

PUBLIC BENEFITS STATEMENT

ALLOCATION E2333A, CLAYTON WEST

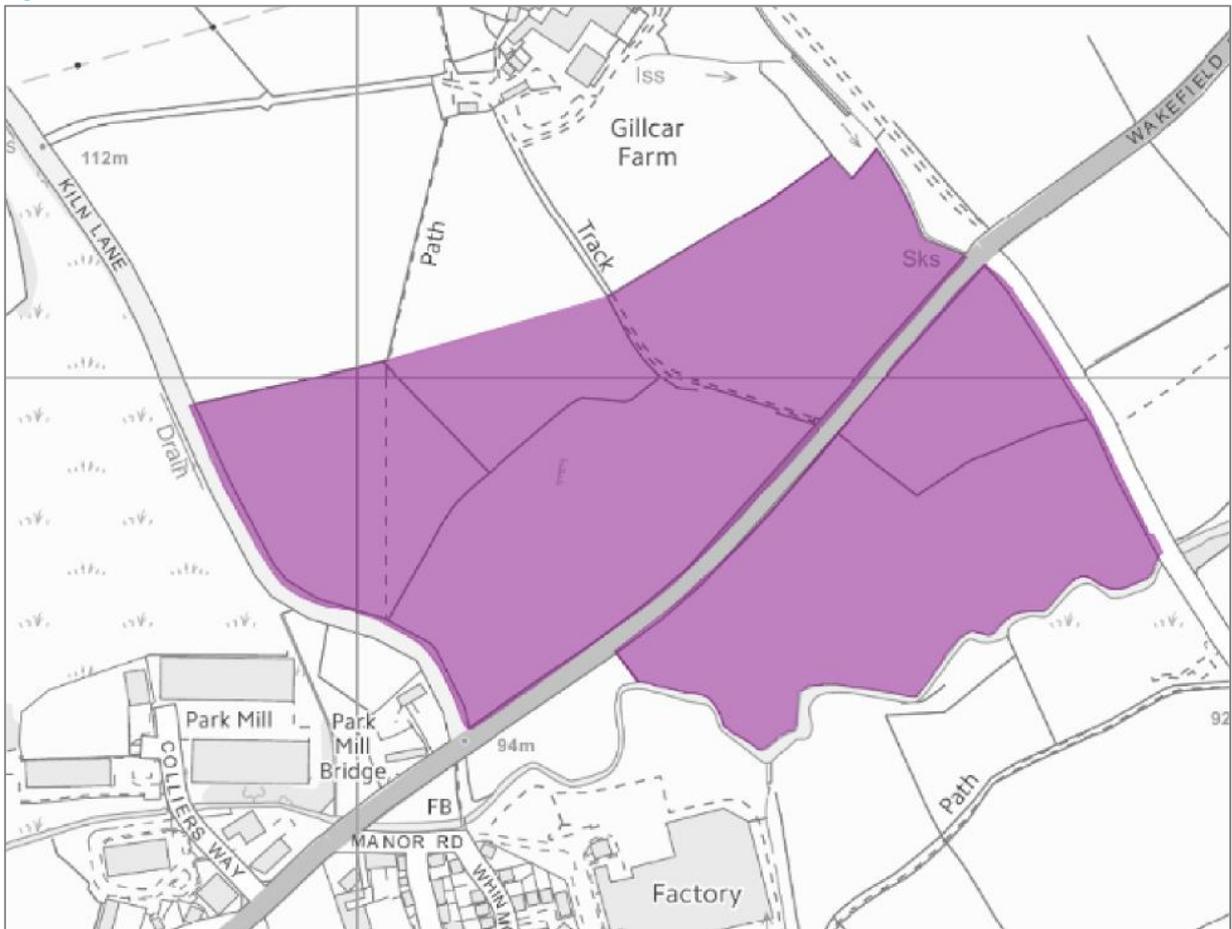
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1 Introduction

- 1.1 This Statement is prepared on behalf of Clayton West Development Company Limited (“CWDCL”). It should be read alongside the other representations and evidence that is before the Inspector.
- 1.2 CWDCL have a development option on 25.7ha of land to the north and south of Wakefield Road, Clayton West. This is shown on the Plan at Appendix 1 to CWDCL’s Statement in Response to Inspector’s Matters, Issues and Questions (January 2018).
- 1.3 This Statement confirms the public benefits that would arise from employment development on land at Clayton West (allocation E2333a, indicated on **Figure 1**) that is proposed to be allocated in the Kirklees Local Plan. These public benefits would similarly arise from development should the allocation be extended in the manner promoted by CWDCL.

Figure 1: Allocation E2333a



- 1.4 The Heritage Appraisal (Appendix 6 to CWDCL’s Statement in Response to Inspector’s Matters, Issues and Questions) demonstrated that the allocation of either E2333a or the CWDCL Land would not harm the significance of the Grade II Parkland Landscape of Bretton Hall (“the RPG”). Earlier representations confirmed that the development would not harm the significance of any other heritage assets.
- 1.5 Notwithstanding the conclusions of the Heritage Appraisal, Historic England (“HE”) has concluded that the development would give rise to a degree of harm to the RPG and other assets within the RPG. HE have confirmed that this harm would “less than substantial”.

- 1.6 Paragraph 134 of the NPPF requires that where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal.
- 1.7 This Statement has therefore been prepared on a without prejudice basis to assist the Inspector's consideration of the allocation.

2 Public Benefits of Allocation

- 2.1 National planning practice guidance (Paragraph: 020 Reference ID: 18a-020-20140306, Revision date 06 March 2014) confirms that public benefits, *“could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (paragraph 7)... They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.”*
- 2.2 The development of circa 59,044 sq.m of employment floorspace¹ at Clayton West (the indicative capacity of allocation E2333a, as calculated by the Council) will give rise to substantial economic², social and environmental public benefits as set out below.
- 2.3 The NPPF sets out that every effort should be made to meet the business and other development needs of an area. The allocation of sufficient employment land is a prerequisite for a sound Local Plan in this case. The benefits of having an adopted Plan include provision of a clear planning framework and therefore certainty to developers, enabling the delivery of the Council’s strategic vision for Kirklees. Having an adopted Local Plan can help Council’s to make the case, directly and indirectly, for infrastructure funding and, in this case, will also enable the progression of the Community Infrastructure Levy (CIL).

Economic

- 2.4 The JLL Market Report (Appendix 3 to CWDCL’s Statement in Response to Inspector’s Matters, Issues and Questions) identifies a significant unmet requirement for employment floorspace in this part of Kirklees. The allocation will meet this need, thereby **ensuring that sufficient land of the right type is available in the right location and at the right time to support growth and innovation.**
- 2.5 The proposed allocation is also of **strategic significance to South Kirklees, making an important contribution to meeting the OAN for jobs and the wider economic objectives for Kirklees.**
- 2.6 It is estimated that during the construction phase (assumed to be 10 years³) the development is likely to give rise to the following economic benefits:
- Investment in the order of **£57 million**;
 - Direct employment equivalent to **450 person-years of direct employment** within the construction sector, equivalent to **45 full-time equivalent (FTE) temporary jobs** and of which it is estimated 15 FTE jobs per annum could be sourced from within Kirklees⁴;
 - A further **15 FTE indirect and induced jobs** would be supported within the supply chain, related businesses and induced expenditure;
 - The construction capital expenditure could deliver a £2.69 million net additional annual GVA contribution to the Yorkshire and Humber economy, equating to a total of **£26.96 million**

¹ It is assumed that a mix of employment generating uses will be delivered at the site, predominantly comprising B1c, B2 and B8 uses with ancillary B1a and other complimentary uses.

² Based on HCA (2014) Additionality Guide 4th Edition and HCA (2015) Employment Density Guide 3rd Edition.

³ HM Treasury considers that 1 permanent FTE construction job is equivalent to 10 person-years of employment. This therefore assumes a 10 year construction period as standard. In reality the volume of construction employees on site will fluctuate and will be higher if the construction period is reduced. It is assumed that the proposed development will have a 10 year construction period allowing for site preparation, infrastructure and residential development.

⁴ Local and regional labour market containment calculated on the basis of evidence from the ONS 2011 Census.

additional GVA⁵ over the 10 year construction period, including circa £19.3 million net additional GVA contribution to the Kirklees economy.

2.7 The operational economic benefits of the development are likely to include:

- In the order of **1,230 gross FTE direct jobs** on site (circa 880 net), of which in the order of 370 FTE job are expected to be taken up by residents of Kirklees;
- Direct jobs created during the operational phase will comprise **a range of managerial, professional, skilled and unskilled trades, and administrative jobs**, providing a wide range of employment opportunities;
- A further **440 FTE induced and indirect jobs** would be supported within supply chain/related business and through onward expenditure of wages. In the order of 185 of these FTE jobs are anticipated to be within Kirklees;
- A net additional **GVA contribution of up to £66 million⁶** to the regional economy, including circa £28 million within Kirklees;
- A net uplift of approximately **£0.98 million in business rate revenue per annum⁷**.

Social

2.8 Economic Activity data (ONS 2011) demonstrates that residents of Clayton West are highly economically active and skilled in comparison to elsewhere in the Borough. A high percentage of the local Clayton West population is also employed in the manufacturing trade, but there is a low supply of manufacturing industry sites within Rural Kirklees. In order to retain the highly skilled population, as well as those employed in the manufacturing industry, new employment opportunities must be provided within Rural Kirklees if sustainable patterns of work are to be achieved. Development at the site would **address the negative trend of outward commuting** and help the Council to achieve their sustainability objectives.

2.9 The Kirklees Local Plan allocates significant land within and around the settlement of Clayton West. Assuming an average household size of 2.5 persons, this will bring an additional population in the order of 1,000 persons. Taking the average economic activity rate for Kirklees (49.6%), it can be assumed that the new population in Clayton West arising from the proposed new housing would be in the region of 496 economically active persons. The allocation **will deliver local jobs to retain the new working population** and create a balanced, sustainable community.

2.10 Job creation can also help **support people's ability to lead healthier and improved quality lifestyles**, which is an objective of the Kirklees Joint Health and Wellbeing Strategy (LE112).

Environmental

2.11 Through the application of appropriate design and landscaping, development has the potential to deliver:

- A new area of **open or leisure space for Clayton West**;
- **Connections to (and therefore extension and/or improvement of) the existing Public Rights of Way network**;

⁵ Average GVA per FTE employee estimates within the Kirklees construction sector sourced from Experian Local Market Forecasts (December 2017) (average trend derived from 2013-17 period).

⁶ Average GVA per FTE employee estimates within the Kirklees manufacturing and warehouse and logistics sector sourced from Experian Local Market Forecasts (December 2017) (average trend derived from 2013-17 period).

⁷ A system of top ups, transfers and tariffs will continue to operate to help even out inequalities between the level of business rates generated by individual Local Authorities. Therefore some authorities may not retain 100%.

- New strategic landscaping within the allocation boundary has the potential to **provide new habitats connecting into existing boundary features and corridors to the benefit of the site's ecological biodiversity.**

2.12 Once redrawn, **the Green Belt boundaries of the site have the potential to be robust, defensible and recognisable** on the ground.

Summary

2.13 Employment development on proposed allocation E2333a would give rise to substantial public economic, social and environmental benefits.

3 Conclusion

- 3.1 The Heritage Appraisal prepared on behalf of CWDCL (together with earlier representations) concluded that employment development at the CWDCL Land would not give rise to harm to the significance of the RPG or other heritage assets.
- 3.2 However, HE has indicated that it considers that the development would give rise to less than substantial harm to the RPG and other assets within the RPG. In these circumstances, it is necessary for the harm to be weighed against the public benefits of the proposal. This Public Benefits Statement sets out the public benefits that would arise as a result of the development on a without prejudice basis to assist the Inspector.
- 3.3 The economic benefits associated with delivery of the proposed development will positively contribute to the local and regional economy. The construction of the proposed development will generate initial temporary direct economic benefit, in the form of additional jobs, a boost to supply chain industries and other industries benefiting from onward expenditure within the economy. As new floorspace is occupied this will provide permanent employment opportunities, boost productivity in the local economy and generate public revenue through additional business rates. The economic benefits will persist over a long period of time, providing significant tangible benefits for the workforce of Kirklees and the wider regional area.
- 3.4 Development at the site would additionally address the negative trend of outward commuting and help the Council to achieve their sustainability objectives. The allocation will also deliver local jobs to retain the new working population that will arise from planned housing growth, enabling balanced, sustainable communities. It will also make an important contribution to meeting the OAN for jobs, the Council's wider economic objectives and will support people's ability to lead healthier and better quality lifestyles through a strong and growing economy.
- 3.5 Through the application of appropriate design and landscaping, development has the potential to deliver a new area of open or leisure space for Clayton West, connections to the existing Public Rights of Way network and biodiversity enhancements. Once redrawn, the Green Belt boundaries of the site also have the potential to be robust, defensible and recognisable on the ground.
- 3.6 **Employment development on proposed allocation E2333a would therefore give rise to substantial public benefits which significantly and demonstrably outweigh any perceived harm to heritage assets.**