



**BRAINTREE DISTRICT COUNCIL
LOCAL PLAN
SECTION 2 EXAMINATION**

HEARING STATEMENT

by

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On behalf of

The Great Notley East Consortium

Main Matter 3
A Prosperous District – A Strong Economy – Policies LPP 2 to LPP 9

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1.0 INTRODUCTION

Background

- 1.1 The Land East of Great Notley, south of Braintree Strategic Growth Location (SGL) is identified for residential-led development in Policy LPP 18 of the emerging Braintree Local Plan (2013-2033) Section 2.
- 1.2 The Great Notley East Consortium (The Consortium) controls 84ha of the 114ha Strategic Growth Location and is currently preparing an outline planning application for residential-led development.
- 1.3 Members of The Consortium have actively participated in the preparation of the Braintree Local Plan for a number of years. Representations were submitted in July 2017 to the Publication Draft Local Plan – Section 2 relating to several policies that related to the site.
- 1.4 The Consortium has agreed a Statement of Common Ground with Braintree District Council. The Introduction to that Statement provides further detail of the various representations submitted to the Council at the Regulation 19 Publication Draft Local Plan stage by both Bellway Homes and the Braintree South Alliance prior to the establishment of the current Consortium.
- 1.5 The Consortium has reached agreement with the Council on all matters of objection except in relation to: Policy LPP 2 – Location of Employment Land; Policy LPP 18 – Strategic Location, Land East of Great Notley; and Policy LPP 77 – Renewable Energy Within New Developments. These outstanding Areas of Disagreement are the subject of responses to the Inspector’s Questions in respect of a separate Hearing Statement for Main Matter 3, Main Matter 6 and Main Matter 14. A Hearing Statement in relation to the latter has been prepared by White Peak Planning.



2.0 RESPONSES TO INSPECTOR'S QUESTIONS IN RELATION TO POLICY LPP 2 – LOCATION OF EMPLOYMENT LAND AND POLICY LPP 3 – EMPLOYMENT POLICY AREAS

Question 1: Are the above policies and site allocations justified by appropriate available evidence, having regard to national guidance, and local context, including meeting the requirement of the BLP Section 1?

2.1 As stated in 4.0(a) under the heading 'Areas of Disagreement' in the Statement of Common Ground:

Areas of Disagreement

a) *The Consortium considers that the stated area requirement of up to 3ha for employment in Policy LPP 2 is too prescriptive and not justified by the employment evidence base. It is considered that the quantum and 'appropriate employment uses to support a major new community' as stated in terms in Policy LPP18 should be determined through the masterplanning and planning application processes and be based on either an overall job creation target or gross floorspace for the development from all potential sources of employment within the mixed use areas and development of the new community as a whole. The site will also be within proximity to the major strategic allocation of 18.5 ha of land to the west of A131 at Great Notley (Ref LPP 21 and allocation ref. GRNO 260) that is now under construction and known as 'Horizon 120 Business, Innovation and Logistics Park', and will provide a wide range of new employment opportunities.*

2.2 I can find no evidence as to how the area requirement of 'up to 3ha employment policy area' as stated in the third column of Policy LPP 2(e) was derived. Although the policy refers to the employment policy area 'to be determined through Masterplan Framework,' the reference to a specific area in hectares is an unnecessary constraint and requirement to the planning of this environmentally sensitive site, with its patchwork of relatively small fields bounded by mature hedgerows, the central east-west valley and watercourse, and a number of listed buildings scattered throughout the proposed allocation of Strategic Growth Location of Great Notley East.

2.3 The explanatory preamble to Policy LPP2 highlights that "out commuting is a feature of the District and more residents leave the District to work, than work within the District. However, over two thirds of the jobs located within the District are taken by local residents." (paragraph 6.7)

2.4 The text continues:



“The economy of the District is dominated by small and medium-sized businesses. It retains a relatively large proportion of industrial-type occupations, and whilst there are a growing number of jobs in the office – based sector, this is significantly below the Essex and national averages.” (paragraph 6.8)

In my opinion this would appear to be a contributory factor to the degree of out-commuting, ie. the shortfall in local office-based job opportunities encourages out-commuting to other areas such as Chelmsford, Colchester and London.

- 2.5 The BLP evidence base includes ‘An Employment Land Needs Assessment (ELNA)’ completed in 2015 by AECOM and used employment projections from the East of England Forecasting Model (EEFM) together with additional local information to recommend the amount of additional floorspace or land that is required to meet forecast employment needs. Paragraph 6.13 of the policy preamble explains how the ELNA identifies 29 designated and non-designated clusters of industrial areas including three large ones, with *“smaller allocations at Strategic Allocations and the Garden Communities”*. It goes on to explain that the employment land identified was categorised into either Employment Policy Areas (Mixed B class) or Business Use (exclusively B1) through Local Plan Policies LPP 2 and LPP 3. (6.13)
- 2.6 Paragraph 6.14 states that the study recommends 53,400m² of additional office space to be required to meet the demand. It acknowledges that *“this amount of floorspace is difficult to convert to hectares because depending on their locations, office buildings in particular can take very different forms”*. It then goes on to explain how the ELNA 2015 calculated the land area requirement of 19.5ha of additional B1 business space and 30.1ha of industrial land.
- 2.7 However robust and valid this evidence may have been at the time, I can find no explanation as to how the 3ha requirement for Great Notley East was derived. Moreover, the overall employment evidence base is now somewhat dated, being at least 6 years old. Bearing in mind also that there is a legal requirement for local plans to be reviewed at least every five years.
- 2.8 Also, unlike the Housing Topic Paper, the Council has not produced an updated position statement in an Employment Topic Paper. It does, however, acknowledge in Topic Paper 1 Consequential Changes that it is necessary for the Section 2 Plan to be revised as a result of the changes to the Use Classes Order.
- 2.9 It is accepted that the Strategic Section 1 Plan has now been adopted and that Section 2 will need to be consistent. Paragraph 5.1 of the Section 1 Plan states that ***“A key objective for the area is to strengthen and diversify local economies to provide more jobs and housing, which will reduce the need to travel and promote sustainable growth.”***
- 2.10 Paragraph 5.11 explains that employment forecasts for the three authorities accordingly factor in longer-term aspirations and that current trends point to overall lower requirements for additional B1 floorspace. *‘This reflects the growth of home working enabled by enhanced digital connectivity; the continuing decline of manufacturing with its need for large floor areas; and the prevalence of ‘hot desking’ leading to lower requirement for office floorspace’.*



- 2.11 Policy SP5 Employment then sets out a ‘baseline’ and a ‘higher growth scenario’ requirement for each district in hectares of employment land required for office, research and development, industrial, storage and distribution uses. For Braintree the baseline is 20.9ha and the higher growth scenario is 43.3ha.
- 2.12 Thus the background to the Section 1 and Section 2 Plans on employment is already out of date and there is a need for new guidance that allows for flexibility in provision for both uses and quantum. All past trends and forecasts are effectively redundant given the changes to the Use Classes, the trend towards home or ‘hybrid’ working, which has clearly accelerated during the Covid-19 pandemic. This has now been adopted as the norm by many employers.
- 2.13 Furthermore, for employment provision associated with, and appropriate to support a new community, such as Great Notley East, then policy requirements should be applied to allow a wide range of flexibility. The trend of home and hybrid work is likely to continue as a major cultural change and it is now totally inappropriate to plan on a specific area of land requirement, as currently contained in Policy LPP 2 for Great Notley East.
- 2.14 The Consortium maintains its point in item 4.0(a) of the Statement of Common Ground that employment provision for the scheme should be determined through the masterplanning and planning application processes. It should be based on either an overall job creation target or gross floorspace for the development from all potential sources of employment within the mixed use areas and the development of the new community as a whole. It should relate to the number of households and take into account that most of the new homes will have facilities for home working.
- 2.15 The site will also be within proximity to the major strategic allocation of 18.5ha of land west of the A131 at Great Notley, ie. ‘Horizon 120 Business, Innovation and Logistics Park’, currently under construction. The Council is now seeking a revision to the LDO to increase the overall permitted floorspace from 65,000m² to 75,000m² and to revise the permitted range of Use Classes to reflect the revisions to the Use Classes Order.

Question 2: Do the employment policies (LPP 2 to LPP 9) within the “A Prosperous District” chapter of the BLP Section 2 make adequate provision to meet Braintree’s economic growth requirements for the plan period and its timescale for delivery?

- 2.16 There is insufficient evidence to answer this question with any certainty, given the changing nature of employment referred to above. Market interest and take-up rates for the new employment floorspace at Horizon 120 should provide some indication going forward. The need for Local Plans to be reviewed at least every 5 years and regularly monitoring should provide guidance as to what actions may be necessary.



Question 3: Do o policies LPP2 to LPP 9 provide clear direction as to how a decision maker should react to a development proposal?

2.17 Not at present, for reasons set out under Question 1.