

## Kirklees Local Plan Examination

### Stage 3 – Policy hearings

#### MATTERS, ISSUES AND QUESTIONS (MIQs)

#### Council Response

##### **Matter 17 – Economy policies**

- 1.1 This statement sets out the council's responses in relation to the Inspector's matters and issues – Matter 17 Economy policies. All of the documents referred to in this statement are referenced within the statement.
- 1.2 The modifications proposed in this document have been provided to assist with the discussions at the hearings for this matter and have not been subject to sustainability appraisal testing or public consultation. Should it be necessary to make any of the modifications these will be added to the full schedule of modifications to the Local Plan which will be made available for comment and subject to sustainability appraisal at a later stage of the Examination in Public, subject to the delegated powers agreed by the council's Cabinet.

***Issue – Does the Plan set out positively prepared policies for supporting a strong and thriving economy, which are justified, effective and consistent with national policy?***

##### **[Policies PLP 9, 10]**

- a) **Does Policy PLP 9 provide a clear framework for applicants on when/how measures to support a skilled and flexible workforce will be sought by the Council? Is the approach appropriate and justified by the evidence?**
- 1.3 Securing employment, training and enterprise opportunities is central to the council delivering Leeds City Region, West Yorkshire Combined Authority and the council's own objectives for supporting a skilled and flexible workforce.
- 1.4 The Leeds City Region Employment and Skills Plan 2016 – 2020 outlines that “skilled people, better jobs” is one of the four key priorities set out in the Leeds City Region Strategic Economic Plan. It further sets out how partners will work together to deliver high levels of prosperity, jobs and quality of life for everyone.
- 1.5 The Kirklees Economic Strategy (LE6), priority three: workforce, skills and employment (page 22) sets out the council's focus on improving skill levels and employability across the district. Key activities to deliver priority three include:
- Build stronger relationships between education and business
  - Build enterprise skills through schools, colleges and universities
  - Raise quality and awareness of apprenticeships
  - Encourage skills development in businesses and uptake and application of higher level skills
  - Expand and create routes into high quality employment
  - Enhance employment and skills in the health and care sectors
- 1.6 Kirklees Local Economic Assessment 2010-2011 (LE9) identifies that Kirklees has a low waged and lower skilled workforce (with up to 69,000 employees that are either unqualified or low skilled).

- 1.7 National Planning Policy Framework (NE1, Paragraphs 18 – 21) sets out the need to build a strong, competitive economy and the local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century. NPPF, paragraph 9, bullets 1 and 4 also states that, “Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as people’s quality of life, including (but not limited to):
- Making it easier for jobs to be created in cities, towns and villages
  - Improving the conditions in which people live, work, travel and take leisure.
- 1.8 Policy PLP 9 Supporting skilled and flexible communities and workforce gives the council the opportunity to ensure where major developments are of a sufficient size and scale, which can sustain an apprenticeship and or training programme, that developers and contractors provide new entrant jobs, including apprenticeships and work experience placements for local residents. In order to ensure residents are able to access local job opportunities, employers and developers may be required through planning obligations to enter into local labour and training agreements, and apprenticeships appropriate to the individual development.
- 1.9 The policy provides a clear steer that development proposals should address these issues and suggests some measures which could be used to achieve this, without being overly prescriptive. This is because the council recognises that there may be larger organisations and construction businesses that already run their own programmes for example existing apprenticeship schemes. In these cases, the council would wish to discuss these initiatives further to help shape or enhance them to achieve the objectives set out in this policy.
- 1.10 The council currently broker and direct support through its Local Works Better and SME Growth Manager team and through the Leeds City Region Growth Service. This offer directs interested businesses to the local support mechanisms in place to enable them to understand how they can increase their workforce skills, take on apprentices and the local unemployed and work more closely with schools on influencing the future workforce. Policy PLP9 helps to ensure that opportunities to improve the districts workforce skills are captured more effectively through planning obligations as opposed to current practices where certain opportunities are being missed. Subsequently it is the Council’s belief that the delivery of the stated objectives of the Kirklees Economic Strategy and Leeds City Region will be significantly improved through the application of policy PLP9.
- 1.11 Kirklees Council and its partners are committed to maximising the benefits from our investments and working towards the adoption of good growth benefits through procurement and influence through the planning system. In line with the West Yorkshire Combined Authority we are looking to create a local policy which will focus on benefits in the following areas; employment, apprenticeships, skills development and engagement with schools.
- 1.12 The council considers that PLP 9 is supported by the Sustainability Appraisal (SD5, Annex 7, page 25-26), in particular potential significant positive effects are identified in relation to the SA objective 1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible; SA objective 2: Achieve an economy better capable of growth through increasing investment and SA objective 3: Ensure education facilities are available for all.

**b) Is the approach to new buildings in the Green Belt, as established in section 2 in Policy PLP 10, clearly expressed and justified?**

- 1.13 The Council considers that the approach to new buildings in the Green Belt is clearly expressed and justified. PLP 10 is intended to support the rural economy including giving guidance on the matters that will be taken into account in the consideration of relevant development proposals. The approach to new buildings in the Green Belt is set out in the National Planning Policy Framework at section 9 (NE1) and in the Local Plan at section 19 (SD1 policies 54 – 60). While section 2 of PLP 10 is intended to ensure that regard is had to the Green Belt, it does not add to national or local policy. The Council would therefore consider an amendment to remove section 2 of PLP 10 so as to avoid duplication, and to add text to paragraphs 7.28 and 7.29 to ensure that regard is had to Green Belt policy.
- 1.14 The council considers that PLP 10 is supported by the Sustainability Appraisal (SD5, Annex 7, page 25-26), in particular potential significant positive effects are identified in relation to the SA objective 1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible and SA objective 2: Achieve an economy better capable of growth through increasing investment.

**Proposed Modifications:**

Page	Relevant part of the Plan	Tracked change	Reason for change
	Policy PLP 10	Delete text: <i>2. Where new buildings are proposed in the green belt the development proposed must be considered to be acceptable having regard to green belt policy. In all cases where development is proposed in the green belt regard must be had to the relevant policies in this plan and relevant national planning policy.</i>	Duplication
	Para 7.28	Add text: <i>“In green belt locations, while national guidance states that the countryside should be protected for its own sake this should not mean that businesses within it cannot thrive. Carefully designed and sited development to support existing businesses, and new businesses that can justify a green belt location, can maintain the economy, provide local jobs and help to support communities. <u>In all cases, where development is proposed in the Green Belt regard must be had to the relevant policies in this plan and relevant national planning policy.</u>”</i>	Clarification
	Para 7.29	Delete text: <i>“Changing agricultural practises also mean that farms are seeking new ways to maintain their viability and this will often lead to proposals for diversification schemes and tourist related enterprises that have a genuine need for a green belt location, usually because they are ancillary to their host enterprise. The re-use of buildings in the green belt makes use</i>	Clarification

		<p><i>of existing resources and in some cases can enhance the appearance of the area. However, the re-use of isolated buildings for economic purposes is unlikely to be acceptable unless there are clear and demonstrable reasons why an isolated location is required. Where the proposal is within the green belt then the requirements of the green belt policies will be applied. <del>Only where there is a genuine requirement for a green belt location will new buildings be permitted.</del></i></p>	
--	--	--	--

**c) Does section 3 in Policy PLP 10 give sufficient recognition to the desirability of protecting the character and appearance of the countryside, and the existence of permitted development rights?**

- 1.15 The Council considers that section 3 in Policy PLP 10, together with other relevant policies in the Local Plan, gives sufficient recognition to the desirability of protecting the character and appearance of the countryside. In particular areas of environmental sensitivity, which includes the Peak District National Park and other areas, such as Special Protection Area's, Special Area's for Conservation, Sites of Special Scientific Interest, Local Wildlife Sites, Local Geological Sites, Ancient Woodland's and Habitats and Species of Principal Importance. However, a modification could be made to the policy text for clarification if needed as set out below.
- 1.16 Policy PLP 10 section 3 read together with other relevant plan policies, in particular the policies within Section 13: Natural Environment represent an effective policy approach when dealing with planning applications in environmentally sensitive areas which is consistent with NPPF.
- 1.17 The Council recognises that there may be cases where the harm to areas of environmental sensitivity might be outweighed by any benefits of the proposed development. All development should have regard to the relevant policies in the Plan. This will ensure that any new development associated with the rural economy achieves the sensitive design necessary to protect the character and appearance of its surroundings and to avoid adverse impact on visual amenity. Consideration may be given to the removal of permitted development rights when planning permission is granted to ensure that subsequent alterations to a building, including the treatment of areas for access and hardstanding or the erection of ancillary or curtilage buildings, will be subject to Development Management considerations.

**Proposed Modification:**

Page	Relevant part of the Plan	Tracked change	Reason for change
62	Policy PLP 10	<p>Amend section 3:</p> <p>Delete and add text: <i><u>“Development proposals will not be supported where through careful design they respect the character of the countryside and would not adversely impact on the setting of areas of particular environmental sensitivity, such as the Peak District National Park, and where proposals would lead to</u></i></p>	

		<i>unsustainable development, and do not conflict with other policies in the Local Plan."</i>	
--	--	---	--

**d) Is the approach to farm shops outlined in section 4 of Policy PLP 10 and paragraph 7.31 justified and in line with national policy?**

1.18 Farm shops are farm diversification schemes which are additions to the core agricultural business. Shops are a main town centre use and should be located within town centres. PPG, paragraph 010 highlights that ‘use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations’.

1.19 Section 4 of policy PLP 10 states that ‘Development proposals for main town centre uses in out of centre locations will only be permitted where identified needs cannot be met within existing local centres or in edge of centre locations.’ In this instance ‘identified needs’ refers to the needs of the business to diversify to maintain and support its viability. Farm shops typically have a locational requirement in that they sell products that are produced on the farm and it has been demonstrated where the proposal is for a farm shop to be located at the farm that it is not viable for the shop to be located within a centre.

**Proposed modifications:**

<b>Page</b>	<b>Relevant part of the Plan</b>	<b>Tracked change</b>	<b>Reason for change</b>
62	PLP 10 4	Add text: ‘ <i>Development proposals for main town centre uses in out of centre locations will only be permitted where identified needs of the business cannot be met within existing local centres or in edge of centre locations.</i> ’	Clarification
63	7.31	<i>Farm shops are generally farm diversification schemes which support the viability of the enterprise. They are <del>additions</del> ancillary to the core agricultural business and are usually proposed to be located at the farm. However, as shops are a main town centre use, this locational requirement needs to be justified. Therefore, proposals for farm shops and other predominately town centre based uses should also have regard to national planning policy and Local Plan policies regarding sequential test and impact assessment, specifically PLP 13.</i>	Clarification