles.

As part of having a 'healthy and prosperous future', Kirklees should maintain existing food growing areas and promoting innovative use of existing Kirklees land eg protecting existing allotments, freeing up land for growing. The local authority has recognised the need for food sustainability and Kirklees Public Health Department is developing a food strategy. Kirklees Neighbourhood Housing is supporting the 'Plant It Eat It Grow It' community growing project (PIGIEI).

The Business School at Huddersfield University is currently assessing the feasibility of creating a social enterprise to draw together the various strands and activities. Informal local growing has also been developed and sustained in various areas in the last few years with active community involvement, including Stirley Community Farm, Growing Newsome, Paddock and Golcar, with support from Kirklees Environment Partnership (KEP).

## **Water**

The Council should protect our supply and access to clean water and protect the population from the effects of flooding. The current strategy was updated in 2014 and priority should continue to be given to ensuring it is fit for purpose as weather patterns change as a consequence of global warming.

Water efficiency and sustainable drainage should be considered for any new developments. This should include protecting areas that provide for natural drainage e.g. peatland moors etc.



## **Wildlife & biodiversity**

Protection of our local flora and fauna should be of vital importance to the Kirklees plan. Consideration of wildlife corridors and enhancing wild spaces should be factored into all planning decisions. All new developments should seek to minimise impact on biodiversity and provide net gains, where possible.

More on local planning policies and biodiversity is at: “Planning for a healthy environment: good practice guidance for green infrastructure and biodiversity” TCPA and the Wildlife Trusts 2010.

**All new developments should be carefully considered with regards to soil management, flood management, water use and sensitivity to local ecosystems**

# **Transport**

## **General comments**

Kirklees needs to adopt a transport policy which seeks to halt and reverse the growth of motor traffic. Kirklees' Local Plan needs to bring about significant and measurable reduction in traffic congestion and commuting to/from work by motor vehicle.

Planning policies can help to reduce dependence on private cars (e.g. for work, shopping, leisure and other journeys), both by focusing developments in places that can be easily reached by cycling and other sustainable transport choices (e.g. preferring town centres to out-of-town locations), and by including good cycling provision in and around the development.

Good planning policies are vital to wider economic, environmental and health objectives. They should explicitly state that built and rural environments need to promote and cater well for walking and cycling to help boost active, healthy travel and recreation, reduce car-dependency and motor traffic volume, and make places attractive to live in and visit.

Just 2% of trips in the UK are made by cycle, compared to 10% in Germany, 18% in Denmark and 27% in the Netherlands. Planning policies covering the use of land and the layout of urban areas make an important contribution to such high levels of cycling.

**We would urge Kirklees to adopt the following Campaign for Better Transport's recommendations:**

To get transport planning right it must be closely integrated with land-use planning. Policies and plans should aim to reduce the need to travel and shorten journey lengths to make more places accessible by walking and cycling.

Instead of being low density and placed in locations far from existing services, new developments should be:

- Located in and around existing centres and public transport hubs
- Close to jobs, services and facilities that can be reached on foot, on a bike or by local public transport
- Designed so that walking and cycling are safer, faster and more convenient than driving
- High density, so that local shops and businesses can spring up with a catchment area of more customers and workers that find them easy to reach
- Built with lower levels of parking provision, which mainly serves to encourage car use and is a poor use of land that also reduces density

**Kirklees Local Plan should include policies on:**

- Locating development where it can be easily reached by walking, cycling and public transport;
  - Supporting pedestrian and cyclist-friendly urban transport strategies;
  - Providing good cycle access to and within new developments;
  - Ensuring the provision of cycle parking and other 'trip end' facilities (e.g. lockers and showers for employees etc.);
  - Adopting, implementing and monitoring travel plans as appropriate to the developments;
  - Securing appropriate developer contributions towards improved cycle provision in the surrounding area;
  - Requiring high standard design for the public realm to create an environment that is inviting for pedestrians and cyclists;
  - Considering the impact that planning decisions may have on recreational and utility cycling, particularly for long distance routes, local green spaces, the rights of way network, canals and riversides, disused railway lines and other transport corridors, national trails, national parks and forests, AONBs and other areas that provide valued opportunities for outdoor activity and recreation;
  - Ensuring that plans for the built environment contribute to improvements in public health.
- 
- Kirklees should always secure developer contributions for measures that benefit cycling and public transport. Kirklees should ensure that any new developments benefit fully from 'planning gain' (developer contributions), which can be used to provide for sustainable transport (e.g. high quality cycle routes to and in the vicinity of new developments).
  - Kirklees should resist development projects that would increase car dependent travel patterns (eg out of town retail developments)

- Kirklees should always adopt a travel plan as part of a wider planning agreement for developments; and they should ensure that they are implemented and well monitored.
- Kirklees should be able to dismiss plans on carbon grounds in the interests of achieving its carbon emissions targets and the legal limits set out in the Climate Change Act.
- Representatives of relevant NGOs and local communities should always be able to put meaningful input into Kirklees planning decisions and the policies and strategies that inform them. Consultation on planning applications for all proposals, major and minor, should be supported by clear information, transparency, regulations and guidance. Communities should also be granted a limited third party right of appeal against planning permissions to which they object.

### **Adopt the 'hierarchy of provision'**

Kirklees should adopt the 'hierarchy of provision' as set out in the Government's Manual for Streets and Cycle Infrastructure Design (LTN 2/08) and Shared Use Routes for Pedestrians and Cyclists (LTN 1/12). Consider first the strategies at the top of hierarchy.

- Traffic volume reduction, traffic management
- Traffic speed reduction
- Junction re-design or hazard site treatment
- Reallocation of carriageway space eg quality cycle facilities
- Conversion of footways to shared use for pedestrians and cyclists.

### **Specific ideas for Kirklees**

- 20 mph limits should be the norm for most streets in built up areas (including villages) and widespread adoption of 40 mph or low limits for rural lanes.
- Some form of dedicated space on busier urban roads where higher speed limits are retained.
- Parallel off-road facilities for dual carriageways and inter-urban roads. Current greenway system within Kirklees to be expanded.
- A cycle route strategy - develop a 'spiders web' model with rail stations, transport hubs being the centre linking to employment areas and housing
- Re-design larger junctions to be cycle-friendly
- Opportunities should also be sought to maximise the funding for cycling improvements through the planning system from new developments and highway maintenance budgets. Explore opportunities to use Community Infrastructure Levy and S106 revenue to pay for these.

**3: What do you think about the concept of relating new development to the characteristics of different places?**

Makes sense. However the local building aesthetics and characteristics of different places should not create a stranglehold on building planning requirements. The urgent need to reduce carbon emissions should be considered an issue of equal or greater importance than the conservation of buildings' aesthetic characteristics.

**4: What are the main characteristics you think we should take into account when we look at places and future development?**

- Impact of any development should be considered in terms of the transition to a low carbon economy and impact on CO2 emissions. Developments should aim to be zero carbon/ carbon neutral.
- Availability of brownfield sites
- Public transport and cycling links
- Local job opportunities
- Opportunities for renewable energy production
- Protection of land, water and natural resources

See suggestions outlined in answer to Questions 2 & 8

**5. What services, facilities and infrastructure would the 4 character areas need to accommodate growth?**

- Impact of any development should be considered in terms of transition to a low carbon economy and impact on CO2 emissions. Developments should aim to be zero carbon/ carbon neutral.
- Transport key – create transport hubs to get people to where they need to go by public transport, walking, cycling rather than the whole of the journey in the car.
- New developments accessible by public transport, foot and cycle not just car
- A cycle route strategy - develop a 'spiders web' model with rail stations, transport hubs being the centre linking to employment areas and housing
- Retention of open spaces within built up spaces
- Exploration of potential renewable energy sites within each area, with a view to setting up community energy schemes where possible. .

- Employment development should be increased in areas where this is low, such as the Holme Valley. –The emergence of dormitory settlements should be avoided in the interests of increasing and maintaining a balanced demographic and reducing long-distance travel to work.
- Town centres vital to keep lively. Support for local shops, libraries, community centres to keep each local area vibrant.
- See suggestions outlined in answer to Questions 2 & 8

**6: Do you think places or character areas should have their own vision and objectives? What would you include?**

It is good to engage the local community but the result needs to fit within the overarching goal for the whole of Kirklees.

**7: Which approach do you prefer?**

Approach 3: Allocating development based on an area's character *and* the size of its settlements

**8: Are there other approaches to allocating development to areas you think we could consider?**

In addition to all of the suggestions above, Kirklees could consider adopting a supportive policy on Low Impact Development:

A number of planning departments have adapted their planning policies to allow for and support Low Impact Developments (LID). These include the Pembrokeshire Low Impact Development Policy, the Dartmoor National Park Authority's emerging plan on low impact dwellings in the countryside and the Welsh Assembly Government's One Planet Development policy.

Low Impact Development can be defined as development that is:

- Locally adapted, diverse and unique
- made from natural, local materials
- of an appropriate scale
- visually unobtrusive
- enhancing biodiversity
- based on renewable resources
- autonomous in terms of energy, water and waste
- increasing public access to open space

- generating little traffic
- linked to sustainable livelihoods
- co-ordinated by a management plan

Such developments have historically been opposed by local planning departments as any housing is perceived as detrimental to the natural environment.

We suggest that now is the time to recognise the positive potential of Low Impact Developments and to focus on working alongside groups who are aiming to create such developments.

### **Framework for assessing developments**

Friends of the Earth has developed the following suggestions for factors to take into consideration when considering location of developments [Source: Local Development Frameworks, Friends of the Earth 2013]

In order to achieve sustainable development and travel patterns and to protect and conserve areas of recognised environmental and amenity importance, LDFs should adopt the following sequential approach in their policy towards the identification of locations for development:

- the re-use of previously developed land and buildings (brownfield sites) within urban areas provided it is not of high environmental value;
- on other previously developed land well connected to public transport links;
- new locations within urban areas, subject to the need to protect and conserve areas of recognised environmental and amenity interests;
- on other sites and locations which are well located for achieving sustainable development and reduce the need to travel.

To ensure that the sustainable development objectives are met and that consequently the most sustainable mix of locations within, adjoining and outside of urban areas is selected within any development plan area, the LDF should use the following criteria in establishing the suitability of individual sites:

- The accessibility of development sites by non-car modes, and the potential to improve such accessibility. (*Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.* para 34, NPPF)
- The capacity of existing infrastructure, including public transport, utilities and social infrastructure (such as schools and hospitals) to absorb further development.
- Physical constraints on the development of land, including for example, the level of contamination, stability and flood risk. (*To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location.* para 120, NPPF)

- The impact that the development of sites will have on the area's environmental carrying capacity and in particular their implications for resource conservation, natural resources and biodiversity. *(minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; para 109, NPPF)*
- The impact that the development of sites will have on the area's cultural resources. Local authorities should recognise the contribution of heritage features to the social and economic regeneration of an area. *(recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. para 126, NPPF)*
- The impact of the development on general pollution levels. Local authorities should recognise the existing problems of poor air, water and soil quality in many areas and acknowledge the potential negative cumulative impact of further development on these areas. *(preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; para 109, NPPF)*
- The suitability of sites for mixed use development and the contribution that development might make to the social, economic and environmental fabric of local communities.

Response submitted on: 22/12/14 by:

- Holmfirth Transition Towns: [www.hott.org.uk](http://www.hott.org.uk)
- Huddersfield Friends of the Earth: [www.huddersfieldfoe.wordpress.com](http://www.huddersfieldfoe.wordpress.com)
- Marsden & Slaithwaite Transition Towns: [www.mastt.org.uk](http://www.mastt.org.uk)