

# LIGHTWOOD STRATEGIC: MATTER 2 HEARING STATEMENT

## **NORTH ESSEX AUTHORITIES**

### **Shared Strategic (Section 1) Plan**

#### **FURTHER HEARING SESSIONS**

#### **Matter 2 (Employment Land Provision for the proposed garden communities)**

**Tuesday January 14<sup>th</sup> (PM)**

#### **Issue**

**Are the employment land requirements for the three proposed GCs, set out in the NEAs' suggested amendments to policies SP7, SP8, SP9 & SP10, supported by robust evidence, and are they consistent with the requirements of policy SP4?**

- 1) Lightwood Strategic note the Inspectors guidance in IED20 (paragraphs 12-13), that hearing statements are not obligatory and that further written material will only be helpful if additional points are raised that were not covered in the representations on the NEA's technical consultation. Given the volume of material that the examination is having to process we understand the Inspector's wish for brevity and to avoid repetition.
- 2) We also note that some of the questions raised in the Matter 2 agenda (**Q1 – Q5**) are only for the NEA's to answer, and that all participants will be afforded a 1,500 word right of reply by December 16<sup>th</sup> 2019. We consider that it is most efficient to the examination process proceed in a light touch way in respect of the initial hearing statements, but to fully utilise the right of reply stage.
- 3) Having regard to **Q1-Q5** agenda questions we believe that the key points raised in our representations have been recognised. The Inspector's line of inquiry is clear.
- 4) The NEA's propose an employment land allocation for each of the NEA's that it is said would 'enable' 1 job per dwelling and the land implications feed through into the viability assessment. The proposals for a plentiful and aspirational supply of employment land is not unsound within each garden community is not unsound. However, the fundamental question is not whether the Part 1 Plan secures employment land, and enough of it, but whether, during the plan period and to 2036, and beyond, the economic strategy and economic growth expectations for the sub-region as a whole (including Uttlesford and Easton Park) is realistic, with a particular focus on what can justifiably be assumed for the garden communities. The conclusion on this point has knock-on consequences for the Additional Sustainability Appraisal Work (Matter 8).
- 5) Questions Q6-Q8 are for all participants to comment on in at this stage.

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

- 6) No. Whilst it is reasonable for the NEA's to compare the North Essex area to better performing economic sub-regions, the analysis should not have stopped there.
- 7) **7. 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)?**
- 8) No. Funding for the dualling of the A120 (£522m for route option 'D') has not been secured. The absence of such investment funding will affect the aspiration to boost the economic performance of the sub-region. Even if funding is secured, it is still a leap of faith to assume that a performance 'boost' due to the A120 will be at a level that resulted in an employment growth rate that would see the sub-region match the ratio of the comparator regions by 2036. Would this mean that North Essex would have to outperform the comparator regions during the next 15 years? Of course, all place aspire to achieve the profile of arc of prosperity, but aspiration alone is not enough to justify a phase of Development Plan review that includes 4 larger scale garden communities along the A120, including Eatery Park in Uttlesford. Speaking plainly, the economic development 'cake' is not big enough for all the garden communities to claim a meaningful slice of it into the early 2030s. There is also a risk that an employment land uptake with the garden communities would be at the cost of uptake within single or mixed-use Part 2 Plan allocations, thus denuding the potential sustainability credentials of those allocations.

**8. 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?**

- 9) This is a perceptive question and reveals that EB/052 presents a reasonable split, but that it did not give the NEA's the 'right' answer for the GCs and the land implications for the viability profile.
- 10) One of the more extreme 'unjustified' assumptions in EB/081 is the 9% share of financial and insurance services at CBBGC. That is 1,900 jobs assuming one job per dwelling. Comparing this to the comparator locations in 2053 (Table 37 and Fig 45 of EXD/052), this cannot be substantiated.
- 11) Business Services are assumed at 28%-30% in the proposed GCs, whereas the NEA baseline in 2053 is 19%, and the comparator locations range from 18.3% (Milton Keynes) to 28.5% Cambridge and East Surrey, and average at 23.5%. It is difficult to assume that the GC's would outperform Milton Keynes.
- 12) Why is there only 0.5% real estate activity compared to an 11% baseline in 2053 and 9.3% as the average for comparator locations.

- 13) At the other end of the spectrum we see the unreasonable suppression of land hungry, less dense employment uses.
- 14) These factors have the effect of generating a mix of sectors that compresses the employment land requirement of the GCs, which impacts on viability. More employment land equates less housing land, less land value and worsening viability.
- 15) The original Hvas viability work (accompanying the Submission Plan) contained a much lower overall homes jobs ratio, and a completely different sectoral split very much focused on retail and leisure. We refer the Inspector to our Regulation 19 representations (paragraphs 4.49-5.50 and the associated tables). We were unable to locate the original Hvas report and appendices on the examination website. Even though it has been superseded, it still needs to be available in the examination library.