

## York Labour Party (YLP) Phase 2 Inspector's MiQs Response

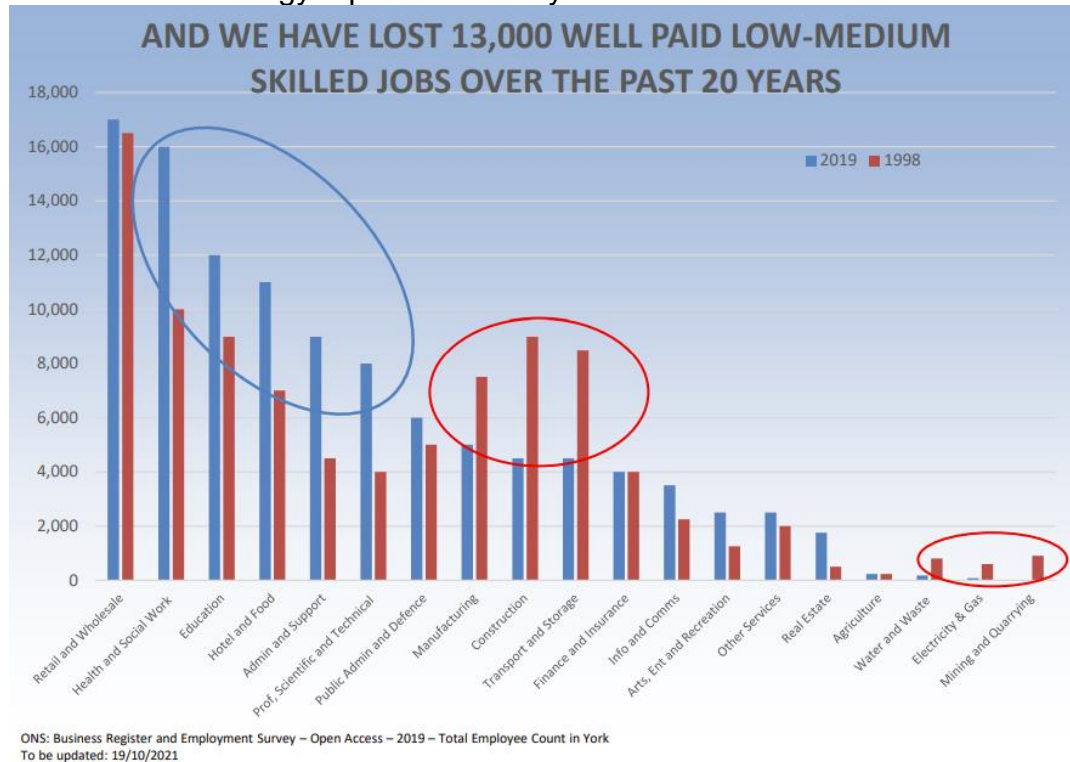
### Matter 3: Economic Development

Inspector's Question	Our response	References
<p><b>The Plan requirement for economic development</b></p> <p>3.1 Policy SS1, as currently worded in the Plan, says that sufficient land will be provided to accommodate around 650 new jobs per year.</p> <p>a) In effect, is 650 new jobs per year the Plan's requirement or target for economic growth?</p> <p>b) How has the 650 figure been arrived at and is the evidence underpinning it both robust and consistent with national policy and guidance?</p>	<p>b) Ref. our submissions (SID 364). The plan evidence (Oxford Economics: York Economic Outlook 2015 was used in its preparation) is now out of date, and further impacted by the economic effects of Brexit, Covid19, stricter immigration and an ageing workforce. This gave a forecast of 650 jobs per year over the life of the plan.</p> <ul style="list-style-type: none"><li>• The Oxford Economics (OE) job growth forecast (2019) for York for the period to 2038 gave a forecast of 425 jobs per year.</li><li>• The Oxford Economics job growth forecast (Oct 2021) for York for the period to 2038 gave a forecast of 506 jobs per year.</li><li>• These forecasts have been outstripped by the real-life data (jobs growth) over the period 2015 to 2021. OE reports a total of 4,600 jobs or 766/year.</li></ul>	

- Given York has consistently outperformed the OE forecasts 650 jobs per year is an underestimate and a higher figure should be used for the plan period.
- The York Central development is going to further stimulate jobs growth and secondary centres due to off shoot businesses and associated economic activity

There has been a significant loss of 13k well paid low- median level skilled jobs in the last twenty years (notably in manufacturing, construction and transport) – cf. Economic Strategy report to Scrutiny here:

<https://democracy.york.gov.uk/documents/s157333/Economic%20Strategy%20Climate%20Change%20Scrutiny.pdf>



<p>c) What proportion of the 650 new jobs per year target should be identified for each employment sector? Has this been assessed? If not, should such an assessment have been undertaken to assist in identifying an appropriate supply for the identified amount?</p>	<p>Measures to address this loss also need to be taken into account to ensure all sections of the population benefit from future employment opportunities and prosperity is delivered for all as we argued in our original submission SID 364 - this also argues for a more generous jobs growth assumption and site allocations. Overly tight allocation will continue to squeeze opportunities to address this challenge.</p> <p>c) Yes, an assessment of the proportion of the new jobs in each employment sector should be carried out, and the types of use classes required. Due to the impacts of the Covid pandemic and the York North Yorkshire Devolution process the landscape for employment space is shifting. The devolution asks, particularly BioYorkshire, are driving the need for small industrial units suitable for Green Technology and BioScience lab and product manufacture space. An up-to-date assessment of the number of new jobs in each employment sector would assist in identifying an appropriate land supply for each sector. There is also still a large demand for office space but on smaller floor plate and shared space (reformatting of current space and provision of new alternative spaces more suited to smaller business/part time use or start-ups). Business organisations and Venture Creation programmes from local Higher Education Institutions report a lack of seed, shared space. There is probably a need to rebalance the current large floor plate proposals in favour of employment spaces more suited to micro/small and growing business allowing for part time use, start-ups, incubator, accelerator and cluster space.</p>																			
<p>3.2 Table 4.1 of the submitted Plan (page 77), sets out employment land and floorspace requirements by use class for the Plan period (2017-2033) and also in the post Plan period 2033-2038. Is this assessment still the most up-to-date? If not, what is the most up-to-date position and</p>	<p>No, table 4.1 is not up-to-date and should be amended taking into account our comments on the preceding question 3.1 above, but also the ongoing severe loss of office space that we flagged was leading to the highest rate of loss of any UK city in our previous submissions (SID 364). The latest figures we have for this are of continuing office loss:</p> <table border="1" data-bbox="607 1270 1715 1396"> <thead> <tr> <th>Area</th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> <th>2016-17</th> <th>2017-18</th> <th>2018-19</th> <th>2019-20</th> <th>2020-21</th> </tr> </thead> <tbody> <tr> <td>York UA</td> <td>366</td> <td>366</td> <td>356</td> <td>350</td> <td>340</td> <td>316</td> <td>311</td> <td>301</td> </tr> </tbody> </table>	Area	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	York UA	366	366	356	350	340	316	311	301	<p>Non-domestic rating: stock of properties including business</p>
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<p>how should this be rectified in the Plan?</p>	<p>This has involved almost 36,000m<sup>2</sup> of lost B1a floorspace:</p> <table border="1" data-bbox="607 316 1624 853"> <thead> <tr> <th></th> <th>No of Sites Where loss of B1a Office Space took Place**</th> <th>Amount of Lost Net Floor Space</th> </tr> </thead> <tbody> <tr> <td>2014/15</td> <td>1</td> <td>-1647.7</td> </tr> <tr> <td>2015/16</td> <td>9</td> <td>-6613.8</td> </tr> <tr> <td>2016/17</td> <td>8</td> <td>-11493.6</td> </tr> <tr> <td>2017/18</td> <td>7</td> <td>-4024.8</td> </tr> <tr> <td>2018/19</td> <td>2</td> <td>-1646.1</td> </tr> <tr> <td>2019/20</td> <td>2</td> <td>-550</td> </tr> <tr> <td>2020/21</td> <td>2</td> <td>-9815</td> </tr> <tr> <td>2021/22*</td> <td>0</td> <td>0</td> </tr> <tr> <td><b>Totals</b></td> <td><b>31</b></td> <td><b>-35791</b></td> </tr> </tbody> </table> <p>*to 1 March 22 *to 1 March 22</p> <p>This needs rectifying through additional and more varied allocations, plus increased protection of key remaining city centre office sites by removing permitted rights, as we have previously argued.</p>		No of Sites Where loss of B1a Office Space took Place**	Amount of Lost Net Floor Space	2014/15	1	-1647.7	2015/16	9	-6613.8	2016/17	8	-11493.6	2017/18	7	-4024.8	2018/19	2	-1646.1	2019/20	2	-550	2020/21	2	-9815	2021/22*	0	0	<b>Totals</b>	<b>31</b>	<b>-35791</b>	<p>floorspace, 2021 - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>)</p>
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<p>3.3 Unless we have missed something, the Plan does not say how much land or floorspace is needed each year to accommodate the 650 new jobs per annum that are planned for. Why not?</p>	<p>We agree that this information should be provided including accounting for ongoing losses.</p>																															
<p>3.4 If Table 4.1 in the submitted Plan is not up-to-date, how much land or</p>	<p>The Council should be asked to undertake and bring forward an up-to-date analysis taking into accounts our comments on 3.1 above, plus our original submission points about addressing linked needs such as addressing the skills</p>																															

<p>floorspace is needed for each of the employment sectors expected to deliver jobs growth?</p>	<p>gap and lifelong learning opportunities, as well as providing space for a Rail Academy to take advantage of the significant potential future employment opportunities in the rail sector, and now of green jobs linked to the decarbonisation agenda we flag in matter 8.</p>	
<p>3.5 Should the answer to the preceding question be set out in the Plan as an explicit target?</p>	<p>Yes</p>	
<p>3.6 Has any updated assessment of the employment requirement for land and jobs taken into account the 2020 changes to the Use Classes Order, particularly for employment uses (e.g. Use Classes B1 a), b) and c) to Class E? If not, what effect would these changes have on employment requirements? How have these Use Class changes impacted on the overall employment requirement?</p>	<p>No, and the Council should be asked to address this as part of the extra analysis referred to in questions 3.2 / 3.4.</p>	
<p>3.7 Is it likely that the departure of the UK from the EU and/or the Covid-19 pandemic could have an impact on jobs growth during the Plan period? If so, is it possible for the Plan to properly gauge those impacts with any degree of certainty? How should the Plan respond to these issues, if at all?</p>	<p>We have already partly covered this in our answer to question 3.1 above. At this point York appears to have been relatively insulated from the impacts of Brexit, but there have been huge difficulties for the tourism, visitor, hospitality and leisure sectors in particular from Covid, which is not over yet. Given York has recovered slightly better so far than other parts of the region we feel that reinforces our arguments in 3.1 for a more generous job growth provision.</p>	
<p>The supply of land for economic development</p>		

<p>3.8 Policy EC1 of the submitted Plan sets out the amount of employment floorspace that is to be provided on each identified site allocation during the Plan period. These are set out within the policy both on strategic and non-strategic sites. Are the floorspace figures in Policy EC1 for these sites still correct and justified?</p>	<p>No. The evidence behind this is now out of date due to impact of Brexit, Covid19. Oxford Economics, etc. as we have covered in our response to question 3.1 above.</p> <p>Also, since the consultation in 2018 the Council and the York Central partnership have confirmed that York Central (ST5) will not meet its Local Plan Employment floorspace target, in part due to the ambiguous planning permission that has been granted in 2019. It is even possible that there will be 30% shortfall of provision. There is no reference to any modifications to the Plan to recognise this significant change.</p>	<p><a href="http://york.gov.uk">COMMITTEE REPORT (york.gov.uk)</a></p>
<p>3.9 Is the amount of employment floorspace provision and its proposed distribution consistent with the evidence base?</p>	<p>No. The evidence behind this is now out of date due to impact of Brexit, Covid19. Oxford Economics, etc. as we have covered in our response to question 3.1 above. We'd also note that sites outside York Central are more likely to deliver on space for indigenous businesses (affordability issues – which we feel have not been properly taken into consideration more generally).</p>	
<p>3.10 In line with Policy SS1, has sufficient land been identified to meet employment needs of the City of York over the Plan period?</p>	<p>No. See our response to question 3.1 and 3.8 above.</p>	