

GEORGE F. WHITE



SITE H49a: MATTER SIX
MATTERS, ISSUES AND QUESTIONS
4TH SEPTEMBER 2017

HELEN BOSTON

1.0 **Introduction**

- 1.1 George F. White (Planning and Development) are instructed by Mr John Lund ('the Site Owner'), Site H49a (Land adjacent Brick Hill Farm, Oddfellows Street, Scholes, Cleckheaton) to submit representations to the Kirklees Local Plan; Stage 1 Matters, Issues and Questions, 10 July 2017.
- 1.2 The publication of the plan and the need to accommodate the new homes and jobs, within Kirklees up to 2031, is strongly supported.
- 1.3 In responding to the Matters, Issues and Questions Document, we have considered each of the questions and make representations only to those considered relevant at this time. We would also like to rely on the submissions to date, which for ease of reference has been appended to this submission.
- 1.4 We welcome the opportunity for further engagement and the opportunity to appear at the Examination in Public.
- 1.5 We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
- 1.6 Please do not hesitate to contact us to discuss any issues raised in this Representation further.

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]

3.0 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?
- b) What is the total amount of employment land predicted to come forward over the Plan period, arising from Table 3 in the Plan5? Should the total supply estimate be included in Table 3 of the Plan and/or a policy?
- c) Is the predicted supply of employment land over the Plan period (arising from Table 3 in the Plan6) justified, deliverable and supported by robust evidence? In particular:
- i. What account is taken of employment land losses since 1st April 2013?
 - ii. What is the justification for the 10% flexibility allowance? How does it compare to past non-implementation rates?
 - iii. Does the potential intensification supply of 48 hectares from Priority Employment Areas (PEAs) include contingency for potential non-delivery, or intensification involving change of use to other employment generating uses such as retail or leisure (as permitted under Policy PLP 8)?
 - iv. What account is taken of future potential losses of employment land on non-PEA sites and PEA sites (in line with Policy PLP 8)?
 - v. What is the reason for the uplift in employment allocations from 91 to 167 hectares? (as established in the Council's Response to the Inspector's Initial Note, dated 16th June 2017). Is this rate deliverable?
 - vi. Why are an uplift rate and a flexibility allowance included?
 - vii. How many of the proposed employment allocations have been carried forward from the Council's Unitary Development Plan (2004) and/or already have planning permission for employment use?
 - viii. Do the mixed use allocation policies for sites MX1903, MX1906, MX1907 and MX3349 in Part 2 of the Plan provide sufficient clarity regarding the amount of employment use anticipated? Are further details required to ensure employment land delivery?
 - ix. How does the average annual employment land supply rate (supply rather than the requirement for 175 hectares) over the Plan period compare to past take-up rates?

- 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?**
- e) What is the definition of 'prime employment sites', and to what degree do the proposed employment allocations fall under this category?**
- f) How does the economic strategy and proposed employment allocations in the Plan fit with other neighbouring local authorities' approach to economic development? Are there significant unimplemented employment permissions or proposed employment allocations in proximity to Kirklees?**
- g) Does the Plan provide sufficient clarity regarding which employment uses (in B Use Class) are permitted on the allocation sites? Are other employment generating uses such as retail and leisure uses permitted on the allocations?**
- h) If allocation sites come forward for office use outside designated centres, does the Council intend to apply sequential and impact tests in these cases?**
- i) Is the Council's PEA study⁷ based on a comprehensive and robust assessment of site suitability for employment across Kirklees, which takes into account the needs of different sectors and the intentions of landowners/businesses? How much land was identified in the process as being unsuitable for PEA designation? How many of these sites are proposed for allocation for other uses in the Local Plan?**
- j) Is the phrase 'employment generating uses' clearly defined in Policy PLP 8? What effect will the loss of PEA sites in B use classes to other employment generating uses (such as retail and leisure), as permitted in section 1 of Policy PLP 8, have on the stock of employment land and the delivery of economic growth in Kirklees?**
- k) Is the approach to protecting PEAs from loss to non-employment use, as set out in section 2 of Policy PLP 8, clearly defined, justified and consistent with national policy? What evidence will be required from applicants, in order to demonstrate that sites or premises are no longer capable of employment use?**
- l) Does paragraph 7.18 in the Plan provide a clear and robust framework for dealing with proposals for change of use from employment on non-PEA sites? Would re-use be supported if a scheme does not incorporate plans for the re-location of existing businesses on the site? Will the approach enable sufficient employment land to be retained to meet local economic needs? Should the Council's approach be captured within a policy rather than supporting text?**

3.1 We do not wish to make any detailed comments on the above other than to stress the importance of economic growth in line with housing need. We are satisfied that the Council's technical ability will ensure that this is the case moving through the plan period into 2031.

3.2 With regards to how interlinked economic growth is with housing supply and in line with the NPPF, which underlying ethos, seeks to ensure sustainable development. We would like to highlight the merits of Site H49a as identified in our earlier representations (appendixed) and the Annex 1 of the Sustainability Appraisal Report which states the site H49a

"While the location of housing sites will not influence the number, location or type of employment opportunities available in Kirklees, the proximity of housing to employment nodes can affect people's ability to access jobs.

Most of this site is within 11-15 minutes travel time of the nearest employment node, although a small area in the south east is within 16-20 minutes travel time; therefore a significant positive effect on this objective is expected".

3.3 The SA goes on to state;

"How well connected housing sites are to services, facilities and employment opportunities by sustainable modes of transport will affect the extent to which residents are able to make use of non car-based modes of transport day to day.

In the accessibility heat mapping work that was undertaken for Kirklees Council, this site was classed as mainly or entirely 'green' in terms of its access to five of the eight features assessed. Therefore, a significant positive effect is likely".

4.0 **Conclusion**

- 4.1 Whilst the Local Plan will be examined by the Inspector, who will ultimately conclude whether the plan has been prepared with the Duty to Cooperate, legal and procedural requirements and sound. We are satisfied that the Plan the Inspector is being asked to consider is positively prepared and justified, effective and consistent.

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