

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?*
- 1 No. As stated above, we have concerns.
- b) *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?*
- 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?*
- 1 The Plan serves to separate employment from housing. It locates housing in rural areas and adds to the need to commute. It fails to recognise all the opportunities for growth and the changes to the nature of employment.
- 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?*
- 1 The Plan does not take account of proximity to Sheffield, Manchester and Peak District.
- 2 The appraisal of tourism in the Economic Strategy is laughable in that it promotes Wakefield and Bradford before Holmfirth, an internationally known area.

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?*

1 The Rural Economy policy is partial and does not reflect the reality of economic activity in small semi-rural and rural areas. It also fails to recognise that the character and nature of the 'Place' is a significant factor in its tourism appeal. Tourism can generate a host of related economic activities, such as the maintenance of the countryside and visitor services, in addition to merely the farm diversification referred to in the Rural Economic Review. There are also the health and well-being benefits which could be offered to the wider community of the area but the Plan is silent on these. The richness of the area's cultural, artistic, craft and historic heritage is unrecognised.

2 There are many other 'service' economy activities and a burgeoning growth in professional and technical service and e-commerce businesses which offer considerable potential, especially given the Valley's centrality to the economies of Greater Manchester and South Yorkshire as well as the predominant Leeds City Region. Kirklees has referenced these in the Rural Economic Review of October 2016 but has not translated them into actionable policies.

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?*

1 No. As noted above, we have concerns.

⁷ As outlined in the Council's Methodology Paper: Priority Employment Areas (October 2016) (BP8).

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?*

1 As above. We consider that the Council has taken an old fashioned view of employment.

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?*

1 As above. We urge a far greater use is made of mixed development sites and the better to use employment land to generate and promote other

economic activities that are not site based rather than use green fields and the green belt.

- 1) *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?*

- 1 No, as above we have concerns.