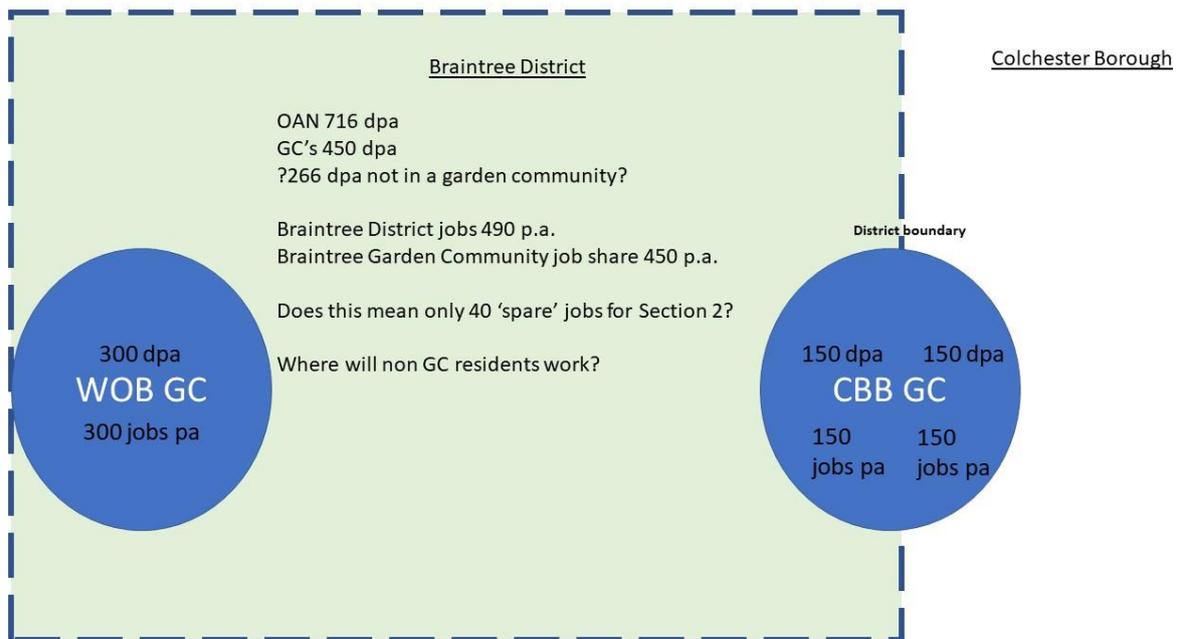


Employment – hearing statement response

The concerns we have set out in consultation submissions and our hearing statement remain un-addressed. We continue to assert that the allocation of employment land alone is not adequate for proposals on this scale. Two things are missing – a plan to overcome the barriers to growth and any tangible and realistic strategy to create employment growth.

Over-reliance on garden communities

Our concern about the ‘cannibalisation’ of jobs by the garden communities, particularly in Braintree District, seems to have been validated by the confirmation that the intention is for one job per household in the garden communities. It is not at all clear what the split is between Section 1 and Section 2 jobs. Here are our assumptions for Braintree:



If these assumptions, which we set out in our consultation response but have not been addressed, are wrong, it should be explained why. If they are right, then there are insufficient jobs ‘left over’ for Section 2. The result will be a worsening of the current out-commuting pattern. This will be in contravention of the NPPF:

- paragraph 152 which states that significant adverse impacts should be avoided;
- and paragraph 34, need to minimize travel;
- and also paragraph 182, to seek the most appropriate strategy.

Matter 2 December 2019

We also agree with Lightwood's hearing statement that there will be knock-on consequences of the garden communities on the ASA. The impact of the GC's on their surrounding area (i.e. the cumulative impact of section 1 & 2) needs to be assessed.

We agree with the hearing statement submitted by Williams Group that there is a gross over-reliance on the garden communities to generate retail and employment. If established centres are not expected to generate one job per household, why should the GC's be any different?

Comparators

We said we would say more about comparators once we have seen the authorities' response, and we now defer to Robin Miller, of Understanding Data, with regards to his analysis of comparators in the hearing statement for Shalford PC. We agree with his assessment.

We add one question: why were areas with very large new housing developments, perhaps like those listed by Savills in the build-out submission, not also used as comparators?