



Kirklees Local Plan Examination

Stage 1 – Initial Hearings

Hearing Statement

**Submitted on behalf of Upper
Dearne Valley Environmental
Trust (registered charity number
1157540)**

**Matter 6 – Employment needs
and delivery**

September 2017

Matter 6 – Employment needs and delivery

Issue - Does the Plan set out a positively prepared strategy for the delivery of employment development and jobs, which is justified, effective and consistent with national policy?

1. The Upper Dearne Valley Environmental Trust has already submitted representations in relation to this issue and trust that the Inspector has these representations and will take them in to consideration. However, the Upper Dearne Valley Environmental Trust wish to make the following additional comments in relation to the specific Questions raised by the Inspector. Upper Dearne Valley Environmental Trust also wish to speak at the hearing in relation to Matter 6.
2. Matter 6 – question (a)
 - 2.1 The Upper Dearne Valley Environmental Trust do not consider that the employment land requirement is justified or robustly based.
3. Matter 6 – question (c)
 - 3.1 The Local Plan is allowing current employment sites in the Dearne Valley to be converted to housing, such as H3325a and by the side of Denby Dale station. The latter is also not congruent with the Transport Strategy of encouraging people to use the train as no car or cycle parking has been planned. Even the land on the station approach which could have provided car and cycle parking has now been allocated for houses. In addition, a former employment site at Cuttlehurst in Scissett has been allocated for housing. This site is still derelict and undeveloped.
 - 3.2 The loss of site H3325a as an employment site would have a significant negative impact on the economy with the loss of circa 200 jobs.
 - 3.3 There is scope to develop the old tip off Collier's Way at Clayton West further, this has not been included in the Local Plan.
 - 3.4 There is plenty of scope to provide and extend employment sites in the Dearne Valley without encroaching on green belt. Urgent review and amendment is called for.
 - 3.5 The proposed allocation of Green Belt land for employment uses, such as E2333a cannot be an appropriate strategy when existing employment sites such as H3325a are being re-allocated from employment to housing land.
 - 3.6 The reallocation of employment sites is not an efficient use of land particular when further employment land is then being allocated within the same area but within the Green Belt! Is there a need for employment land within the Dearne Valley area or not?

- 3.7 The Council have already identified that the Dearne Valley comes under pressure to allow employment land to be changed to residential. This shows that there is not sufficient need for employment land within this area so if this is the case then why allocate more employment land within this area?
- 3.8 If there is a need for employment land within the Dearne Valley then existing employment sites such as H3225a should be retained as employment sites not reallocated for housing. This would reduce the amount of Green Belt land being built on.
- 3.9 In any event the Upper Dearne Valley Environmental Trust do not consider that the need for employment land is justified or supported, particularly in the Dearne Valley given that there is a vast amount of empty business space within this area. At Junction 39 of the M1 there is a large amount of commercial development land available.

4. Matter 6 – question (f)

- 4.1 The Upper Dearne Valley Environmental Trust believes that there are better placed employment sites closer to the M1 within Wakefield and Barnsley which is better located and could better accommodate any employment need. The Upper Dearne Valley Environmental Trust do not consider that the Council have worked closely enough with these neighbouring authorities to look at the potential of the M1 junctions for employment use.
- 4.2 For example Calder Park is situated in a prominent position immediately adjacent to junction 39 of the M1 motorway with fantastic links to the M1. This business park is situated in the centre of one of the largest population catchment areas with Wakefield City Centre being 4miles away and Leeds and Sheffield both within close proximity. Calder Park is a sustainable site which is fully supported by a sustainable travel plan. How this business park can assist in meeting any employment need within the Dearne Valley area has not been considered by the Council and it should be.

5. Matter 6 – question (k)

- 5.1 As set out previously the Council have identified that there is pressure, particularly within the Dearne Valley, to allow employment allocations to be reallocated for housing developments.
- 5.2 The Local Plan will not prevent employment sites allocated through the Plan from becoming housing sites. The Upper Dearne Valley Environmental Trust consider that sites such as E2333a will become housing sites as the demand for employment land within the Dearne Valley does not exist. The Council have always been powerless to prevent these re-allocations and they will remain powerless under this Local Plan.