

**North Essex Authorities Section 1 Local Plan
Resumed Hearings
Statement to Matter 2: Employment provision
for the proposed garden communities
On behalf of Parker Strategic Land**

December 2019

Contents

1.	Introduction	1
2.	Question Responses	2

Client
Parker Strategic Land

Our reference
MATS3000

2 Dec 2019

1. Introduction

- 1.1 This Statement has been prepared behalf of Parker Strategic Land in relation to the shared Section 1 Local Plans for Braintree District Council ('BDC'), Colchester Borough Council ('CBC') and Tendring District Council ('TDC'), which are collectively referred to as the North Essex Authorities ('NEAs').
- 1.2 This Statement responds to the Inspector's Issues and Questions (Document IED019) for Matter 2 (Employment provision for the proposed garden communities) of the resumed Examination hearing sessions.
- 1.3 Parker Strategic Land has major land and development interests in Braintree District at Kelvedon, and in Colchester, and therefore has a significant interest in the Section 1 Local Plan.
- 1.4 In particular, Parker Strategic Land is promoting an area of approximately 468 hectares located to the north west and south west of Kelvedon on land within Braintree District. This land is primarily located to the north of the existing railway line with the exception of an area between the railway line and the A12. The land extends from the A12 south of the railway line and includes land between Oak Road and Cranes Lane. To the north of the railway line, the site extends from Cranes Lane in the south west to Coggeshall Road to the north east.
- 1.5 This Statement should be read alongside the representations submitted on behalf of Parker Strategic Land to the Section 1 Local Plan Technical Consultation on 30th September 2019. Those representations were supported by a range of material which set out concerns regarding the nature of the Section 1 Local Plan, the suggested amendments and the material prepared in support of the Plan. In addition, the representations submitted on behalf of Parker Strategic Land set out the case in support of the identification of Kings Dene, Kelvedon as a location for growth.
- 1.6 In addition, this Statement should be read alongside the Statements submitted on behalf of Parker Strategic Land to other Matters to be considered during the resumed Examination hearing sessions.
- 1.7 Parker Strategic Land's response to Matter 2 is set out in Section 2 of this Statement.
- 1.8 From a procedural perspective, Parker Strategic Land acknowledge that the submitted Plan is that which is being examined. Whilst the NEAs have prepared a set of 'suggested amendments', we understand that any Main Modifications will need to be subject to further consultation.

2. Question Responses

Q6: Is there clear justification for selecting the comparator locations identified on p55 of EXD/052, rather than other comparator locations?

- 2.1 No.
- 2.2 In our September 2019 representations we observed that no attempt was made to explain the selection of the comparator areas referenced as informing the basis of the investment-led scenario in EB/081. This prevented meaningful comment on the extent to which they were justified in their selection.
- 2.3 The information in EXD/052 fails to provide reassurance as to the rationale or justification for the selection of the seven comparator locations over other such comparators. It appears that their selection is dependent on their geographical location, being located both around London and in the London-Stansted-Cambridge corridor or so called ‘arc of prosperity’. Furthermore the justification appears to be predicated on the fact that they all currently enjoy higher GVA per capita than North Essex and can therefore be viewed as representing *‘a level of economic success that North Essex can reasonably aspire to attain, given its location and potential linkages’*¹.
- 2.4 Whilst we do not take issue with the principle of identifying areas which are performing better than North Essex and which share broad locational similarities EXD/052 does not satisfactorily explain why they are considered to represent a reasonable benchmark noting there are other locations which would fit this criteria.
- 2.5 Irrespective of the above, our concern remains that the approach taken in EB/081 is not sufficiently robust to provide anything but an indicative requirement for employment land within each Garden Community. It fails to set its recommendations in a wider understanding of market demand and businesses’ needs, nor attempts to align with published evidence on employment land needs² which itself underestimates such needs but directly informs Policy SP 4. This means that they cannot be claimed to be consistent with Policy SP 4.
- 2.6 This contrasts with the evidence that Turley has submitted in support of the strategy for Kings Dene³ which considered the job forecasts used to inform the housing and employment land requirements alongside market evidence. It also considered the comparative opportunity for the Garden Communities to respond to unmet qualitative and indeed quantitative needs, particularly for industrial and large scale logistics uses.

¹ EXD/052 page 55

² AECOM (2015) Braintree District Employment Land Needs Assessment / NLP (2015) Colchester Employment Land Needs Assessment / Peter Brett Associates (May 2017) Employment Land and Floorspace: aligned with the November 2016 OAN

³ Appendix 16 to the September 2019 representations submitted on behalf of Parker Strategic Land: https://braintree.objective.co.uk/common/search/advanced_search.jsp?&page=1&pageSize=20&id=1017139&sortMode=response_date&lookingFor=representations&tab=list&q:sortMode=

This should be considered as an important factor in justifying the provision of employment land within the Garden Communities and its mix.

- 2.7 In this context, we await the NEAs' response to Matter 2 Question 4, as it is our assertion that the employment land provided within the Garden Communities will not meet the full need for employment land across North Essex.

Q7: Is it reasonable to assume that, in the inward investment-led scenario, North Essex increases its employment-to-population ratio to that of the comparator regions by 2036 (para 2.4 of EB/081, p116 of EXD/052)?

- 2.8 No.

- 2.9 Table 4 of EB/081 indicates that the application of this assumption has only a marginal impact on the quantum of employment land recommended to meet employment growth, and its appropriateness or otherwise should be considered in this context. As noted above, our wider concern remains that the approach taken to identify the employment land to be provided at each Garden Community has not adequately taken account of the extent to which they will meet the total need for employment land, or deliver the type of premises required.

Q8: Is the percentage mix of employment sectors shown in Table 2 of EB/081 justified, having regard to the sectoral GVA shares identified in EXD/052, pp125-127?

- 2.10 We have no specific comment on the approach on this specific aspect of EB/081 & EXD/052. Critically, however, we observe that these studies make no attempt to relate their recommendations to an overall evidenced need for different types of employment land throughout North Essex. Their methodology is blind to the type and location of premises needed by different industrial sectors.

Turley
1 New York Street
Manchester
M1 4HD

T 0161 233 7676

Turley