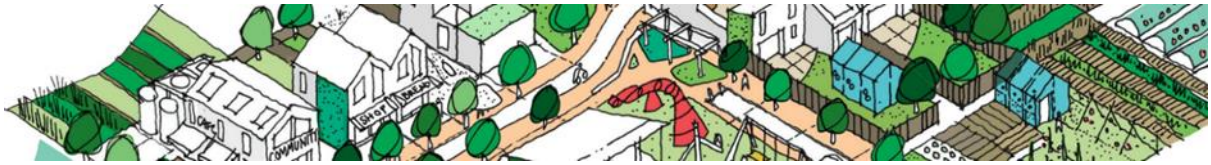
LPAHS5



INDEPENDENT EXAMINATION

Tendring Colchester Borders Garden Community (TCBGC)
Development Plan Document (DPD)

HEARING STATEMENT – LOCAL PLANNING AUTHORITY

Main Matter 5 – Economic Activity and Employment (GC Policy 5: Economic Activity and Employment)

April 2024

Tendring District Council

Colchester City Council

1. INTRODUCTION

1.1 This document is Tendring District Council (TDC) and Colchester City Council (CCC) "the Councils" response to the Matters, Issues and Questions identified for examination by Inspector Graham Wyatt of the Planning Inspectorate, as published on 4 March 2024 (IC3). This is one of nine separate response papers produced to address the specific matter and issue as identified on the front page.

1.2 Each response paper includes a number of references to specific evidence which has been relied upon in answering the matters, issues and questions. These reference numbers relate directly to the Examination Library website, where all evidence is published:

Tendring Colchester Borders Garden Community Development Plan Document: Examination Library | Creating a Place for Life (tcbgardencommunity.co.uk)

1.3 As a result of a full and comprehensive review by the Councils of all Regulation 19 representations, and following positive and cooperative engagement with statutory bodies and stakeholders through Statements of Common Ground (SoCG), a series of modifications have been recommended to the DPD Policies and supporting text. Where relevant these modifications are referred to throughout the Councils' Hearing Statements and a full schedule can be found in the 'Schedule of Modifications' (CC4).

2. RESPONSE TO INSPECTOR'S QUESTIONS

Main Matter 5 – Economic Activity and Employment (GC Policy 5: Economic Activity and Employment)

Are the requirements of the Policy justified by appropriate available evidence, having regard to national guidance, and local context?

2.1 Yes, the Council submits that GC Policy 5 'Economic Activity and Employment' is justified by appropriate available evidence, and consistent with national policy and takes account of the local context.

2.2 NPPF Chapter 6: Building a Strong, Competitive Economy provides the national planning policy context. The Chapter encourages innovation and states that each area should build on its strengths, counter any weaknesses and address the challenges of the future. Planning policies should set out an economic vision, set criteria or identify strategic sites and should recognise and address the specific locational requirements of different sectors. This includes '*making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations*' (paragraph 83).

2.3 The principle, approximate amount and location of employment land for the Garden Community have been established via the Section 1 Plan. Policy SP8 (c) (5) states that the DPD will allocate about 25 hectares of land for employment use. This may include provision for office, research & development, light industrial and/or other employment generating uses

towards the south of the site in proximity to the existing University of Essex and Knowledge Gateway and provision for office, research & development, industrial, storage and distribution uses towards the north of the site close to the A120.

2.4 The objectives within the Strategic Vision (p34) (EB2) for the employment space are as follows:

- Encouraging medium/small-scale employment uses near the district centres
- Maximising the potential from the University of Essex and the Knowledge Gateway
- Facilitating live-work and co-working spaces
- Providing flexible and adaptable buildings with the potential for expanding floor space, aiding in their retention within the garden community
- Offering larger scale industrial/storage space accessible via A-roads and the Link Road
- Respond positively to changing patterns of retail and leisure

2.5 GC Policy 5 is justified by appropriate available evidence and a range of technical studies which have considered issues relating to employment and economic development. The primary sources of evidence are as follows:

- 'Economic and Employment Study' by Quod (EB15)
- 'Review of University Land Requirements' by Wisher Consulting (EB16)
- 'Infrastructure Delivery, Phasing and Funding Plan' (EB17)

2.6 The various sources of evidence have come together as part of a strategic masterplanning process which has drawn together material on the baseline context (EB4), the development of alternative design options (EB3) the articulation of an overall strategic vision (EB2), leading to the preparation of a final 'Strategic Framework Masterplan (EB1) which draws together all the previous work and wider work across the other relevant themes.

2.7 The Councils are also working proactively the lead development Latimer are preparing a Statement of Common Ground which includes suggested modifications to the wording of GC Policy 5 which both parties have agreed to. Where relevant these modifications are referred to throughout the Councils' Hearing Statements and a full schedule can be found in the 'Schedule of Modifications' (CC4).

2.8 GC Policy 1 and GC Policy 5 allocates approximately 25ha of employment land for various types of businesses and industries, such as research and development, office space, manufacturing, and warehousing. The 'Strategic Framework Masterplan' (EB2) and 'Policies Map' (CD2) illustrate these areas as being located in the northeast and in the southwest of the DPD area, as well as some incidental employment uses within the neighbourhood centres.

2.9 In relation to assessing the appropriate uses on the employment sites, the GC Policy 5 takes into account that Colchester adheres to a "town centre first" policy, aimed at ensuring that growth outside the centre does not undermine the vitality and sustainability of town centre uses, and to prevent "hollowing out". The RTS will facilitate Garden Community residents' easy access to jobs in the town centre, but could also result in activity moving away from the town centre. Therefore, employment space at the Garden Community should be concentrated on uses that would not typically be located in the town centre, reinforcing the combination of a business park zone and a university-linked zone as the optimal strategy. Other employment uses within the 'neighbourhoods' are anticipated to primarily serve a local (within the Garden Community) catchment area.

2.10 The key evidence supporting the DPD is set out in the 'Economic and Employment Study' by Quod (EB15) which explores the potential, demand, and timelines for employment land in the Garden Community. This includes a market assessment informed by close collaboration and market testing with Bidwells, property consultants and agents with regional experience and specific expertise in industrial and employment strategies alongside housing development.

2.11 The report indicates that Business Park E(g)(ii)(iii) / B2 / B8 uses are in demand and are expected to be quickly delivered and leased on site (although, acceleration of E(g)(ii) uses would require de-risking of delivery). Office use is anticipated to be integrated with the Business Park with an auxiliary function. This range of uses not only supports the place making objectives outlined in Table 4.1 of the Quod Report 'Occupier Needs', but also underscores the need to maintain a variety of uses at this masterplanning stage. The report recommends that these should be located as a consolidated single site, in a part of the Garden Community with suitable road access (and other location factors as listed in Table 3.1 of the Quod Report). Logistics is likely to drive the immediate demand for space in this location, but the Councils also aspire for B2/E(g)(iii) uses that could work here as well, including manufacturing and assembly. Given the market demand for these uses, and the existing transport connections, their early implementation is likely to be feasible and will support local economic development in the most efficient manner.

2.12 The existing Knowledge Gateway at the University of Essex (UoE) is a relatively new addition to the market and offers a business park-style cluster, but with the amenities and facilities sustained by proximity to the University. It is generally perceived as being successful with strong growth prospects, alongside significant planned growth in student numbers, over the long term. The evidence suggests that demand for innovative, knowledge-intensive office-based research and spin-out space (E(c) and E(g)) will result in slower take-up rates, but that there could be opportunities to accelerate if it is de-risked. The 'Strategic Framework Masterplan' (EB1) comments on the orientation and positioning of the Knowledge Gateway (p68/9) '*the employment buildings will allow for flexibility in providing buildings with generous floor-ceiling heights. Building heights of up to 3-4 storeys will be required for the Knowledge Gateway so as to provide a suitable noise barrier against the A133, shielding homes to the north.'*

2.13 According to the Town and Country Planning Association, providing workplaces within easy commuting distance of homes is a fundamental principle of the Garden City model. Furthermore, the changing nature of work is recognised, and it is anticipated that there will be an increasing demand for employment space that accommodates flexible ways of working. Office uses in neighbourhood centres will likely be integrated with other neighbourhood centre uses, serving a local catchment of SMEs and supporting home and flexible working. There is limited evidence of demand for significant E(g)(i) office use in the short term and the preference for these to have town centre locations means that the Garden Community is not likely to be a preferred location for significant and large floorplate office buildings, if left to the market.

2.14 Given the above, the 'Economic and Employment Study' (EB15) recommends the following:

- Up to 20ha, northeast of the site, east of the new link road, for an industrial business park (E(g)(ii), E(g)(iii), B2, B8, and ancillary uses). The business park should be a consolidated single site.

- Up to 8ha of "Knowledge Gateway 2", on a parcel in the southwest corner of the TCBGC developable area, north of the A133. This should support university-linked commercial space and/or higher density office and lab space and ancillary uses. The report states that it is likely that this will be developed over the medium to long-term, although it could be developed within the short term with public sector intervention and promotion.

- Between one and two local centres comprising flexible E class uses that are able to achieve a critical mass of activity and footfall. The shared recommendation of Prior and Partners and Quod is that these should be prioritised for the purposes of sustaining small office uses. It is envisaged these centres will only provide limited opportunities for small office space, so the policy provides a degree of flexibility to define this within the master planning exercise.

2.15 The aspiration of the Plan as a whole is to achieve a minimum of one job per household close to home or within a sustainable commutable distance of the Garden Community, which is an ambitious target that the Councils believe is important for creating a prosperous and sustainable community. In response to representations, the Councils also clarify that the calculation of one job per household will not include students and the retired.

2.16 The UoE indicate in their representation that they would recommend 12ha for knowledge-based employment. The University also consider that the location and layout is insufficient to deliver the potential growth in jobs that matches the ambition and aspiration of the University. The Councils position is that the evidence as set out in the "Economic and Employment Study" (EB15) and "Review of University Requirements" (EB16) both consider the scale and location and support the Councils proposals in the DPD. The 'Policies Map' (CD2) identifies the location of knowledge-based employment as a 'broad location'' providing sufficient flexibility for future planning applications to bring forward suitable layouts. Further information on the UoE position is set in the Hearing Statement for Matter 2: Land Uses and Spatial Approach.

2.17 GC Policy 5 aligns with the NPPF, which supports economic growth and productivity, and encourages the use of mixed-use development. GC Policy 5 also considers the local context of the Garden community, such as its proximity to the UoE, the A120 and A133 corridors, and the existing and planned infrastructure and services.

2.18 While the quantum and type of employment land needed across the build timeframe of 35 years is justified, in terms of practical delivery of employment floorspace, this will be largely dependent on market conditions. Alongside job creation in 'Neighbourhood Centres' within the site, employment opportunities are also available nearby such as Port of Harwich, as well as the sustainable links by RTS to the Colchester City Centre, the UoE and established employment locations such as Whitehall and Severalls industrial/business parks. Further employment growth is anticipated at Freeport East. These nearby opportunities will support the Garden Community employment growth in the build phases while the on-site opportunities are being developed.

2.19 GC Policy 5 recognises the need for a range of improvements in infrastructure to help support and achieve the economic potential of the site. This includes a range of transport and connectivity improvements as set out in the 'Transport Evidence Part 2 – Transport Measures' (EB20) and the 'Infrastructure Delivery, Phasing and Funding Plan'' (EB17).

2.20 The Financial Viability Assessment Update (EB25) has considered the proposed scope and scale of employment uses (alongside the related infrastructure requirements) as part of the overall Garden Community development, with the scheme being shown to be viable. The Update has also included an allowance for developer contributions to be used to help attract new businesses and create jobs on the site which could be used to help stimulate early demand and take up.

2.21 The Councils consider that a modification to GC Policy 5 is appropriate in relation to how and when employment and business accommodation may come forward in relation to the specific first phase of the development. The 'Infrastructure Delivery, Phasing & Funding Plan' (EB17) sets out an illustrative approach to phasing. The approach to phasing of housing and employment areas will be further defined through the preparation of planning applications for the site and will need to take into account market conditions. The Councils recognise the importance of ensuring jobs come forward alongside housing, but also that this can be achieved through a variety of means, including through employment within the neighbourhoods, at the neighbourhood centres as well as across the employment areas. In addition, new jobs and opportunities will be created across the wider area in line with the policy ambition for new housing growth to occur in tandem with growth in employment within sustainable commuting distance, including as part of the growth of the UoE and in areas linked by the RTS. The applicants will still need to prepare an Economic and Employment Strategy to show how economic potential can be realised. The Councils therefore consider that a modification is appropriate to not require business accommodation in each separate employment area to come forward alongside the first phase. The proposed modification has been included in the 'Schedule of Modifications' (CC4) and is set out in the Statement of Common Ground being prepared with Latimer.

2.22 Further information on TDC and CCCs economic growth requirements for the Section 1 Plan period is set in the Hearing Statement for Matter 2: Land Uses and Spatial Approach.

Does the Policy provide clear direction as to how a decision maker should react to a development proposal?

2.23 Yes, GC Policy 5 does provide clear direction as to how a decision maker should react to a development proposal.

2.24 The planning policy adopts a proactive approach, outlining both the requirements for developers and the areas where beneficial aspects of development proposals are encouraged. The policy articulates the Councils' aspirations and objectives, providing clear support for proposals that align with these goals. It defines acceptable uses within employment areas, directly tied to evidence-based reasoning and the overall vision. This clarity guides decision-makers in their assessment of proposals. Importantly, the policy does not focus on controlling negative outcomes; it actively seeks positive results. As per NPPF paragraph 16(b) plans should be prepared positively, in a way that is aspirational but deliverable. For a decision maker, it is essential to comprehend the purpose of the policy, its broader objectives, and any specific criteria to determine whether a proposal results in harm or benefit. In some instances, the policy wording partially reflects the demands of statutory consultees who require specific wording to ensure that the decision maker and applicant clearly understand the requirements, facilitating the approval of the planning application.

2.25 Additionally, the policy specifies supplementary information that must accompany planning applications in Part D. The Councils consider that GC Policy 5 is clear and can be applied by decision makers.

END.