

Wivenhoe Town Council – Matter 2

Hearing Statements Response to NEAs hearing statement: -

The view of Wivenhoe Town Council (WTC) remains unchanged. The employment provisions are woefully inadequate, based on poor comparator locations, the wrong industry sectors and hinge on the fundamental flaw that housing alone will generate long term employment in the locality.

Question 1

What criteria were used to select the comparator locations identified on p55 of Cebr's Economic Vision and Strategy for the North Essex Sub-Region [EXD/052]?

Reference – 2.1.1 *“these comparator locations are located in the ‘Greater South East’ (London, South East, and East of England). They are however in the more prosperous ‘core’ of the region around London”* – this is admitting that the comparator locations are inappropriate. The prosperous core around London is not comparable with the Tendring district.

Reference – 2.1.2 *“Although the Greater South East is often seen as highly ‘monocentric’, i.e. dominated by London, it includes other significant centres of high-value, highly-skilled employment (e.g. Cambridge, Milton Keynes, Oxford, Reading) – it is not just the capital’s ‘commuter belt’ but a highly polycentric region”* This is pure fallacy. Firstly if Colchester and Clacton were polycentric their economies would naturally be much stronger, the GC's are a tiny proportion of the population already living in the area and cannot be reasonably expected to be the catalyst for comparable growth with the aforementioned regions and the documented risk within the employment provisions is that Tendring\Colchester is a low value, low skill area. There is simply no credence to this statement.

Reference – 2.1.3 *“London and other major employment centres (i.e. along the London-Stansted-Cambridge Corridor, adjacent to North Essex) are experiencing constraints to their growth – on housing”* Then build where there are already constraints on growth rather than creating more commuters who – like large numbers of existing residents – already commute to these areas given the low local wages.

Question 2

(a) Were the employment figures for each GC shown in Table 4 of Employment Provision for the North Essex Garden Communities (August 2019) [EB/081] calculated in the following way:

(b) If not, what calculation method(s) were used?

Reference – 2.2.1 *“the employment figure was assumed to be the same as the number of dwellings at each garden community” and later “one job (within sustainable commuting distance) per house”*. We question what sustainable commuting is, what this distance would be, why it is not taken into account and how sustainable commuting criteria can be met for an area without a train station (unlike the strategically more appealing Weeley site). The NEA's also contradict themselves as they cite one newly created job per site but do not state the percentage of these that will be onsite making transport decisions even more complex as there is no assumed figure for outward commuting from the GC's.

Reference –2.2.3 *“The investment-led scenario is based on an ambitious view of the future, in which a proactive sub-regional economic strategy generates significant new employment opportunities across North Essex”* This is troubling as ‘proactive economic strategies for north Essex’ have been produced since the 1980’s and yet Tendring is still a national employment blackspot. It is not acceptable to expect long term residents to believe that this will change because of additional over-development. If the NEA’s confidence that the GC’s are a magic bullet for inward investment is genuinely believed by them then they should acquiesce to demands for break points to be put in place to prevent houses being built quicker than jobs are created.

Question 3

(a) Are the employment figures for the West of Braintree GC shown in Table 4 of EB/081 based on a cross-boundary GC, including an area within Uttlesford District?

(b) What would the figures be if they were based on the West of Braintree GC as proposed in the Section 1 Plan, with a maximum of 10,000 dwellings?

WTC have no comments on WOB GC as it is too far to sustainably commute to, other than to make a general observation. The NEA’ state *“Household size was assumed to stay constant for every year after 2041 at 2.26”* which raised a few eyebrows as the plan discusses houses being built until 2088.

Question 4

How do the employment figures for the GCs shown in Table 4 of EB/081 relate to the annual jobs forecasts for the three NEAs set out in policy SP4, having regard to any differences in the methods by which they were arrived at?

Reference –2.4.5 *“It is likely that the building of garden communities and provision of modern employment space as part of a wider sub-regional economic strategy would boost overall employment creation within North Essex”*. This is completely unsubstantiated, does not account for employment provision under alternative strategies and is merely another example of perceiving the GC’s as a magic bullet that will create jobs simply by existing.

Question 5

Are the employment land requirements of policies SP7, SP8, SP9 & SP10 part of, or additional to, the employment land requirements of policy SP4?

Reference –2.5.2 *“Policy SP7 says that the new garden communities will deliver 20 hectares of employment land within the Plan period (7 in Tendring Colchester Borders, 4 in Colchester Braintree Borders, and 9 in West of Braintree), as set out in Table 4 of EB/081”*. This is not enough employment space to account for future business growth and limits the amount of space available to sectors that require more than average space, such as manufacturing or any currently undefined opportunities that may arise in the future up to the conclusion of each GC.

Reference –2.5.4 *“In this context the 20 hectares proposed for the garden communities would represent between 10% and 36% of the total employment land provision across North Essex within the Plan period to 2033”*. 10% to 36% is not enough as this space will be in the potentially high job creation zones created by the GC’s. Also, the GC’s are proposed to run across plan periods up to 2088 and therefore additional employment space will be required.

Question 6

WTC has already commented.

Question 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)

Reference –2.7.3 *“Therefore the assumption of an employment-to-population ratio of 0.435 from 2036 onwards in North Essex represents a ratio which the comparators can reasonably be expected to achieve. It should be possible for North Essex to match this rate, but – as per the nature of the investment led scenario – it is based on a future in which a pro-active sub-regional economic strategy has been successful in attracting significant new employment to the area”*. What happens if the pro-active economic strategy fails in the same manner as every other economic plan to improve Tendring has? Where are the documented risks and contingencies for anything other than the best-case scenario?

Question 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?

Reference - 2.8.4 *“Adjustments to these employment shares per garden community were based on Cebr’s view of how the economic geography of each (i.e. proximity to Stansted Airport, the University of Essex, London-Stansted-Cambridge Corridor, or the Great Eastern Main Line) is likely to affect sectoral mix”*. Whilst acutely aware of the fact that we are repeating ourselves we are 37 miles from Stansted and the University of Essex does not have a business plan past 2025. The knowledge Gateway currently employs very low numbers and its ‘raison d’etre’ is to provide placements for undergraduates. Simply repeating the mantra that the University of Essex is a job creator does not make it a reality.

Conclusions

Outward commuting will remain the norm in this area due to local wages and distance from London\Chelmsford. Not recognising this, and its impact on the local transport networks, is a serious flaw.

There is still no headline inward investment – this final submission ahead of the hearing would have been the ideal opportunity to reassure all participants that “deals were done” and that there was indeed private sector interest in investing in employment provision. There remains none and that is hugely concerning and does nothing to allay local fears that people from outside North Essex will buy in to the GC’s and continue to commute to areas where wages are not as low as Tendring. In addition, there are concerns that the TBGC will be a “second class citizen” to the two other GC’s whose proximity to London (and significant advantage of not having to drive through Colchester traffic) will attract the lion share of any (we do not believe that there will be) inward investment.

Finally, there is no risk assessment of failure to create jobs, no contingency planning, no strategic comparisons with more appropriate sites in North Essex and the NEA’s continue to hope that aspiration and ambition will mask pre-determinism and lack of external investment.