

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

Question 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?

6.1 The Roger Tym and Partners 2010 Study is recognised as one of the leading approaches to estimating job densities but it is now becoming a little dated. There are many factors which will influence future job densities including for example in the office (B1a) use class working from home for part of the week, though this has not been as extensive as originally envisaged, the extent to which artificial intelligence will be used to replace some jobs (e.g. bookkeeping and other basic financial recording), improvements to the working environment which could act to enhance the workspace/employee (e.g wider provision of breakout areas and other staff support facilities). In the R & D field more space per employee or no decrease may result from higher space requirements for labs/equipment/demonstration areas etc. The influence of robotics in advanced manufacturing will be another development which creates additional space requirements but reduces the number of employees making it difficult to assess the net impact on job densities. There are many other factors which will have plus and minus effects making it difficult to predict forward to the end of the plan period. Monitoring and review will be important. However I conclude that the currently selected densities are justified and sufficiently robust to be relied on .

6.2 I have not seen any evidence produced to date which disaggregates the employment land requirement by use class. This is an important requirement as some estimate of the land and floorspace requirements for support services in office and R&D needed to supply the new advanced manufacturing development as well as the increasingly sophisticated needs of existing industry is required. At paragraph 5.8 of the Employment Technical Paper (SD22- April 2017) there is some limited recognition of this requirement in relation to the two strategic allocations proposed at Cooper Bridge and Chidswell. It cannot and should not however be assumed that these support services will all be provided on these large new strategic allocations and there is a need for a limited number of small to medium sized free-standing office and research parks to meet the needs of existing industrial clusters and new investment.

Question b) :- What is the total amount of employment land predicted to come forward over the Plan period , arising from Table 3 in the Plan? Should the total supply estimate be included in Table 3 of the Plan and/or a policy?

6.3 I read the total employment land predicted to come forward over the Plan period as 167 hectares having allowed for completions to date within the Plan period of which 48 hectares is the potential supply from what are generally small expansion sites within the identified PEAs. It is not clear what amount of safeguarded land has been identified for employment purposes by removal from the Green Belt. The amount of land should be identified in both a policy and in the table.

Question c):- Is the predicted supply of employment land required over the Plan period (arising from Table 3 in the Plan) justified, deliverable and supported by robust evidence? In particular :-

i) What account is taken of employment land losses since 1st April 2017?

I look forward to seeing the Council's response to this sub question .

ii) What is the justification for the 10% flexibility allowance? How does it compare to past non-implementation rates?

An outline justification for the flexibility allowance is provided at paragraph 7.11 of the draft Plan and at paragraph 7.8 of the Employment Technical Paper (SD22). I agree with this flexibility requirement and consider it to be modest in extent. I consider that further allowances may be necessary. I look forward to reviewing the Council's response to the second question.

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)?

BP8 is the Methodology Paper for Priority Employment Areas (PEAs). This does not provide an answer to either part of this sub question on land supply. It is likely in my professional opinion that there will be a significant rate of non-delivery. It will often be the case that the expansion requirements of constituent companies cannot adequately be met on site in either quantitative and/or qualitative terms. Re-location will be the only solution for some companies which can bring problems and opportunities, the latter including modernisation of floorspace and greater productivity. The proposal to allow for other employment generating uses in these areas (policy PLP 8 .1) is surprising and arguably not sufficiently protective of these defined PEAs. If this policy is maintained then a further reduction in the 48 hectare supply provision is necessary with compensatory additional supply in the form of new allocations.

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)?

I look forward to the Council's response.

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?

I conclude that the overall requirement of at least 167 hectares is justified and deliverable. The Strategic Employment Land Review for the LCR and the LCR SEP clear economic growth strategy requirements support this level of land provision and the recognition that some further sites can be justified

vi) Why are an uplift rate and a flexibility allowance included?

The Council need to lead on the response to this sub question and I reserve my position until I have seen this response.

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?

I look forward to the Council's response.

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?

There is insufficient clarity on the master-planned content of these sites to demonstrate the net amount of employment land envisaged and potentially deliverable. It is necessary to provide at least outline master plans to demonstrate the provisions for on site POS, drainage, access and other infrastructure as well as to incorporate landscaping and sufficiently high quality 'stand-off' areas between industrial/commercial uses and residential development proposals. These requirements are likely in my experience to reduce either the net residential or employment land provision or both. Other constraints and mitigation areas also need to be incorporated. If this is the case compensatory employment land supply will be required.

ix) How does the average employment land supply rate (supply rather than the requirement for 175 hectares) over the Plan period compare to past take-up rates.

I look forward to reviewing the Council's response.

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?

6.4 In general terms the location of employment land accords with the Spatial Development Strategy but there are exceptions most notably the Cooper Bridge site which in general does not have a good fit with the housing distribution and the availability of sustainable access solutions and uncongested access to the motorway network.

6.5 The requirements of different businesses and sectors outside the manufacturing and distribution use classes are not identified and potentially not catered for to a sufficient extent.

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?

6.6 I would like the majority of my evidence response to matter 1 highlighting the need for greater co-operation between Bradford and Kirklees Councils on economic development issues and employment land supply to be taken into account in response to the first question. Essentially I am arguing for much greater alignment of the policy and implementation approach in North Kirklees and South Bradford/Bradford Urban.

g) :- Does the Plan provide sufficient clarity regarding which employment uses (in B use class) are permitted on allocated sites? Are other employment generating uses such as retail and leisure permitted on the allocations?

6.7 I conclude that there is insufficient clarity in the Council's current response to the first question. Other employment generating uses of any scale should not be permitted on allocated sites except in a limited and ancillary service capacity. The Council have in the past sacrificed strategic employment land for retail/leisure park uses notably at Birstall off junction 27 of the M62.

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?

6.8 While I await the Council's response to this question I have already identified in my evidence that there is a very good case for two or three small to medium sized business parks to accommodate an identified range of office and R&D uses which are not catered for by multi-storey and other office developments in the City and town centres.

i) :- Is the Council's PEA study based on a comprehensive and robust assessment of the 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?

6.9 Generally the Council's PEA study (BP8) is based on a logical approach but in relation to answering the first question it is clear that the survey and assessment work could have been more comprehensive to cover in more depth the intentions of landowners. This is clearly a difficult area as we have left a recessionary period in the economy and then entered the uncertainties of the Brexit period. The other two questions are specifically for the Council to answer.

j);- Is the phrase employment generating uses clearly defined in policy PLP8? What effect will the loss of PEA sites in B use classes to other employment generating uses (such as leisure and retail), as permitted in section 1 of policy PLP8, have on the stock of employment land and the delivery of economic growth in Kirklees?

6.10 In my experience of dealing with applications for other employment generating uses a clearer definition is essential. It is important to restrict the loss of potential expansion land for existing established industries, subject to my earlier comments that some residual land sites will not be large enough to accommodate modern business requirements. Too great a loss will require the provision of additional land on newly allocated sites to deliver the level of economic growth which is required to meet national, northern powerhouse, Leeds City Region and local aspirations and targets.

k):- Is the approach to protecting PEAs from loss to non-employment use, as set out in section 2 of policy PLP8, 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?

6.11 I do not consider this part of PLP 8 to be clearly defined and justified by supporting policy reasoning and/or explanatory text. National policy has shifted post the NPPF by providing greater flexibility for changes of use of employment property to housing. Applicants should be required to produce a report incorporating surveyed deficiencies in a property which render it redundant for the B use class employment uses.

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 relocation 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?

6.12 While awaiting the Council's response I conclude that a specific policy plus supporting text needs to be added to deal with this recurring issue.

MATTER 6 :- EMPLOYMENT NEEDS AND DELIVERY- KIRKLEES LOCAL PLAN EXAMINATION
REPRESENTATIONS ON BEHALF OF SCHOFIELD AND PASK BY CLIVE A BROOK FRTPI RE OMMITTED
SITE REF E2700- LAND TO THE WEST OF BRADFORD ROAD AND SOUTH OF SYKES LANE OAKENSHAW