

Calderdale Local Plan Examination
STAGE 1 - HEARINGS
MATTERS, ISSUES AND QUESTIONS (MIQs)
Council Responses

MATTER 5 - Employment need and supply

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

Questions

a) Is the identified Functional Economic Market Area (FEMA) of Calderdale appropriate and robustly-based? How does the Calderdale FEMA fit with the wider FEMA of the Leeds City Region (LCR)?

- 5a1) The Planning Practice Guidance [PPG] notes that since patterns of economic activity vary from place to place, there is no standard approach to defining Functional Economic Market Areas [FEMAs]; however, it is possible to define them taking account a range of factors¹, including the extent of Travel to Work Areas [TTWAs].
- 5a2) A commonly accepted approach to defining a TTWA is where at least 75% of an area's resident workforce is also employed in the area (FEMA Test #1), and all of those working in the area at least 75% also live there (FEMA Test #2). However, for areas with a working population in excess of 25,000, self-containment rates as low as 66.7% are accepted to define a TTWA as part of a limited "trade-off" between workforce size and level of self-containment².
- 5a3) The Office for National Statistics (ONS) carried out an analysis of TTWAs across the country in 2015, based on commuting patterns recorded in the 2011 Census³. This analysis concluded that Calderdale effectively comprised the 'Halifax' TTWA. The Halifax TTWA area traces the Calderdale administrative boundary and implies that the Borough is its own

¹ 61-019-20190315

² Commuting to work, Changes to Travel to Work Areas: 2001 to 2011 (ONS, December 2015)

³ ONS (2015) Census 2011 Travel To Work Areas

self-contained TTWA. This reflects the relatively high level of internal commuting patterns within the Borough.

- 5a4) The Calderdale Employment Land Study [ELS] 2018 examined commuting flows from the travel to work patterns data in the 2011 Census, the ELS reported that overall, 68,144 residents lived and worked in Calderdale Borough, out of a total of 95,160 people working in the Borough. This means 71.6% of people working in the Borough also live there, which is slightly below the 75% level considered to be a self-contained FEMA as defined by CLG guidance. Out of the 97,063 residents in employment who live in Calderdale 68,144 both live and work there. At 70.2% this is again too low to classify Calderdale as a self-contained FEMA based on this criterion alone, although it is above the lower 67% threshold referred to above.
- 5a5) Calderdale has a net outflow of 1,903 commuters. Whilst 27,016 people commute in to Calderdale, 28,919 people commute outwards. Commuting flows are particularly strong between Calderdale and Bradford / Kirklees. This indicates that Calderdale Borough/Halifax TTWA boundary overlaps with other TTWAs in the Leeds City Region.
- 5a6) In terms of other FEMA indicators, ONS jobs density data for 2016 shows that Calderdale has a job density of 0.85⁴. This is above the rates for Yorkshire and the Humber (0.80) and Great Britain (0.84), which is likely to contribute to the signs of employment self-containment within Calderdale Borough. Furthermore, on the basis of an assessment of migration patterns, the Calderdale SHMA (2015) concluded that Calderdale can be considered to be a self-contained Housing Market Area [HMA].
- 5a7) In summary, the TTWA analysis based on 2011 Census commuting data suggests that Calderdale has levels of self-containment at or around 70% and there are strong linkages with neighbouring Bradford and Kirklees. The ONS (2015) study found Calderdale to be self-contained and labelled it the 'Halifax' TTWA. Moreover, TTWA self-containment does not automatically confirm a FEMA and whilst the PPG states there is no standard approach to defining a FEMA, it sets out other factors that can be considered when defining a FEMA including HMA. The evidence from the Calderdale SHMA suggests that both commuting and migration trends are relatively self-contained within Calderdale. Furthermore, when considering the spatial economic context of Calderdale compared to nearby authorities; Calderdale has one of the highest job densities of any Yorkshire authority.

⁴ ONS (2016) Jobs Density

- 5a8) Overall, considering the relatively high level of commuting self-containment, the fact that 'Halifax' is TTWA, and the findings of the 2015 SHMA regarding the extent of the HMA, it is considered reasonable to view Calderdale as a self-contained FEMA.
- 5a9) That is not to say that it exists in isolation with other Boroughs in the Leeds City Region (particularly Bradford and Kirklees), hence Lichfields consulted with adjoining authorities in formulating the employment land requirement, and factored in a number of 'Policy On' Econometric modelling scenarios that accelerated job growth in key sectors targeted by the Leeds City Region LEP, thus ensuring that the strategies were aligned.
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5bi). Is the application of the Experian REM 'policy-on plus transport' scenario (scenario 3) to estimate the employment OAN starting point justified?

- 5b1) The starting point is the Experian baseline figure. The 'policy on plus transport' scenario incorporates additional direct and indirect job growth which is forecast to flow from the significant transport infrastructure coming forward in this part of West Yorkshire over the coming years to align with the Leeds City Region LEP aspirations.
- 5b2) As required by the NPPF, the Council's decision to pursue a higher level of employment growth than that which the baseline projections would suggest, is intended to positively and pro-actively encourage sustainable economic growth (paragraph 21)
- 5b3) Furthermore, the decision to pursue a level of employment land that would align with higher levels of job growth associated with successful transport infrastructure developments fully aligns with paragraph 21 of the NPPF, which states that planning policies should "*seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*".
- 5b4) In assessing the future land requirements for B use employment the Employment Land Study presented a number of scenarios for growth to assess the quantitative element. The Experian Regional Econometric Model for the Leeds City Region presents the baseline forecasts for employment growth, together with two additional scenarios modelled on the implementation of the SEP strategies and identifying the uplift in economic growth expected through the implementation of major projects
- 5b5) Experian have provided the Regional Econometric Model (REM) for Yorkshire and Humber for over 20 years. The model has been developed

and refined over that period to reflect new developments, improvements in data availability and enhancements to the model's operation and functionality. As such, it is a well-recognised, robust model that has been used in Local Plan preparation and similar applications for Local Authorities in the Yorkshire & Humber Region over a number of years.

- 5b6) All data inputs into the REM are taken from official sources, primarily the ONS utilising data sources such as the UK National Accounts. The model is an econometric model, meaning it is estimated based on historical data and the relationships between variables. It uses an input-output methodology to understand the relationships between different components of the economy and therefore the inter-relatedness of elements of the economy. Again, ONS data forms the basis of this.
- 5b7) The REM provides baseline forecasts based on the well-established methodology and robust data inputs described above. Whilst these forecasts assume a certain level of growth in an area, the model also enables scenarios to be developed to take account of additional investments and/or interventions in the economy. In preparing the Local Plan, Calderdale Council considered a range of potential growth scenarios. These included two scenarios based upon the Leeds City Region Strategic Economic Plan (SEP). The SEP is the City Region's currently adopted economic plan, which sets out the area's ambitions to grow the economy in a way which achieves high levels of prosperity, jobs and quality of life for everyone.
- 5b8) One scenario Calderdale considered took into account the impact of the interventions proposed in the SEP in areas such as infrastructure, skills and business support. Whilst this package of investment will provide a substantial uplift in employment and economic output, it did not factor in the substantial investment secured to improve transport connectivity in the City Region. Transport is recognised as a significant constraint on growth in the Leeds City Region. In recognition of this, the LEP has secured funding to enable the establishment of the £1bn West Yorkshire-plus Transport Fund. This fund will support the delivery of a number of strategic transport projects to facilitate growth identified in the SEP and enable its ambition to be fully realised. The second scenario considered by Calderdale (**'policy-on plus transport'**) takes this planned investment in transport infrastructure into account, in addition to the other interventions planned in the SEP. This scenario reflects the fact that significant transport investment is required to achieve the SEP's growth ambitions, and that a substantial package of funding has been secured to deliver this.

- 5b9) This 'policy-on plus transport' scenario is the scenario used to estimate employment growth in Calderdale and is aligned to the SEP's forecasts for an additional 35,700 jobs in Leeds City Region between 2016 and 2036, over and above baseline forecasts. This SEP forecast was based on rigorous analysis.
- 5b10) The scenario underpinning the employment estimates used here is therefore based on a forecast developed to reflect both the historical performance of the local area, and regional growth strategies that encapsulate planned and desired investments to provide a level of growth that aims to close the gap between the Leeds City Region and national economies. In applying this scenario in the assessment of the land requirement the local Plan reflects a requirement for space to accommodate growth that will meet forecast demand and accommodate a level of growth required to raise local economic performance and prosperity.

ii. Is the allowance for employment land/premises which may be lost to non-employment use (37.47 ha) justified and supported by the evidence? Has the change in approach to the protection of employment land (as set out in Policy E5 in the Replacement Unitary Development Plan (RUDP)), and Policy EE1 of the Local Plan) been taken into account? To what degree could the allowance be affected by an upturn in the local economy?

- 5b11) At the time of drafting the ELS an analysis was undertaken of past losses of employment land from 2008/09 to 2014/15 based on the Council's Annual Monitoring Reports and supplemented by discussions with CMBC Officers and an analysis of developments by Lichfields. This work is summarised in Table 4.13 of that Report and suggests that over the 7-year period an average of 3.16 ha of B-Class employment land has been lost annually to alternative forms of development.
- 5b12) The losses that had occurred in the past are often due to mills being converted and/or sites being redeveloped for retail/residential development (for example the demolition of the existing Hollyns Mill in Elland and its replacement with a 60 bed Care Home in 2011/12). The most sizeable loss in the ELS however, comprised the loss of B2 industrial land (totalling 22,853 sqm) at Victoria Retail Park, Shroggs Road, Halifax in 2009/10 for a retail warehouse unit. A further substantial loss to retail involved the demolition of the existing 9,361 sqm NuSwift Factory in Elland and the construction of a foodstore, with the factory being relocated.
- 5b13) 26% of the total floorspace losses therefore related to just one site, the Victoria Park retail warehouse resulted in the loss of 22,853 sqm of B2 industrial floorspace in 2009/10. If this figure (which is more than double

the size of any other loss of employment land over the analysis period) were considered anomalous and excluded from the overall losses figure, the average rate of losses falls to around **2.34 ha** annually.

- 5b14) Section 7.0 of the ELS discussed the extent to which past trends of losses should be factored into the future employment land requirement. To convert the net requirement for employment space into a gross requirement (i.e. the amount of employment space or land to be allocated/ planned for), an allowance is typically made for the replacement of losses of existing employment space that may be developed for other non B –Class, uses in future. Not all losses need necessarily be replaced as some will reflect restructuring in the local economy as less space may be needed in some sectors (particularly traditional manufacturing) in future. However even in declining industrial sectors some replacement will inevitably be needed to refresh the quality of the stock and to avoid the employment land supply continually declining.
- 5b15) There is an argument that not all such losses of employment land should necessarily be replaced or reflected in an increased gross land requirement. This would be on the basis that the stock of employment land in Calderdale contains some older sites less likely to meet future needs and is of a scale that reflects past industrial patterns, rather than the amounts of land needed in future.
- 5b16) However, against this argument is the likelihood that other sites may also be lost by 2032, and these will represent losses to the overall land portfolio, reducing choice within the market.
- 5b17) It is also worth considering the recent introduction of Permitted Development Rights permitting streamlined ‘office-to-residential’ conversion, especially given that commercial agents have pointed this out as being a current issue (alongside the suggestion that a considerable amount of the existing employment land stock in Calderdale is no longer fit for purpose and needs replenishing with better-quality units more suited to meeting modern operator requirements).
- 5b18) Balancing these considerations (and having removed the Victoria Park DIY store loss which risked distorting the level of losses overall) the ELS suggested that a replacement factor of around 2.34 ha per annum for Calderdale provided a reasonable basis to go forward. Lichfields recommended that this should be monitored by the authority over the next few years and adjusted as necessary to ensure that it is approximate to future losses. **Over 16 years, this equates to 37.47 ha to adequately replace losses.**

- 5b19) Clearly Lichfields' recommendation to continually monitor the losses of employment land is necessary given the current economic and political uncertainties including those surrounding Brexit. The majority of past losses of B-Class land have involved redevelopment for residential (and to a lesser extent retail) uses, and this is likely to continue for the foreseeable future. Furthermore, data now available for 2015/16 suggests that the rate of losses may even be increasing, with the redevelopment of the 3,279 sqm Former Hollyns Mill in Greetland, Halifax, for an 81-bed Care Home and the 22,928 sqm Former Fountainhead Brewery for 277 homes, both of which were completed in March 2016.
- 5b20) This suggests that the losses replacement allowance of 2.34 ha annually by the Council may be considered reasonably conservative, albeit the Council will continue to monitor and consider whether to re-visit the figure in future once further data becomes available.
- 5b21) The focus of Replacement Calderdale Unitary Development Plan (RCUDP) Policy ' E5 Safeguarding Employment land and Buildings' was to specify those circumstances where non employment uses could be permitted .The format of the Local Plan Policy however, is based on the premise that good employment land should be retained unless specific circumstances exist.. The purpose of both policies is to retain good employment land. The RCUDP provided more flexibility as it was considered at the time of publication, that in some areas, there was a good supply of small employment sites.
- 5b22) Even though the threshold size for the allocation of land has reduced from 0.4h to 0.25ha in the Local Plan there is a limited supply of new employment land in the Upper valley. This reaffirms the need to retain existing employment premises and land.
- 5b24) It is recognised that not all existing premises or sites are suitable for continued employment use, and the criteria where a loss of employment land can be justified and is acceptable are defined within the Policy.
- 5b25) it is also recognised that a loss of employment land to uses that are complimentary to B uses could assist in the retention of other employment uses in the vicinity. For this reason the Council suggests a modification to vary the wording of the Policy EE1 to allow for employment related or complimentary uses.

iii. Is it reasonable to apply a flexibility buffer (8.7 ha), in the context that a significant uplift above OAN is also applied in the Plan?

- 5b26) The NPPF requires that Planning 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 21]
- 5b27) The flexibility buffer and the additional uplift are separate elements of the assessment and are included for different reasons, and reflecting the need to include both qualitative and qualitative considerations in the assessment.

Flexibility buffer

- 5b28) To estimate the overall requirement of employment space that should be planned for allocating sites and to allow for some flexibility of provision, it is normal practice for ELSs to add an allowance as a safety margin for factors such as delays in some sites coming forward for development.
- 5b29) This margin is a contingency factor, providing a modest additional land buffer so that supply is not too tightly matched to estimated demand, and so that shortage of land do not arise if future demand turns out to be greater than the forecasts. Such flexibility is sensible given the uncertainties in the forecasting process and the scope for delays in developing employment space.
- 5b30) The South East England Planning Partnership Board (SEEPB) Guidance on employment land assessments recommends an allowance that is equivalent to the average time for a site to gain planning permission and to be developed, typically about two years. For Calderdale Borough, on the basis of the long term gross average annual completions, a figure of 8.70 ha was incorporated (i.e. 2years worth of 4.35 ha annual take up).
- 5b31) A two-year margin of choice may ordinarily be seen as being reasonable, particularly in the light of the ongoing economic uncertainties and the need to provide market ready sites to prevent occupiers from moving beyond the authority areas when searching for appropriate sites. Hence an increased margin of choice would help to provide a balanced portfolio. A number of agents commented that an overall lack of supply, specifically a lack of purpose-built industrial premises and particularly larger industrial premises greater than 50,000 sq ft could restrict inward investment opportunities and serve as a deterrent to companies wishing to locate in the Borough.
- 5b32) It is considered that the approach taken in defining a two-year margin of choice remains valid.

Uplift

5b33) The Employment Land Study states in para. 9.36 that:

“CMBC may choose to allocate a quantity of employment land over and above the identified OAN (Objectively Assessed Need) target, not least to provide for flexibility and churn in the market especially bearing in mind the quantum of poorer premises and the need for refurbishment/redevelopment of these sites. Other issues could include uneven distribution, or that it was felt that the modest supply of sites in recent years, and therefore employment developments coming forward, had resulted in unmet, or spatially imbalanced, demand across the Borough”.

5b34) The reasons for including an additional uplift in the amount of land allocated for new employment are outlined in the Employment Technical Paper para 4.1.7. (EV01)

- a) *Unsuitability of existing employment land and premises for continued employment use.* The potential growth of existing businesses is often hampered by constraints of location and limited accessibility, the poor condition and unsuitability of premises to accommodate modern technology and the lack of adjacent land for expansion. The inclusion of an uplift in the allocation will provide more opportunity for existing businesses to relocate.
- b) *The nature, in terms of size, type and location of future requirements to relocate or rationalise premises into one location.* There is a need to provide a range of sites to allow business to expand in this way, and an uplift in the allocation will assist.
- c) *The suitability of current industrial land and premises for alternative development as warehousing/ distribution .* The assessment of the land requirement is a 'net' calculation and there is therefore an underlying assumption that land that is no longer required for manufacturing will be suitable for B8. This may not always be the case and uplift will provide more opportunity for B8 businesses.
- d) *The rate of future loss and nature of employment land which will be developed for other uses.* Whilst Policy EE1 seeks to protect existing B use land and premises where appropriate, it is accepted that not all are suitable for continued employment use. The assessment of the land requirement includes an allowance for the loss of existing land, but if the rate of loss (due to the nature of existing sites, and the strength of the

economy), is greater than anticipated, an uplift will provide additional flexibility.

- e) *Provision of land for B8 storage uses.* The need for land for B8 storage and distribution uses that have a low employment density, but a land requirement is not adequately recognised in the land requirement assessment (see also response to Question 5biv. below). An uplift in the land allocation will provide additional opportunity for such uses.

5b35) Please refer to the response to Question 5ci) below.

- iv. **Paragraph 6.33 in the Plan indicates that the OAN of 73 ha does not take account of the potential need for B8 land without premises and with low jobs density, including the storage of vehicles, building materials and machinery. What are the implications of this?**

5b36) The OAN assessment of 73ha is based on the 3 elements of

- a) The net land requirement from the labour demand assessment plus
- b) A replacement for loss of employment land and
- c) A flexibility margin

Whilst the employment forecasts identify an increase in employment in B8 sectors the standard calculation for the land requirement relates to premises/floorspace. It does not therefore, include distribution and storage uses that require land and not premises, eg storage of building materials, plant and machinery, vehicles and caravans. The employment ratio of 'employees to land area' is low for these uses, but nevertheless they fulfil an important role in the supply chain for other businesses, and the need for such sites must be recognised.

5b37) Several sites allocated for New Employment are currently in such uses and have been allocated as they are suitable for a more intensive use. The Plan must recognise the need for B8 uses without premises, and whilst it is not possible to forecast the land requirement, this is considered to be one of the reasons for applying an uplift in the land allocation for B uses (see para 5b34 above).

- v. **Are the employment density and plot coverage assumptions used to translate the jobs estimates into land requirements justified and robustly based?**

Employment densities

- 5b38) The ELS (at page 66) sets out the approach taken to translate B-Class job growth into employment floorspace projections. The job densities are based on the HCA's (November 2015) Employment Densities Guide, 3rd Edition, adjusted by Lichfields to translate Net Internal Areas [NIA] to Gross External Areas [GEAs] for planning purposes. The HCA Guidance (which remains the most up to date available at the time of writing) takes account of recent trends in terms of the changing use of employment space, the main change being the more efficient utilisation of office space due to increased flexible working and hot-desking. This has resulted in a decrease in the amount of floorspace per office worker compared to previous guidance.
- 5b39) To estimate floorspace needs, the following average FTE ratios were applied in the Experian REM ELS modelling:
- 1 One B1a/b general office FTE job requires 14 sqm of employment floorspace [GEA];
 - 2 One B1c light industrial FTE job requires 60 sqm of employment floorspace [GEA];
 - 3 One B2 industrial FTE job requires 38 sqm of employment floorspace [GEA];
 - 4 A combined B1c/B2 factor of one FTE job per 49 sqm was obtained by taking an average of the aforementioned B1c/B2 GEA equivalents;
 - 5 One job per 70 sqm for general, smaller scale warehousing (assumed to account for 50% of future space) and 1 FTE job per 86 sqm for large scale, lower density units (assumed to account for 50% of future space) [GEA]⁵.
- 5b40) As the labour supply scenarios (4-6) were provided to Lichfields in workforce jobs rather than FTEs, slightly lower densities were applied from the HCA Guidance for these scenarios (specifically 1 B1a/b job per 12.5 sqm; 1 B1c/B2 job per 45 sqm and 1 B8 job per 65/80 sqm).

Plot ratios:

- 5b41) The ELS adopted the floorspace ratios and plots ratios reported in the former ODPM Guidance Employment Land Reviews Guidance Note (2004). This document states that plot densities typically range from 0.25-0.40 for Business Parks; from 0.35 to 0.45 for industrial land; from 0.40 and 0.60 for warehousing; and from 0.41 to 2.00 for town centre office. On this basis, The ELS assumed that a gross area of 1 ha is required to develop

⁵ Given that the majority of B8 warehousing has been low bay warehousing in Calderdale in recent years, around 50% of future demand is estimated to be for 'small' warehousing and the remainder for larger high bay warehousing.

4,000 sqm of industrial, commercial or warehousing / distribution space (equal to a plot ratio of 40%). This plot ratio reflects typical development densities for these uses and is a widely used metric in Employment Land Studies across the country.

ci. What is the reason for the extent of the proposed uplift above OAN? What benefits would accrue from this level of employment growth?

- 5c1) See response to Question 5biii)
- 5c2) The additional uplift of 24 ha represents an increase of 33% above the OAN (i.e. 97ha compared to 73ha) . However as only 84ha of land within the sites comprising 97 ha is developable (due to constraints), the actual increase is 15% of the OAN of 73 ha. The reasons for including the uplift are outlined in the response to Question 5biii. above and in the Employment Technical Paper (EV01). The extent of the uplift was determined following the site assessment process and by the number of sites identified as suitable for allocation.
- 5c3) It is not envisaged that the allocation of an additional uplift of 11 ha will create an additional growth in jobs, as the purpose is to provide a wider flexibility of supply of sites that may come forward during the plan period to accommodate the forecast growth.
- 5c4) Monitoring of site take up, job creation, and changes in employment forecasts on a regular basis, will enable the review of need and land requirements, that will then inform a Review of the Local Plan in five years.

cii. Are exceptional circumstances demonstrated to support the proposed level of Green Belt release for employment purposes (about 23 ha, as set out in document CC 01)?

- 5c5) The circumstances that have necessitated the allocation of sites that are designated Green Belt in the RCUDP are outlined in para 3.17- 3.18, and 3.24 'Exceptional circumstances for the release of Green Belt - Technical Paper (EV09)'.

"In terms of employment allocations the physical characteristics of Calderdale have made it difficult to identify sufficient suitable and deliverable sites (a number of existing employment sites in the Calder Valley have following the catastrophic flood of Boxing Day 2015 become wholly unusable for continued employment use and certain occupiers have struggled to find alternative premises.....the practical reality

of the situation is that suitable and deliverable new B2-B8 employment sites will generally be greenfield and ideally close to the strategic road network.

“3.18.....To provide sufficient employment land Calderdale has had to identify sites that are currently in the Green Belt.”

“3.24 All of the LCR planning authorities face essentially the same pressures on account of Green Belt, and as such it has been agreed that each authority will accommodate their own identified needs (see Statements of Common Ground).”

- 5c6) Six of the 30 sites allocated for New Employment (representing a third of the land area) are within the boundaries of the Green Belt as defined in the RCUDP. Three of these are located adjacent to existing employment uses within the urban area.
- 5c7) All sites have been allocated to provide a range of sites in terms of size and/or location. Four of the seven sites that are greater than 4ha in size are designated as Green Belt in the RCUDP.
- 5c8) The smaller sites at Listers Road Halifax and Wakefield Road Copley perform poorly in regard to the assessments against the Green Belt purposes, and both are situated adjacent to existing commercial premises on the edge of settlements. It is not considered that the development of these sites and the alterations to its boundary would create any harm to the nature of the Green Belt in these areas
- 5c9) The sites at Brighouse and Ainley Top are larger and their allocation enables a wider range in size of site to be allocated. Due to the nature of the Borough, in terms of topography and heritage there have been limited opportunities for larger scale development to attract new business or allow existing business to expand. The industrial parks in the Borough have little spare capacity. Whilst these site currently fulfil a greater role in respect to the purposes of the Green Belt , the opportunity to allocate ‘good’ or ‘very good’ sites in terms of quality is considered to be a factor that outweighs the loss of Green Belt.

Table 1. New Employment Sites designated Green belt in RUDP					
Site	Location	Site area (ha) gross	Develop-able area (ha)	Green Belt Review (No. purposes met)	Employment Land Study Rating
LP0021	Ainley Top	4.6	4.6	3-5	Good
LP0025	Dewsbury Road, Elland	1.66	1.66	3-5	Good
LP0105	Listers Road Halifax	0.3	0.3	0-2	Average
LP1203	Wakefield Road, Copley	1.01	0.52	0-2	Average
LP1618	Huddersfield Road, Brighouse	7.00	6.69	3-5	Very Good
LP1622	Top Land, Cragg Vale	8.38	7.63	3-5	n/a
		22.94	21.4		

- 5c10) Evidence from the number of enquiries that have been received by the Authority and through the Leeds City Region for sites which have easy access to the motorway, and are over 4 ha, supports the need for larger sites. The manufacturing sector is the area of greatest demand within existing businesses who wish to move and grow. Following the floods of 2015, a greater range of enquiries was received for premises which were out of flooded areas and able to offer good access. Offering strategic sites which are within Green Belt, provides the only key option to ensure that demands for business are met, as without them the growth of the economy in the Borough will not be achieved.

ciii. How does the planned supply of employment land over the Plan period compare to past take-up rate

- 5c11) The Employment Land Study (Table 4.2) identified the annual take up of employment land over the period 2002/3 to 2014/15 as 4.35ha pa. This ranged from the highest rate of 7.2h in 2003/4 to the lowest of 1.4ha in 2009/10.
- 5c12) A take up of 97ha over 16 years equates to an average of 6.06ha pa. However, as this uplift of allocation has been made to provide for more

flexibility, the take up for the OAN assessed requirement of 4.5ha is considered more likely. It marginally higher than in previous years and allows for the forecast growth to be accommodated.

c iv. How does the planned level of employment growth link with proposed levels of housing growth in the Plan? Will there be sufficient local labour force to support growth? (also see Question 3d)

- 5c13) Please refer to the response to Question 3d
- 5c14) Whilst employment land has been allocated in the Plan to enable growth in the local economy and businesses in the Borough, the growth in jobs will offer new opportunities for residents. This could alter the pattern of commuting, or improve the employment rate in the borough. Calderdale is part of the wider Leeds City Region economy and the strategies and programmes of the SEP, and in particular the West Yorkshire plus transport Fund, will encourage better connectivity between residents and the location of employment.

cv. How many additional jobs in B use classes would be created above the OAN forecast of 1,318 jobs (scenario 3), linked to the proposed level of employment land provision? Is this higher rate of job creation deliverable over the Plan period?

- 5c15) Please refer to responses to Questions 5biii and 5c1 above
- 5c16) The Plan does not seek to provide land for an additional number of jobs, but to provide the flexibility in supply and range of opportunity to allow the forecast OAN requirement to be met.

cvi. How does the planned level of employment growth in Calderdale fit with the LCR Strategic Economic Plan? Will the scale of planned employment growth in Calderdale have implications for the delivery of employment growth in other nearby authorities?

- 5c17) Please see response to Question 2d in Matter 2 Vision Objectives and overall strategy

d. How many of the employment allocations and mixed-use allocations incorporating B uses have been carried forward from the RUDP?

- 5d1) Twelve of the 45 sites allocated for New Employment or New Mixed uses sites were previously allocated in the RCUDP. The Employment Land Study recommended that these sites should retain an allocation in the Local Plan . The Study gave an overall ‘very good’ or ‘good’ site rating to eight of the sites, with the remaining rated as ‘average’.

Table

Local Plan Employment and Mixed Use sites previously allocated in RUDP					
LP site Ref		RUD P Ref	LP Allocation	ELS Recommendation and Rating	Reason for Inclusion
LP0032	To rear of Crosslee PLC	EM68	New employment	Allocate Site – safeguard for long term Average	Brownfield Viable for End user Recent interest expressed
LP0264	Well Lane / King Street, Halifax	MU2	New Mixed Use	Allocated MU site – retain Good	Located in LCR Spatial Priority Area
LP0509	Dewsbury Road Brighouse	MU5	New Mixed Use	Allocated MU site – retain Good	
LP0960	Land off South Lane, Elland	EM11 A	New employment	Allocated MU site – retain Good	Viable Developer led and End user
LP1018	West of Holmfield Industrial Estate Halifax	EM52	New employment	Allocated site – retain Good	Viable Developer led and End user
LP1170	Mulcture Hall Road Halifax	MU2	New Mixed Use	Allocated MU site – retain Good	Located in LCR Spatial Priority Area
LP1217	Holmfield Industrial Estate Halifax	EM63	New Employment	Allocated site – retain Good	Viable Developer led and End user
LP1219	North Holmfield Industrial Estate Halifax	EM56	New Employment	Allocated site – retain Average	Viable Developer led and End user
LP1220	Adj Lloyds Wakefield Road	EM57	New Employment	Allocated site – retain Average	Viable End user

LP1223	Lowfields Elland	EM67	New Employment	Allocated site – retain Very good	Brownfield Viable End User
LP1231	Shay Lane	MU8	New Employment	Allocated MU site – retain Average	Viable End User
LP1232	Wakefield Road/Clifton Common	EM42	New Employment	Allocated site – retain Very Good	Site is one of nine strategic regional employment sites included in Leeds City Region M62 Corridor Enterprise Zone

e Does the Plan seek to plan for an appropriate overall mix of B1, B2 and B8 uses which is supported by robust evidence?

- 5e1) The ELS analysed how the overall B-Class employment land requirement for Calderdale Borough could be split between the B1a/b, B1c/B2 and B8 uses. Lichfields noted that it was not a straightforward exercise to directly translate the net split into gross requirements, as the data was not sufficiently robust to enable a precise breakdown of land lost/margin of choice by B-use type. Instead, a judgement was made, based on a number of (often) conflicting considerations:
- a) Based on the current 'stock' of floorspace in Calderdale Borough, there is a considerable supply of industrial units, comprising approximately 87% of all floorspace in the Borough (2.1 million sqm of the 2.42 million sqm total floorspace), compared with just 13% for B1a office (310,000 sqm).⁶
 - b) The Experian job growth forecasts indicated stronger growth in B1a/b offices and B8 warehousing land requirements and a decline in demand for B2 industrial. The various policy-on forecasts suggest slightly higher growth in B1a/b office and B8 floorspace and a less pronounced decline in B2 land requirements. Excluding the (net) decline in B2 floorspace, the split between net floorspace growth for office :warehousing is broadly around 20%:80% for all 3 econometric demand-led scenarios.

⁶ VOA statistics (2012)

- c) The LEP's target growth sectors have a broadly equal split between the knowledge economy, manufacturing, health and life sciences, logistics and creative and digital sectors.
- d) Vacancy levels for office space, at just over 10% of the total stock across the Borough, represent a reasonable balance between demand and supply. In contrast, vacancy rates for industrial units are much lower at just 4%, suggesting that there is a general shortage of available industrial and warehousing stock in Calderdale.
- e) The stakeholder discussions and Business Enquiry data indicated that there is limited demand for new office space. Most requirements are for small to medium sized (2,000 to 10,000 sq ft, or 186-929 sqm) industrial units in the South East of the Borough where there is good access to the M62. Many respondents identified a strategic need for new, unconstrained, industrial sites larger than 5 ha, with a particular need for modern, new build industrial premises of up to 10,000 sq ft (929 sqm).

5e2) On the basis of the points above, the ELS concluded that an indicative split of 20% for B1a/B1b office, 40% for B1c/B2 industrial and 40% for B8 land could be appropriate for Calderdale to plan for. This sought to balance the replacement of existing industrial stock and low vacancy levels at present with aspirations for heightened demand in this sector going forward; the positive growth in office requirements alongside economic aspirations for this sector; the structural decline of the manufacturing sector and the ongoing demand for B8 warehousing (recognising that this land hungry sector requires a disproportionate amount of land relative to employment generated).

5e3) Business surveys are undertaken across the Borough and at Leeds City Region level. The last survey undertaken across Kirklees Calderdale and Wakefield in 2015, covered a range of issues including the requirements for premises and growth options. Calderdale showed very little opportunity for growth to premises as very few sites were available ..Over the past 3 years at least 2 larger businesses have moved out of the Borough to secure more suitable sites. Following the consultation of the Clifton Site nine local businesses expressed an immediate interest in the units on the site as critical for their growth.

f. Are the identified ‘appropriate B uses’ on the employment allocations (as set out in Policy SD5) justified and supported by robust evidence? How does the Council intend to deal with office proposals outside identified centres?

- 5f1) The specification of ‘appropriate B uses’ is based on a consideration of several robust assessments. These include the Employment Land Study Site Assessments, the Local Plan site assessments, the Viability Assessment Report, and other feasibility studies undertaken in the context of corporate strategies and regeneration projects, eg Town Centre Delivery Plan, and schemes linked to West Yorkshire Plus Transport Fund expenditure.
- 5f2) The ‘appropriate’ uses identified in Policy S5 are not intended to be prescriptive in determining the nature of B use development on site, but to identify what would be appropriate and allow flexibility in provision so that the market can respond to the current needs during plan period. Many sites have been identified as being suitable for all types of B use. The take up of sites and the quantity of different B uses premises built will be closely monitored to allow future review.
- 5f3) The criteria for assessment in the Employment Land Study is outlined in in Appendix 2 of the report, and the detailed assessments of 134 sites in Appendix 5.
- 5f4) The Council will consider applications for office use on non allocated sites outside of the town centres under Policy RT3 which is currently entitled Sequential Test and Retail Impact Assessments’. The Council considers that the wording of this policy should be the subject of a modification to clarify the requirements of the policy, and suggests that the word ‘retail’ should be removed from references to ‘Retail Impact Assessments’. Impact Assessments will also be required for office proposals outside town centres.

g Are the identified ‘appropriate uses’ on the mixed-use allocations (as set out in Policy SD6) justified and supported by robust evidence? How have the indicative employment floorspace capacity estimates in Policy SD6 been derived, and what land-take would this involve, in hectares?

- 5g1) Calderdale Council and its partners remain fully committed to securing the delivery of a number sites allocated for mixed use development in Halifax Town Centre. These include all the sites referred to in Matter 5 g:

Town centre Mixed Use sites.	
LP0264	Car Park Well Lane/ King Street (Cripplegate)
LP1170	Mulcture Hall Road (Cripplegate)
LP0289	Land off King Cross Street (Hopwood Lane)
LP0749	Stoney Royd Mill/ Albion Mill (Bailey Hall)
LP 1287	Northgate (former Council offices and Central Library building)
LP1632	LP1632

- 5g2) .This commitment is already being demonstrated by the sustained, strong period of transformation currently being witnessed across Halifax Town Centre and led by Calderdale Council; not least the construction of a new Central Library, alongside the comprehensive regeneration and restoration of the internationally significant Grade 1 listed Piece Hall, both of which completed in 2017. Also, the £35 million Broad Street Plaza which is also now completed and open for business.
- 5g3) The successful delivery of these and other sites in Halifax Town Centre for mixed use development has long been advocated in a number of existing economic regeneration strategies and studies that include the formative “Halifax Town Centre Delivery Plan” (Calderdale Council/ Turner & Townsend, November 2014) and the “Halifax Eastern Gateway Place Making Study” (Calderdale Council/ Aspinall Verdi, August 2017).
- 5g4) Building on these place making strategies, more recently a number of additional studies have also been prepared or commissioned to further inform and support the delivery of these sites for mixed use development. Amongst others, these include the “Halifax Station and Albion Works Regeneration Strategy and Vision Document” (Calderdale Council/ Nestle/ Fletcher Rae, 2018) which explored the mutual benefits of the regeneration of the Halifax Train Station combined with the important assets of Bailey Hall and Albion Mill, including concept proposals for mixed use regeneration and analysis of potential uses in line with Local Plan Policy SD6.
- 5g5) The former Council offices and Central Library building at Northgate has over recent months also been subject to further detailed feasibility exercises and technical studies. These have culminated in construction work having now started on site to redevelop the former library as a new 6th Form College which is due for completion in December 2019, whilst the refurbishment and construction work that has also started on the remaining

portion of the building office, is set to complete in Spring 2020 and will deliver a mix of office and retail uses also in line with the Local Plan SD6 policy.

- 5g6) In addition to the above examples demonstrating how Local Plan policy SD6 is already being delivered, a significant amount of investment funding has also been allocated to support the delivery of these and other mixed use sites. Of particular note are the multi-million pound funding allocations provided by the Council's partners at the Leeds City Region (Local Economic Partnership)/ West Yorkshire Combined Authority (WYCA), who through the West Yorkshire Plus Transport Fund programme (WY+TF) are supporting the Council deliver a wide range of multi-modal transport improvements in Halifax. These WY+TF projects will not only re-connect the Town Centre with the mixed use development sites identified in Local Plan policy SD6 and thereby make the new employment opportunities easier to access, but will also increasing overall pedestrian footfall and in turn supporting commercial viability.
- 5g7) For example, the circa £40m funded WY+TF Phase 2 scheme in Halifax Town Centre will have the dual benefits of not only creating new bus rail interchange opportunities, bus infrastructure, improved pedestrian and cycling facilities and enhanced public realm, but will importantly also create a modified eastern route around Halifax Town Centre; one that will more evenly redistribute through traffic around the Town Centre and crucially provide new road widening and access improvements at a number of key mixed use sites. These include those sites located at the Well Lane/ King Street car park (Cripplegate), Mulcture Hall Road (Cripplegate) and Church Street which is immediately adjacent to the New Street/ Horton Street mixed use development site. A full business case for the Phase 2 project has already been submitted to the WYCA and a decision is now anticipated during 2019.
- 5g8) A further example is the WY+TF Halifax Railway Station Gateway project. This circa £10.6m funded scheme will aim see a new station gateway constructed including the removal of the station access bridge, a third platform opened and the introduction of a transport interchange, combining all modes of travel. The economic benefits associated with this project will not only benefit the Town Centre but also 5g.provide a further catalyst to the regeneration and delivery of neighbouring sites allocated for mixed-use development, not least the Bailey Hall and Albion Mill site referred to earlier. An outline business case for the Station Gateway project is anticipated to be submitted to the WYCA during 2019.

- 5g9) The indicative employment floorspace capacity estimates have been identified with reference to the studies referred to above, together with the Viability Assessment report that considered each individual site.
- 5g10) As indicated in above the implementation of the Mixed uses sites in progressing at different rates. In those circumstances where there is no detailed information or assessment, the indicative floorspace is calculated on the basis of the 50% of the site becoming available for B uses, and the same criteria regarding plot ratios as used in the Employment Land Study have been applied.