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Friday 16 January 2026

Notice of Meeting

Dear Member

Growth and Regeneration Scrutiny Panel

The **Growth and Regeneration Scrutiny Panel** will meet in the **Council Chamber - Town Hall, Huddersfield** at **10.00 am** on **Monday 26 January 2026**.

This meeting will be live webcast. To access the webcast please go to the Council's website at the time of the meeting and follow the instructions on the page.

The items which will be discussed are described in the agenda and there are reports attached which give more details.

A handwritten signature in black ink, appearing to read "S Lawton".

Samantha Lawton

Service Director – Legal, Governance and Commissioning

Kirklees Council advocates openness and transparency as part of its democratic processes. Anyone wishing to record (film or audio) the public parts of the meeting should inform the Chair/Clerk of their intentions prior to the meeting.

The Growth and Regeneration Scrutiny Panel members are:-

Member

Councillor Zarina Amin (Chair)

Councillor Timothy Bamford

Councillor Donna Bellamy

Councillor Harry McCarthy

Councillor Alison Munro

Councillor Yusra Hussain

Chris Friend (Co-Optee)

Agenda

Reports or Explanatory Notes Attached

Pages

1: Membership of the Panel

To receive apologies for absence from those Members who are unable to attend the meeting.

2: Minutes of the Previous Meeting

1 - 8

To approve the minutes of the meeting of the Panel held on the 15 December 2025.

3: Declaration of Interests

9 - 10

Members will be asked to say if there are any items on the Agenda in which they have any disclosable pecuniary interests or any other interests, which may prevent them from participating in any discussion of the items or participating in any vote upon the items.

4: Admission of the Public

Most agenda items take place in public. This only changes where there is a need to consider exempt information, as contained at Schedule 12A of the Local Government Act 1972. You will be informed at this point which items are to be recommended for exclusion and to be resolved by the Panel.

5: Deputations/Petitions

The Panel will receive any petitions and/or deputations from members of the public. A deputation is where up to five people can attend the meeting and make a presentation on some particular issue of concern. A member of the public can also submit a petition at the meeting relating to a matter on which the body has powers and responsibilities.

In accordance with Council Procedure Rule 10, Members of the Public must submit a deputation in writing, at least three clear working days in advance of the meeting and shall subsequently be notified if the deputation shall be heard. A maximum of four deputations shall be heard at any one meeting.

6: Public Question Time

To receive any public questions.

In accordance with Council Procedure Rule 11, the period for the asking and answering of public questions shall not exceed 15 minutes.

Any questions must be submitted in writing at least three clear working days in advance of the meeting.

7: Building Safety Compliance Update

11 - 24

To provide an update on the Council's compliance with building safety regulations as a social landlord.

Contact: Phil Jones Service Director for Homes and Neighbourhoods Tel: 01484 221000.

8: District Heating Update

25 - 36

To provide an update on the district heating programme including:

- Latest position of any remaining actions from the Corporate Governance Audit Committee (CGAC) of June 2025, and the original Internal Audit of 2024.
- Timeline for the procurement of new metering and billing provider.
- Planned programme for ending of the current contract and implementation of new metering arrangements following contract award.
- Process for setting the bills for those on district heating from April 2026 and planned next steps.

Contact: Phil Jones Service Director for Homes and Neighbourhoods, Tel: 01484 221000.

**9: Mass Transit Spatial Development Framework
Development Plan Document update**

37 - 74

To update on the progress of the Mass Transit Spatial Development Framework Development Plan Document.

Contact: Elaine Orme Senior Planner and Mathias Franklin, Head of Planning

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Contact Officer: Jenny Bryce-Chan

KIRKLEES COUNCIL

GROWTH AND REGENERATION SCRUTINY PANEL

Monday 15th December 2025

Present: Councillor Zarina Amin (Chair)
Councillor Timothy Bamford
Councillor Donna Bellamy
Councillor Harry McCarthy
Councillor Alison Munro

In attendance: Cllr Moses Crook, Deputy Leader and Cabinet Member
for Transport and Housing
Cllr Graham Turner, Cabinet Member for Finance and
Regeneration
Joanne Barthlomew, Service Director Development
Phil Jones, Service Director for Homes and
Neighbourhoods
Alaistair Kimpton, Strategic Partnership Lead
Erran Taylor, Head of Housing Governance

Apologies: Chris Friend (Co-Optee)

25 Membership of the Panel

Apologies for absence were received on behalf of Chris Friend.

26 Minutes of the Previous Meeting

RESOLVED:

That the minutes of the meeting held on the 3 November 2025 be approved as a correct record.

27 Declaration of Interests

No interests were declared.

28 Admission of the Public

All agenda items were considered in public session.

29 Deputations/Petitions

No deputations or petitions were received.

30 Public Question Time

No public questions were received.

31 Asset Disposals Update Report 2025

Councillor Graham Turner introduced the agenda item, advising that it was a straightforward asset report and that officers would provide further detail.

Joanne Bartholomew, Service Director Development, informed the Panel that the asset disposal update report is part of a regular series of reports to the panel and would provide an update on the progress on assets against the target for disposal.

In reference to the report, the Panel was advised that progress remains on track to achieve the £6 million target, and that current projections indicate this figure is likely to be exceeded within the financial year. The primary focus of the report is to ensure the Council has a clear understanding of those assets that are essential to service delivery. Wherever appropriate, the Council will seek to dispose of assets that are not of strategic importance or do not serve a core operational function. This approach will facilitate potential development opportunities on those sites and contribute to reducing the Council's revenue costs associated with maintaining those buildings or parcels of land

The Panel was informed that over successive reporting cycles, the approach has been to provide a focused, transparent account of the costs associated with asset disposals and the capital receipts generated from previous disposals. The report includes several tables which outline progress in relation to asset disposals and also details a number of assets previously declared surplus that have been awaiting disposal for some time.

The Panel was advised that there is a comprehensive programme of disposals underway, with the auction method being used in most cases. This approach ensures full transparency, allowing any interested party to bid providing openness in the prices achieved. On occasions, disposals are made directly to interested parties, particularly where they adjoin the asset in question, and that some transactions have proceeded via a 'best and final offer' process, including one due to conclude this week.

In response to the information presented, the Panel asked a number of questions and made comments including some of the following:

- How can the Panel be assured that the Council exhausts all other means of raising capital before it resorts to disposal of its assets often against the wishes of the community and council taxpayers?
- How is the target set?
- The report identifies that some assets are allocated as miscellaneous or pipeline. What are the main reasons that they have been put into that category and what are the main issues that have been identified as to why they are struggling to get disposed of?
- Occasionally a site goes in for auction and then it is withdrawn. Does withdrawing it from auction have a cost implication to the Council?

Growth and Regeneration Scrutiny Panel - 15 December 2025

- Are there any opportunities for the Council to incorporate some of these sites into its own housing stock and where the Council owns the land and could support developers access funds, are potential opportunities being missed?

RESOLVED:

That the Cabinet Member and officers be thanked for presenting the Asset Disposals Update Report 2025.

32 Community Asset Transfer Update

Councillor Graham Turner introduced the agenda item, advising that this was the latest report on the Community Asset Transfer (CAT) process, which outlines current activity within Kirklees. The report presents a positive update and demonstrates the success of the programme to date.

Alistair Kimpton, Strategic Partnership Lead, informed the Panel that Kirklees is regarded as an example of good practice in the management of Community Asset Transfers. This recognition included being invited to present at the Local Government Association Conference a few years ago. The strength of the Kirklees approach lies in working with communities in a community-led, rather than asset-led, approach when progressing CAT proposals.

The Panel was reminded that:

Community Asset Transfer: (CAT)

- the transfer of ownership and management of public land and buildings from the Council to a community organisation.
- assets are transferred at less than market value for local social, economic or environmental benefit.

The primary purpose of CATs in Kirklees:

- invest in our communities
- help our communities achieve their aspirations
- ensure assets and services remain available for the community

The Panel was informed that the current policy was updated in 2020, and in total there have been 27 asset transfers in addition to a variety of other assets. The policy was developed to support the council's corporate vision, and to reflect current best practice and the lessons learned. It was developed in consultation with a variety of stakeholders including locality, nationally recognised bodies who help to develop community capacity.

The policy sets out a framework for the process, the whys, the whats and the hows. It is designed to be transparent to guide interested groups through the process and to make the process equal for all interested parties.

Transfers are by a long leasehold, and this is one of the examples of where there has been learning from previous practice and a move away from a freehold model to a leasehold model. The presumption is that all assets will be transferred by the grant of a leasehold for up to 125 years. This enables any future CAT leaseholders to

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have more detailed and better conversations with funders when they are applying for funding for revenue costs.

A key advantage of granting a long leasehold is that it establishes and maintains an ongoing relationship between the community group and the Council. Experience has shown that, where a freehold is transferred, the Council may lose an element of control; for example, if the CAT arrangement fails, the asset could potentially be sold on the open market. By contrast, a leasehold arrangement enables the Council to retain a degree of oversight and safeguard its long-term interests

Covenants are included in the lease to ensure that the asset is predominantly restricted to community use. There is a 70/30 model to restrict the commercial use of that building to 30% of the ongoing revenue, which means that they have the ability to raise revenue from commercial entities, however, the asset remains community focused. The Council reserves the right to use the asset for libraries or polling stations. The terms of the asset transfer do require a full repairing obligation to the people taking it on.

Referring to the presentation slides, the Panel was shown information which set out the indicative timescales associated with the Community Asset Transfer process. It was emphasised that these timescales are indicative only, as the Council works closely with groups taking on assets to ensure they have sufficient time to undertake their deliberations. Many of the stages are dependent on the capacity of the community group to engage in discussions and agree the heads of terms.”

It was further noted that another reason Kirklees is regarded as an example of good practice is the level of support provided to community groups, which takes two main forms:

Financial

- Grant of up to £10,000 to cover professional fees, surveys etc, legal advice associated with the application, previously £5,000 maximum
- Applicants able to apply to the Council for a grant in order to fund urgent condition works or physical adaptations to the asset that will improve accessibility
- Match funding loan of up to £100,000, can be applied for retrospectively
- Revenue funding for building running costs (1st and 2nd year)

Additional support available to groups

- Internal support through Third Sector and Active Citizen teams
- External support commissioned through Locality, a national charity network with broad experience of asset transfers
- a critical friend for Kirklees and advice on current best practice
- support with the review of business models, capital project development, funding bids and procurement
- CAT Network meetings, workshops/bespoke training sessions for groups to develop knowledge and skills (as required)
- The overall aim is to support the delivery of successful and sustainable Community Asset Transfers within Kirklees

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The overarching aim is to support delivery and to ensure that community groups are given the best possible opportunity to succeed.

Currently there are three cases with cabinet approval, and these are progressing towards completion, with the aim that all three will complete by the end of this financial year. These are Honey Village Hall, the Hudawi Centre and the DRAM centre.

Challenges

- Council's economic circumstances
- Competing priorities for assets
- Managing expectations of community organisations/Council
- Capacity within the community
- Access to and availability of external funding
- Timescales – 18/24 months process

In response to the information presented, the Panel asked a number of questions and made comments including some of the following:

- To date 27 asset transfers have gone through the process, when did it all start?
- Has the council always given a loan in terms of helping the community and if they default is that factored in, because it can be a risk especially for communities who do not have the experience and at what point would the Council intervene before it gets to that stage?
- In terms of the assets, if the community were to take over an asset and there are substantial repair works that needs to be done before they take it on, who is responsible and would the Council do that work?
- Quite a lot has changes in terms of CAT since changed from freehold to leasehold. Is financial support only available to the ones that are leasehold or is it also available to the assets that have already gone through as freehold?
- The government is currently introducing the Devolution and Community Empowerment Bill, which sets up a communities right to buy. Some of the assets may not be Council assets and will include private assets that could be at risk of being sold off. Is there anything that the Council is doing or could do to share its expertise in dealing with this process to help community groups navigate this process?
- How many of the existing CATs are freehold and are they all held by town councils and Parish councils and have any been disposed of by communities?

RESOLVED:

That

- a) the Cabinet Member and officers be thanked for providing an update on Community Asset Transfers.
- b) further information be provided outlining the chronology of asset transfers to date.

33 Homes and Neighbourhoods Service Governance Review

Councillor Moses Crook presented the agenda item, advising the Panel that the report provided an update on the Homes and Neighbourhoods Service governance review, setting out the outcomes of the recent assessment of the service's governance arrangements. The report will progress to Cabinet in January 2026, and comments and input from the Scrutiny Panel are welcomed.

The Panel was informed that the update of the governance arrangements builds on the existing structures to reflect the changes in regulatory environment for social landlords, and also to reflect any response needed from the emerging risk register. There was a planned name change for the Homes and Neighbourhoods Improvement Board, which, along with an updated terms of reference for that group, will better position this body to provide the ongoing assurance required to ensure continued compliance with the Regulator of Social Housing's consumer standards.

Councillor Crook explained that, in order to reflect the transition from responding to the regulatory notice to achieving compliance and progressing towards becoming an inspection-ready social landlord, amendments would be required at an appropriate point. The timing of this change would be delegated, given that the final date for the removal of the Notice to Improve has not yet been confirmed.

There is continued importance placed on the tenant led panel, this bridge between service and tenant voice will remain critical during the transition, not just for regulatory compliance but also to developing a relationship of increasing trust with tenants. There is a need to move from a position of simply regulatory compliance to one of increasing tenant satisfaction where tenants are happy and secure in their safe, warm and decent homes.

There are two new officer boards and an extended scope for the Transformation Board, to reflect additional layers of governance to enhance and accelerate the improvement journey.

In response to the information presented, the Panel asked a number of questions and made comments including some of the following:

- With reference to section 2.15 of the report which refers to a 'team led panel' creating a two-way communication channel with the tenant base. How is that being undertaken?
- Surveys are sent to council tenants, what is the return rate?

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- The report mentions a risk regarding data integrity management, security. How is data currently being managed within Homes and Neighbourhoods and what other specific issues have been identified as being a risk? For example, gaps and knowledge regarding stock or keeping personal information secure, and how would the new governance arrangements address that?

RESOLVED:

That the Cabinet Member and Officer be thanked for providing an update on the Homes and Neighbourhoods Service Governance Review.

34

Tenant Voice Strategy Update

Cllr Moses Crook introduced the agenda item informing the Panel that the information provides an update on progress in delivering the tenant voice strategy, including the implementation of the refreshed engagement framework introduced in September 2025. The information outlines how these updates and improvements are strengthening compliance with the consumer standards, in particular the transparency, influence and accountability standard which sits under the Social Housing Regulation Act 2023.

The report describes significant changes in how tenant engagement is carried out and the importance that is placed on the tenant voice contributing to the development and improvement of the service. It describes the move to embedding engagement across all aspects of the service to ensure the tenants views and needs are reflected in, and central to every aspect of housing provision.

RESOLVED:

That the Cabinet Member and Officer be thanked for providing an update on the Tenant Voice Strategy Update.

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KIRKLEES COUNCIL

COUNCIL/CABINET/COMMITTEE MEETINGS ETC

DECLARATION OF INTERESTS

Growth & Regeneration Scrutiny Panel

Name of Councillor

Item in which you have an interest	Type of interest (eg a disclosable pecuniary interest or an "Other Interest")	Does the nature of the interest require you to withdraw from the meeting while the item in which you have an interest is under consideration? [Y/N]	Brief description of your interest

Signed:

Dated:

NOTES

Disclosable Pecuniary Interests

If you have any of the following pecuniary interests, they are your disclosable pecuniary interests under the new national rules. Any reference to spouse or civil partner includes any person with whom you are living as husband or wife, or as if they were your civil partner.

Any employment, office, trade, profession or vocation carried on for profit or gain, which you, or your spouse or civil partner, undertakes.

Any payment or provision of any other financial benefit (other than from your council or authority) made or provided within the relevant period in respect of any expenses incurred by you in carrying out duties as a member, or towards your election expenses.

Any contract which is made between you, or your spouse or your civil partner (or a body in which you, or your spouse or your civil partner, has a beneficial interest) and your council or authority -

- under which goods or services are to be provided or works are to be executed; and
- which has not been fully discharged.

Any beneficial interest in land which you, or your spouse or your civil partner, have and which is within the area of your council or authority.

Any licence (alone or jointly with others) which you, or your spouse or your civil partner, holds to occupy land in the area of your council or authority for a month or longer.

Any tenancy where (to your knowledge) - the landlord is your council or authority; and the tenant is a body in which you, or your spouse or your civil partner, has a beneficial interest.

Any beneficial interest which you, or your spouse or your civil partner has in securities of a body where -

(a) that body (to your knowledge) has a place of business or land in the area of your council or authority; and

(b) either -

the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or

if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you, or your spouse or your civil partner, has a beneficial interest exceeds one hundredth of the total issued share capital of that class.



REPORT TITLE: BUILDING SAFETY COMPLIANCE UPDATE

Meeting	Growth and Regeneration Scrutiny Panel
Date	26 th January 2026
Cabinet Member	Cllr Moses Crook Deputy Leader and Transport and Housing
Key Decision Eligible for Call In	No No
<p>Purpose of Report To provide an update on the Council’s compliance with building safety regulations as a social landlord. It outlines how the service responds to legal and statutory requirements across key areas of health and safety, commonly referred to as the ‘Big 6’ (gas, electrical, water, asbestos, LOLER, and fire safety), and includes damp, mould, and condensation as an additional area of focus. The report details current performance, highlights areas for improvement, and describes ongoing and planned actions to ensure the Council meets its obligations and continues to improve safety outcomes for tenants.</p>	
<p>Recommendations The report recommends actions that support the Council’s obligations to tenants by ensuring well-managed and high-quality services. Specifically, the recommendations are designed to help the Council seek appropriate assurance that it is meeting the requirements of both the Regulator of Social Housing and the Building Safety Regulator. This includes:</p> <ul style="list-style-type: none"> • Supporting the Council in fulfilling its legal and regulatory obligations as a social landlord. • Ensuring robust oversight and assurance mechanisms are in place for compliance with building safety regulations. • Providing assurance that the Council is meeting statutory requirements across the key areas of health and safety (the ‘Big 6’: gas, electrical, water, asbestos, LOLER, and fire safety), as well as damp, mould, and condensation (Awaab’s Law). • Encouraging continuous improvement in performance and safety outcomes for tenants. <p>Reasons for Recommendations The recommendations support the Council in its obligations to tenants to provide well managed and high-quality services. The recommendations support the Council in seeking appropriate assurance that we are meeting the requirements of the Regulator of Social Housing and the Building Safety Regulator.</p>	
<p>Resource Implications None.</p>	
Date signed off by <u>Executive Director</u> & name	David Shepherd – 6 January 2026
Is it also signed off by the Service Director for Finance?	Not Applicable for Scrutiny report
Is it also signed off by the Service Director for Legal Governance and Commissioning (Monitoring Officer)?	Not Applicable for Scrutiny report

Electoral wards affected:	All
Ward councillors consulted:	No
Public or private:	Public
Has GDPR been considered?	Yes

1. Executive Summary

- 1.1 The Council as a social landlord has several legal and regulatory responsibilities relating to the management of health and safety in our properties. Historically, these have been referred to as the 'Big 6' areas of compliance – gas, electrical, water, asbestos, LOLER, and fire safety. In addition to the Big 6 we would also now include damp mould and condensation as a key area of enquiry.
- 1.2 Within each of these areas the Council is required to meet specific legal requirements outlined in each section. The requirements will not apply to all properties so for each area there should be an assessment and confirmation of the number of properties against which the requirement applies.
- 1.3 The report outlines how the service responds to the requirements of the legal and statutory requirements including detail on process and plans for further improvement. There is a more detailed focus on fire safety in this report, recognising the increased level of work and scrutiny at present. Key performance data is summarised below.

Area	Target	Perf	RAG	Trend (qtr)
Gas safety certs (residential)	100%	99.9%		
Gas safety cert (communal)	100%	100%		
Electrical safety cert (residential)	100%	99.6%		
Electrical safety cert (communal)	100%	100%		
Stock with physical water risk assessment	100%	99.7%		
Stock with physical or desk top assessment	100%	100%		
Properties with a valid asbestos survey	100%	100%		
LOLER	100%	100%		
Properties with a valid FRA in place	100%	99.9%		
Fire remedial actions complete	100%	60.7%		
DMC inspections undertaken in timescale	100%	100%		
DMC works completed within timescale	100%	98%		

- 1.4 The key areas of focus as a result of this review are;
- Work is required to develop strategy and action plan for lift safety ensuring workflow and reporting from Adaptations to inform delivery and assurance processes.
 - Establishment of a task and finish group to oversee the efficient delivery of fire safety actions resulting from the accelerated FRA programme.
 - A focus on improving data quality and outcome reporting across the system.
 - Improvement in the way in which we report our key health and safety information to our tenants.
 - Whilst performance risk management across Building Safety is high, all areas will continue to benefit from robust oversight and review in partnership with Building Safety Assurance Board.

2. Information required to take a decision

- 2.1 The Council has statutory responsibilities to maintain safe, compliant, and fit-for-purpose housing stock. The scope of these obligations covers the six major building safety domains (“Big 6”) and additional requirements emerging from Awaab’s Law concerning damp and mould hazards under the Housing Health and Safety Rating System (HHSRS).
- 2.2 The Regulator of Social Housing (RSH) requires compliance with the Social Housing (Regulation) Act 2023, robust health and safety management, completion of assessment actions within appropriate timescales, and the integration of tenant safety considerations in service delivery. The Building Safety Regulator (BSR) expects landlords to operate systematic, risk-based safety management regimes, particularly for higher-risk buildings, supported by monitoring, reporting, and evidence-based governance.
- 2.3 The Health and Safety Executive (HSE) enforce compliance with the Health and Safety at Work Act 1974 and a range of Approved Codes of Practice across asbestos, legionella, gas, and electrical safety. The Council has established inspection programmes, data regimes, and third-party validation processes to ensure adherence to legislative requirements and continuous improvement.
- 2.4 As part of our governance arrangement, it is important that there is robust oversight of our stock’s performance with regards to health and safety matters, and that assurance is given to how we are meeting our compliance obligations.

Building Safety Performance

2.5 Gas safety

Legal Requirements

- 2.5.1 Gas safety within social housing is principally governed by the Gas Safety (Installation and Use) Regulations 1998, which place a statutory duty on landlords to ensure that gas appliances, fittings, and flues are maintained in a safe condition and are inspected at least every twelve months.
- 2.5.2 These regulations require landlords to employ competent, Gas Safe registered engineers to undertake inspections, testing, and certification activities, and to issue safety records to residents within prescribed timescales. All of our current engineers are Gas Safe registered.
- 2.5.3 In addition, landlords must maintain written records of inspections and evidence of remedial work, and they must take all reasonable steps to gain access to properties to complete checks. Under broader health and safety legislation, including the Health and Safety at Work Act 1974, the Council must demonstrate that risks arising from gas installations are identified, assessed, and mitigated, and that systems of control are effective, proportionate, and monitored.

Number of Properties in Scope and Validation

- 2.5.4 The gas safety programme covers 19,818 domestic properties and 67 communal buildings. The number of properties in scope is reconciled annually using stock condition data and asset management records to ensure that all new or reactivated gas installations are incorporated within the inspection cycle.

Service delivery

- 2.5.5 Annual inspections are managed by Property Services, supported by automated scheduling and monitoring systems. Complex cases, such as properties affected by hoarding or meter disconnection, are addressed through targeted interventions and multi-agency engagement. Reporting mechanisms have been developed to track capped gas supplies and monitor risk during annual visits.

- 2.5.6 The Council commissions Corgi Technical Services to undertake third-party auditing, including random post-completion inspections and rotational in-progress audits to verify quality and technical compliance.
- 2.5.7 Current performance stands at 99.9% compliance for domestic properties and 100% for communal areas, with only 20 inspections overdue. Performance remains consistently strong, with overdue activity mostly attributed to tenant access challenges.
- 2.5.8 Priorities for the year ahead include;
- Strengthening data reconciliation.
 - Enhancing reporting of capped supplies through system integration.
 - Improving engagement strategies for properties that have persistent access barriers.

2.6 Electrical Safety

Legal requirements

- 2.6.1 Electrical safety in domestic rented housing is primarily regulated under the Landlord and Tenant Act 1985, which requires landlords to ensure that electrical installations are safe for continued use and maintained in good repair. This duty includes conducting periodic inspection and testing, typically on a five-year cycle, supported by appropriate certification and documentation.
- 2.6.2 The Council must also comply with the Electricity at Work Regulations 1989, which place obligations on employers and duty holders to prevent danger from electrical systems through design, installation, maintenance, and inspection.
- 2.6.3 For communal areas, additional compliance may be required under the Building Regulations and relevant British Standards, particularly where emergency lighting, fire detection, or powered equipment is installed.
- 2.6.4 The legislative framework emphasises technical competence, record keeping, and evidence-based risk management, requiring landlords not only to complete inspections but also to act on identified defects within appropriate timescales. Regulatory enforcement exists through local authorities, HSE, and civil liability frameworks, reflecting the potential risk of fire, electric shock, and property damage if compliance is inadequate.

Number of Properties in Scope and Validation

- 2.6.5 The programme covers 20,177 domestic properties and 900 communal installations. Asset lists are validated annually as part of cyclical reconciliation exercises, ensuring new stock is incorporated promptly.

Service delivery

- 2.6.6 Electrical Installation Condition Reports (EICRs) are managed through a five-year cyclical programme linked to asset management databases. Overdue inspections are prioritised based on risk, particularly where access challenges, hoarding, or unclean properties delay completion.
- 2.6.7 Independent assurance is provided by Corgi Technical Services, alongside internal audit reviews of data completeness, technical quality, and safety compliance.
- 2.6.8 Performance remains high, with 99.62 % domestic compliance and 100 % communal compliance. Quality inspections have achieved 100 % completion rates, demonstrating consistent delivery standards.

2.6.9 Key improvement themes include strengthening data integrity, addressing recurring access challenges, and building operational capacity for emerging technologies such as EV charging and battery storage systems.

2.7 Water safety (Legionella)

Legal requirements

2.7.1 Management of legionella and water quality within residential properties is governed by the Health and Safety at Work Act 1974 and supported by the Control of Substances Hazardous to Health Regulations (COSHH). These establish a legal duty for landlords to assess and control risks from exposure to legionella bacteria.

2.7.2 The Health and Safety Executive's Approved Code of Practice (ACoP) L8 and supporting technical guidance HSG274 set out prescriptive standards for the risk assessment, monitoring, and management of water systems, including requirements for competent persons, inspection frequencies, temperature control, and record keeping. Social landlords must complete risk assessments at intervals deemed appropriate by risk profile, retain documentary evidence, and ensure that actions identified through assessments are delivered effectively and promptly.

2.7.3 The regulatory intent is to prevent the outbreak of legionellosis, including Legionnaires' disease, a potentially fatal condition that is higher risk in vulnerable populations. Failure to comply can lead to criminal prosecution, civil claims, and regulatory enforcement action, particularly where risk controls are absent or ineffective.

Number of Properties in Scope and Validation

2.7.4 The programme covers 20,404 properties, of which 99.69 % had received on-site assessments and 0.31 % had been reviewed through a desktop approach in November 2025. Validation of scope is supported by ongoing stock condition surveys, new-build handovers, and system-based asset updates.

Service delivery

2.7.5 The Council has concluded its initial assessment phase and has moved to a risk-based cyclical review programme. All properties assessed to date have been classified as low risk. Compliance activities are underpinned by reliable data management systems and are aligned with capital investment and planned maintenance processes.

2.7.6 Operational delivery is executed through a blended model of in-house teams and external contractors. Core responsibilities encompass undertaking risk assessments, implementing control measures, managing and maintaining water systems, and completing remedial works within required timeframes. Delivery of the water safety programme is supported by dedicated technical officers and property assistants.

2.7.7 External assurance remains limited at this stage but is expected to increase as the cyclical review programme matures. The introduction of independent audit is under consideration as part of future governance arrangements. Accredited contractors are engaged to undertake detailed evaluations of communal water systems, providing a degree of external validation of compliance and performance.

2.7.8 In November 2025, water safety assessments were completed across all required stock (20,404 properties). Of these, 99.69 % were subject to full on-site assessments, with the remaining 0.31 % evaluated through a desktop review approach. The Council has achieved full coverage across all properties in scope, with all assessments indicating low risk. Performance trend indicates a stable compliance position, moving from mobilisation to business-as-usual management.

2.7.9 Planned improvements include embedding cyclical reviews, enhancing data integration, improving tenant communication, maintaining third-party assurance, and exploring use of data analytics to identify emerging risks.

2.8 Asbestos Safety

Legal requirements

2.8.1 The service is required to meet the expectations of:

- CAR2012
- Health and Safety at Work etc Act (HSAWA) 1974.
- Management of Health and Safety at Work Regulations 1999.
- Construction (Design and Management) Regulations 2015.
- Workplace (Health Safety and Welfare) Regulations 1992.
- The Control of Substances Hazardous to Health Regulations 2002.

Number of properties in scope

2.8.2 There are 2,089 communal properties within scope for asbestos surveys. Communal blocks are re-inspected on a risk-based frequency to ensure compliance with Regulation 4 of CAR 2012.

Service delivery

2.8.3 H&N acknowledge that health hazards may arise from exposure to asbestos and are committed to ensuring that risks are suitably assessed and effectively eliminated or managed to minimise the likelihood of asbestos related health risks to tenants, employees, contractors, and any other persons occupying, working in and/or using its premises as far as is reasonably practicable.

2.8.4 Details on how we effectively manage asbestos are documented within the Asbestos management plan and policy.

2.8.5 Asbestos consultancies within the 'Asbestos Services' Lot 2 framework can undertake quality checks on all asbestos surveys carried out by H&N staff to ensure quality. Asbestos consultancies within the framework must maintain membership of a recognised accreditation body complying with BS EN ISO/IEC 17020:2012 Surveying for Asbestos in Premises (or any standard which supersedes it) to undertake management surveys and refurbishment and demolition surveys. The United Kingdom Accreditation Service (UKAS) is currently the sole recognised accreditation body in Great Britain.

2.8.6 H&N asbestos services are committed to fully populating the un-surveyed stock with real survey data and are intending to complete this by 28/29. This programme is currently underway utilising external contractors within the 'Asbestos Services' framework.

2.9 Lifting Operations and Lifting Equipment Regulations (LOLER)

Legal requirements

2.9.1 The requirements mandate that the Contractor comply with all current British and equivalent EU standards for electric lifts and a comprehensive range of statutory health, safety, and building regulations. This includes obligations related to the safe design, installation, operation, and maintenance of equipment; management of workplace risks; lifting operations; electrical safety; hazardous substances; work at height; confined spaces; noise and vibration; first aid; and fire safety. The Contractor must also observe recognised industry standards, approved codes of practice, and specific guidance documents governing safe use of tools, access equipment, and in-service lift testing.

Number of properties in scope

2.9.2 There are currently 43 passenger lifts installed across 34 buildings. With respect to other lifts and lifting equipment installed in individual dwelling, step lifts, through floor lifts, stair lifts (curve or straight), mechanical stretchers and hoists, there are 863 installed across council stock.

Service delivery

- 2.9.3 Following a procurement exercise, ANSA Elevators was awarded a two-year contract for the servicing and repair of passenger lifts, with the option to extend annually up to a total contract term of five years. At the conclusion of this period, a further procurement process will be required.
- 2.9.4 ANSA is responsible for planned preventative maintenance (PPM) and reactive repairs across high-rise and six-storey blocks, as well as retirement living schemes. ANSA also undertakes supplementary (LG) tests. LOLER thorough examinations are undertaken independently by HSN Insurance, acting as the competent person. Servicing frequency is risk-assessed for each lift by the specialist contractor. Typical frequencies include:
- High-rise blocks: monthly servicing.
 - Six-storey blocks: bi-monthly servicing.
- 2.9.5 A thorough examination is undertaken every six months by an independent assessor. Supplementary tests, commonly referred to as LG tests, are comparable to a vehicle MOT and are conducted at defined intervals, or may be requested by the competent person undertaking the LOLER examination. Typical schedule:
- LG5 at year 5.
 - LG10 at year 10.
 - LG5 at year 15.
 - LG10 at year 20.

External validation

- 2.9.6 ANSA Elevators is a member of the Lift and Escalator Industry Association (LEIA). All engineers are qualified to NVQ Level 3 in Lift Servicing and Installation, with many holding QCF Level 4 in Testing Operations or higher. This is underpinned by a fully certified ISO 9001, ISO 14001, and ISO 45001 management system.

Areas for improvement over coming 12 months

- 2.9.7 Work will be undertaken to establish comprehensive reporting on stairlift and related equipment within housing stock. This will involve gathering data, validating asset information, and initiating appropriate compliance checks to ensure full visibility and oversight.
- 2.9.8 Enhancements to monthly performance reporting will include the incorporation of LG test data. Although these tests are being undertaken, formal reporting will support improved monitoring and assurance.
- 2.9.9 An upgrade programme is in progress to replace analogue lift call points with digital systems in retirement living schemes, in preparation for the analogue service switch-off. Once complete, upgrades will be extended to six-storey and high-rise blocks.
- 2.9.10 A stock survey of all passenger lifts has been completed and includes recommendations relating to future lift replacements. These findings will be reviewed further to support the development of a forward plan and funding strategy.

2.10 Fire safety

Legal requirements

- 2.10.1 Fire safety in residential buildings is governed primarily by the Regulatory Reform (Fire Safety) Order 2005, which requires responsible persons to undertake fire risk assessments, implement preventive and protective measures, and ensure that buildings are managed in a way that reduces risk to occupants.

- 2.10.2 Recent legislative changes, including the Fire Safety Act 2021 and elements of the Building Safety Act 2022, have expanded duties relating to structure, external walls, and flat entrance doors, particularly in high-rise and higher-risk residential buildings.
- 2.10.3 These frameworks impose obligations for systematic risk assessment, remediation of identified hazards, installation of suitable life safety systems, and communication of risks to residents. In higher-risk buildings, the Building Safety Act also introduces requirements for safety case reporting, resident engagement strategies, and regulated building safety roles.
- 2.10.4 Fire safety compliance failures can trigger enforcement action via the Fire and Rescue Authority, the Building Safety Regulator, or the Regulator of Social Housing, and can result in criminal prosecution, restrictions on building occupation, or regulatory downgrade.

Number of properties in scope

- 2.10.5 We have, in total, 837 buildings in scope for fire risk assessments. This includes one high-rise block (Harold Wilson Court), 17 medium-rise blocks and 819 other residential settings, including low rise and retirement living schemes. Stock classification and validation have been completed through data reconciliation and building surveys.

Service delivery

- 2.10.6 Service delivery within the fire safety programme is supported by a structured suite of documented procedures covering fire risk assessments, remedial actions, cyclical maintenance, and broader building safety management activities. These procedures define roles, workflows, escalation triggers, and verification processes, and they are periodically reviewed to ensure alignment with regulatory requirements, emerging good practice, and organisational learning.
- 2.10.7 The programme operates on a data-driven basis, with property, risk, and action data centrally recorded and subject to reconciliation to maintain completeness, accuracy, and traceability. This information is used to drive operational decision-making, allocation of resources, and performance reporting. Data insights inform programme planning, highlight risk trends, and support prioritisation of remedial activity, ensuring that the service remains responsive to emerging issues and capable of demonstrating evidence-based compliance.
- 2.10.8 Resident access and engagement play a central role in service delivery, particularly where inspections, maintenance, or remedial work require physical entry to properties. Escalation protocols are applied when access is repeatedly refused, balancing tenant rights with statutory responsibilities to maintain a safe living environment.
- 2.10.9 Interventions and works are prioritised based on risk, ensuring that higher-risk actions are addressed within defined timescales and tracked through completion. Risk categorisation supports consistent decision-making and enable the organisation to allocate resources to the most complex cases. Progress against actions is monitored through digital systems and performance dashboards, enabling operational teams and managers to track delivery, identify blockages, and allocate corrective resources where necessary.
- 2.10.10 Performance is subject to continuous monitoring through key performance indicators and a structured audit regime, which incorporates both first and second line assurance through weekly monitoring by the Fire Risk Assurance Group and SMT. Independent scrutiny through governance provides impartial challenge and supports the identification of gaps, trends, and opportunities for improvement. Internal reporting mechanisms ensure that risk information is escalated to management and governance forums, enabling oversight and accountability.

- 2.10.11 The Council has undertaken comprehensive FRAs across all buildings in scope, supported by external programme management, improved process mapping, and the development of tenant-focused mitigation strategies.
- 2.10.12 Turner & Townsend has been appointed to lead and manage the Council's Fire Safety Works Programme, acting as the programme manager to ensure compliance and delivery. Their role includes establishing governance and reporting structures, coordinating workstreams, providing technical peer reviews, and overseeing project and contract administration. They also support financial profiling and cost control, ensuring the programme remains on track, whilst maintaining robust documentation and assurance for regulatory engagement.
- 2.10.13 Harmony Fire has been appointed as a specialist contractor to deliver independent fire safety assurance as part of the Council's formal response to a Regulatory Notice from the Regulator of Social Housing. Their role is to review and validate the Council's fire safety mitigation measures across medium-rise residential buildings, providing third-party assurance that robust systems are in place. This commission builds on previous assurance activity and supports ongoing dialogue with the Regulator to demonstrate sustained compliance and improvement.
- 2.10.14 As of 21 November 2025, 99.88 % of FRAs had been completed, generating 9,661 actions of which 60.69 % have been closed. Overdue actions have reduced and are on track to be below projections by the end of the calendar year.
- 2.10.15 Over the next 12 months, the Council's fire safety plan is focused on sustaining and building upon recent improvements in compliance, risk management, and tenant engagement.
- 2.10.16 The Council will transition from a one-off, full-coverage Fire Risk Assessment programme to a robust annual cyclical assessment model, ensuring that all residential properties remain compliant with statutory requirements and sector best practice.
- 2.10.17 Priority will be given to accelerating the closure of outstanding remedial actions, particularly those rated as high risk, with a target to keep overdue actions below projections and to further reduce this number throughout the year.
- 2.10.18 Enhanced tenant engagement will be achieved through the rollout of bespoke Fire Safety Information documents, especially for midrise blocks, and by embedding new communication strategies to keep residents informed and involved in fire safety matters.
- 2.10.19 Internally, the Council is strengthening its Asset Management and Fire Safety teams through targeted recruitment and ongoing training, whilst also leveraging technology, such as the Asprey asset management system, for real-time tracking and reporting of compliance activities.
- 2.10.20 The programme will continue to benefit from external validation and audit, with partners like Turner Townsend and Harmony Fire providing independent assurance. Continuous improvement will be driven by regular reviews of processes, integration of audit feedback, and a commitment to sector-leading practice, ensuring that fire safety remains a top priority and that the Council is well-prepared to respond to evolving regulatory expectations and resident needs.

2.11 Damp, mould and condensation

Legal requirement

- 2.11.1 Awaab's Law, introduced through amendments to the Social Housing (Regulation) Act 2023, establishes statutory duties for landlords to inspect, diagnose, and rectify damp and mould hazards within fixed timeframes.

- 2.11.2 The legislation requires landlords to undertake inspections within ten working days of cases being reported and to complete remediation within a prescribed period, with escalation requirements for significant or urgent work. Reporting duties include formal performance publication and management of outstanding cases, ensuring transparency and accountability.
- 2.11.3 Awaab's Law operates alongside the Housing Health and Safety Rating System (HHSRS), which identifies damp and mould as a high-risk hazard with significant adverse health impacts, especially for children and vulnerable individuals.
- 2.11.4 The regulatory framework seeks to prevent prolonged exposure to hazards by shifting damp and mould from a maintenance issue to a statutory safety risk, backed by enforcement powers that may include intervention by the Regulator of Social Housing, consumer enforcement action, and potential legal liability.

Number of properties in scope

- 2.11.5 All social housing stock is included within the scope for damp and condensation monitoring and remediation. This workstream combines proactive inspections with reactive responses to tenant reports. Validation is driven by ongoing stock condition surveys, conducted at a rate of approx. 900 properties per month over the next two years with 20% of stock covered on a rolling basis thereafter. A tenant census has also been initiated that enables proactive identification of cases.

Service delivery

- 2.11.6 The Council's approach to delivering damp, mould and condensation services is underpinned by a tenant-focused policy and strict compliance with regulatory standards. The process begins with prompt logging of all reports into a dedicated tracking system, which enables real-time dashboards for case tracking and management oversight. Cases are triaged to prioritise urgent health and safety risks, followed by property inspections and diagnostic surveys to identify root causes.
- 2.11.7 Repairs and remedial works are scheduled alongside tenant engagement to ensure access and provide advice on prevention. The approach integrates short-term fixes with long-term investment planning, supported by data analysis to target high-risk stock. Staff and contractors receive training to embed consistent practices, and progress is monitored through performance KPIs and governance reviews. This structured process, aligned with Awaab's Law and Ombudsman recommendations, ensures timely, transparent, and effective resolution while driving continuous improvement.
- 2.11.8 External assurance has been provided by David Tolson Partnership, as part of wider validation of work relating to the Regulatory Notice, which has confirmed that positive system and process changes have been implemented.
- 2.11.9 The Council has achieved 100% compliance with inspection timescales and 98% compliance with works completion targets set out in Awaab's Law since its inception on 27 October 2025, with no emergency cases reported. Performance remains stable despite increased reporting volumes identified through proactive reporting.
- 2.11.10 The Council has identified key areas for improvement in its damp, mould and condensation services, focusing on systems, data and technology. Current IT systems need greater integration and automation to streamline case management and enable real-time visibility across teams. Data quality and governance require strengthening, with more accurate stock condition records, standardised diagnostic surveys and predictive analytics to prioritise high-risk properties. Technological enhancements such as smart sensors, and mobile tools should be adopted to support proactive maintenance to enable a more robust, intelligence-led approach to managing DMC risks.

3. Implications for the Council

3.1 Council Plan

- 3.1.1 The council is committed to serving our people by working together to deliver excellent services to our residents. Under the Council priority '*Thriving people and communities – now and over the long term*' we have made a commitment to ensure that people are living in homes that are modern, safe, warm and addressing all outstanding issues in compliance.

3.2 Financial Implications

- 3.2.1 The total cost for delivering all activities relating to achieving and maintaining building safety compliance is provided for by the Housing Revenue Account (HRA). Key expenditure is included within the proposed revenue budget and five-year capital plan reported to Cabinet on 2nd December 2025.
- 3.2.2 The financial implications of poor building safety generally relate to the impact in repair/maintenance, legal, and insurance related costs in dealing with the impact of product, system, or building failure.
- 3.2.3 When an area of building safety fails it can lead to significant damage, or even destruction of the property asset. This leads not only to the cost of repair but can also mean significant rent loss whilst works are completed.
- 3.2.4 In addition to the cost to the asset, there can also be a cost to the individual in damage to personal property, loss of time, injury, or in extreme circumstances loss of life. All of these areas of consideration carry additional financial implications for the Council in both actual costs and legal expenses.

3.3 Legal Implications

- 3.3.1 There are several implications of failure to address building safety effectively. These range from regulatory enforcement action to prosecution for the Authority, or individual senior officers leading to fines and/or imprisonment.

3.4 Climate Change and Air Quality

- 3.4.1 There are two key areas of focus with regards to air quality; effective and safe management of asbestos preventing accidental release; and the effective treatment of damp, mould and condensation as a category 1 hazard (Awaab's Law). Ensuring that we deliver high levels of performance safeguards air quality.

3.5 Risk, Integrated Impact Assessment (IIA) or Human Resources

- 3.5.1 The report identifies several risks that challenge the effective delivery of a building safety programme, these include;
- Access to property to complete safety checks and undertake required works.
 - Timely delivery of the fire safety works programme emanating from the programme of fire risk assessments.
 - Confidence in data quality, and accuracy / consistency of reporting.
 - Emerging legal and regulatory framework positions.
 - Effective tenant engagement and communication.
- 3.5.2 All notified risks have mitigations in place ensuring effective management.

3.5.3 There are also some ongoing significant challenges in the recruitment of staffing resources that enable us to deliver our safety programmes effectively. We have a number of key roles in recruitment that have proved hard to fill for an extended period. Whilst we continue to work through this programme of recruitment this presents an overall risk to capacity and competence within the service. This is currently managed through the employment of consultants and contractors at a higher cost to service.

4. Consultation

4.1 In the development of this report consultation has been undertaken with various departments to bring relevant information together.

4.2 Moving forward information will be shared by the service on the Homes and Neighbourhoods website enabling customers to review, check and understand our overall performance position.

5. Engagement

5.1 Not applicable for this report.

6. Options

6.1 Options considered

6.1.1 No options to be considered.

6.2 Reasons for recommended options

6.2.1 The Growth and Regeneration Scrutiny Panel are asked to note this paper and its content as part of their role in scrutinising the effective delivery of the Homes and Neighbourhood service.

7. Next steps and timeline

7.1 Performance with regards to building safety is reported periodically to the Building Safety Assurance Board, H&N Senior Leadership Team, to Cabinet Portfolio Holder via briefing meetings, and to the Homes and Neighbourhoods Improvement Board for scrutiny. Key building safety information will also be shared with Cabinet twice per year in the Homes and Neighbourhoods Update.

7.2 With regards to specific next steps, the following actions are noted

- Improvement in the way in which we report our key health and safety information to our tenants.
- Develop action plan for lift safety ensuring workflow and reporting from adaptations to inform delivery and assurance processes.
- Establishment of a task and finish group to oversee the efficient delivery of fire safety actions resulting from the accelerated FRA programme.
- A focus on improving data quality and outcome reporting across the system.
- Whilst performance risk management across Building Safety is high, all areas will continue to benefit from robust oversight and review in partnership with Building Safety Assurance Board.

8. Contact officer

- 8.1 Phil Jones
Director of Homes and Neighbourhoods
Philip.Jones@Kirklees.gov.uk

9. Background Papers and History of Decisions

- 9.1 None.

10. Appendices

- 10.1 None.

11. Service Director responsible

Phil Jones
Director of Homes and Neighbourhoods
Philip.Jones@kirklees.gov.uk

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REPORT TITLE: DISTRICT HEATING UPDATE

Meeting	G&R Scrutiny Panel
Date	26 th January 2026
Cabinet Member	Cllr Moses Crook Deputy Leader and Transport & Housing
Key Decision Eligible for Call In	No No – If no give reason: This report is not asking for a decision on customer charging but setting out the process for how price increase will be determined.
<p>Purpose of Report:</p> <p>To provide an update on the district heating programme including:</p> <ul style="list-style-type: none"> • Latest position of any remaining actions from the Corporate Governance Audit Committee (CGAC) of June 2025, and the original Internal Audit of 2024. • Timeline for the procurement of new metering and billing provider. • Planned programme for ending of the current contract and implementation of new metering arrangements following contract award. • Process for setting the bills for those on district heating from April 2026 and planned next steps. 	
<p>Recommendations:</p> <ul style="list-style-type: none"> • That G&R Scrutiny Panel note the contents of the report and to share with key stakeholders, tenants and leaseholders. <p>Reasons for Recommendations:</p> <ul style="list-style-type: none"> • To ensure key stakeholders are aware of the current position and progress regarding the district heating programme and delivery. • To allow for proactive engagement with tenants and leaseholders who will be affected by an increase in district heating and community heating billing in 2026/27. 	
<p>Resource Implications:</p> <p>A key recommendation from CGAC agreed with Interim Service Director to establish a dedicated post (Heat Network Manager post) and, as identified in the Council’s Audit report to ensure that District Heating and Community Heating metering and billing arrangements are well managed including balancing the ring-fenced account for this service area.</p> <p>This role has been graded and appointed to during Q3 2025/26 and the Manager is in post. The new Heating Network Manager as appointed sits within Asset Management & Building Safety portfolio, focusing on managing heat networks for Kirklees Homes and Neighbourhoods Directorate.</p> <p>This role is also taking a lead to manage the commissioning of consultants Chirpy Heat to develop the future District and Community Heating and Retrofit Strategy.</p>	

The timeline for the re-procurement of the heat metering and billing contract is on target with a new contract to be in place by beginning of February 2026 which will also allow for a period on transition as the current Switch 2 contract comes to an end and the new contract is implemented commences to allow for seamless transition for tenants & leaseholders.

Date signed off by Executive Director & name

14 January 2026 - David Shepherd, Executive Director of Place

Is it also signed off by the Service Director for Finance?

NA for Scrutiny report

Is it also signed off by the Service Director for Legal Governance and Commissioning (Monitoring Officer)?

NA for Scrutiny report

Electoral wards affected: All wards affected.

Ward councillors consulted: Councillors will be consulted on the metering and billing arrangements as part of communications plan for charges for 2026/27.

Public or private: Public

Has GDPR been considered? Yes

1. Executive Summary

- 1.1 The findings of the internal audit into the district heating schemes first published in June 2024, has accelerated the work we are doing to resolve the historic issues relating to district heating scheme charges and has highlighted some important priority areas that have and will continue to be addressed.
- 1.2 In response, Homes & Neighbourhoods Asset Management, Sustainability and Performance team have established a project group that brought together the relevant teams and expertise from across the Council that has developed a comprehensive action plan and has included senior-level governance oversight to ensure timely progress is achieved.
- 1.3 A key priority from the Action Plan has been to re-procure a new pre-payment metering and billing provider for district heating schemes and billing management. The tender has been published on the YPO framework, bids closed on 27 November 2025. The estimated timeline for Council contract award is 2nd February 2026.

2. Information required

- 2.1 District heating, also known as a heat network, is a system that uses a singular central heat source to distribute heating and hot water through a network of insulated pipes to multiple individual dwellings. Each dwelling has a meter for their supply and are charged according to usage. The structure is typically used to deliver heating and hot water requirements to flats and maisonettes.

- 2.2 Kirklees operates 25 district heat networks supplying 1,042 homes, approximately 18% of which are leasehold. These properties span multiple wards across the Kirklees area.

Electoral Ward	Property count	Electoral Ward	Property count
Almondbury	28	Dewsbury South	30
Ashbrow	44	Dewsbury West	210
Batley West	10	Greenhead	99
Birstall/Birkenshaw	40	Lindley	45
Crosland Moor/Netherton	48	Liversedge and Gomersal	65
Dewsbury East	246	Newsome	177

- 2.3 Property breakdown:

Property type	Property Count	Property type	Property Count
Sold/Leasehold	193	Bungalow / house	75
Converted (not in use)	2	Flats (high risk)	772

- 2.4 In June 2024 an internal audit was completed in respect of our approach to charging for district heating. This audit generated fourteen (14) clear recommendations for the service to implement to ensure necessary improvements were made. Of the fourteen recommendations ten were ‘*significant*’, three ‘*fundamental*’, and one ‘*merits attention*’.

- 2.5 As the table below demonstrates we have completed thirteen (13) of the recommendations and one action is on track. A more detailed breakdown of the Audit Action Tracker is available at Appendix 1.

Action ref:	Classification	Status	Update position
R1	Significant	Complete	
R2	Fundamental	On track	Procurement review complete and tender exercise completed. On track to achieve 2nd Feb 2026 target date.
R3	Fundamental	Complete	
R4	Significant	Complete	
R5	Significant	Complete	
R6	Significant	Complete	
R7	Significant	Complete	
R8	Significant	Complete	
R9	Significant	Complete	
R10	Merits Attention	Complete	
R11	Significant	Complete	
R12	Fundamental	Complete	
R13	Significant	Complete	
R14	Significant	Complete	

- 2.6 Action R2 relates to ensuring that a compliant procurement process is in place for district heating services. The current provider delivers an end-to-end heat management service under a contract that expired initially in January 2023. Exemptions have been approved following a report to the Corporate Governance and Audit Committee by the Interim Service Director for Homes and Neighbourhoods allowing for an extension until 30th June 2026. The current timetable for procurement has a new provider in place by February 2026.
- 2.7 Also, worth noting is Action R13, decision on application to apply for funding under the Heat Network Efficiency Scheme. Homes and Neighbourhood working with our partner, Chirpy Heat, were able to bid under round 9 of the funding and were successful in securing £37,000.

- 2.8 Kirklees Homes and Neighbourhoods also manage Independent Living Schemes (ILS's), that have communal boilers. These are different to district heating in that they are dwellings that have one communal boiler that supplies heat and hot water around a single building to multiple individual dwellings (flats).
- 2.9 These dwellings do not have pre-payment meters installed like district heating properties, they pay for their heat and hot water via a service charge. These sheltered heating schemes are not classified as District Heating and was not part of the District Heating Internal Audit that was undertaken in June 2024.
- 2.10 However, the learning from this audit and, service improvements now recommends that the approach to manage district heating should also be applicable to other community or grouped heating schemes (including ILS's) to ensure openness and transparency of costs. This will be picked up as part of the forward plan of work in section 7.3.
- 2.11 Governance and oversight is achieved by regular reporting from the project team into the H&N Housing Capital & Revenue Investment Board (HCRIB), which in turn reports into H&N SLT. Governance reporting and the requirement for decisions will flow as per the H&N Service Governance Review Paper (reported to Growth and Regeneration Scrutiny Panel on 15 December 2025 and Cabinet on 13 January 2026)

3. Implications for the Council

3.1 Council Plan

- 3.1.1 The council is committed to serving our people by working together to deliver excellent services to our residents. Under the Council priority '*Thriving people and communities – now and over the long term*' we have made a commitment to ensure that people are living in homes that are modern, safe, warm and addressing all outstanding issues in compliance.

3.2 Financial Implications

- 3.2.1 From 2025/26 charges increased from 4.6p per kwh plus a daily admin charge of 14.5p to a maximum of 13.7p per kwh plus a daily admin charge of 24.3p. Meters were amended from 2nd January 2025 to reflect these increases. The tariff will be reviewed by the new contractor and a new tariff set from 1st April 2026. It is proposed that the service will monitor energy markets quarterly and make recommendations as outlined in 3.3.3.
- 3.2.2 There is an ongoing piece of work to establish the amount of money that has been under recovered from the leaseholders and residents. This information is difficult to establish accurately as we are reliant on Switch2 for the data and this is proving to be inaccurate in many cases. The aim is to achieve a full cost recovery of heating charges in 2025/26. The forecast shortfall at Q2 2024/25 was £573k and the forecast shortfall at Q3 2024/25 was £553k.
- 3.2.3 Homes and Neighbourhoods are working with appointed consultant (Chirpy Heat) and current provider Switch2 to review all heat networks to ensure transparency in charges. This will position us to provide individual tariffs for each site, and to address any underpayment during 2025/26. A report has been completed on all heat network efficiencies, and this will be used to calculate the tariff for 2026/27 for district heating and Independent Living Schemes.

3.3 Legal Implications

- 3.3.1 It is important that tenants and leaseholders are appropriately charged for their own heating bills, this is consistent with any household who has individual gas boilers and/ or other forms of heat and where the Council does not subsidise through the Council's Housing Revenue Account (HRA).
- 3.3.2 It was accepted by the Council, that given the scale of under-recovery as identified in 2024 it would be difficult initially to increase costs to recover full costs within one financial year. However, 2025/26 should be reconciled within this year and, for 2026/27 the district heating account (ring-fenced within the HRA account) should balance income and expenditure in year.
- 3.3.3 Given the volatility of energy prices we now need to continually review if charges need to adjust in-year. Proposals/recommendations will be made to Service Director for Homes and Neighbourhoods in consultation with Portfolio Holder and clearly consulted with tenant and leaseholders.

3.4 Climate Change and Air Quality

- 3.4.1 A future Homes & Neighbourhoods Decarbonisation Strategy is being developed which will include a full review of HRA Heating Strategy, if approved in 2026/27 for implementation as part of the HRA Capital Plan (5-year Capital Plan) will be subject to consultation with all Council tenants & Leaseholders and teams affected prior to implementation and will include specific plans for Kirklees heat networks.
- 3.4.2 Heat networks are a key contributor to our long term aims to become carbon neutral by 2038. Our consultants Chirpy Heat are advising us on a potential Green Heat Network Fund bid that would provide capital and revenue funding to decarbonise our heat networks in our Independent Living Schemes (ILS's).
- 3.4.3 With the incoming heat regulations [Heat networks regulation timeline | Ofgem](#) Homes and Neighbourhoods will be required to individually meter all dwellings for heat so we can charge residents only for their own usage. Currently in Independent Living Schemes all boilers are powered using gas, residents pay for heat via a service charge, and they pay for electric direct to their individual supplier.
- 3.4.4 If Chirpy Heat advise us that a bid has a good chance of success, we will apply for 50% of the costs to remove the gas boilers and to install ground source heat pumps. This work has a high initial capital outlay but long term the residents will have less disruption as they will not have a gas meter in their individual dwellings and Kirklees will decarbonise multiple dwellings with one installation.
- 3.4.5 Residents in Independent Living Scheme's will pay for the heat they use through their electric bill providing clear and transparent billing and full cost recovery as opposed to the current charging via service charge.

3.5 Risk, Integrated Impact Assessment (IIA) or Human Resources

Risk	Mitigation	RAG
Regulatory compliance: Failure to comply with the new heat regulations could result in legal or financial penalties	Dedicated resource in place working with consultants to ensure we are prepared for incoming heat regulations.	Medium
Contract Management: Evolving contract management with Kirklees and Switch 2 could affect collaboration and programme outcomes, leading to failure to track contract renewal dates, poor decision-making missed deadlines and miss payments.	Implement a robust contract management system to track renewal dates, deadlines, and payments. Schedule regular meetings with Kirklees and Switch2 to maintain open communication, documenting all interactions and decisions to ensure transparency and accountability.	Medium
Inaccurate Data: The absence of a central storing place of the data makes it difficult to keep track of the latest versions and ensure data accuracy in one central place.	Implement a centralised data management system accessible to all relevant stakeholders. Conduct regularly audit data to ensure accuracy and consistency. IT backup systems in place to aid with the loss of data.	Medium
The increases in unit rates applied in January 2025, may be under recovery	Ongoing monitoring of position and reported each ¼ to Cabinet in normal Finance reports.	Medium
Investigation of accounts which may yield potential debts and other issues around contractor performance, due to Inaccurate reporting by Switch2 and not having a dedicated Officer to manage the contract.	Resolution of debt needs further investigation. Establish clear processes for tracking and recovering debts. Engage with residents to negotiate manageable repayment plans for the collection of the debt.	Medium
Staff changes impacting the delivery of the action plan	Once the procedures and new contract and ways of working are in place, future handovers should be more thorough and achieve continuity of service.	Medium
Project Governance	Housing Capital & Revenue Investment Board for H&N Introduced in 25/25 to have oversight of District Heating and associated projects. See below.	Low

4. Consultation

- 4.1 Tenant Led Panel (TLP) were consulted on the letter for residents, informing them of the increase to their energy charge, implemented from the 2nd of January 2025 and all residents were given the 30 days' notice required, by letter.
- 4.2 TLP endorsed the proposal for full cost recovery and the level of charges for 2025/26 and noted the approach for setting charges for 2026/27. The decision to implement the increase remains a Council decision, ensuring compliance with policy and governance requirements.

5. Engagement

- 5.1 Residents received communication regarding increase tariff charges, which included key contact details for queries and, for any household in severe financial hardship details of support that may be available.
- 5.2 Following procurement of the new metering and billing contractor, residents will be contacted to:
- Advise on the requirement to change meters.
 - Inform them of the new billing provider.
- 5.3 No further engagement can take place until procurement is complete, as the outcome will determine the scope of works required to transfer services.

6. Options

6.1 Options considered

6.1.1 None. It is a landlord's responsibility to manage and maintain District Heating Schemes and any equipment used or owned by the Council. It also requires the Council, as landlord, to manage and, bill for the cost of heating used by tenants & leaseholders otherwise this would have a detrimental impact on Council HRA Business Plan and, Council General Fund Budgets.

6.2 Reasons for recommended option

6.2.1 In line with recommended Council key policies and charging practices, including consultation with tenants & residents.

7. Next steps and timelines

7.1 Complete procurement of metering and billing provider and commence contract in February 2026.

7.2 Procurement timeline:

Procurement Stage	Date
Evaluation Period Ends & Internal Sign off (this includes the tender (evaluation report), drafting of the letters and issue the Letters	Thurs 8 th Jan 26
10 Day Voluntary Standstill Period Ends at Midnight on	19 th Jan 26
Contract(s) Award	w/c 26 th Jan 26
Contract Start Date	2 nd Feb 26

7.3 With the completion of the Audit Action Plan Future the service will continue to progress with developmental actions. These actions include;

- Manage programme of works for meter replacement with new contractor ensuring no disruption to supply of heat and hot water or ability to pay for their service.
- Manage handover of contract for billing services from Switch2 to new provider again ensuring no disruption to services.
- Use findings of HNES optimisation studies to compile capital grant application for heat network efficiency upgrades.
- Work with heat network consultants on an application for the Green Heat Network Fund to decarbonise Kirklees H&N heat networks contributing to our carbon reduction targets.
- Continue to collaborate closely with heat network consultants on implementation of heat regulations to ensuring ongoing compliance.
- Ensure heat networks are included in Kirklees Homes and Neighbourhoods decarbonisation strategy.

8. Contact officer

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9. Background Papers and History of Decisions

27 September 2024, Corporate Governance & Audit Committee
[District Heating](#)

[Appendix 1](#)

7 March 2025, Corporate Governance & Audit Committee
[District Heating Update](#)

[Appendix 1](#)

20 June 2025, Corporate Governance & Audit Committee
[District Heating Update](#)

13 January 2026, Cabinet
[H&N Service Governance Review](#)

10. Appendices

Appendix 1: District Heating Audit Action Tracker

11. Service Director responsible

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District Heating Audit Action Tracker

No	Recommendations	Auditee Response	Owner	Completion Date
R1	<p>Documented Procedure Notes should be produced and reviewed at least annually (or more often if systems change).</p> <p>This will aid the transitional arrangements currently in place for colleagues imminently leaving the council.</p> <p>Classification: Significant</p>	<p>Agreed.</p> <p>An end-to-end process for the management of the district heating scheme will be established and implemented and scheduled to be reviewed on an annual basis.</p> <p>Procedure notes to be drafted alongside the terms of the New contract for the District Heating. Current process has been drafted. The consultant, when appointed, will advise on the end-to-end process and agree a new process.</p> <p>The consultant has been appointed and are completing a report for SMT. Completed June 2025.</p>	<p>K. Duke – Project Manager</p> <p>P. Johnson</p>	<p>December 2024 Completed</p> <p>May 2025 Completed</p>
R2	<p>As a priority, a procurement process compliant with Contract Procedure Rules should be completed.</p> <p>Classification: Fundamental</p>	<p>Agreed.</p> <p>A new contract for the management of the district heating services to be drafted and procured. Considering maintenance and repair obligations, data access and billing arrangements.</p> <p>A project group has been formed, and members will support with the procurement process. The purpose of the project group is to ensure a compliant procurement takes place, prioritising the needs of end users and ensuring value for money.</p> <p>Section 20 to be considered for leaseholders if the intention is to pass on the costs of replacing the meters.</p>	<p>J. Hilton – Strategic Category Manager and H&N Service Director</p>	<p>On track for 2nd February 2026</p>

		<p><i>The current extension of the contract with Switch2 expires on 30 June 2026. The risk is that we will be without a contract for three months unless a further extension to use Switch2 is agreed.</i></p> <p><i>Head of Procurement – Recommended to review the extension and extending the contract to allow for time to procure the new contract. Consultant appointed to finalise a new contract specification. Service Director was made aware of being unlikely to achieve the extension deadline.</i></p> <p>January 2025 update: A contract to be awarded to Switch 2 for an additional 12 – 18 months.</p> <p>Procurement completed and new contract will be in place from 2nd Feb 26.</p>		
R3	<p>As previously recommended, the full costs and income associated with the District Heating scheme should be recalculated, following which a decision should be made as to the extent to which the charges to tenants/leaseholders should be increased.</p> <p>Classification: Fundamental</p>	<p>This required a full review of the current charges and a reconciliation of the shortfall and review of what the new charges should be and what is reasonable to pass on to tenant & residents. If the charges are to be raised, there may be a need to continue to subsidise the charges initially, gradually bringing costs in line with current energy charges.</p> <p>Housing Management are currently undertaking their own service charge review and therefore this review will need to be run independently.</p>	<p>L. Ramsden P. Johnson</p>	Completed
R4	<p>Colleagues interacting with Switch2, need to show a greater degree of professional scepticism in their dealings and perform sample checks (e.g. to council collected meter readings) to confirm that income, and other data, is consistent with expectations.</p> <p>Classification: Significant</p>	<p>Process in place to check itemised invoices for repairs in the Asset Mgt Sustainability (Energy) Team and are now responsible for meter reading & billing. This team now take monthly meter readings. Completed. A SOP (Standard Operating Procedure) is required for Consistency of approach and address the problem of staff turnover within the team. This will be completed as the consultant is appointed. Team needs to understand the end-to-end process from the purchase of commercial gas to the pre-payment meters the tenants top up. Effective audit of finances can only be achieved with a transparent process.</p>	<p>Completed P. Johnson – Project Manager</p>	<p>November 2024 Completed May 2025 Completed</p>
R5	<p>District Heating Income and District Heating Expenditure should be recorded under the same</p>	<p>This action is complete. All District Heating expenditure and income is now accounted for directly within the HRA.</p>	<p>KM Jones Business Partner</p>	<p>30th September 2024</p>

	group heading in SAP, so as to allow for easier comparison. Classification: Significant		Finance	Completed
R6	As previously recommended, the vulnerability criteria should be reviewed to ensure it is till appropriate. Classification: Significant	The current criteria need to be confirmed, reviewed and the recommended changes implemented if applicable. Ensure any changes are communicated with the Energy Team. A new Vulnerability Policy for KHN has been drafted and led by Claire Felvus and reviewed by Service Managers. Update: The new vulnerability policy has been approved by Cabinet. Vulnerability officers will support the process. Completion date changed from 31 st January to 31 st March 2025.	P. Johnson – Project Manager	30 th December 2024 31st March 2025 Completed
R7	As previously recommended, high value credit balances should be routinely reviewed with a view to refunding customers and giving the option to reduce future pre-payments. Classification: Significant	Review current process, produce a SOP and implement changes. A process is not in place now for a resident who has high levels of credit or debt until a property becomes void. This is currently being reviewed and with the Council vulnerabilities team to find an effective solution.	G. Sykes - Strategic Manager Housing Services (Action for Accounts Support) J. Woodfine	June 2025 Completed
R8	The boiler replacement programme should be completed as a priority. Classification: Significant	A replacement programme is underway - led by Paul Goodwin, General Manager. Mark Hall, Mechanical and Water Technical Officer, leads on the boiler replacement programme, replacing boilers based, prioritised by age. The replacement programme for 2024 was completed on time. All planned works for the DH boiler works is on track to be completed this financial year; by 31 st March 2025. A watch group may need to be implemented to understand and consider grants and funding for any future replacement.	S. Hughes Property services	31 st March 2025 Completed
R9	A formal assessment should be undertaken as to whether the current meters, need to be upgraded.	An assessment will be undertaken to complete a replacement programme. This may need to form part of the new contract for the management of	Service Manager – Asset Mgt	May 2025 – Completed – HNES

	Classification: Significant	the District Heating schemes. Consultant has been appointed and will assess whether the meters need to be replaced.	J. Woodfine P. Johnson	optimisation studies w identify requirement t upgrade meters
R10	Depending on future pricing decisions, the benefits of relatively low-cost heating should be promoted more robustly to increase take-up. Classification: Merits Attention	This is ongoing service provided by the H&N Energy Team and is included within the communications strategy.	Paulette Johnson Helen Jakes	31 st March 2025 Completed
R11	Those who have chosen not to use the district heating system should not have to pay the standing charge. Classification: Significant	Review the options for opting out of District heating. Currently no option to opt out. Decision needs to be taken. This should form part of the heat network strategy and subsequently the communication plan. This is being reviewed and guidance will be given by the consultant.	P. Johnson	30 th May 2025 Completed
R12	Homes & Neighbourhood Management need to decide if they want to apply for funding through the Energy Bill Relief Scheme (via a rebate in 2024/25), and if so the District Heating Team need to provide evidence stating why they are entitled to government funds and communicate to tenants that the funds have been received through the scheme. Classification: Fundamental	The Energy Bill Relief Scheme was a 12-month scheme from 1 st April 2023 to 31 st March 2024, Kirklees climate change team, applied for the funds and were successful. This funding is no longer available.	D. Andrews	31 st July 2024 Completed
R13	Homes & Neighbourhood Management need to decide if they want to apply for Capital funding available under the "Heat Network Efficiency Scheme". Classification: Significant	Chirpy Heat have assisted Kirklees with an application for revenue for round 9 of the HNES scheme. The bid was successful and Kirklees have been awarded £37,000.00 for two optimisation studies benefitting 8,200 people.	P. Goodwin S. Hughes J. Woodfine	30 th June 2025 Completed –
R14	The Energy & Climate Change Team need actual readings to be taken at least twice a year and preferably quarterly. Classification: Significant	Currently performed by the Asset Team and reported to Finance. Process in place to capture meter readings.	Service Manager – Asset Management, Sustainability Performance	31 st July 2024 Completed

Please note the Assets Strategy and Performance Team name in H&N changed to Asset Management, Sustainability & Performance in December 2025.



REPORT TITLE: Mass Transit Spatial Development Framework Development Plan Document update

Meeting:	Growth and Regeneration Scrutiny Panel
Date:	26th January 2026
Cabinet Member	Cllr Moses Crook (Transport portfolio holder) Cllr Graham Turner (Regeneration portfolio holder)
Purpose of Report To update on the progress of the Mass Transit Spatial Development Framework Development Plan Document	
Recommendations <ul style="list-style-type: none"> Scrutiny Panel to note the progress on the Mass Transit Spatial Development Framework Development Plan Document and timescales for production Reasons for Recommendations <ul style="list-style-type: none"> Scrutiny Panel to be sighted on progress as requested at Council on 17th September 2025 	
Resource Implications: Existing resources are provided within Planning Policy but there may be a requirement for other service areas to assist with the process to final adoption.	
Date signed off by <u>Strategic Director</u> & name	David Shepherd Executive Director for Place – 14.01.26

Electoral wards affected: All

Ward councillors consulted: Information on the proposed consultation was issued to all Ward Cllrs on 14th January 2026, along with the latest version of the SDF DPD document

Public or private: Public

Has GDPR been considered? No personal data is contained in this report.

1. Executive Summary

On 8th July 2025, Cabinet delegated approval to a Council meeting of 17th September 2025, to approve officers to commence work on a joint Mass Transit Spatial Development Framework DPD and delegate constitutional powers to approve Regulation 18 and Regulation 19 consultation at a WYCA hosted Joint Member Committee.

This report sets out the following:

- An update on progress of the production of the Mass Transit Spatial Development Framework Development Plan Document
- Timescales for final production of the Mass Transit Spatial Development Framework
- Consultation arrangements for the upcoming Regulation 18 consultation

2. Background Information

2.1 Decision making

A report on the Mass Transit Spatial Development Framework was presented to Cabinet on 8th July 2025 which outlined the approach to be taken in terms of producing a joint development plan document (across five West Yorkshire districts) to support WYCA's Mass Transit programme in the light of WYCA not having statutory planning powers. A decision was taken to delegate approval of the decision to a Council meeting on 17th September 2025. A summary of the decisions at Council on 17th September 2025 are outlined below:

- That approval be given to the making of an agreement with Leeds City Council, Bradford City Council, Wakefield Council and Calderdale Council to commence the preparation of a Joint West Yorkshire Mass Transit Spatial Development Framework Part 1 Development Plan Document.
- That authority be delegated to undertake initial Regulation 18 consultation and Regulation 19 consultation on the draft West Yorkshire Mass Transit Spatial Development Framework Development Plan Document to the West Yorkshire Combined Authority Joint Member Committee, in so far as it is a council planning function relating to the Development Plan Document.
- That authority be delegated to the Joint Member Committee to authorise initial early engagement and public consultation (Regulation 18) on the draft Joint West Yorkshire Mass Transit Spatial Development Framework Development Plan Document and to prepare the submission draft and consultation for Regulation 19.

2.2 Progress to date

Since September, WYCA, its consultants and the districts have been working to produce a Regulation 18 consultation document to ensure the submission of the DPD under the existing local plan system with a programme for submission prior to December 2026.

On 18th December 2025, WYCA released a press statement indicating that the mass transit programme had changed. The announcement reflects changes / resequencing to the mass transit milestone programme following a peer review and the process to review business case sign-offs which means the target for operational start of services will now move back 2/3 years from mid 2030's to late 2030's.

How this announcement affects the programme for the SDF was discussed in a workshop session on 8th January between all 5 districts and WYCA. The outcome of the session was that all districts and WYCA are keen to maintain momentum with policy development for Mass Transit to inform and provide the foundation for future policy development for all five districts. On this basis, it was determined districts should proceed on a 'business as usual' basis with the preparation of the SDF and the Regulation 18 consultation.

The consultation document is appended to this report and was circulated to all Cllrs on 14th January 2026 for information.

2.3 Mass Transit SDF timetable

The proposed timeline for production of the document to formal submission to Secretary of State is shown below.

Action	Start	End	Who
Inaugural Joint Committee meeting (approve Reg 18 consultation and ToR)	23 rd Jan 26		WYCA Joint Member Committee
Consultation (Reg 18) ¹	29 th Jan 26	12 th March 26	WYCA/Districts
Review response to Reg 18 Consultation and oversee preparation of draft MT SDF Part 1 for Reg 19	13 th March	June 26	WYCA/Districts
Approval submission draft of MT SDF Part 1 for consultation (Reg 19)	June 26	July 26	WYCA Joint Member Committee
Reg 19 consultation period	Aug 26	Sep 26	WYCA/Districts
Submit to SoS for Examination in Public (Reg 22)	Oct 26	Oct 26	Kirklees Full Council
Adoption (Reg 26)	Spring 27		Kirklees Full Council

2.4 Regulation 18 Consultation arrangements

The Regulation 18 consultation will run from Thursday 29th January – Thursday 12th March 2026 meeting the minimum statutory period for consultation of 6 weeks.

Whilst WYCA will be managing the consultation, it is the responsibility of each local authority to ensure compliance with legislative requirements from the Town and Country Planning (Local Planning) (England) Regulations 2012 and compliance with its own Statement of Community Involvement (SCI).

Officers have been liaising with WYCA, their consultants and the other four districts over SCI requirements and reaching agreement over appropriate levels of consultation for the document given its strategic nature.

An engagement strategy has been produced to support those discussions. Previous Kirklees DPD consultation methods typically include (as listed in the Councils Statement of Community Involvement):

- Sharing information internally/maximise the use of networks or communication channels used by other services or local community websites where required
- Make use of council publications such as Kirklees Together to include articles
- Make use of social networking sites in accordance with the council's policy on social media – Facebook/Twitter
- Make use of interactive workshops or discussion groups with key stakeholders.
- Deliver presentations or hold question and answer sessions at meetings of existing groups where resources allow.
- Hold exhibitions or road shows with unmanned displays or staffed drop-in sessions
- Make use of posters, flyers, or site notices – these may be used to raise awareness of consultation events

- Hold meetings with elected members – members will be kept informed of progress and plans through briefings, workshops, and email.
- Working with parish / town councils
- Publication of formal public notices in newspapers

It should be noted that the SCI formed an important document in the scrutiny of the “adequacy” of the council’s engagement and consultation at the examination of the existing Local Plan. The independent Inspector considered the “public consultation ... was extensive and wide ranging and elicited a high level of responses” and concluded the consultation was in compliance with the SCI and relevant regulations ([Kirklees Council Local Plan Inspector's Report](#) paragraphs 14 – 16) January 2019. It is, therefore, important moving forward that any early engagement/consultation activity required to meet statutory stages in Plan making process are shaped in the context of the SCI and the council’s Inclusive Communities Framework. The council must also comply with its public sector equality duty under the Equality Act 2010 and will produce an Integrated Impact Assessment at key milestones of the update.

3. Implications for the Council

3.1 Council Plan

The planning framework to support opportunities for West Yorkshire Mass Transit supports Council Plan priorities including improved, quality places, encouraging thriving communities, securing economic growth for the district, encouraging inclusivity. It also advocates a positive approach to working with our regional partners to deliver these joint ambitions.

3.2 Financial Implications

The drafting of the SDF has been commissioned by WYCA. Support for the process is being accommodated by existing staff resources, the revenue budget within the Planning Policy team and officer time will be recharged to WYCA via the Mass Transit collaboration agreement where appropriate. The costs associated with engagement will depend on the agreed strategy, it is anticipated support will be provided by existing staff resources, with time & materials recharged to WYCA where appropriate.

3.3 Legal Implications

The Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) govern the review, preparation, consultation, examination, and adoption of development plan documents. In preparing a DPD, the council amongst other things must ensure that the plan is prepared in accordance with the council’s Local Plan Timetable, have regard to national policies/guidance, comply with the council’s Statement of Community Involvement.

The Joint DPD is prepared under Section 28 of the Planning and Compulsory Purchase Act and the Town and Country Planning (Local Planning) (England) Regulations 2012. It will be accompanied by a Sustainability Appraisal (meeting Regulation 12 and SEA Regulations 2004), HRA Screening, and EqIA. Adoption follows the statutory process: Reg.18, Reg.19, submission, Examination in Public, Adoption.

NPPF (Dec 2024) para 16 requires “early, proportionate and effective engagement”. Consultation must comply with each district’s SCI (minimum periods, access, formats, notifications).

Following the Written Ministerial Statement (Nov 2025), while the Duty to Cooperate statutory test will cease under new regs, authorities must maintain effective cooperation and

Statements of Common Ground, this Joint DPD is explicitly governed through the Joint Member Committee and is supported by a MT Statement of Intent signed by all 5 districts.

Risk of Judicial Review (JR): potential grounds include procedural non-compliance with SCI if applicable, inadequate SEA/SA scope (due to limited timescales), misleading presentation of route certainty, or failure to demonstrate effective cooperation between all 5 districts.

The Council must comply with its public sector equality duty under the Equality Act 2010 and additionally will produce an Integrated Impact Assessment as required.

3.4 Climate Change and Air Quality

The draft SDF supports the WYCA Regional Climate Plan and Council's Climate Action Plan.

3.5 Risk, Integrated Impact Assessment

Key Risks include:

- SCI compliance – as each LPA has its own SCI, the SDF DPD must comply with the minimum consultation requirements.
- Programme reform/interdependency: National plan-making changes and Mass Transit resequencing may alter dependencies and public/political perceptions.

Integrated Impact Assessment:

- An IIA was completed for the SDF DPD: [Integrated Impact Assessments | Kirklees Council](#)

4. Consultation & Engagement

Council officers are working closely with WYCA colleagues on the development of the SDF DPD document.

The planned consultation will last for a period of 6 weeks, this is the statutory minimum given the short timescale pre-purdah which makes it compliant from a legal perspective however it will be a decision for each LPA how to undertake additional engagement and comms dependent on the nature of the document and previous local plan engagement activity.

It is anticipated that Kirklees will:

- Contact residents/organisations directly who have expressed interest in planning policy document production (approx. 2500) via email and post (dependant on preference)
- Host a landing page on Kirklees website with direct links to the WYCA Your Voice consultation
- Hold member briefing sessions (where advised/required)
- Place copies of the document in deposit locations at Huddersfield and Dewsbury Customer Service centres and produce posters to ensure visibility
- Use Kirklees Together to highlight the consultation to residents
- Use Kirklees Involve consultation portal to ensure the consultation is visible internally
- Use social media feeds to promote the consultation
- Publish a formal public notice in both the Dewsbury Reporter and Huddersfield Examiner of the impending consultation

6. Next steps and timelines

The timeline for the production, consultation and governance of the final Mass Transit Spatial Development Framework Development Plan Document is outlined in section 2.3.

Work will continue with the programme areas outlined in the report. Further changes implemented through revised national planning policy, planning reforms or legislation relating to the production of development plan documents will continue to be monitored and reviewed.

8. Contact officers

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9. Background Papers and History of Decisions

- Cabinet report 8th July 2025 – Joint West Yorkshire Mass Transit Spatial Development Framework Development Plan Document (Reference to Council) [Agenda for Cabinet on Tuesday 8th July 2025, 1.30 pm | Kirklees Council](#)
- Council report 17th September 2025 - Mass Transit Spatial Development Framework (SDF) Development Plan Document (Reference from Cabinet) [Agenda for Council on Wednesday 17th September 2025, 5.30 pm | Kirklees Council](#)
- Kirklees Local Plan adopted 27th February 2019 www.kirklees.gov.uk/localplan

10 Appendices

Appendix 1: Mass Transit Spatial Development Framework Development Plan Document
Regulation 18 consultation document

11 Service Director responsible

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Chapter 1: Introduction

Context

The West Yorkshire Combined Authority (the Combined Authority), working with partners, is proposing a transformative Mass Transit network to deliver improved connectivity, economic growth, and net zero objectives across the region. Mass Transit is a large-scale public transport system with its own brand identity which may comprise one or more of the following transport technologies: advanced bus rapid transit, light rail, tram or tram-train vehicles.

The Combined Authority and all five West Yorkshire Councils (Bradford, Calderdale, Kirklees, Leeds, and Wakefield) have signed a 'Statement of Intent' relating to the proposals for Mass Transit¹. The agreement promotes effective co-ordination and co-operation to positively influence the project and includes creating a strategic policy framework to add to existing local planning policy and inform the development of future Local Plans. This strategic policy framework will take the form of a Spatial Development Framework (SDF), which will have formal planning policy status.

The SDF will set out policies to support the concept of Mass Transit and shape how future development can be planned around the transport hubs that will be built as part of the Mass Transit network. This is a farsighted move to join-up policies and investment in transport and development in a way that has not been done recently in England outside London.

The first element of the SDF is to prepare a joint Development Plan Document (joint DPD) covering West Yorkshire. This is to be prepared collectively by the five Councils through a Joint Committee. It will apply to the geography of the West Yorkshire local authority areas, as shown on the Key Diagram below. Once adopted, it will form part of the statutory Development Plan for each Council and will carry the same weight as other Local Plans. The Combined Authority and Councils intend to develop further policies specifically in relation to Phase 1 of the Mass Transit project in due course². These policies will be set out under a separate DPD.

Purpose of this consultation

This first stage consultation (known as 'Regulation 18') is to seek views on the scope and content of the joint DPD from members of the public, businesses, community groups, charitable organisations, statutory bodies and other stakeholders.

The feedback received will inform the development of draft planning policies which will be consulted upon in mid-2026. Subject to the outcome of this second stage of consultation (known as 'Regulation 19') it is the intention of the Councils to submit

¹ WYCA (2021) Mass Transit Statement of Intent

² WYCA (2025) West Yorkshire Mass Transit Consultation Outcome Report.

the draft joint DPD to Government by the end of 2026. The joint DPD would then be subject to Independent Examination, during which interested parties will have an opportunity to provide further representations before any decision is made³.

How to provide feedback

PLACEHOLDER: TO BE COMPLETED BY WYCA ENGAGEMENT TEAM

Consultation Questions

Q1. Do you support the proposal that there should be guiding spatial planning principles across the region to help maximise the benefits of the investment in Mass Transit?

Q2. Do you agree with the proposed Vision and Objectives for the joint DPD?

Q3. Do you agree with the suggested approach to the policy themes?

Q4. Are there any areas where you think the joint DPD could go further?

Q5. Is there anything else which you think should be covered in this joint DPD?

Structure of this document

The remainder of this consultation document sets out the proposed spatial vision and objectives followed by the strategic policy themes around which the joint DPD will be developed in greater detail before further consultation later this year:

Chapter 2 – Context, Vision and Objectives

- West Yorkshire Mass Transit – what’s happened so far?
- The role of the joint Development Plan Document
- Spatial Vision
- Joint DPD Objectives
- Spatial Options

Chapter 3 – A co-ordinated approach to delivering great places

- Policy Theme 1 - A place-based approach to transit-oriented development
- Policy Theme 2 - Creating a seamless, integrated transport network

³ The joint DPD is being prepared under Section 28 of the Planning and Compulsory Purchase Act 2004, in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012. It is informed by a Sustainability Appraisal to meet the specific requirements of Regulation 12, and the Environmental Assessment of Plans and Programmes Regulations 2004, as well as a Habitat Regulation Assessment (HRA) Screening Report, and an Equality Impact Assessment (EqIA).

- Policy Theme 3 - Delivering inclusive growth

Chapter 4 – Environment and Climate Change

- Policy Theme 4 - Climate Change
- Policy Theme 5 - Protecting and Enhancing the Built Environment

Chapter 5 – Funding and Delivery

- Policy Theme 6 - Co-ordination of Funding and Investment on the Mass Transit
- Policy Theme 7 - Safeguarding and Delivery of Mass Transit Infrastructure

For each of the seven policy themes, the document explains why it is considered that a policy is needed and provides an overview of what the policy will do. This consultation document does not include suggested policy wording; that will be provided in a subsequent 'Regulation 19' consultation draft anticipated in summer 2026.

Chapter 2: Vision, Objectives and Options

West Yorkshire Mass Transit – what's happened so far?

West Yorkshire faces a persistent productivity challenge, characterised by an annual £11 billion output gap compared to the UK average. Analysis indicates that this underperformance is not just due to the structure of the economy but is also directly linked to transport constraints. The lack of a modern integrated public transport network also contributes to high carbon emissions and social exclusion. Mass Transit is a key component of a wider set of proposals for addressing these issues.

The proposals for a West Yorkshire Mass Transit network are well established and have been subject to previous consultations including:

- 2021: Connectivity Infrastructure Plan⁴ (a proposed delivery pipeline of infrastructure improvements) and Mass Transit Vision 2040
- 2022/23 – Updated Mass Transit Vision 2040⁵ which, among other things, set out a vision (see Box 1) and five objectives for Mass Transit (see Box 2)
- 2024: Route Options for Phase One of Mass Transit⁶ - which consulted upon route options between Central Leeds and South Leeds (the 'Leeds Line'); and Bradford to Leeds (the 'Bradford Line').

⁴ WYCA (2021) Connectivity Infrastructure Plan: draft for engagement.

⁵ WYCA (2022) West Yorkshire Mass Transit Vision 2040.

⁶ WYCA (2025) West Yorkshire Mass Transit Consultation Outcome Report.

Box 1 Mass Transit Vision

By offering a new public transport option, which increases capacity and provides an attractive alternative to car travel, Mass Transit will support and facilitate:

- *A low emission, low carbon inclusive future*
- *A bigger stronger and rebalanced economy – increasing access to jobs, education and training*
- *Enhanced quality of life for West Yorkshire’s residents and visitors*
- *Inclusive growth through improving transport for up to 675,000 people within the top 20% most deprived communities*
- *Sustainable development and regeneration of neighbourhoods, district centres, towns and cities*

Box 2 - Mass Transit Objectives

<p>Connect West Yorkshire’s important places. Help people travel to jobs and education in a reliable, efficient and affordable way. Increase the job and training opportunities people can easily get to.</p>
<p>Support economic recovery Improve connections between areas of housing growth and employment, education, health and leisure opportunities. Improve connections to new employment sites.</p>
<p>Improve health and wellbeing Make travelling around West Yorkshire a more pleasant experience. Support improved public realm. Provide an attractive alternative to car travel.</p>
<p>Support levelling up and help rebalance the economy Reduce transport barriers which limit travel horizons and so increase access to employment, education, health, leisure and other services. Improve connections to local and district centres. Be fully accessible to all. Support redevelopment and regeneration.</p>
<p>Help combat climate change, provide climate resilient infrastructure and improve air quality by being low emission and providing an attractive and sustainable alternative to car travel.</p>

In 2025, the Combined Authority consulted upon a draft Local Transport Plan for West Yorkshire. This emphasised the importance of the alignment of transport and land use planning for delivering sustainable growth through maximising access of development to existing and planning transport infrastructure such as Mass Transit. It included a commitment to work with the five Councils to develop a strategic approach to integrating development and land use across West Yorkshire with existing and planned infrastructure, including Mass Transit, a franchised bus network and rail⁷.

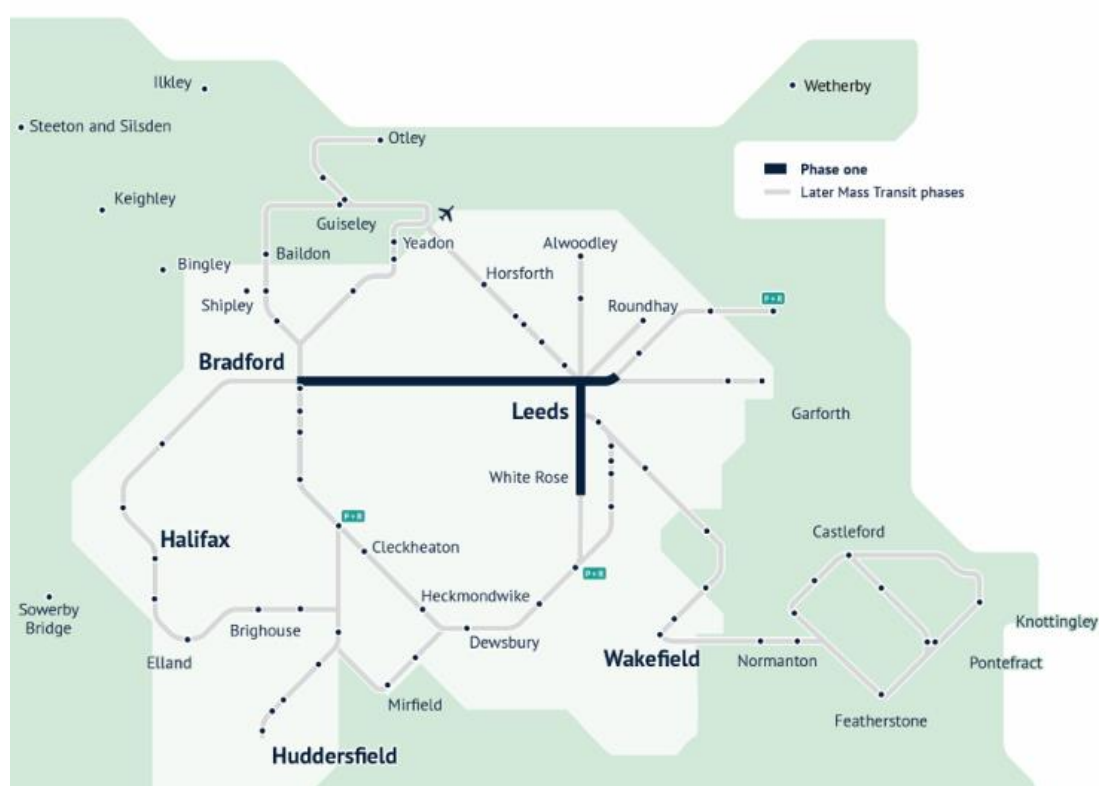
Also in 2025, the Combined Authority published a draft Local Growth Plan (LGP) which identified ‘an integrated transport network’ as one of five regional priorities for growth. The Mass Transit system is viewed as central to realising the Combined

⁷ WYCA (2025) Local Transport Plan.

Authority’s ambition to grow the West Yorkshire economy in an inclusive way. The draft LGP states that the SDF (alongside a proposed Mass Transit and Rail Growth Prospectus) will set the foundations to maximise sustainable economic growth and transformational opportunities along the routes.

These strategies and documents have been prepared to fully align with the overall policy intent set out at a national level through the National Planning Policy Framework (NPPF) (2024). The NPPF establishes that transport issues should be considered from the earliest stages of all plan-making, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places.

Figure 1: Proposed West Yorkshire Mass Transit Network



Source: West Yorkshire Combined Authority

All diagrams in this document are illustrative and indicative. They do not represent fixed alignments, site boundaries, land-take requirements, or development allocations, and are intended to support strategic policy discussion only. Indicative Mass Transit corridors or lines are shown for strategic planning purposes only. These do not represent fixed alignments, stations, depots, or land requirements. Locations shown are indicative only and subject to further design, assessment and consent.

The role of the joint Development Plan Document

It is the view of the Combined Authority and the five Councils that a strategic, West Yorkshire-wide approach to planning is required to deliver the transformational change expressed in the Mass Transit Vision 2040, the draft Local Transport Plan, and the draft Local Growth Plan. And, that this requires the identification of spatial

priorities, principles, and implementation mechanisms to shape development and growth opportunities across the proposed Mass Transit network.

Under changes to the planning system set out in the Planning and Infrastructure Act (2025), the Combined Authority will be responsible for the preparation of a Spatial Development Strategy (SDS). The SDS will be used to define the long-term pattern of spatial development at the regional level, along with other strategic priorities.

In anticipation of the SDS, there is the opportunity for a joint DPD to establish consistent cross-boundary policies that can align the proposed Mass Transit network with spatial and land use principles to maximise the benefits of the investment. The joint DPD will provide a long-term (25 years) West Yorkshire-wide framework supporting the delivery of all emerging and future phases of Mass Transit.

Putting this framework in place is a proactive approach that sets out a clear and united ambition and can be a tool for implementation that is also aligned to the business case and consenting processes that are being prepared for the different phases of Mass Transit.

It will seek to ensure that decisions on land use, growth, regeneration, and transport are aligned. It will also guide decision-making related to the early phases of Mass Transit and associated development, while simultaneously establishing clear strategic principles and criteria for future, more detailed, local planning as the Mass Transit network evolves.

Local Plans in West Yorkshire set ambitious targets for housing and employment growth. The joint DPD will not review or update these targets or any of the associated site allocations. However, it will provide a clear strategic policy direction on how the delivery of planned growth can be enhanced by using the investment in Mass Transit to create well-designed, locally-appropriate mixed-use development and regeneration in well-connected places, improving access to jobs and services, and becoming a catalyst for economic growth across the region.

The joint DPD will form part of the statutory development plan for each of the five Councils, alongside their Local Plans. It is envisaged that the joint DPD may contain two broad types of policy:

- a) high level strategic principles to be applied to the planning, design and/or implementation of Mass Transit; (some of these may be used in decision making where appropriate).
- b) those which provide a framework for future Local Plans to provide further detail.

Given the context set out above, and the relationship between the joint DPD, existing Local Plans and the forthcoming SDS, it is important to state that the joint DPD will NOT include:

- Any site allocations (housing, employment, or mixed-use);
- A local or strategic Green Belt review;

- Detailed safeguarding of routes for Phase One, or later phases of the Mass Transit network;
- Any new growth targets, or any proposals for the distribution or reallocation of growth; or
- The direct replacement of adopted Local Plan policies.

Spatial Vision

There is a need to translate the Mass Transit Vision into a 'spatial vision' from which specific objectives for the joint DPD can be developed. The proposed spatial vision for Mass Transit is provided in Box 3.

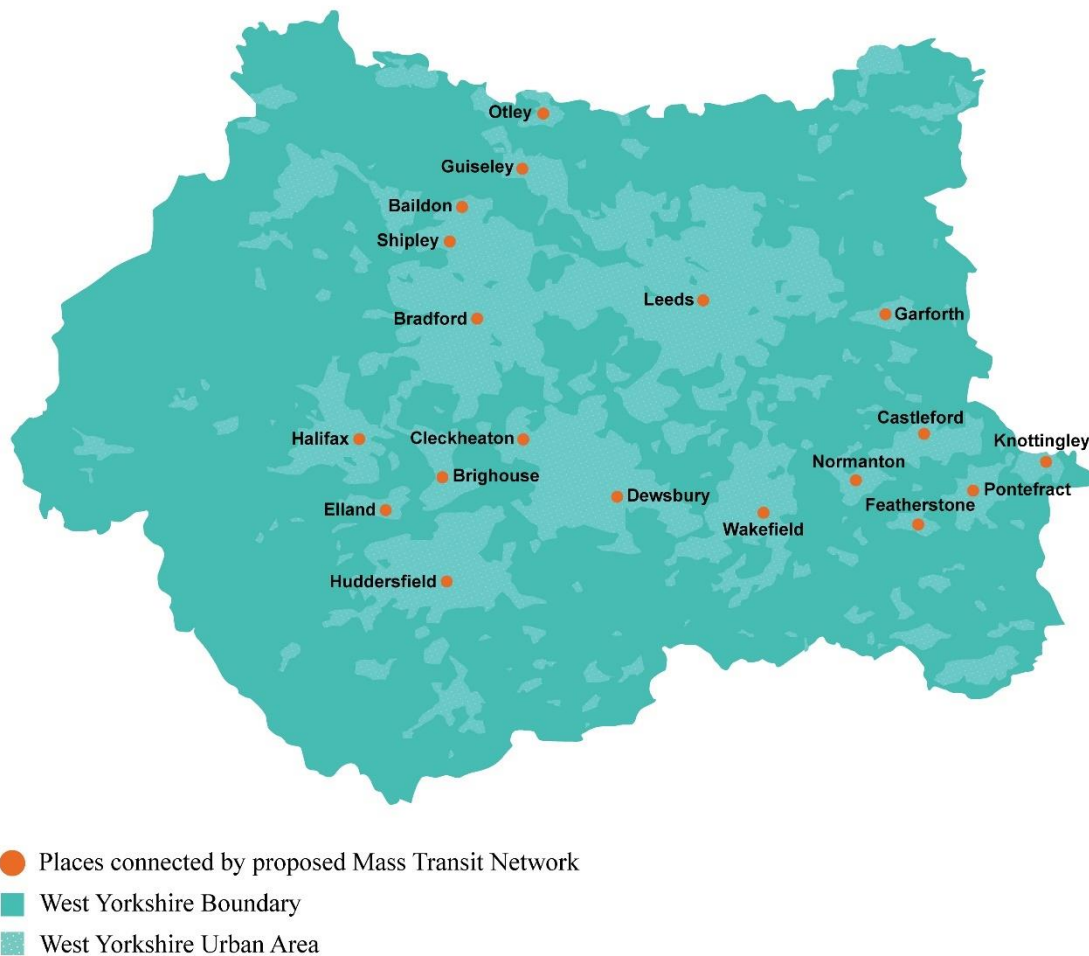
Box 3: Proposed Spatial Vision for Mass Transit

The Mass Transit network provides a generational opportunity to support sustainable and inclusive economic and housing growth in West Yorkshire by improving the connections between places making it easier for residents, workers and visitors to access jobs and services, and unlocking development and regeneration.

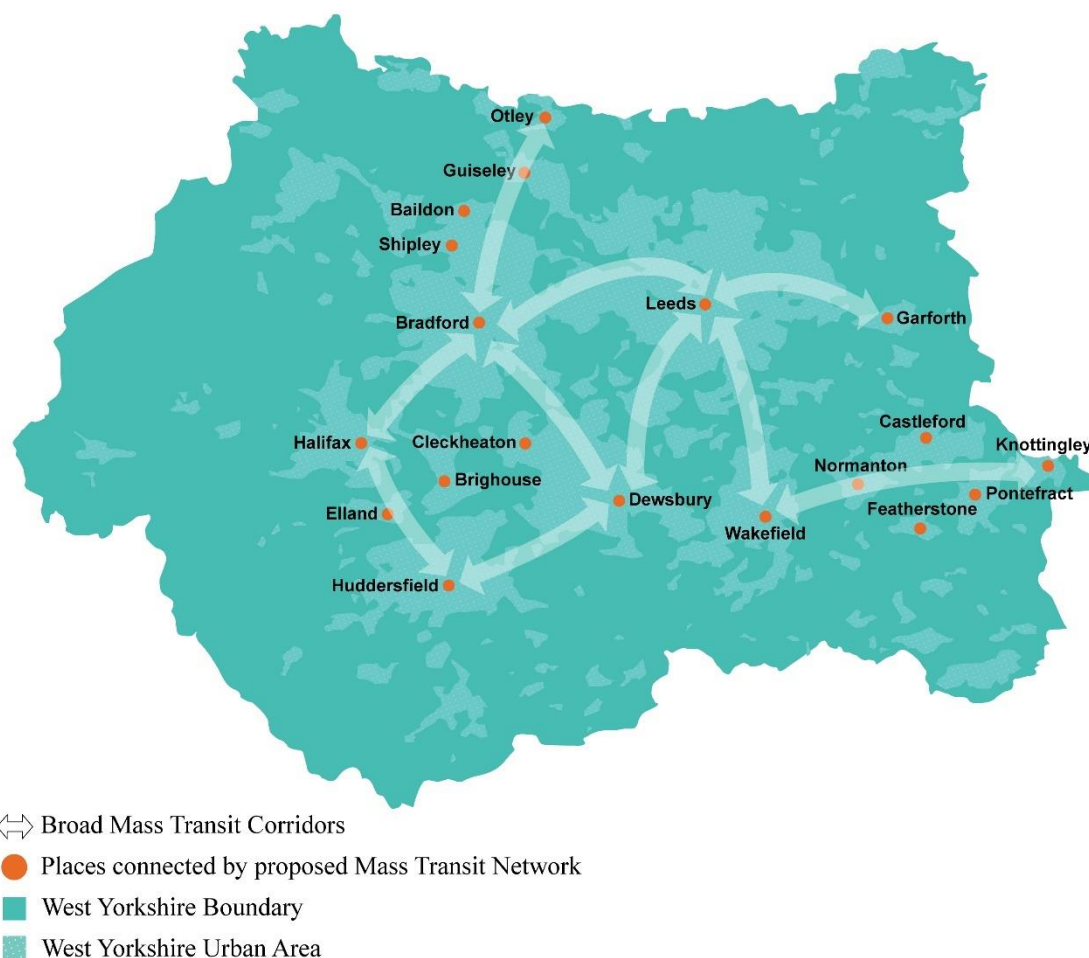
The places connected by the Mass Transit network (as shown on the Key Diagram) provide a clear spatial focus for investment, both to optimise its use, but also to regenerate and improve the quality of the existing urban environment and deliver new housing and employment. Along the proposed Mass Transit lines (or corridors), opportunities to meet identified needs on previously developed land will be maximised, making the most of opportunities to deliver higher density and high-quality development in accessible and well-connected places.

This will require a proactive and planned approach to delivery to ensure investment is co-ordinated and timely, so that the Mass Transit network is fully integrated into the existing urban environment and proposed new developments, maximising accessibility for users and connectivity between West Yorkshire's towns and cities through a people-first design approach which enhances the built and natural environment so that places on the network are where people want to live, work, visit and enjoy.

Key Diagram Option 1: Places connected by the proposed Mass Transit Network



Key Diagram Option 2 – Places connected by the proposed Mass Transit Network and Broad Mass Transit Corridors



Joint DPD Objectives

The following spatial planning objectives have been developed to express how the joint DPD will contribute to the delivery of the Mass Transit Vision 2040 (and associated objectives) and the West Yorkshire Local Growth Plan.

- **SO1: To integrate transport and spatial planning** by delivering high quality development in sustainable locations that are well-connected and are accessible to the proposed Mass Transit network.
- **SO2: To generate inclusive growth** and realise wider socio-economic benefits for all by improving connectivity between homes, economic hubs, and regeneration areas, and to support a productive and resilient economy. This will include maximising the opportunities for growth within existing settlements, especially on previously developed land where available.
- **SO3: To help create a fully integrated transport network** that promotes sustainable travel patterns by creating seamless integration across all modes, prioritises active travel, and reduces car dependency and its associated environmental impacts.

- **SO4: To deliver high-quality, place-led regeneration that creates safe, attractive, and well-designed, well-connected places, which respect and enhance local character and heritage.**
- **SO5: To create healthy and inclusive communities where inequality is reduced, the benefits of growth are shared equally, communities become more liveable and active, and all residents can safely and easily access services and opportunities (particularly education and health).**
- **SO6: To support the transition to a net-zero carbon economy by providing a low-carbon transport alternative and shaping energy-efficient, climate-resilient development.**
- **SO7: To protect and enhance the natural and built environment delivering measurable gains for biodiversity and green infrastructure, improving air quality, and conserving the significance of local character and identity, and heritage assets.**
- **SO8: To identify safeguarding principles for land potentially required for future phases of the Mass Transit network to be applied following identification of preferred routes (including associated infrastructure, e.g. depots, servicing etc) through other design, assessment or consenting processes to protect them from development that would prejudice construction or operation.**

Spatial Options

The existing and emerging Local Plans in Bradford, Calderdale, Leeds, Kirklees and Wakefield set out the scale of growth – in terms of new homes and retail, leisure, and employment space – that needs to be delivered across West Yorkshire. This purpose of the joint DPD is to set out how the proposed Mass Transit system can support and unlock delivery this growth in a way that maximises its economic, environmental, and social benefits.

We suggest there are two options for how the joint DPD could be developed to fulfil its vision and proposed objectives.

Option A: Maximise the benefits of Mass Transit through joined up approach to spatial planning across West Yorkshire (Preferred Option for joint DPD)

This option would create a set of spatial and land use policies and principles to help maximise and fully realise the benefits of Mass Transit. It would establish a region-wide, proactive, and coordinated approach that sets a clear ambition and a framework for implementation.

This option would seek to concentrate development of new homes and business space close to mass transit stops, locations that will be highly accessible. This would support increases in development density to reflect enhanced accessibility and connectivity and promote intensification of economic activity in a way that supports

the economy by enabling clustering, employment growth, and employers to access to a larger workforce. By increasing residential densities it will support housing growth in a sustainable way. It provides an opportunity to support and enhance the role of city, town and local centres and other economic hubs as focal points for retail, education, services, and employment. It can support the creation of great places that are well-designed, walkable and bikeable, sustainable, safe and inclusive. And it can support growth and opportunity in key economic corridors across West Yorkshire linking economic assets and connecting people to jobs and opportunities, driving up social inclusion.

This approach can create a clear and powerful framework for implementation, helping focus and coordinate investment and intervention at the regional scale across different public sector bodies – bringing together transport, local and social infrastructure, regeneration, housing, economic development, and skills investment. This approach can also send clear and consistent signals to the market regarding the places for growth, and where and how the public sector will seek to unlock private sector investment and development.

Option B: Rely on Local Plans to secure the benefits of Mass Transit (Business as Usual)

This option assumes that Mass Transit proceeds, but without a clear strategic policy framework to help focus development in well-connected places near Mass Transit stations and stops. Without a consistent and cross-boundary steer development would still occur in accordance with established plans and strategies, but it would be more ad hoc, and would miss the opportunity to achieve the scale, density, quality, sustainability, and positive impact of fully aligning development with the proposals for Mass Transit.

Equally, the opportunity would be lost to plan proactively and collaboratively for higher quality development to help create great places, to drive-up sustainability, and to create a strong and coherent framework for the coordination of other investment along main economic corridors. Under this option there is a greater likelihood that investment in supporting social and environmental infrastructure will be reactive and not be embedded within new development, placing increased pressure on existing services. There could also be an inconsistent approach to the consideration of how the most deprived communities across West Yorkshire can benefit from the Mass Transit network.

Chapter 3: A co-ordinated approach to delivering great places

Issues and Opportunities

Mass Transit is set to be one of the most significant infrastructure interventions in the region and it is right that it is shaped by a fully integrated approach to spatial

planning and delivery. Taking a place-based approach is the best way to align the investment with development proposals to maximise the economic, environmental, and social benefits and define how Mass Transit can be a positive influence on the places of West Yorkshire.

It also sends a clear signal to communities, investors, and developers that the region is ambitious and determined to deliver the right type of growth, in the right places, to benefit everyone. It also provides a framework where future growth opportunities can be identified over the long term – in conjunction with the different phases of the Mass Transit network – and be used to inform the scope of additional DPDs, and/or future updates to Local Plans, where appropriate.

It is important to recognise that aligning spatial and land-use planning with the proposals for Mass Transit will look different in the different places across the region. The spatial policy framework is not seeking to enforce a ‘one-size fits all’ approach on the future planning of the region. Instead, it is the means to create consistency and coherence when looking to maximise the opportunity from the investment. Clearly, locally appropriate responses will be different depending on whether the context is a highly urban city-scale environment versus a more district-scale or neighbourhood-scale context. The framework is intended to be both strategic and flexible enough to respect those different contexts, whilst establishing key principles that can proactively secure real benefits.

Policy Theme 1 – A place-based approach to transit-oriented development

Why is a policy needed?

In simple terms, transit-oriented development is making a more efficient use of land to deliver more sustainable development. This aligns with the West Yorkshire Local Transport Plan, which defines transit-oriented development as compact, mixed-use, pedestrian-friendly development organised around a station or stop. It is not simply development near transit; it is development oriented towards it. The application of these principles has been effective in other locations, such as Manchester and London, when delivering similar Mass Transit projects.

It is also about supporting high quality development and regeneration in existing places by creating zones of activity within the catchment of the Mass Transit stations and stops. It prioritises ‘placemaking’ to create vibrant, mixed-use communities that reduce reliance on private vehicles, helping foster inclusive growth and environmental resilience. In turn, it provides an opportunity to enhance the role and function of key places as destinations and anchors within local communities.

Directing growth and regeneration to align with the investment in Mass Transit will help West Yorkshire act as more of a cohesive, single unit rather than separate centres of activity. Working collectively and cross-boundary can help improve the region’s productivity by supporting agglomeration, clustering activity around well-

connected places, reducing travel times, and improving reliability between key centres and economic hubs.

As Mass Transit is delivered and matures, the certainty provided by an enhanced transport network will also encourage businesses to relocate within the economic hubs served by the network and support existing firms to invest and expand. Investment plans and development strategies can capitalise on Mass Transit's ability to bring firms closer to workers and suppliers and increase the effective density of employment across the region by better matching labour supply to jobs. Mass Transit also provides the opportunity to increase knowledge-sharing in key sectors and support continued growth in existing specialisms such as digital, financial and professional services, health innovation, and innovative manufacturing.

A place-based approach which supports transit-oriented development also provides a greater opportunity to coordinate the delivery of strategic-scale sites across the region. The investment in Mass Transit can help 'de-risk' and unlock key development sites by improving certainty and viability (including generating value uplift to help achieve wider policy aims).

What will it do?

At the heart of using transit-oriented development to deliver great places is a strong focus on 'people-first' design and placemaking. This is to support the long-term vision for West Yorkshire and make sure the Mass Transit project integrates, supports, and enhances those characteristics that make the region unique. It must make the places and locations that it serves better off and be a means to align a range of policy interventions to help overcome existing challenges and deliver positive benefits to all.

This policy will take a long-term view over the spatial planning of the region, recognising that the Mass Transit project will be delivered in phases. As such, it provides a platform for further collaboration at the regional and local level, linked to the production of the SDS and future Local Plans. It acknowledges that development opportunities linked to stations and stops will evolve over time, and that it is important to be proactive and think ahead so that the Mass Transit investment can be used as a catalyst for revitalising places.

Transit-oriented development by itself does not automatically create successful places. It provides the spatial logic for '*where*' development might occur, but it must work in conjunction with placemaking principles to help support the rationale for '*how*' development is delivered. This draws upon the ideas set out in West Yorkshire Mass Transit "Approach to Placemaking" strategy and recognises that these ideas must be embedded within the design, construction, and operation of Mass Transit⁸.

⁸ WYCA (2023) West Yorkshire Mass Transit: Approach to Placemaking.

The policy will establish a series of principles for how transit-oriented development could be promoted across the region, these include:

- promoting a mix of development types in well-connected and highly accessible places within the catchment of transport hubs.
- encouraging high quality development that supports and enhances the role of city, town, and local centres and other economic hubs as focal points for housing, retail, education, services, and employment.
- supporting a range of development densities to align the proposals for Mass Transit with local development opportunities and strategic regeneration sites.
- increasing development density in certain locations to help unlock development potential, support a greater scale of development, and improve viability. This will also increase the number of people living and working closer to the Mass Transit network, helping to secure its ongoing viability and commercial success.
- specifying design criteria so that the Mass Transit project enhances the quality, character, and amenity of the places it passes through.
- designing and integrating Mass Transit stations and stops so that they enhance and celebrate local identity, build upon the unique local characteristics (such as townscape, heritage, and culture) across the region. This includes adhering to the "Streets for Everyone" principles, ensuring that transit-oriented development repairs urban severance and enhances the built environment.

On this basis, this policy theme will require that the Combined Authority and the Councils continue to identify, support, and enhance the role of key places; helping to create more sustainable patterns of development of the right type, in the right locations to achieve a more inclusive and sustainable future for West Yorkshire.

Policy Theme 2 – Creating a seamless, integrated transport network

Why is a policy needed?

Mass Transit is the missing link in the West Yorkshire transport system to deliver much-needed improvements in capacity, quality, and connectivity. It will be the central part of an integrated and seamless multi-modal transport system that links Mass Transit with bus, rail, walking, and cycling to create seamless door-to-door journeys and offer an attractive alternative to car travel.

The investment in the Mass Transit provides an opportunity to:

- **Increase capacity** – by creating additional routes and an overall uplift in capacity across the network. A range of different technologies will offer the ability to carry significantly more passengers, providing crucial additional capacity on congested routes.
- **Improve accessibility** – by being designed to be inclusive, accessible, and safe for all ages and abilities. It will be affordable and equitable, making sure cost is not a barrier to access.

- **Boost connectivity** – by providing fast, high capacity, and direct connectivity between major centres, key employment and housing locations, and other hubs of activity, like hospitals or schools. Mass Transit can enhance the effective density of urban centres, helping expanding labour market catchments.
- **Create seamless integration across all modes** – by improving the overall offer and providing realistic choices for all users, so that people can select the right mode for the right journey. There will be a deliberate focus on the “*first and last mile*” to allow fully joined-up journeys.
- **Increase frequency and reliability** – by delivering more frequent services on specific routes to improve connections with existing communities. This may include segregation from general traffic to help tackle congestion and improve reliability.
- **Raise the quality** – by offering a high quality, attractive alternative to car travel. Vehicles and stops will be visually attractive, safe, secure, and monitored by CCTV, with real-time displays. Quality will also be enhanced by having seamless, joined-up timetabling, tickets, fares, and information linked to the Combined Authority’s ambitions for the Weaver Network.
- **Accelerate decarbonisation and improving air quality** – by helping achieve the region’s ambitions to reduce carbon emissions and be ‘net zero carbon’. The service will be zero-emission at the point of use, powered by green renewable sources, and provide an attractive, clean alternative to car travel, supporting modal shift and improving air quality.

What will it do?

Spatially, this is about connecting and integrating Mass Transit within existing places and transport hubs in a way that makes connections easy and travel more attractive to all users.

The policy will set out principles to make journeys to and from stations and stops easier, safer, and more inclusive. It will focus on making new development associated with Mass Transit seamlessly fit into the places they are located. This will include providing attractive public realm; providing effective signage, wayfinding, lighting, and safety features; and increasing the provision of blue and green infrastructure to elevate the quality of place.

The policy will also support the creation of a more reliable transport network with more frequent services, so that places are better connected and people can have confidence in accessing jobs and services when they need them, and that this access is equal and fair. This includes identifying and improving connections to other transport modes in the places and communities not directly served by the Mass Transit network, so that they have greater integration and reliability to access services, facilities, jobs, and homes.

The policy will positively enhance the role that the stations and stops play in the places they are located. This will include being a positive influence during both

construction and operation. It means fully aligning the route planning and implementation of Mass Transit with existing and planned development and regeneration sites, so that the physical development of the region is integrated with the transport network and focuses on delivering inclusive growth and environmental resilience. This will require a more conscious strategy to more effectively connect planned new development with transport hubs through improved active travel links for the “*first and last mile*”, as well as improving the overall quality of place.

To be effective in transforming the transport network the design and implementation of Mass Transit must also be aligned with complementary investment as part of a reformed bus network, rail improvements, active travel, park and ride, and approaches to car parking. This will help create real sustainable transport choices for people across the region, and to use the investment to help create places and neighbourhoods that improve the overall quality of place.

As with other matters, the integration of Mass Transit will look different in different places across the region. For example, for major transport hubs, usually within larger urban areas, the focus is likely to be on physically stitching into the existing urban fabric, including direct integration with existing transport infrastructure (stations and buildings). There may be an immediate focus on rail integration at key interchanges to support wider regional and national connectivity. There will be a requirement for strong focus on integration with the surrounding streetscape and public realm, with a view to raising the quality of place through improved wayfinding, signage, lighting, safety, and design. It will also be important to acknowledge the role these locations will play in helping increase the presence of blue and green infrastructure into urban environments, helping tackle issues such as air and noise pollution, lower carbon emissions, and help improve resilience to climate change.

For town, district, or local centre locations, usually within smaller urban areas, the focus is likely to be on integrating into the existing transport network, looking at opportunities to reduce the distance and time required at points of interchange. Integration should respect local character, design, and context, and a more ‘people-based’ approach should ensure there is permeability, and easy and safe access. There will be a stronger emphasis on integrating the ‘first and last mile’ of journeys to make them as seamless as possible, whilst promoting greater levels of active travel and shared mobility.

Policy Theme 3 – Delivering inclusive growth

Why is a policy needed

The region faces significant inequalities. Approximately 20% of the population lives in areas ranked within the top 10% most deprived in the UK. These communities are often physically disconnected from the economic opportunities generated in the main urban areas, which creates a barrier to inclusive growth.

Transport is often the barrier rather than an enabler, and reliable access to employment, education, and services like healthcare is frequently reliant on car ownership. Although the public transport network is improved, it suffers from congestion-related delays, often making it an unreliable option for time-sensitive commitments like shift work or childcare.

This policy is a means to create a more inclusive West Yorkshire where people are better connected to homes, jobs, opportunities, and services. There is an opportunity to help overcome spatial disparities across the region by linking together major hubs of activity and planned developments so that the region can work together to deliver more than the sum of its parts.

The West Yorkshire Plan's (2040) mission for the future is about creating a "*happy West Yorkshire*", a "*safe West Yorkshire*", and to create an inclusive region that is filled with "*great places and healthy communities*". This policy is about using the investment in Mass Transit to help tackle long-standing challenges through positive action.

What will it do?

The policy will create a framework whereby the investment in Mass Transit can be a catalyst for creating better places and better lives. To secure long-term benefits 'on-the-ground' the investment in Mass Transit must directly connect existing communities that experience deprivation and social exclusion and bring them within easy reach of homes, jobs, services, and facilities.

As noted above, the policy will focus on integrating with the existing transport network, looking to reduce the distance and time required at points of interchange, and ensure that those communities that are not directly connected to the Mass Transit network can benefit through enhanced services and easier connections. Connecting these excluded communities (and more peripherally located places) to the network and providing better links to main centres of economic activity will help overcome barriers to participation, and means benefits are extended to a much wider area across West Yorkshire, helping more places to thrive.

More specifically, this policy will take a strong focus on designing and delivering a Mass Transit network for people of all ages, backgrounds, and abilities – recognising that inclusive design is indivisible from good design. It will set out criteria linked to:

- overcoming transport-related social exclusion;
- ensuring all journeys are safe, welcoming, inclusive, and affordable;
- improving physical inactivity levels by making stations and stops fully integrated with the local community and therefore promoting walking and cycling for 'first and last mile' journeys;
- improving health and well-being by reducing a reliance on car use that contributes to health issues such as poor air quality due to harmful pollutants from road traffic;

- increasing opportunities to access physical activity or leisure pursuits, including greater access to nature and blue and green spaces; and
- overcoming barriers and severance issues created by heavy traffic flows and major road infrastructure, which restricts movement, and increased exposure to harmful noise levels, which can cause health problems.

The policy will also reduce the costs associated with accessing and using the current transport network. Connecting existing places to the Mass Transit network can help lower the cost of living by removing the necessity of car ownership, and by making access to employment and education easier and more affordable. Integrated ticketing and multi-modal transport hubs allow low-income residents to access opportunities across the region without high travel costs.

Chapter 4: Environment and climate change

Issues and opportunities

A key principle of Mass Transit’s approach to placemaking is being environmentally responsible – this applies both to responding to climate change and its impacts as well as the protection and enhancement of the natural environment.

The climate crisis and its impacts are well recognised in West Yorkshire, with a shared ambition to tackle the climate emergency by reducing carbon emissions and mitigating the impacts of climate change. Each council has declared a climate emergency. There is therefore a shared collective ambition to reduce carbon ambitions and respond to the impacts of climate change. The joint DPD provides an opportunity to provide a planning framework for how Mass Transit can contribute to this.

West Yorkshire is shaped by its diversity in its physical and natural environment. From beautiful natural landscapes and internationally important wildlife to green spaces, parks and trees in towns and cities the natural environment plays an important role in the region – providing for nature, climate resilience and spaces for leisure and recreation.

West Yorkshire’s natural environment supports a wide range of habitats and species; however, the nature network has suffered severe decline - as well as losing habitats and species, natural processes that provide flood protection, climate regulation, and urban cooling have weakened. Land use and climate change are the primary drivers of this degradation. Nature’s collapse is not just an environmental crisis—it undermines economic resilience and community safety⁹.

⁹ WYCA (2025) Draft West Yorkshire Local Nature Recovery Strategy.

Development around Mass Transit can be leveraged to support the natural environment, provide for nature as well as provide wider benefits for climate resilience through providing for multi-functional green infrastructure.

Policy Theme 4: Climate change

Why is a policy needed?

Transport is the largest carbon-emitting sector in West Yorkshire, accounting for 37% of greenhouse gas emissions, dominated by road transport¹⁰. Part of the vision for the future of West Yorkshire is about tackling the climate emergency through the fair and inclusive decarbonization of the transport network, as part of the wider mission to achieve net zero by 2038¹¹. Analysis indicates that projects like Mass Transit are required as part of the maximum ambition, which if delivered effectively could help reduce carbon emissions in West Yorkshire by 81%¹². Modelling suggests that major investment in sustainable transport alongside behaviour change, technology and other policy interventions can make a significant contribution towards a net zero carbon transport sector¹³.

Future climate hazards within the West Yorkshire region are likely to include warmer and wetter winters, increased heavy rainfall, drier and hotter summers with increased extreme heat. Climate change poses risks such as flooding, extreme weather, and overheating in urban areas, which can disrupt transport networks and increase costs¹⁴.

There is a recognition that recent extreme weather in West Yorkshire has disproportionately harmed vulnerable communities and damaged infrastructure. There is an objective to build a climate resilient region¹⁵¹⁶. The delivery of the Mass Transit network should therefore also be about creating system-wide sustainability and resilience.

Current and emerging local plans address the need to reduce carbon emissions and mitigate the impacts of climate change in a range of different ways. A strategic policy can help to identify a consistent policy approach to the provision of Mass Transit infrastructure and surrounding development.

¹⁰ WYCA (2025) Draft Local Transport Plan.

¹¹ WYCA (2023) The West Yorkshire Plan.

¹² WYCA (2025) WYCA Draft Local Transport Plan.

¹³ WYCA (2021) WYCA Connectivity Infrastructure Plan.

¹⁴ WYCA (2025) Draft Local Transport Plan

¹⁵ WYCA (2024) West Yorkshire's Climate and Environment Plan (2025 2038)

¹⁶ WYCA (2024) The Mayor's West Yorkshire Local Transport Plan – draft for consultation

What will it do?

Reducing carbon emissions

A strategic planning policy for reducing carbon emissions associated with Mass Transit infrastructure could include:

- Setting out how Mass Transit infrastructure could be operationally net zero. (This could also include policy for exploring options for renewable energy sources such as solar energy along the network).
- Setting out how the design and construction of Mass Transit infrastructure can be achieved in line with sustainable design and circular economy principles.
- Seeking to minimise whole life carbon emissions for the implementation of Mass Transit infrastructure.
- Exploring if specific sustainable design standards such as BREEAM could be supported.

The approach could include providing a high-level framework for Local Plans to:

- Set out more detailed policy for development associated with Mass Transit to reduce carbon emissions through their design and construction.
- Encourage surrounding development to prioritise decentralised energy options, linking in with existing or planned heat networks for example.

Climate resilience

For a future Mass Transit system to be resilient to the different impacts of climate change, the approach to strategic planning policy could include:

1. Embedding climate resilient design considerations to address extreme and warmer temperatures, including for example:
 - Thermal comfort at stations and stops, maximising opportunities for passive cooling (through orientation, shading and materials). This could involve setting out a cooling hierarchy.
 - Providing for thermal comfort whilst people are travelling on the infrastructure.
 - The provision of green and blue infrastructure to assist with cooling and flood resilience (providing wider benefits to biodiversity as covered in policy theme 5).
2. Embedding mitigating flood risk as a core principle in planning for transport infrastructure.

The approach could also include providing a high-level framework for Local Plans to include green and blue infrastructure, including sustainable drainage, and ensure this is integrated and complementary to Mass Transit infrastructure to maximise the benefits of this such as cooling and reducing flood risk.

Policy Theme 5: Protecting and enhancing the natural environment

Why is a policy needed?

West Yorkshire contains internationally protected wildlife sites including the South Pennine Moors Special Area of Conservation (SAC) / Special Protection Areas (SPA) and other European/Ramsar sites that may have pathway connectivity (e.g. via air quality, recreation, and hydrology). Any potential impacts on internationally protected sites will be considered through the Habitats Regulation Assessment (HRA) process for this joint DPD. Where likely significant effects cannot be excluded, Appropriate Assessment will be undertaken as part of the joint DPD HRA prior to adoption. Subsequent plans and projects will also be subject to HRA where required at the appropriate plan-making stage. Other irreplaceable habitats such as natural woodlands are protected under national and local planning policy.

West Yorkshire is also home to some national character areas (South Pennine and Yorkshire Southern Pennine Fringe) – any potential impacts on these landscapes will also need to be kept under review as the project progresses.

Mass Transit and associated development have both the potential to impact on the natural environment through their construction and operation, but also provide the opportunities for enhancement to nature, increase access to the natural environment as well as contribute to wider climate resilience as identified in policy theme 4.

The Local Plans in West Yorkshire have a range of policies to conserve and enhance the natural environment but these are not specific to Mass Transit and vary by each council. A strategic policy approach to the protection and enhancement of the natural environment is required to ensure that there is a clear and consistent policy approach across West Yorkshire and support the sustainable delivery of Mass Transit.

Not all Local Plans have Biodiversity Net Gain (BNG) policies but the Environment Act sets out the mandatory BNG requirements. The joint DPD can support this by setting out how mandatory BNG requirements can be delivered for works associated with the scheme, aligning this with the objectives of the West Yorkshire Local Nature Recovery Strategy (LNRS) and maximising opportunities for habitat restoration and connectivity consistent with the Mass Transit Sustainability Strategy¹⁷.

What will it do?

Provide a framework for biodiversity enhancement, nature recovery and blue and green infrastructure for sites/areas around future Mass Transit infrastructure, in ways which support the Mass Transit Design Philosophy and Mass Transit Sustainability Strategy.

A strategic planning policy for Mass Transit could include:

¹⁷ WYCA (2024) Mass Transit Sustainability Strategy

- The creation and maintenance of new biodiverse-rich habitats along existing and new Mass Transit and associated infrastructure such as highways, cycleways, pavements, bus corridors etc.
- Providing for biodiversity net gain as part of construction and maximising associated opportunities for habitat restoration.
- Seeking to avoid and minimise effects on sensitive environmental assets, and where necessary mitigate impacts (notwithstanding the separate requirements of HRA for European sites).
- Incorporating wildlife-friendly infrastructure design into existing and planned development to enhance ecological connectivity.
- Maximise the provision of green and blue urban infrastructure within the scheme footprint, supporting and complementing wider green and blue infrastructure delivery within the region.
- Significantly increasing the number of urban trees and woodlands, planting resilient species particularly where existing canopy cover is limited, and prioritising links to habitats.
- Providing a framework for sustainable drainage to support wider green and blue infrastructure, prioritising solutions which have benefits for nature.

The approach could also include providing a high-level framework for Local Plans to support planning for increased and multi-functional green infrastructure around Mass Transit routes, stations and stops, and how that greening can maximise multiple benefits, for example: sustainable urban drainage, shading, reduced noise pollution and improved air quality as well as incorporating habitats for wildlife in urban spaces around mass transit.

Chapter 5: Funding and Delivery

Issues and Opportunities

This consultation document sets out the potentially transformational nature of the positive change that Mass Transit can facilitate across West Yorkshire, in terms of social inclusion, economic development, placemaking, and natural environment.

However, evidence from across the UK, Europe and the US, demonstrates that these outcomes are not a given. They require significant co-ordination of public and private investment towards a shared set of goals with a clear programme of action and the implementation of a wide range of complementary transport, planning and economic policies¹⁸. The Combined Authority and the Councils will all have important roles to play in this respect.

All adopted and emerging Local Plans in West Yorkshire acknowledge the importance of infrastructure and delivery mechanisms, including the role of

¹⁸ J Siraut (2004) Economic and regeneration impacts of Croydon Tramlink

partnership working and developer contributions which can include s106 agreements and Community Infrastructure Levy (CIL) funds. However, the need for a co-ordinated region-wide approach to the development of funding and delivery mechanisms will be critical to ensure that the place-based benefits of Mass Transit are realised across West Yorkshire, and not solely in the main economic centres of Leeds and Bradford.

At the strategic level, the Combined Authority will work with key government departments and agencies to agree and co-ordinate public funding streams, for example to deliver infrastructure and housing which is essential to bring forward key development sites identified in Local Plans along Mass Transit routes. This should help overcome perceptions of risk for investors by providing the certainty required to de-risk private investment. For the delivery of key Transit-orientated Development local delivery vehicles may be needed to provide the dedicated resources and skills required. The governance, responsibilities and focus of delivery vehicles are likely to vary depending upon the characteristics of the opportunity and the location.

Through its devolved powers and funding across transport, skills, housing and economic development, the Combined Authority will need to align strategic decision making and resources to those priority places along the network which would benefit from early intervention to address financial (e.g. viability constraints), physical infrastructure or capacity (e.g. skills development) constraints to growth or regeneration that will enable them to benefit from the opportunities that enhanced connectivity will bring.

Implementation of Mass Transit will require the co-ordinated provision of a complex range of enabling and supporting infrastructure assets and facilities including: Rights of Way/Pathways; stops and interchanges; walking, wheeling and cycling infrastructure; buildings (e.g. operations control centre, depot buildings, welfare facilities etc); signalling and control systems; high and low voltage power supply network; structures (bridges, tunnels etc); park and ride facilities; public realm works (e.g. landscaping and sustainable drainage systems); utilities; and earthworks. These facilities and infrastructure need to be planned and delivered in a co-ordinated way to facilitate a safe, functional, efficient and effective Mass Transit system.

Some of the enabling works will be delivered directly by utility companies or highway authorities using their permitted development rights, but many of the supporting facilities will need planning permission (or be consented via deemed permission through a Transport and Works Act Order (TWAO), in the case of Phase One). Larger facilities, for example, Park and Ride sites and depots/stabling yards will require significant areas of land for which suitable sites should be allocated through Local Plans.

It will be essential that the demand associated with Mass Transit – both directly through the operation of the network and indirectly through the intensification of development in and around transit hubs and interchanges – is factored into utilities

demand forecasts well in advance. This will require proactive and ongoing engagement between the Combined Authority, the five local Councils and the utility companies to ensure the regulatory regime supports timely investment.

The delivery of Mass Transit will be a long-term complex process, over many years, with significant risks. One of these will be potential conflict with other land uses, for example where planning permissions are granted along a proposed Mass Transit route which may place constraints on the design e.g. alignment or location of supporting infrastructure. A failure to 'safeguard' the land required for Mass Transit could at worst undermine its delivery, for example, if development encroaches on the proposed route. Alternatively other proposed developments could occupy land identified for supporting infrastructure or constrain the ability of the system to reach its full potential by impacting on access to the network.

Policy Theme 6: Co-ordination of funding and investment on the Mass Transit network

Why is a policy needed?

Working with Government, the Combined Authority and the Councils will look to explore the feasibility of a range of local funding and finance mechanisms, to supplement grant funding, including opportunities for capturing increases in land value, which can then be reinvested in and along the network. The viability and mechanisms for this require further investigation on a region wide (cross boundary) basis, and options could include, for example, a Mayoral CIL (first used in London to contribute towards the funding of the Elizabeth Line) and/or more localised developer contributions.

The Councils will need to take a proactive approach to the preparation of development frameworks for key transit-orientated developments or other large-scale development/regeneration areas served by the network, as Leeds (e.g. Leeds Southbank) and Bradford (e.g. Southern Gateway) are doing for Phase 1, to provide statements of intent and provide confidence to investors.

What will it do?

A strategic policy approach to funding and delivery will seek to maximise opportunities arising from Mass Transit across West Yorkshire by:

- Emphasising the critical role that the Combined Authority will have securing and prioritising funding and investment through deploying the full range of its devolved powers (including as Local Transport Authority and strategic planning) and funding to secure, prioritise and co-ordinate the delivery of a wide range of public resources towards the Mass Transit objectives.

- Confirming that the Combined Authority should work with Councils to consider where local delivery vehicles may be beneficial to drive implementation and what form these should take.
- Setting out how Councils will be expected to take a proactive approach to planning for the development and placemaking opportunities afforded by Mass Transit, including through:
 - Local Plan reviews, to ensure their spatial strategies align with the phased delivery of the Mass Transit network,
 - working with stakeholders to prepare development frameworks, masterplans and delivery plans for associated infrastructure,
 - Development management decisions on development proposals which come forward along the proposed Mass Transit routes,

In the absence of strategic policies which commit the Combined Authority and Councils to work collaboratively and take proactive measures to co-ordinate and manage investment and funding, there would be a greater reliance on landowners and developers to put in place the supporting infrastructure (secured through planning obligations) on a site-by-site basis. This has a high risk of development not being delivered in ways which either enable or maximise the wider benefits of the Mass Transit network.

Policy Theme 7: Safeguarding and Delivery of Mass Transit Infrastructure

Why is a policy needed?

Most Local Plans in West Yorkshire do not take a proactive policy stance on Mass Transit due to Local Plans having already been adopted or in advanced stages when work commenced on Mass Transit route options. A strategic policy is needed to provide a region-wide steer on the ways of working that will be required to ensure that the necessary supporting infrastructure and facilities are delivered at the right time and, where applicable, are appropriately integrated into new developments (including, but not exclusively, Transit-orientated Development).

Secondly, there will be a need - initially for Phase One – for Councils to work with the Combined Authority to identify suitable sites in their Local Plans for critical supporting infrastructure which are likely to include, depots, stabling, interchanges, park and ride and an operational control centre. Where applicable there would also be a significant benefit having a common approach to the safeguarding of Mass Transit routes following the announcement of their preferred route through the TWAO process, to enable the Combined Authority and the Councils to protect the land required, enable integration with other development and reduce uncertainty among the public, landowners, developers and investors.

Safeguarding transport infrastructure in Local Plans relates to the identification and 'saving' of land required to deliver transport infrastructure that may be required now or in the future. For example, if a proposed development encroaches or abuts a safeguarded transport scheme it will need to either provide a corridor to allow the safeguarded scheme to come forward or deliver (or partly deliver) the safeguarded transport scheme. If it does not do so, the Council (or potentially the Combined Authority using 'call-in' powers it will receive from April 2026) may refuse the planning permission if it would prejudice the delivery of Mass Transit. Any safeguarding principles set out in the joint DPD will be strategic and criteria-based, and do not fix alignments, land-take or specific sites; these matters will be determined through subsequent design, assessment and consent processes.

Delivering Mass Transit will also require organisational co-operation and co-ordination to realise the full benefits of the project. There will need to be a full programme of integration with other transport bodies and organisations, such as Network Rail, Great British Railways, National Highways, and the Train Operating Companies. It will also require the co-ordination of other infrastructure plans, policies, programmes, and interventions to make sure delivery of the project happens in a streamlined manner.

Furthermore, the physical construction of the project (at all phases and stages) should represent best practice and delivers its own benefits. Each phase has the potential to be very disruptive, both to road users, as a result of utility works, and to the local community due to likely construction impacts on noise, light, air pollution and visual amenity. A strategic approach to the management of construction across the network could identify in advance good-practice principles and a consistent approach to construction environmental management, to support efficient consenting without prejudicing the outcome of project-level Environmental Impact Assessment (EIA)/HRA.”.

Policies will need to be put in place to deliver the Combined Authority's stated objectives for Mass Transit to provide significant employment and skills development and supply chain contracts within the region both during construction and operation of the network enabling a significant proportion of the income and spending to be captured locally.

What will it do?

A strategic policy would support the Combined Authority and the Local Authorities to work collaboratively to:

- safeguard land for the individual phases of the Mass Transit network within relevant Local Plan(s), subject to agreed timescales following announcement of a preferred route (and subject to further assessment).
- identify sites (and where appropriate safeguard or allocate them in Local Plans) for Mass Transit supporting infrastructure, including for example

depots, sidings, park and ride, and interchanges for each phase of the scheme as the project progresses.

- establish principles for construction and environmental management to manage impacts during construction of the network.
- develop a Mass Transit Infrastructure Delivery Framework as a mechanism to work proactively with infrastructure providers to ensure that investment/funding commitments for necessary upgrades to support timely and co-ordinated delivery of construction works. This would support the 'single dig' approach to minimise utility diversions and limit disruption to residents and businesses.
- Implement the employment skills action plan and supply chain action plan

Abbreviations

BNG	Biodiversity Net Gain
Combined Authority	West Yorkshire Combined Authority
DPD	Development Plan Document
CIL	Community Infrastructure Levy
EIA	Environmental Impact Assessment
EqIA	Equality Impact Assessment
HRA	Habitats Regulation Assessment
LGP	Local Growth Plan
NPPF	National Planning Policy Framework
SAC	Special Area of Conservation
SPA	Special Protection Areas
ToD	Transit-orientated Development
TRSE	Transport related social exclusion
TWAO	Transport and Works Act Order
LNRS	Local Nature Recovery Strategy

Glossary of Key Terms

Term	Definition
Accessibility	The ease with which a person can access and use facilities, services, and information in their environment regardless of mobility capabilities. Accessibility ensures that everyone can participate in social, economic, and recreational activities.
Community Infrastructure Levy (CIL)	A charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area.
Economic corridors	Economic corridors are integrated networks of infrastructure within a geographical area designed to stimulate economic development.
Economic hubs	Economic hubs are focal points for commercial, leisure, retail, and other forms of economic activity (including residential). Economic hubs include established city, town, and local centres – but also include other locations of significant economic activity, for example, Leeds Bradford International Airport.
Green and Blue Infrastructure	A network of multi-functional green (e.g. parks, gardens, recreational space, natural and semi-natural) and blue (e.g. rivers, streams, canals, ponds etc) spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.
Mass Transit (network)	In West Yorkshire this will be a system of urban transportation which may include a combination of advanced buses, light rail/trams, tram-trains and ultra-light rail.
Mass Transit lines	Nine corridors in West Yorkshire along which Mass Transit routes are proposed to be identified and delivered (see Key Diagram).
Mass Transit route	An alignment for one of the proposed Mass Transit lines which make up the proposed West Yorkshire Mass Transit network.
Mass Transit stop	A designated stop where passengers board or alight a Mass Transit vehicle.
Transit-Orientated Development (ToD)	An approach to urban development designed to bring people, services, and activities together with quality public transport supported by walking and cycling conditions to facilitate shorter trips, better lifestyles, and more efficient use of resources.
Safeguarding	Refers to policies and regulations designed to protect future infrastructure projects from conflicting developments.
Transport hubs	Transport hubs are fixed locations on the transport network that allow people who are walking, wheeling, or cycling to

	connect to rail, bus, and tram services. They can also provide shared mobility schemes and form part of a park and ride site.
Transport related social exclusion (TRSE)	Where limited access to transport or other issues with the transport system means that people cannot fully participate in society in the way they would like. This can include being able to access a good education, having meaningful and gainful employment, connecting with friends and family, and being able to access leisure facilities, tourist attractions, and the natural environment.
S106 agreement	A legally binding agreement or “planning obligation” between a local planning authority, like us, and a property owner. The purpose of a S106 agreement is to mitigate the impact of the development on the local community and infrastructure.
Weaver Network	An integrated network of public transport (and active travel) across West Yorkshire which will bring together all local bus, rail and proposed Mass Transit services to offer simpler fares and ticketing and improved travel information.

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