

## Statement on the Policy SP4 Employment Land Figures for Braintree and Tendring

### Issue to be addressed

1. Table 1.1 in Policy SP4 sets out two B-use employment land requirement figures, in hectares, for the three North East Essex Authorities based on different growth scenarios – one ‘baseline’ scenario and one ‘higher growth’ scenario. These figures provide a range upon which the authorities can base their B-use employment land allocations within their respective Section 2 plans.
2. The Inspector has asked Braintree and Tendring District Councils to confirm the source of their figures.

### **Braintree hectares of B use land required**

The source of both figures is the Braintree Employment Land Needs Assessment (BDC/010) and requires the addition of figures from several tables within that report as detailed below. The baseline position has been incorrectly summed in the table set out in SP4 and should read 20.9ha as set out below.

<p>Higher Growth Scenario</p> <p><b>43.3ha</b></p>	<p><b>19.2ha</b></p> <p>Medium requirement for net additional office space based on plot ratio of 1:032</p> <p><u>Source: Table 6.1 and footnote 84 (page 79)</u></p> <p>+</p> <p><b>9.2 ha</b></p> <p>Medium scenario net additional industrial land</p> <p><u>Source: Table 6.3 (page 81)</u></p> <p>+</p> <p><b>14.9ha</b></p> <p>Amount of current land proposed to be deallocated and so to be replaced</p> <p><u>Source: Recommendation R6 (page 90)</u></p> <p>=</p> <p><b>43.3ha</b></p>
<p>Baseline</p> <p><b>23ha</b></p> <p><b>Should read 20.9</b></p>	<p><b>13.4 ha</b></p> <p>Low requirement for net additional office space based on a plot ratio of 1:025</p> <p><u>Source: Table 6.1 and footnote 84 (page 79)</u></p> <p>+</p>

	7.5ha
	Low scenario net additional industrial land
	Source: Table 6.3 (page 81)
	<b>= 20.9ha</b>

## Tendring

In preparing this response Tendring have identified an error in their use of evidence base documents.

### Published plan requirement

3. The higher figure of 38.0 hectares comes from the Council's 2016 Employment Land Review undertaken by Aspinal Verdi (TDC/028) which states in paragraph ES 4 of the executive summary:

*"The 2013 Employment Land Review estimated a total requirement of 7.1 Ha additional employment land over the plan period up to 2032 on top of 30.75 Ha identified. This would allow for a further 1,800 'B' class jobs to be created. The study concluded that employment sites located along the Colchester fringe are the most popular."*

4. The 38.0 hectares is based on the need of 7.1 hectares added to the 30.75 hectares that were identified in the Council's 2013 Employment Land Review undertaken by Regeneris (TDC/051). However, on further investigation, this figure is based on misinterpretation of the 2013 Review. In paragraph 25 of the 2013 Review, Regeneris state:

*"The demand assessment suggests that there is an overall requirement for between 2.3 ha (Base Scenario) and 7.1 ha (High Growth Scenario). In terms of supply, we have identified 30.75 ha of employment land which is made up of available land on existing sites and outstanding planning permissions. In quantitative terms, there is a sufficient supply of land to meet future needs even if the most optimistic scenario is adopted."*

5. The correct interpretation of the 2013 Review should have been that, in the high growth scenario, there was a need for 7.1 hectares of employment land for which there is more than sufficient land (30.75 hectares) available, for allocation in the Local Plan, to meet.

### Lower range employment land figure

6. Peter Brett Associates' (PBA) paper entitled 'Employment Land and Floorspace – Aligned with November 2016 OAN' (EB/032) sets out the required change in B-use floorspace 2014-2036 based on more up-to-date Experian forecasts. For Tendring, the table for Tendring on page 9 gives a figure of 46,802 square metres floorspace. PBA have advised the Council that an update to the employment land figure to reflect these more recent employment growth forecasts would require up to around 12 hectares (@40% plot ratio). But as noted in that report; this estimate is a 'net number' and makes no reference to the need to increase numbers for market choice; friction or to make good losses. So this 12ha is a very minimum required.

### Upper range employment land figure

7. The published lower 'baseline' employment land figure for Tendring of 20.0 hectares is not based on the 2012 SNPP but reflects the 19.83-21.8ha of employment land allocated within Policy PP7 in the Section 2 plan for Tendring.
8. In light of the above, the proposals in Section 2 provide for a modest over-allocation which provides flexibility and choice in light of Tendring's challenges in attracting inward investment. We thus propose an upper range figure of 20 hectares. This broadly reflects the findings of the 2013 Review which recommend reducing the employment land allocation from the 30.75ha originally identified.

### Conclusion

9. The Council will be suggesting that the following modification to Policy SP4 is required to address this issue:

### **Policy SP4 – Providing for Employment and Retail**

A strong, sustainable and diverse economy will be promoted across North Essex with the Councils pursuing a flexible approach to economic sectors showing growth potential across the Plan period. Jobs provision will be reconciled with housing demand and as informed by the modelling the following forecasts will apply to the North Essex Authorities;

#### **Annual Jobs Forecast:**

Braintree (EEFM)	490
Colchester (EEFM)	928
Tendring (Experian)	490

In order to meet the needs of the three authorities' employment land requirements for the period 2016 – 33 for B class employment uses and maintain appropriate flexibility in provision, the ranges set out below will be required. Site specific employment allocations for each local authority are set out in each authority's Section 2 of their Local Plan.

#### **Hectares of B use employment land required:**

	Baseline (2012-Based SNPP)	Higher Growth Scenario
Braintree	<del>23</del> <b>20.9</b>	43.3
Colchester	22.0	55.8
Tendring	<del>20</del> <b>12.0</b>	<del>38</del> <b>20.0</b>
<b>North Essex</b>	<b>65-54.9ha</b>	<b>137.1-119.1 ha</b>