

Consultation comments on E5 – Enhancing employment opportunities

- Support - 8
- Neither support of object - 4
- Object - 1

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Comments which neither support of object to policy E5 – enhancing employment opportunities		
Respondent number	Comments	Officer comments
ANON-KSAR-NKQ5-G Curdrige Parish Council	Please add: Business premises must provide adequate parking to avoid impact on neighbouring streets.	It is important that LP is read as a whole. The issue of parking provision is considered in the Transport Policies of the local plan (T1-T4) and it is not necessary to repeat that here. Recommended response: No Change.
ANON-KSAR-N81Y-1	Draft Policy E5 sets out uses that the Council considers to be employment. This includes: i “Offices, light industrial research and development such as can be carried out within a residential area (Use Class E(g)). ii Industrial, warehousing and distribution (Classes B2-B8). iii Some Sui Generis activities where they are employment and business-led, to be determined on an individual basis.” There are other types of uses that do not necessarily	Policy E5 considers proposals for industrial and office uses and a limited number of sui generis uses generally considered as employment uses. Paragraph 10.87 also sets this out and explains that other activities that generate employment can be considered in relation to the plan’s economic strategy as set out in Strategic Policy E1. Uses such as academic institutions, or healthcare facilities are considered in relation to their primary functions; ie education or health provision, and suitable locations can be considered in the light of that activity.

	<p>fall within “Sui Generis” that can also be employment or generating business led, for example academic institutions which employ a number of staff through teaching, research, business and administration roles. It would therefore be helpful if the wording of point iii) is amended to refer to “other uses” or “other activities” rather than Sui Generis. This would allow for flexibility and still provide the Council with control to assess matters on an individual basis.</p>	<p>The separate offices of an academic institution - for example -, which serve the purposes of business administration, rather than education could be considered under i) of this policy.</p> <p>Recommended Response: No Change</p>
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Comments which object to policy E5 – enhancing employment opportunities		
Respondent number	Comment	Officer comment
ANON-KSAR-NK3N-B	<p>1. No evidence is provided in the Local plan for either the demand for or approach to delivering new employment sites or for protecting existing employment sites from re-designation. If the Local Plan is to support the urgent action needed to address the Climate Emergency, a significant number of new employment sites are required that will provide well paid jobs for both the current residents and future residents of the 15,000 new homes that are to be built within the plan period. If jobs are not offered locally, long-distance commuting, with all its environmental impact, will grow at a time when it needs to reduce. The Local Plan needs to set a target for the number of new jobs that are being targeted under the Local Plan.</p> <p>2. The Local Plan must clearly state what land is being allocated for employment sites and what else is being</p>	<p>The plan makes provision for the amount of additional employment land estimated to be needed over the plan period. The requirement for this new land/floorspace is derived from estimates of the number of new jobs likely to be arising as a result of planned new residential development, population growth and change, the changing requirements of industries and a number of other factors.</p> <p>The current requirement resulting from this is c20ha of additional land, arising from the 2020 ELR. Employment land needs are currently being reviewed and a revised land requirement will be planned for in the final version of the local plan.</p> <p>The required amount of land and the strategy for achieving this is set out within Strategic Employment</p>

	done to enable employment sites to achieve the required number of new jobs.	<p>Policy E2 above land includes site allocations for employment uses, or a mix of uses that include employment. The amount of land specified will be updated as necessary following the updated Employment Land Study. Outside of the local plan other council initiatives are working to create jobs, particularly via the GEDS and its associated actions.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKZX-V (TO E6)	<p>(Objection to E6 carried to here)</p> <p>Whilst the intention of the policy is to prevent the loss of employment land and floorspace to non-employment uses, as with Policy E1 above the current wording of the policy could be interpreted as preventing the redevelopment of outdated employment sites / floorspace for modern employment premises.</p> <p>It is therefore recommended that the policy be amended to include explicit support for the redevelopment of existing employment sites / premises for employment use, or simply set out that the policy only applies to the redevelopment of employment sites for non-employment uses.</p>	<p>It is intended that the local plan will support the modernisation, refurbishment and redevelopment of exiting sites, supporting the demand for premises that meet modern occupiers' needs.</p> <p>An amendment is proposed to Policy E5 to make this clear.</p> <p>Recommended Response: Add to first paragraph of E5 as follows – '...including new development, extensions to existing businesses, modernisation and refurbishment and the redevelopment of existing sites...</p>

	Recommendations	Officer response
Comments from SA	NONE	
Comments from HRA	NONE	

Amendments to Policy E5

Amendments to supporting text

All supporting text updated, see final version below.

VIBRANT ECONOMY – DEVELOPMENT MANAGEMENT POLICIES

ENHANCING EMPLOYMENT OPPORTUNITIES

10.92 Strategic Policy E1 sets out the Local Plan approach to the economy within the district. This includes support for a wide range of employment opportunities. Policy E5 below specifically supports the development of traditional employment uses within the industrial and office uses.

10.93 Employment uses are defined as office, industrial and some sui generis uses, as set out in Policy E5 below. It is recognised that there are also a large number of other activities that generate employment that do not fall within this definition. These activities also make a large contribution to the economy of the district and they will be considered in relation the principles set out within Strategic Policy E1.

10.94 Changes to the Town and Country Planning (Use Classes) Order 1987 came into effect on 1 September 2020, through the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

10.95 The Uses Classes Order now has a Commercial, Service and Business Class Class E. Sub-class g of which consists of the office, research and development and light industrial uses which were previously within the Industrial Class B as set out below;

- i. General, office administration use,
- ii. Research and development and
- iii. Light industrial that can be carried out within a residential area in principle

10.96 Sui generis uses are uses that do not fall within any specified use class. Whether a particular proposal that is sui generis will fall within the terms of this policy will therefore need to be considered on a case-by-case basis. Some activities that are specifically referred to in the legislation as being sui generis, that would fall within the terms of this

policy however, are - scrap yards and car breakers yards, fuel stations, car sales sites, retail warehouse clubs and mineral storage and distribution sites.

10.97 Subject to compliance with the policies of the development plan as viewed as a whole, employment development as described within Policy E5 and the text above, will generally be supported within the settlement boundaries of the district. Within the countryside, proposals will be considered in the light of the rural economy approach set out in policies E9, E10 and E11.

10.98 In order to maintain a suitable mix of employment uses across the plan area, it may be necessary to limit permissions to particular use classes of industrial and office development or impose conditions to remove certain permitted development rights, where this would be necessary and reasonable to with regard to the plan strategy and national policy.

10.99 In particular, office/light-industrial use will generally be restricted to use within the sub-class E(g), in order to prevent changes to other uses within Class E which would otherwise be permitted under the GPDO and would be inappropriate within industrial areas or outside of town centres.

10.100 Class E comprises commercial, service and business uses that should first be considered within town centres in line with the sequential approach. Offices [E(g)i)] will therefore be carefully considered in accordance with the approaches set out in Strategic Policies E3 and E4 above.

Policy E5 Enhancing Employment Opportunities

Employment development will be supported within the settlement boundaries, including new development, extensions to existing businesses **modernisation and refurbishment** and the redevelopment of existing sites for alternative employment uses, subject to meeting the requirement of other policies in the Plan.

Employment uses are considered to be the following:

- i. Offices, light industrial research and development such as can be carried out within a residential area (Use Class E(g))
- ii. Industrial, warehousing and distribution (Classes B2-B8)

iii. Some Sui Generis activities where they are employment and business-led, to be determined on an individual basis

Uses that attract significant amounts of visitors or are primarily aimed at visiting members of the public will not generally be acceptable within industrial areas and will be directed to town centres in accordance with the sequential approach. Office development will be restricted to sub-class E(g) in order to prevent unregulated changes to other uses within Class E that are appropriate within town centres.

Permissions may be restricted to particular use classes or sub-divisions thereof and/or restrictions may be placed on permitted development rights where appropriate and reasonable.

~~Due consideration will be given to~~ **Where appropriate, applicants will need to demonstrate that they have taken** amenity issues **into account** and it may be necessary to restrict the range of employment uses within residential areas, or in the vicinity of sensitive uses, such as residential accommodation, health facilities and education sites.