

*Are the proposed employment allocations justified, effective, deliverable and in line with national policy?*

1. Policy SD5 and Use Classes Order/GDPO

1.1 We note that the Inspector's questions were written before the announced changes to the Use Classes Order and General Permitted Development Order, which take effect this September. These could pose a major risk to the Plan, because the Council will have negligible control over future changes between A and B1 uses (new Class E) and residential uses through the B1 to C3 permitted development route. We consider this requires a major modification to SD5 and much more specificity in the site allocations as to the intended use of each. This would give the Council more scope to refuse applications that are not for the envisaged use, and to therefore have confidence that buildings will be put to those envisaged uses for the foreseeable future.

1.2 In light of this, we consider that two additional questions need to be asked of all the proposed employment allocations, namely:

- Would subsequent changes of use be a sustainable outcome and/or undermine the strategy?
- In relation to the proposed Green Belt changes for employment allocations, is the justification of exceptional circumstances contingent on the presumption that the site would remain in the envisaged use?

1.3 It may be helpful to adopt a mixed-use approach to more site allocations so that a range of anticipated uses is specified, and some changes of use within that are welcomed.

1.4 We objected to the B1 allocation at LP0960, South Lane, Elland, because we consider B1 office uses should be more centrally located in order to facilitate placemaking. On reflection, especially in the light of the UCO changes, we consider that the Plan should be much more explicit in preventing office developments that are not within walkable town centre locations.

2. LP1232

2.1 In our response to the Publication Draft Plan in September 2018 we mistakenly referred to this site as a Green Belt release site. Our other objections at that time, that its development would have negative impacts in terms of transport and ecology, remain. Our answers to the Inspector's questions are made without prejudice to our overall objection, but seek to address specific concerns that affect whether the outcome of allocating and developing the site would be more or less sustainable.

2.2 With reference to our position on the Plan's need to radically transform its climate response, and drawing on the evidence of the WYCA-commissioned report *West Yorkshire Emissions Reductions Pathways* report, there is a pressing need for existing and new employment to be accessed primarily by sustainable and active travel modes. New allocations should be justified on the basis of how they will assist in increasing the proportion of jobs that are primarily accessed by those modes.

2.3 In this context we do not accept that the strategic road the Inspector refers to here can possibly be a justifiable transport intervention. It will inevitably induce additional road traffic, and reinforce the predominance of the private car as the means to access employment. This also disadvantages those people who do not have use of a car from accessing the new employment opportunities being planned for.

2.4 We accept that there is a need for some businesses uses to be located where their associated freight movements do not impact on residential streets. This is why we have long argued for a region-wide logistics and distribution strategy. But this site is earmarked for advanced manufacturing by the Inclusive Economy Strategy (EV63), which would be expected to have relatively low freight needs and low trip generation, compared to a distribution site, and access to a good workforce will be a much greater consideration.

2.5 We do not therefore see any reason why a new strategic road route should be critical for the success of this site for its intended purpose. It should be technically possible to develop this site in a way that makes walking and cycling genuinely attractive propositions for accessing it from central Brighouse, thereby supporting local employment. By contrast, focusing on car access from the motorway and new link road will increase the likelihood of in-commuting to the site. It would therefore be counter-intuitive to make the site and the link road mutually dependent in the Plan.

2.6 In the light of our comments about SD5 above, we consider that if LP1232 is to remain in the Plan as a strategic employment allocation then it requires a specification of the envisaged uses and a masterplan to ensure that placemaking and ecological aspects are fully embraced.

### 3. Other Employment Allocations

3.1 We have identified the site allocations we object to in our representations. In relation to Green Belt impacts and exceptional circumstances, we welcome the Inspector's approach of addressing these on a site-by-site basis. In each case, a key factor in weighing up of whether exceptional circumstances exist must be the question, 'what will this Green Belt change enable?'

3.2 For clarity, the sites we objected to on Green Belt grounds were LP0021, LP1618 and LP1622.

3.3 Each of these has site-specific concerns – heritage impacts, landscape impacts and ecological impacts. For ecology, the net gain approach is required: the development that the Green Belt change enables should achieve net gain for biodiversity.

3.4 With reference to our statement for Matter 8 on climate action, it is essential that new development provides net improvements for carbon emissions, road traffic reduction and modal shift, and for green infrastructure. So all these site-specific Green Belt changes need to be assessed in terms of whether they enable those net benefits, through a combination of what happens on the sites themselves, and through compensatory enhancements under the provisions of NPPF2019 para 137 and 141.

3.5 At present, this quality of evidence has not been provided. The Green Belt assessments are limited to whether the allocation harms the purposes of the Green Belt, without adequately considering the positive and negative outcomes that the change might enable. It is our position that exceptional circumstances have not been demonstrated for Green Belt changes because:

- The employment strategy is not robust, as covered in our Matter 8 statement;
- All the sites we have objected to are poorly geared to enabling road traffic reduction and modal shift;
- There is no strategy in place for harnessing Green Belt change as a net positive outcome for the environment and the remaining Green Belt.

3.6 Therefore, the Green Belt changes will not enable sustainable outcomes.