

# Case Study: Local Plan Development Allocations **Kirklees Council**

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May 25, 2017

**AECOM**

In a nutshell...

# A look at how strategic development planning can take appropriate account of Air Quality – through the preparation of the Local Plan



# Presentation Overview

## – The Purpose of a Local Plan

- How does it consider Air Quality?
- How does it link with LAQM?

## – What did we do, and How?

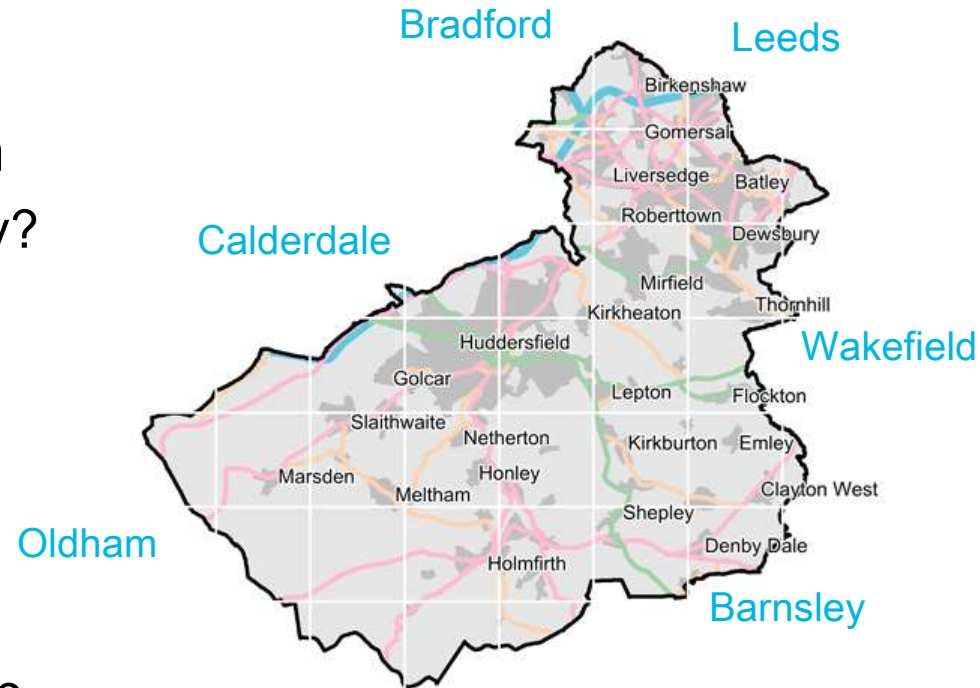
- Methods, Results

## – Outcomes

- What have Kirklees got out of it?
- Public/stakeholder confidence that AQ/health properly considered
- Local Plan Examination
- Better understanding of Cumulative Impacts
- A body of work to refer back to

## – Alternative Approaches

- How could this be done differently? Cheaper alternative?
- Funding...



## Local Plans

The Government wants every area in England to have an adopted local plan to provide the framework for development across the country

A local plan sets out local planning policies and identifies how land is used, determining what will be built where.

Local peoples' views are vital in shaping a local plan, helping determine how their community develops.

Development should be consistent with the national planning policy framework (NPPF)





## Kirklees Local Plan

Kirklees Council is preparing a new Local Plan, to set out the District's development plans to 2031.

Kirklees want the Plan to consider the air quality implications of development; the Plan should not designate land for a development of a type and size in an area where impacts may be unacceptable, and unavoidable. Therefore they commissioned an Air Quality Assessment

Future planning complications and adverse health effects upon communities within the District must be avoided.

**Influencing / shaping the Local Plan should be a core LAQM responsibility.**

# National Planning Policy Framework (NPPF)

## Air Quality Planning Policy Guidance (PPG)

Sets out national policies/principles on land use planning:

*“The planning system should contribute to and enhance the natural and local environment by 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...”*

*“Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of AQMAs and the cumulative impacts on air quality from individual sites...”*

Air Quality PPG states:

*“...the Local Plan may need to consider... ways in which new development would be appropriate in locations where air quality is likely to be a concern... This could be through, for example, identifying measures for offsetting the impact on air quality... including supporting measures in an air quality action plan or low emissions strategy where applicable.”*



# Local Plan Examination

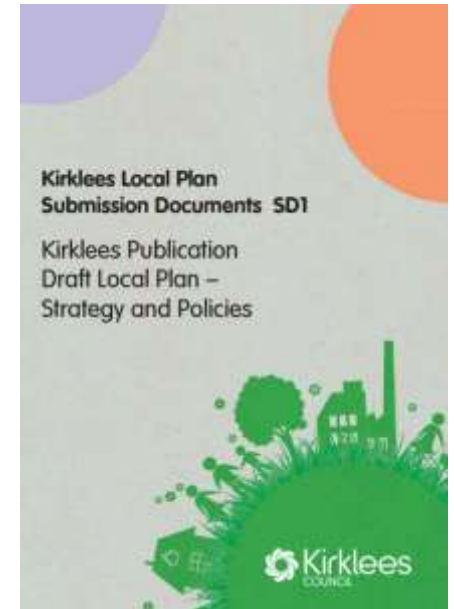
Kirklees Local Plan was submitted recently, together with several supporting documents (including the Air Quality Assessment)

The planning inspectors will examine the plan impartially and publicly.

The Inspector's role is to test the "soundness" of the Plan; has the duty to co-operate been met? is it legally compliant?

It is for Kirklees to decide how they wish to proceed after the Inspector produces his/her report into the Examination.

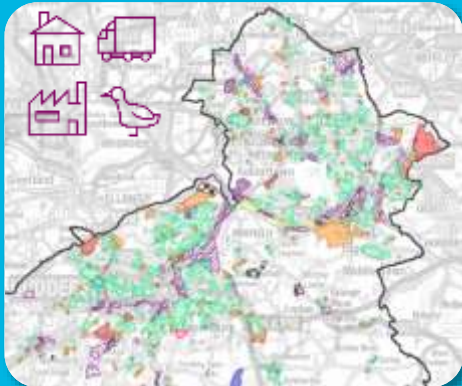
**The adoption of a Local Plan can only be overturned by a successful challenge in the High Court on a point of law**






















# What did we do?

## 1. Agree Approach

## 2. Proposed Land Allocations Review



Map Legend	
▼ Accepted Options 1	<input checked="" type="checkbox"/>
 Employment_Acc_...	<input checked="" type="checkbox"/>
 GypsyTraveller_Acc...	<input checked="" type="checkbox"/>
 Housing_Acc_PDLP...	<input checked="" type="checkbox"/>
 LandStorthesHall_A...	<input checked="" type="checkbox"/>
 MineralAreasofSear...	<input checked="" type="checkbox"/>
 MineralExtract_Acc...	<input checked="" type="checkbox"/>
 MineralInfras_Acc_...	<input checked="" type="checkbox"/>
 MineralPreferr_Acc...	<input checked="" type="checkbox"/>
 MixedUse_Acc_PDL...	<input checked="" type="checkbox"/>
 Waste_Acc_PDLP16	<input checked="" type="checkbox"/>
 WasteSafeguarding...	<input checked="" type="checkbox"/>
▼ Accepted Options 2	<input checked="" type="checkbox"/>
 AddGreenBelt_Acc_...	<input checked="" type="checkbox"/>
 PriorityEmployArea...	<input checked="" type="checkbox"/>
 GreenInfrastrPro_A...	<input checked="" type="checkbox"/>
 LocalGreenSpace_A...	<input checked="" type="checkbox"/>
 RemoveSmSiteGB_...	<input checked="" type="checkbox"/>
 RemoveUrbanGS_A...	<input checked="" type="checkbox"/>
 SafeguardedLand_...	<input checked="" type="checkbox"/>
 UrbanGreenSpace_...	<input checked="" type="checkbox"/>

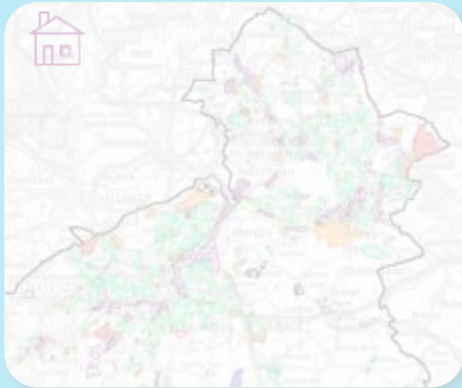
- Approximately 600 plots of land allocated in the Draft Plan
  - Residential
  - Employment
  - Mineral extraction
  - etc...



# What did we do?

1. Agree Approach 

2. Proposed Land Allocations Review



3. Transport Demand Model

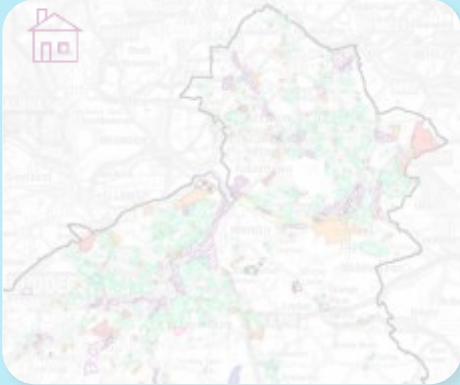


- Traffic forecasts from the Kirklees Transport Demand Model – covers Kirklees and (part of) surrounding authorities.
- The model predicts how traffic associated with all the different land uses will be distributed.
- **Three scenarios:**
  - 2015 – Baseline
  - 2020 – part implementation of development associated with the Plan
  - 2030 – full implementation of development associated with the Plan

# What did we do?

## 1. Agree Approach

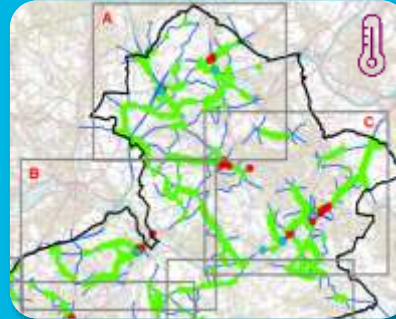
## 2. Proposed Land Allocations Review



## 3. Transport Demand Model



## 5. Key Issues / Hot-Spots

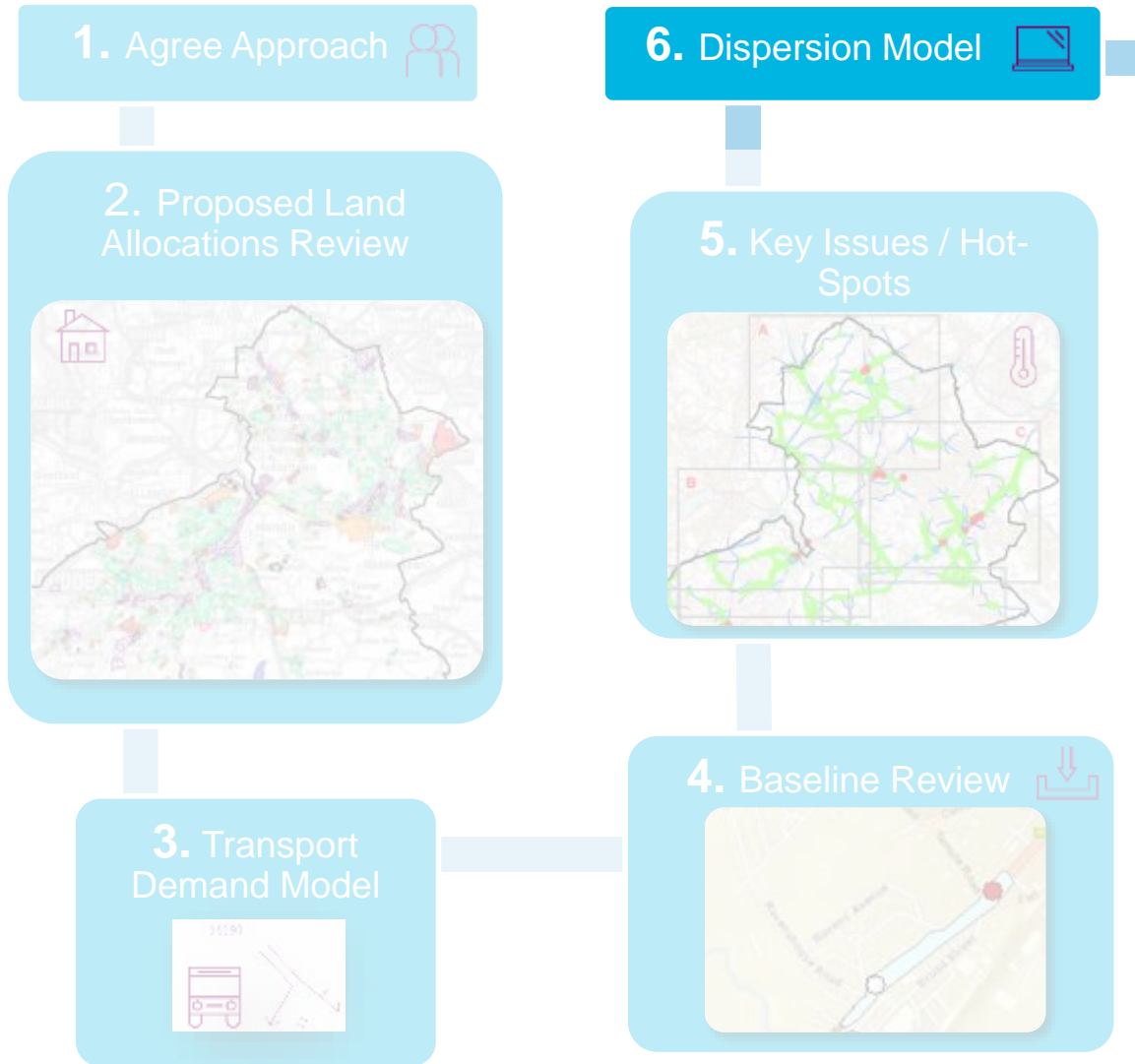


## 4. Baseline Review



- >50 monitoring sites (NO<sub>2</sub> and PM)
- Many NO<sub>2</sub> exceedances
- Two AQMAs
- Enough for verification
- District split into zones
  - Roads to model based on predicted traffic impacts
  - Extra care and attention for the 'hot-spots'
- **6500** Receptors! (including new properties and sensitive ecosystems)

# What did we do?



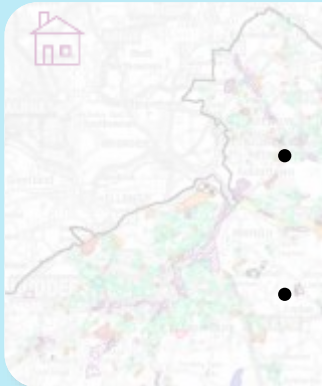
## • **ADMS Roads**

- 2015 – verification
- 2020 – (2018 backgrounds/ emissions rates)
- 2030 – (2023 backgrounds/ emissions rates)
- Many thousand road links
- EFT version 7.0
- NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>
- Local 2015 met data

# What did we do?

## 1. Agree Approach

## 2. Proposed Land Allocations Review

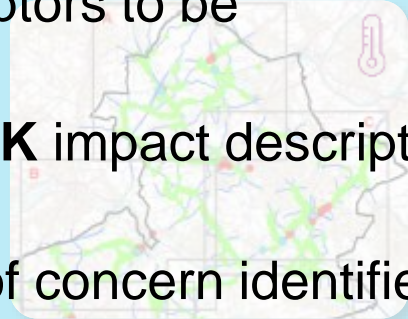


## 3. Transport Demand Model

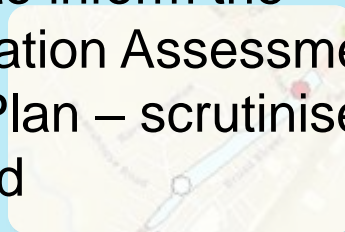


## 6. Dispersion Model

## 5. Key Issues/Hot Spots

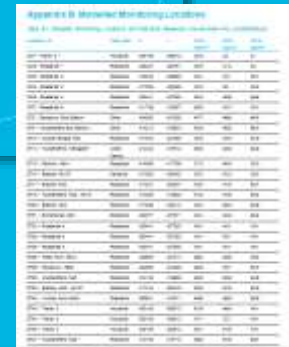


## 4. Public Review



- **Simple Report** – suitable to be read by members of the public
- GIS provides a means for data for all 6500 receptors to be interrogated
- **IAQM & EPUK** impact descriptors used
- A few areas of concern identified for extra analysis – but no significant detrimental effects
- Data provided to inform the Habitats Regulation Assessment (**HRA**) for the Plan – scrutinised by Natural England

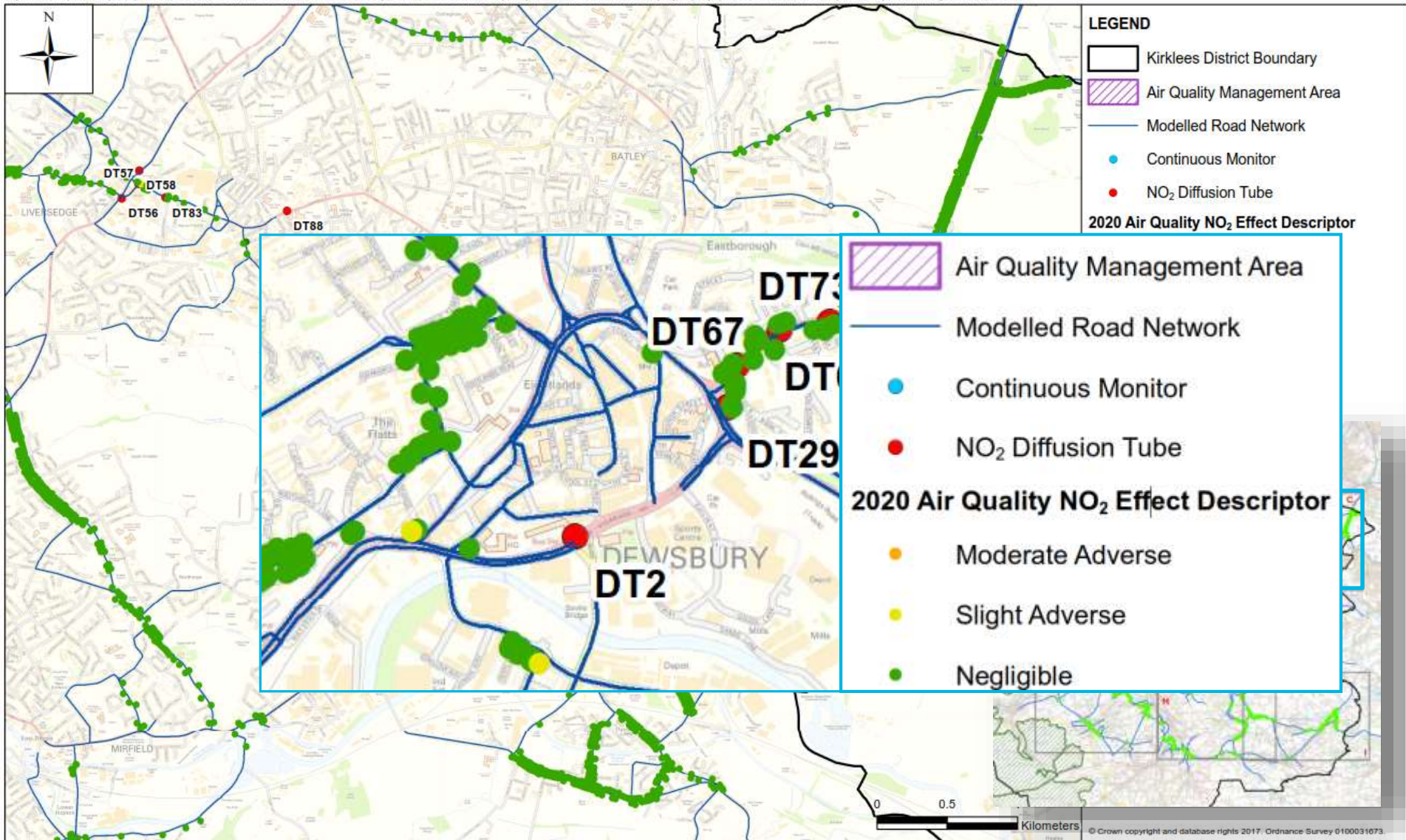
## 7. Interpretation & Reporting



Location	Coordinates	Height	Distance from Source	Notes
1	51.555, -0.255	10m	100m	...
2	51.555, -0.255	10m	100m	...
3	51.555, -0.255	10m	100m	...
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49	51.555, -0.255	10m	100m	...
50	51.555, -0.255	10m	100m	...







Client: KIRKLEES COUNCIL

Project: KIRKLEES COUNCIL LOCAL PLAN AIR QUALITY ASSESSMENT

Title: 2020 Annual Mean NO<sub>2</sub> Effect at Individual Receptors

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2 City Walk  
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## Outcomes (Short Term)

- AQ featured heavily at early public engagement events
- Being able to reassure the public / stakeholders that AQ was being properly looked at was invaluable
- Since our assessment was completed a few months ago the Local Plan team have been constantly referring to it.

### **“Gold Dust!”**

- This was NOT a box ticking exercise – the Plan could have been altered
- The AQ assessment (and many other studies) should ensure that the examination process goes smoothly

## Outcomes (Long Term)

- **Confidence that development in accordance with the Local Plan *should not* cause air quality problems**
- The work informs where special emphasis on sustainable travel should be prioritised
- Cumulative impacts – so often the problem for EHOs when considering planning applications – are inherently covered
- When air quality assessment for planning applications come in for review, the EHO will have a reference point
- There is now an ADMS model for the whole of Kirklees – it can be re-used, re-purposed etc..

# Alternative Approaches / Funding

- How could this be done differently? Cheaper alternatives?
  - Alternatives to Dispersion modelling, which is fairly time consuming.
  - Screening approaches / Emissions analyses only
  - Apportioning Impacts to separate development allocations
- Funding
  - Local Plan budget
  - Defra contribution





# Thank You

Special thanks to Kirklees Council Officers  
and colleagues at AECOM

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