

## Kirklees Local Plan Examination

### Additional note to EX52 – clarification of employment land definitions

31 May 2018

#### 1. Inspectors Question:

- 1.1 EX52, Note on employment uses (Actions 8, 9 and 12) – can the Council provide an addendum/additional note to EX52, which sets out justification for the Council’s approach to employment uses on allocation sites (e.g. excluding B1a offices). As sought at the hearing session, this should include detailed reasons for the approach and benefits arising, and explore the implications for delivery of B1a office development in the district (in the context of identified needs for additional land).

#### 2 Council response:

- 2.1 This note has been provided in response to the inspectors question set out above and should be read in conjunction with EX52.
- 2.2 The council has planned positively in accordance with the NPPF and NPPG to meet the employment needs of the district. The employment uses on sites are justified, as demonstrated in the Council’s MIQ response (M6.1) and the Employment Technical Paper (SD22)
- 2.3 Through the Local Plan the Council is proposing new employment land allocations to support the economic growth objectives derived from the Kirklees Economic Strategy (KES), the Leeds City Region (LCR) Strategic Economic Plan (SEP) and the Joint Health and Well-being Strategy (JHWS). These allocations seek to not only deliver on the economic priorities for Kirklees and the LCR but to also deliver the employment needs of the district in full.
- 2.4 When considering the approach to employment allocations, consideration has also been given to the locational needs of business and industry and the corporate objectives of the Council for the role and function of its town centres. (Employment Technical Paper (SD22))
- 2.5 The Council are seeking to support and enhance the town centres of Kirklees and provide a positive policy framework (policy PLP13) to direct main town centre uses as defined in NPPF Annex 2: Glossary page 53 into the districts town centres.
- 2.6 The regeneration of both Huddersfield and Dewsbury town centres are of priority importance to the Council and the Local Plan supports this corporate priority through policies PLP17 which recognises Huddersfield’s role as having the principle role for office (including high quality Grade A office space) and policy PLP18 which also seeks to provide space for business use to support small scale start-ups to larger multinational corporations within Dewsbury town centre.

- 2.7 In addition, the council has confirmed the intention to produce area action plans for both Huddersfield and Dewsbury, a key part of the evidence base will be Cushman and Wakefield's Kirklees Town Centre Delivery Study Huddersfield 2016 (LE34) and Kirklees Town Centre Delivery Study Dewsbury 2016 (LE35) and GVA's Kirklees Market Strength Assessment (LE11). These studies concluded there was quantitative vacant capacity within the town centres but the limitation was the current quality of the stock and the current office market within both centres.
- 2.8 When considering the Local Plan's approach to employment allocations all of the above objectives and evidence has been taken into account and underpin the approach to the range of B Use Class operations on sites allocated for employment. The land requirement for employment includes flexibility to ensure a range and choice, ensuring flexibility to meet the market requirements throughout the plan period. This flexibility allows for the council to positively plan to accommodate a degree of office on out-of-centre sites if the sequential and/or impact tests are passed. This approach ensures the allocations can support needs whilst not undermining policies PLP13, PLP17 and PLP18 and the overarching corporate objectives of the KES for town centres.
- 2.9 It should be noted that it is anticipated that a degree of employment development and therefore future supply will come from allocations identified to support employment in town centre locations (mixed use sites) and this is where the council has a preference to see office development.
- 2.10 Taking a less prescriptive approach to the employment allocations ensures the Local Plan positively plans for the employment needs of the district over the plan period. This flexible approach ensures sites remain market attractive and the optimum use can come forward on them, and critically will enable Kirklees to attract inward investment over the plan period. Thus recognition is afforded to the need for Local Plans to positively respond to rapid change in the economy (NPPF, paragraph 14, bullet 2 and paragraph 21, bullet 3).

### **3 Conclusion**

- 3.1 The Local Plan would establish an up to date position that seeks to maintain the NPPF approach of ensuring flexibility towards employment allocations providing for a range and choice both in terms of quantum and quality which can positively respond to rapid change in the economy (NPPF, paragraph 14, bullet 2 and paragraph 21, bullet 3). It will also establish a policy framework where office development would be directed towards town centres in the first instance thus supporting the objectives of the Council for these centres.
- 3.2 This approach to employment allocations therefore ensures the employment needs of the district are being met in full and that the Council's corporate objectives for the districts town centres are supported through the application of policies PLP13, PLP17 and PLP18.