HS5.3

Hearing Statement- Main Matter 5 – Economic Activity and Employment

Tendring Colchester Borders Garden Community Development Plan Document (DPD)

Wivenhoe Town Council

23.160

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1. Introduction

1.1 Cerda are instructed on behalf of Wivenhoe Town Council to act on its behalf in respect of the Examination into the Tendring Colchester Borders Garden Community DPD.

1.2 The Town Council are a key stakeholder and provided representations to the Regulation 19 consultation, making strong objections to the plan.

1.3 This document has been prepared in response to the Planning Inspectors invitation to provide further statements on the soundness of the plan and other elements of the plan ahead of the Examination in Public which starts on May 7th.

2. Matter 5 Questions and Responses

2.1 ***Question 1*** *– Are the requirements of the Policy justified by appropriate available evidence, having regard to national guidance, and local context?*

Further to our previous comments there is further policy conflict. In the Section 1 Inspectors letter of 10 December 2020, he determined that 30ha are needed for employment in the plan period. Therefore, if the link road is not built before the end of the plan period other employment land will need to be found that is accessible by the spine road. This is omitted from current policy.

These policies are supported by the Economic and Employment Study December 2022 (EEC). This document relies on the evidence set out in appendices 9. All of the employment evidence listed is dated prior to Covid, our exit from the European Union, and the start of the Russia/Ukraine war, all of which have had significant effects on our economy. The EEC acknowledge this limitation throughout the document. Another limitation is that the EEC is directed within the Framework of the adopted policy in the Section One plan. Our concern is that the Section One plan was also built on the Evidence and understanding of the employment market prior to Covid, our exit from the European Union, and the start of the Russia/Ukraine war. The Planning Advisory Service Good Plan Making Guide[1] states that "evidence base documents relating to retail, employment and housing that were completed three or more years before the submission date are particularly at risk of having been overtaken by events", there is not a better example of this being the case than the employment evidence used to develop this DPD.

The EEC having stated that "the brief was not to challenge or test the 25ha allocation" it perhaps predictably concludes "that the total employment land does not surpass the 25ha as required by the adopted Section 1 policy". The brief was such that this document provides no insight into whether 25ha of employment land allocation in the new economic climate is deliverable.

The EEC does recognise that "the transport network is critical to the success of this portion of land – for occupier businesses as well as employees" and that "further development of transport provision will be critical to avoid sterilisation of parts of the site in the early years, as well as to ensure the long-term success and vitality of the employment spaces". The lack of funding the full Rapid Transit System could sterilise parts of the garden community and is a significant risk to delivery.

[1] Good Plan Making Guide, Plan Making Principles for Practitioners, September 2014

Also, in the letter of 10 December 2020

‘101. I identify access to employment opportunities at the adjacent University of Essex and its associated Knowledge Gateway as one of the factors contributing to the ability of the GC to deliver sustainable development.’ However, the university is a net generator of traffic and for many years have argued they need a road to give access from the A120 to facilitate this.

However, we note that following press articles;

BBC News - University of Essex freezes pay and jobs amid £14m shortfall.

https://www.bbc.co.uk/news/uk-england-essex-6864272738% drop in international postgraduate applications was to blame.

BBC News: Cost of Living: Hardship fund of up to £6k for Essex university students

https://www.bbc.co.uk/news/uk-england-essex-66512581

In December, the university announced it had invested £100,000 towards creating jobs on its campuses for students to help them develop skills and earn money during their studies.

Many foreign students to lose right to bring family to UK 24 May 2023

https://www.bbc.co.uk/news/uk-politics-65683046

Foreign postgraduate students on non-research courses will no longer be able to bring family members to the UK, under new immigration curbs.

Applications have also risen since rules were changed in 2019 to allow foreign students to stay in the UK for two years after graduating to look for jobs.

Home Secretary Suella Braverman said the rise in dependants being granted visas was "unprecedented," and it was "time for us to tighten up this route to ensure we can cut migration numbers".

The Knowledge Gateway currently employs less than 150 people and numbers fluctuate due to short term lets to encourage tenants. The notion that the closed loop economy of the university at a time when the sector is facing critical if not existential pressures is a panacea for economic vibrancy, is simply folly.

Further employment evidence of issues not considered in the EEC report:

The Inspector should be aware of regional issues that need to be addressed in policy to allow decision makers to exploit the slim chance of economic activity locally.

A comparison of GCSE Mathematics grades for 2019 by county (https://analytics.ofqual.gov.uk/apps/GCSE/County/) demonstrates that at 31%

Essex has the second lowest attainment level. This does not inspire confidence in raising the skills shortage. With low scoring academic and vocational qualifications, it is impossible to see the skills gap as anything other than an insurmountable blocker to growth. Put simply this has been holding the region back for decades and the likelihood that more over-development will resolve the inherent inequalities that create the complex employment scenario (particularly in Tendring) is infinitesimally small.

Table 1 (2020 figures)	
Comparator	% Mathematics Grade 6>
Essex	31
Cambridge	33.2
Milton Keynes (Beds)	28.7
Buckinghamshire	43.4
Oxfordshire	33.4
Berkshire	39.3
West Surrey (Surrey) East Surrey (Surrey)	39.4

Where is the inward investment? If the GC's were such a viable and attractive proposition how come the LAs do not have a single employer lined up? (CBC FOI ref: 361086 – a copy can be provided)

The additional road capacity, should it ever materialise, will be of equal disbenefit as it becomes easier to commute to areas with higher salaries.

The economic effects of Brexit continue to be ignored – for example European projects fund the sciences (note university funding issues and European student decline) that the skills growth relies on as well as some regional infrastructure.

The diluting effect of increased congestion on the desirability of employment investment – as congestion increases areas become less favourable for relocation.

In conclusion it is evident that employment-to-population ratio will not keep track with an increasing population across the region as employment will not be created faster than houses. Therefore, the ratio will fall and exponentially over time widen further still. What is more reasonable is to raise the employment-to-population ratio prior to population increase. With over ambitious and inappropriate projected housing numbers over the cycle of several local plan periods rather than just one this divergence will be amplified, and we will see the employment-to-population continue to run in an opposite trend to comparator

locations. The plan is not, positively prepared, effective, justified or consistent with national policy and is unsound.

2.2 ***Question 2***– *Does the Policy provide clear direction as to how a decision maker should react to a development proposal?*

The Town Council advise that aspirations for economic activity and employment are so far divorced from reality to be of no practical support for any decision maker. According to Payscale the average wage in Colchester in December 2023 is £29kpa and in Clacton it is £24kpa. Alarmingly in 2018 at Section 1 hearing these figures were £26kpa and £23kpa. This base wage level is patently insufficient for the purchase of new build homes and in most cases a barrier to anything but social level rents. The detrimental impacts on economic activity are clear. The other unavoidable conclusion is that most new residents will commute to Chelmsford and London retaining their existing jobs that allow them to move to the GC creating unaccounted for traffic volumes. This is a low wage area and the only incentive for private industry (not one company has agreed to move to the GC despite years of trying from the LA's) to relocate is low wages.

The employment area to the northeast cannot be built as there is no access to it. Although it was claimed to be the most likely to have short to medium term viability according to the employment evidence. The University have recently finished a very large development as part of their existing knowledge gateway centre and it, and many of the other employment units lie empty. They also have significant problems in filling current student accommodation even though this provides income which presumably was a large driver for their request for additional land to build more. The LA's that at one point may have considered some kind of joint venture on the new knowledge gateway or student accommodation, have significantly scaled back any appetite to do so. Colchester has, because of the risks involved, put its commercial wing into dormancy (Amphora Homes). Whilst being left with various loss-making ventures and commitments that are impeding heavily on the year on budget deficits. This will take many years to recover if at all as there have been significant changes in office space up take since COVID. Simply put the garden community was planned for a different world.

We also strongly suspect that only providing half a link road will act as a disincentive to relocating businesses and is contrary to the recommendations of the EEC report.

Clear trigger points are required to enable a decision maker the powers necessary to control the buildout rate of the GC so that it aligns with internal economic growth and retains the aspiration – an aspiration that was clear from the LA's was deliverable – that there should be one job per home on site. Without this there can be no clear direction for decision makers to ensure that the economic promises fundamental to garden community principles can be achieved.

The aspiration ‘to create one job per home’ must be enshrined in policy. If this were even remotely possible it would be because a large number of jobs in a specific sector would become accessible. Our fears surrounding the lack of character of the GC could be ameliorated by strong policy determining the employment sectors required to be present to provide jobs at volume thereby creating an economic identify. For comparison Elmstead is historically agricultural and Wivenhoe a shipyard and docks This would enable any future decision maker the strategic direction to drive employment growth and its absence in policy is a barrier that will go on to negatively define the GC. The plan is not, positively prepared or effective, and is unsound.