



Kirklees Local Plan Examination Stage 1 – Initial Hearings

Matters, Issues and Questions (MIQs)

1.0 INTRODUCTION

- 1.1 This statement has been prepared by WYG on behalf of the Church Commissioners for England (herein referred to as “our client”) who have an interest at Leeds Road, Chidswell. By way of reference, our client’s land is referred to as *Land East of 932-1110 Leeds Road, Shawcross/Woodkirk, Dewsbury* (Draft Allocation Reference MX1905).
- 1.2 Our client’s site has been identified to deliver 1,535 dwellings, and 122,500sqm of employment development during the Plan period. They are therefore very keen to engage and assist in the preparation of a sound Local Plan which is positively prepared, justified, effective and consistent.
- 1.3 This response seeks to address the key issues to be discussed at the forthcoming Kirklees Local Plan Examination Stage 1- Matter 6 – Employment needs and delivery.
- 1.4 The response is structured such that it follows the questions posed in the Matters and Issues agenda and should be read in conjunction with the representations by WYG on behalf of our client to the Publication Draft Local Plan in December 2016.

2.0 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?

Policy PLP 8

[see Matter 3 for questions relating to employment forecasts]

Questions

a) Are the employment density assumptions used to translate the objectively assessed need for jobs (23,000) into land requirements justified and robustly based? Has the land requirement been disaggregated by employment use class as well as sector?

- 2.1 The objectively assessed jobs total of c 23,000 is robust and based on a sound and up-to-date evidence base. SD22 considered three approaches, namely:
 - Baseline – considered to be deliverable but did not align with its own economic objectives or overall needs of business;
 - KES objectives and a 75% employment rate - Paragraph 4.29 of SD22 summarises that whilst the Council acknowledge that the jobs growth will be challenging, it is considered achievable when basing this on historical employment rates. Appendix 2 of SD22 are sourced by way of evidence; and
 - KES objectives and an 80% employment rate – Paragraph 4.30 states that it is unrealistic to assume the Kirklees Local Plan would assist in the delivery of an additional 32,900 FTE jobs over the plan period.



- 2.2 Section 5 of SD22 explains that having established the OAN for jobs, it was important to understand how much and what type of land would be required to accommodate the jobs requirement.
- 2.3 The Roger Tym study did GVA not do a study for Kirklees? (Planning for Employment Land, Translating Jobs into Land) is considered by the Council to be the most relevant job density study for Yorkshire and Humber. In the absence of any further assessments for the region, we would support this assumption. The job density assumptions applied to the identified jobs need resulted in the total employment land requirement in Kirklees of 175 hectares.

Overall

- 2.4 Therefore, this demonstrates that the translation from objectively assessed need for jobs (23,000) into land requirements is justified and robustly based.

Has the land requirement been disaggregated by employment use class as well as sector?

- 2.5 Table 2 (FTE jobs growth by sector and associated land requirement (REM, 2015)) of SD22 provides a breakdown of the land requirement by sector. This provides a sound baseline for the plan and we do not believe a specific disaggregation by employment use is necessary when the Council are seeking to plan for an 18-year period (2013 to 2031).
- 2.6 The NPPF is clear that the Government is committed to securing economic growth in order to create jobs and prosperity and to ensure the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth
- 2.7 The NPPF also states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. Paragraph 157 of the NPPF is also clear, which states that they should:
- *allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate*
- 2.8 Therefore, we do not believe that there is a need for the land requirement to be disaggregated by employment use, because of the need for a Local Plan to be flexible during the lifetime of the Plan.



- d) Does the location and type of employment land allocated in the Plan accord with the housing and spatial development strategy in the Plan and the Council’s Economic Strategy (LE6)? Does it reflect the identified land requirements and needs of different businesses/sectors, as established in the Council’s Employment Technical Paper (SD22)? Will it support Huddersfield’s role as the main office location in the borough?**

Location of employment land

Kirklees Economic Strategy (LE6)

- 2.9 Section 2 of LE6 includes its vision which includes:
- *"improved resilience, competitiveness and profitability for business;*
 - *enhanced employment prospects, skills and incomes; and*
 - *a great quality of life and environment where all people are connected to economic opportunity and live in strong and thriving communities."*
- 2.10 Section 3 of LE6 sets out the strengths, weakness, opportunities and threats of the Kirklees Economy. Section 3.1 (assets and opportunity) identifies Kirklees’ world leading engineering businesses, talented workforce, cutting edge innovation and superb transport connections. Kirklees has unrivalled access to considerable markets across Yorkshire and the North West, combined with connectivity to the UK and international export markets.
- 2.11 Kirklees’ location includes fast road and rail links to major cities and markets and good access to ports and airports. LE6 states that it is committed to making the most of Kirklees’ advantages, enhancing its assets, and communicating its unique offer.
- 2.12 In pursuit of the vision LE6 includes the following five priorities which are:
- 1) Precision engineering and innovative manufacturing;
 - 2) Innovation and enterprising businesses;
 - 3) Workforce, skills and employment;
 - 4) Infrastructure; and
 - 5) Quality places.

Leeds City Region Strategic Economic Plan (CR9)

- 2.13 CR9 is also of relevance, which outlines Kirklees’ priorities, that includes regenerating Huddersfield and North Kirklees, to provide much needed space for business to grow. To assist with this strategy, it identifies Chidswell as a major employment growth opportunity.
- 2.14 Page 78 of CR9 refers to those City Region spatial priority areas which have been identified as potential major areas for growth based on a shared City Region and local evidence base that draws on factors such as housing need and market geographies, strategic employment land supply and transport needs. Chidswell is identified as one of six employment growth areas, which comprise mixed use employment sites and enterprise zones.



The Local Plan

- 2.15 The Spatial Development Strategy (page 36 and 37) of SD1 takes account the spatial vision, strategic objectives and place shaping agenda for Kirklees to provide a strategy which has combined them together.
- 2.16 To align with the evidence base, which includes LE6 and CR9, the SDS states that sustainable economic growth is delivered in Kirklees during the Plan period through the provision of:
- *About 165 hectares of new employment land to achieve a 75% employment rate over the plan period.*
 - *Recognising its role in terms of market demand, available land supply and access to the strategic road network, prime new employment development is located along the M62 corridor to the north of Kirklees and in the Dearne Valley, where easier access can be achieved to the M1 through:*
 - Allocated sites at (amongst others) Chidswell, which identifies 35 hectares of employment land.
- 2.17 To deliver sustainable housing growth, the SDS identifies Chidswell as a “strategic site” (page 37 of SD1), which is considered to be part of the 5,000 dwellings identified for Dewsbury in Table 1 of SD1.
- 2.18 Further justification is set out on pages 37 and 38 of SD1, which sets out how the vision, objectives and strategy will be delivered. This includes the following which are of relevance to this question.

Support the growth and diversification of the economy

- *Fully meet the objectively assessed employment needs for the district including aspirations of the Leeds City Region Strategic Economic Plan and Kirklees Economic Strategy.*
- *Allocation of prime strategic employment locations along the M62 corridor.*
- *Focus on mixed use sites in the plan where land use mix can be more flexible, viable and allow for more sustainable development and place shaping.*

Improve transport links and sustainable travel

- *Focus on mixed use sites in the plan where land use mix can be more flexible, viable and allow for more sustainable development and place shaping.*

Provide new homes which meet the housing needs of the community

- *Fully meet the objectively identified market and affordable housing needs of the district in order to stimulate economic growth facilitating the creation of jobs and the provision of the district’s infrastructure requirements, including social and green infrastructure.*
- *Allocation of land for significant urban extension locations to the... north east of Dewsbury to enable housing delivery, which offer:*
 - a) *A increased chance of new infrastructure being provided (including new schools and roads as part of site development);*
 - b) *Masterplanned sites (offering better chance of quality layouts, design, green infrastructure and higher building specifications)*



Overall

- 2.19 Therefore, in the context of Chidswell, its identification as a strategic mixed use allocation for employment and housing **does accord** with the housing and spatial development strategy in the Plan.

Does it reflect the identified land requirements established in the Council's Employment Technical Paper (SD22)?

- 2.20 **Yes.** Section 5 of SD22 explains that having established the OAN for jobs, it was important to understand how much and what type of land would be required to accommodate the jobs requirement.
- 2.21 The Roger Tym study (Planning for Employment Land, Translating Jobs into Land) calculated the job density assumptions to the identified jobs needed, which resulted in the total employment land requirement in Kirklees of 175 hectares.
- 2.22 Section 7 (Economy) of SD1 sets out how the Local Plan seeks to meet this identified employment need, with Table 3 (meeting the employment land requirement) providing a useful breakdown of how the amount of land to be allocated has been arrived at. Paragraph 7.14 identifies Chidswell (allocation MX1905) as a strategic priority of sub-regional importance, which we support.