

Matter 12

APPENDIX B: Council Note on Employment Matters

1. To assist the examination, the Council has produced this Employment Note as Appendix B to the Council's Matter 12 Hearing Statement. The note consolidates proposed amendments to the LPSV as referred to within the Council's Hearing Statements and a number of further amendments which the Council proposes to make in order to ensure consistency and clarity in relation to employment matters throughout the Plan.
2. Specifically, this note outlines:
 - a. Proposed amendments to the supporting text of Policy SP 2 and Policy E 1 and its supporting text to clarify the Council's approach to employment sites;
 - b. The proposed amendment to remove employment designation WAL.E7 (Providence Nursery, Avey Lane);
 - c. Proposed amendments in relation to the designation of existing employment sites and improving clarity in the instances where new employment allocations are effectively extensions to existing designated employment supply; and
 - d. Further collated proposed amendments to employment matters.
3. Consequential changes to Appendix 6 of the LPSV to reflect the changes outlined in this note are also proposed.

Proposed amendments to the supporting text of Policy SP 2 and Policy E 1 and its supporting text to clarify the Council's approach to employment sites

4. The Council's Hearing Statement for Matter 3 Issue 3 proposed several amendments to the supporting text to Policy SP 2 in relation to the Council's approach to the economy as follows:

Policy/Location of text	Proposed Amendment
Paragraph 2.50	<i>[This proposed amendment is outlined in the Council's Matter 3 Hearing Statement paragraph 41]</i>

Policy/Location of text	Proposed Amendment				
	<p>This equates to a requirement of approximately 465 new jobs per annum for the FEMA. This was then translated into employment land floorspace requirements. This has identified that between 2016-2033 there is a need for between 9-22 ha of new office space and 65ha of new industrial space, across the area. These figures take account of the fact that approximately half of the future accommodation needs <u>at the FEMA level</u> will be provided through the regeneration of existing office and industrial sites.</p>				
Paragraph 2.71	<p><i>[This proposed amendment is outlined in the Council's Matter 3 Hearing Statement paragraph 39]</i></p> <p>The Council's approach to supporting the economy is to plan to provide a marginally higher amount of employment land than that identified in the October 2017 Functional Economic Market Area Assessment.</p> <p><u>[Insert new break to paragraph]</u></p> <p>The Council is keen to ensure through this Plan that there is sufficient flexibility to respond to unforeseen demands and to provide for a range and choice of sites in terms of typology, location, mix and phasing. <u>Table 2.5 below outlines the employment land requirements for the District as reported in the October 2017 Functional Economic Market Area Assessment. These requirements take into account what has been delivered in the early part of the Plan period between 2011 and 2016.</u></p>				
Table 2.5	<p><i>[This proposed amendment is outlined in the Council's Matter 3 Hearing Statement paragraph 38]</i></p> <p><i>[Proposed amendment to move Table 2.5 to directly following additional sentence outlined in the row above]</i></p> <p>Table 2.5: Employment <u>Land</u> Requirements 2011-2033 <u>2016-33</u></p> <table border="1" style="width: 100%;"> <tr> <td colspan="2">The components of employment land requirement over the period 2011-2033 <u>2016-2033</u> are as follows:</td> </tr> <tr> <td>Employment land (B uses) required 2016-2033 for offices</td> <td style="text-align: center;">2-5ha</td> </tr> </table>	The components of employment land requirement over the period 2011-2033 <u>2016-2033</u> are as follows:		Employment land (B uses) required 2016-2033 for offices	2-5ha
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Employment land (B uses) required 2016-2033 for offices	2-5ha				

Policy/Location of text	Proposed Amendment	
	Employment land (B uses) required 2016-2033 for <u>industrial</u>	14ha
	<u>Residual Remaining</u> requirement to be provided	16-19ha
Policy SP 2	<p><i>[This proposed amendment is outlined in the Council's Matter 3 Hearing Statement paragraph 34]</i></p> <p>E. Within the period 2011-2033 the Local Plan will <u>maximise opportunities provide for employment needs by jobs growth, with the aim of achieving a minimum of 10,800 new jobs in the District up to 2033. This will include making provision for:</u></p> <p><i>[Existing sub-paragraphs (i) to (iii) which follow from E remain unchanged]</i></p>	

5. The Council proposes a number of amendments to Policy E 1 and supporting text to clarify the Council's approach to employment sites. These are outlined to a large extent in the Council's Hearing Statement for Matter 12, Issue 1, Question 1 as referenced below.

Policy/Location of text	Proposed Amendment	
Paragraph 3.43	<p>Evidence suggests the need for over 10,000 jobs to be generated over the course of the Plan period. To achieve this, it will be necessary to protect and enhance existing employment sites where appropriate, in addition to identifying at least 16-19 hectares of land for B class uses</p>	
Paragraphs 3.48 and 3.49	<p><i>[This proposed amendment is outlined in the Council's Matter 12 Hearing Statement paragraph 2]</i></p> <p>3.48 <u>The Local Plan makes provision for the District's employment needs in accordance with Policy SP 2. Policy E 1 sets out the Council's approach in relation to meeting future employment needs for B Use Classes. Policy E 1 also recognises that some uses fall outside of</u></p>	

Policy/Location of text	Proposed Amendment
	<p><u>the B Use Classes but nevertheless are of an employment character.</u></p> <p><u>3.49 Uses on employment sites which provide an essential facility or service will be considered in accordance with Policy D 2 Essential Facilities and Services. Policies elsewhere in the Plan address the need for non-B Class employment generating uses. This includes Policy E 2 relating to Town and Small District Centres, E 3 Food Production and Glasshouses and E 4 The Visitor Economy. Jobs will also be generated through the provision of future infrastructure, services and facilities, such as schools and health care. Furthermore, policy D5 supports the future provision of jobs which are primarily undertaken through homeworking and peripatetic working.</u></p> <p><u>3.50 Recognising the crucial role that existing employment sites play in meeting the District's employment needs</u> †The Local Plan designates 5356 existing employment sites, equating to approximately 409<u>149</u> hectares of land for future employment use. In addition, the following new employment allocations are made in order to provide sufficient land to meet future needs and ensure sufficient flexibility. Further details are provided in Policies SP 2, SP 5, Chapter 5 and in Appendix 6. In addition, other small-scale employment uses are expected to be provided as part of the development mix within the new Garden Communities, and other appropriate locations, including Debden London Underground Station Car Park.</p>
Policy E 1	<p><i>[This proposed amendment is outlined in the Council's Matter 12 Hearing Statement paragraph 4]</i></p> <p>A. Existing Employment Sites (<u>designated and undesignated</u>)</p> <p>(i) The Council will seek to retain and enhance existing employment sites and premises <u>for their existing uses or for Class B or Sui Generis Uses of an employment character.</u></p> <p>(ii) Proposals for the redevelopment, renewal, intensification, or extension of existing employment</p>

Policy/Location of text	Proposed Amendment
	<p>sites and premises for their existing use <u>Class B or Sui Generis Uses of an employment character</u> will be encouraged.</p> <p>(iii) Proposals which will result in loss of employment space will be expected to provide mitigation measures in the form of contributions to local employment training and small business growth programmes supported by the Council.</p> <p>(iii) <u>Complementary and supporting uses may be considered acceptable where they will not individually, or cumulatively with other non-B Class uses, result in a material change to the site's employment character and function.</u></p> <p>(iv) The change of use of existing employment sites or premises (whether designated or undesignated) to other uses <u>Proposals that do not conform with A (i - iii) above will not normally be permitted unless the applicant it can be demonstrated through evidence, including marketing of the site, that there is no longer a reasonable prospect of the site being used for the existing employment use or alternative Class B or Sui Generis Uses of an employment character.</u></p> <p>B. New Employment Sites</p> <p>(i) The Council will meet the identified need for employment sites through new allocations as <u>summarised in Table 3.1 and set out in Policies SP 2, and SP 5 and Chapter 5.</u></p> <p>(ii) <u>Proposals on allocated employment sites must accord with the relevant requirements set out within Table 3.1, Chapter 5 and Appendix 6.</u></p> <p>C. The Council will support and encourage the development of flexible local employment space to meet the employment and economic needs of the District.</p>
Table 3.1	<p>[Change header of 3rd column]</p> <p>Allocated <u>Primary</u> use</p>

Proposed amendment to remove employment designation WAL.E7 (Providence Nursery, Avey Lane) in LPSV

6. The LPSV includes the designation of employment site WAL.E7 at Avey Lane in Waltham Abbey. The Council has ascertained through further work undertaken since the LPSV was submitted for examination that WAL.E7 is not suitable for designation for B Use Class employment purposes and accordingly proposes an amendment to remove site WAL.E7 from the Plan. The Council further explains and justifies this proposed amendment below.
7. In undertaking the Employment Land Supply Assessment (ELSA, EB602) the B Use Class uses present on existing sites were ascertained primarily through on-site observations and supplemented by desk based evidence such as planning application records. In addition, there was an assumption that while planning history may not have existed for all existing employment sites, they may be lawful as a result of the number of years they had been operating.
8. It was not possible to gain access to Providence Nursery (referred to as site SR-0945 in the ELSA) and therefore it was assessed from the site boundary. The site was determined to be predominantly in B8 use (comprising a number of external storage units). The planning application information included on the ELSA proforma for this site did not verify the B8 uses but, as above, it was considered that the site might still be lawful and this detail was still included for completeness.
9. The ELSA recommended that all existing employment sites were designated unless there was no reasonable prospect of the sites being used for employment purposes in the future (for example, if there was an extant residential planning permission on the site).
10. It has come to light that planning enforcement activity at SR-0945 in 2016/2017 had not been factored into the assessment of this site within the ELSA.
11. The Council has also established that the planning history listed within the proforma for SR-0945 (p C62, ELSA 2007) in fact refers to the adjacent site known as Felicia Nursery. This mistake arose from the fact that both Providence and Felicia Nurseries have the same postcode address.
12. In re-appraising SR-0945 in the light of the planning enforcement activity in 2016/2017 and the correct planning history, the Council concludes that this site is not suitable to be designated as an employment site in the Local Plan. The Council therefore seeks its removal.
13. For completeness, the Council has undertaken an appraisal of the adjacent Felicia Nursery site. Having regard to the planning history, a significant proportion of the Felicia Nursery site is in horticultural use. Whilst a small amount of floorspace was approved for B1 Use Class uses not associated with the site's horticultural function,

this falls below the size threshold adopted by the ELSA and therefore is not sufficient to warrant any B Use Class employment designation of the site in the LPSV. There is no known enforcement history at Felicia Nursery.

Proposed amendments relating to the designation of existing employment sites and proposed amendments to improve clarity in cases where new employment allocations are extensions to existing designated employment sites

14. The LPSV designates a number of existing employment sites for future employment use, as outlined in paragraph 3.49 of the LPSV and Appendix 4 (p226-7). The Council proposes to make a small number of amendments to clarify the quantum of existing designated sites. These amendments are outlined below:

Policy/Location of text	Proposed Amendment
Paragraph 3.50	<p><u>Recognising the crucial role that existing employment sites play in meeting the District's employment needs</u> The Local Plan designates 5356 existing employment sites, equating to approximately 409<u>149</u> hectares of land for future employment use. In addition, the following new employment allocations are made in order to provide sufficient land to meet future needs and ensure sufficient flexibility. Further details are provided in Policies SP 2, SP 5, Chapter 5 and in Appendix 6. In addition, other small-scale employment uses are expected to be provided as part of the development mix within the new Garden Communities, and other appropriate locations, including Debden London Underground Station Car Park.</p>
Table titled 'Employment designations (existing employment sites)' in Appendix 4 (p226-7)	<p>[Addition to include the following existing employment sites which had been omitted] <u>LOU.E2 - Langston Road Industrial Estate</u> <u>NWB.E4 - North Weald Airfield</u> <u>RUR.E19 - Dorrington Farm</u> <u>WAL.E6 - Galley Hill Road Industrial Estate</u></p>
Paragraph 5.141; Policy P 10 C. (vii); and	<p>[This proposed amendment is outlined in the Council's Matter 15 Hearing Statement for Policy P 10 paragraph 337]</p>

Policy/Location of text	Proposed Amendment
Policies Map and extracts within the LPSV and Appendix 6	Redraw the site boundary of NAZE.E7 to reflect that planning permission has been granted for residential use on part of the site (EPF/2271/16).

15. The Council is proposing the following amendments to improve the mapping of employment sites in particular, to make it clearer where new employment allocations are extensions to existing designated employment sites:

Policy/Location of text	Proposed Amendment
Policies Map and extracts within the LPSV and Appendix 6	The Policies Map currently refers to designated employment sites and new employment site allocations as 'Employment site allocations'. This will be amended so that existing employment (as per table in Appendix 4 of the LPSV (p 226-227)) are correctly referenced as ' <u>Designated employment sites</u> '.
Policies Map and extracts within the LPSV and Appendix 6	To update Policies Map to visually differentiate between 'Employment site allocations' and 'Designated employment sites'. Referenced in paragraphs 128 and 228 of the Council's Matter 15 Hearing Statement. This amendment affects the mapping contained within the LPSV, Policies Map and Appendix 6 relating to WAL.E6, LOU.E2, NWB.E4 and RUR.E19.

16. The Council is proposing amendments to the text in the LPSV to ensure consistency in reference to units (i.e. hectares) and to clarify what type of B Use Class uses a site is allocated for. The proposed amendments also provide greater clarity where an employment site allocation is an extension to a designated employment site as follows:

Policy/Location of text	Proposed Amendment
Paragraph 2.126	Approximately 1 hectare ha of B1 Use Class employment land will be provided at Dorrington Farm. <u>Alongside the existing 1 hectare ha of designated employment land,</u> This will provide opportunities for <u>comprehensive redevelopment and the provision of high quality employment uses</u> to be incorporated within the Garden Town, helping to promote sustainability whilst also linking to Harlow town centre.
Policy SP 5 Latton Priory F(ii) (p 43):	<u>Approximately 1 hectare of employment land provided in addition to the 1 hectare of existing designated employment use</u> at Dorrington Farm;
Paragraph 5.37	<i>[This proposed amendment is outlined in the Council's Matter 15 Hearing Statement for Policy P 2 paragraph 100 & paragraph 231]</i> There is also an existing employment site that is <u>identified for designation allocated with an allocation</u> for a further 4,000sqm <u>1 hectare of expansion of B2 class use (general industrial):</u> <ul style="list-style-type: none"> • LOU.E2 – Langston Road Industrial Estate (30.06ha)
Policy P 2 Part D	<i>[This proposed amendment is outlined in the Council's Matter 15 Hearing Statement for Policy P 2 paragraph 101]</i> Policy P 2 Loughton: D. In accordance with Policy SP 2 and Policy E 1 the following site is designated for employment uses with a further allocated expansion for <u>B2 Use Class employment uses:</u> (i) LOU.E2 – Langston Road Industrial Estate
Paragraph 5.53	<i>[This proposed amendment is outlined in the Council's Matter 15 Hearing Statement for Policy P 3 paragraph 144 & paragraph 231]</i> There is also an existing employment site that is <u>identified for designation allocated with an allocation</u> for a further 5,120sqm <u>approximately 1 hectare of B2/B8 class use (general industrial/storage and warehousing):</u> <ul style="list-style-type: none"> • WAL.E6 – Galley Hill Road Industrial Estate (3.89ha)

Policy/Location of text	Proposed Amendment
Policy P 3	<p><i>[This proposed amendment is outlined in the Council's Matter 15 Hearing Statement for Policy P 3 paragraph 126]</i></p> <p>D. In accordance with Policy SP 2 and Policy E 1 the following sites are allocated for B Use Class employment uses: the following site is designated for employment uses with a further allocated expansion for B2/B8 Use Class employment uses:</p> <p>(i) WAL.E6 – Galley Hill Road Industrial Estate</p> <p>[NEW PART]</p> <p><u>E. In accordance with Policy SP 2 and Policy E 1 the following site is allocated for B1c/B2/B8 Use Class employment uses:</u></p> <p>(ii) WAL.E8 – Land north of A121</p>
Paragraph 5.96	<p><i>[This proposed amendment is outlined in the Council's Matter 15 Hearing Statement for Policy P 6 paragraph 230]</i></p> <p>There is also an existing employment site that is <u>identified for designation allocated with an allocation</u> for a further 40,000sqm <u>10 hectares</u> of B1/B2/B8 class use (business use/general industrial/storage and warehousing):</p> <ul style="list-style-type: none"> • NWB.E4 – North Weald Airfield (40.8ha)
Policy P 6	<p><i>[This proposed amendment is outlined in the Council's Matter 15 Hearing Statement for Policy P 6 paragraph 251]</i></p> <p>D. In accordance with Policy SP 2 and Policy E 1 the following site is designated for employment uses with a further allocated expansion for <u>B1/B2/B8</u> Use Class employment uses:</p> <p>(i) NWB.E4 – North Weald Airfield</p>
Paragraph 5.54	<p><i>[This proposed amendment is outlined in the Council's Matter 15 Hearing Statement for Policy P 3 paragraph 144]</i></p> <p>A further allocation site of <u>10 hectares</u> for 40,000sqm of B1c/B2/B8 class uses (business use/general industrial/storage and warehousing) has also been made:</p> <ul style="list-style-type: none"> • WAL.E8 – Land north of A121 (27.84)

Policy/Location of text	Proposed Amendment
Paragraph 5.168	<p><i>[Amend the beginning of the paragraph]</i></p> <p>“There are twenty <u>nineteen</u> existing rural Employment Sites...”</p> <p><i>[Delete RUR.E19 paragraph 5.168]</i></p>
Paragraph 5.169	<p><i>[This proposed amendment is outlined in the Council’s Matter 15 Hearing Statement paragraph 231 & within section Policy P 13-15 paragraph 441]</i></p> <p>There is also an existing Employment Site that is <u>identified for designation allocated with an allocation</u> for a further 5,120sqm of B2/B8 approximate 1 hectare of <u>B1a/B1b</u> class use (general industrial/storage and warehousing):</p> <ul style="list-style-type: none"> • RUR.E19 – Dorrington Farm, Rye Hill Road (1.85ha)
Policy P 13	<p>Employment Sites Part C. delete sub-paragraph (xv): (xv) RUR.E19 – Dorrington Farm (see Policy SP 5 and allocation SP4.1)</p>
Policy P 13	<p><i>[This proposed amendment is outlined in the Council’s Matter within section Policy P 13-15 paragraph 443]</i></p> <p>D. In accordance with Policy SP 2 and Policy E 1 the following site is designated for employment uses with a further allocated expansion for <u>B1a/B1b</u> Use Class employment uses:</p> <p>(i) RUR.E19 – Dorrington Farm, Rye Hill Road – (see Policy SP 5 and allocation SP 4.4 <u>5.1</u>)</p>

Further collated proposed amendments to employment matters

17. The Council proposes an amendment to Policy SP 5 and supporting text in relation to employment provision. The purpose of this amendment is to provide flexibility, subject to ongoing discussions between landowners and changing circumstances, to consider the optimum location for employment uses within the masterplan area to ensure any employment provision contributes positively to wider placemaking objectives. The specific proposed amendments are as follows:

Policy/Location of text	Proposed Amendment
Paragraph 2.126	Approximately 1ha hectare of B1 Use Class employment land will be provided at Dorrington Farm. <u>Alongside the existing 1 hectare of designated B Use Class employment land, this will provide opportunities for comprehensive redevelopment and the provision of high quality employment uses to be incorporated within the Garden Town, helping to promote sustainability whilst also linking to Harlow town centre. "The Council recognises that through the detailed masterplanning process at Latton Priory it may become apparent that the required B Use Class employment uses may be better located elsewhere in the masterplan area.</u>
Policy SP 5	Latton Priory F(ii) (p 43) 1 hectare of <u>B Use Class</u> employment land provided in addition to the 1 hectare of existing designated B Use Class employment use at Dorrington Farm. <u>The Council recognises that through the detailed masterplanning process at Latton Priory it may become apparent that the required B Use Class employment uses may be better located elsewhere in the masterplan area;</u>

18. The Council is proposing some minor amendment to the Trajectory for Employment Allocations table in Appendix 5 (p245) as follows:

Allocation Reference	Site Address	Total Supply (ha)	2017/18-2021/22	2022/23 – 2026/27	2027/28-2031/32	2032/33
LOU.E2	Langston Road Industrial Estate	1	1			
NWB.E4	North Weald Airfield	10		5	5	
RUR.E19	Dorrington Farm	1.85 <u>0.93</u>	0.94 <u>0.93</u>			
WAL.E6	Galley Hill Road Industrial Estate	1.28	1.28			
WAL.E8	Land North of A121	10		5	5	
Total		23.22 <u>23.21</u>	3.22 <u>3.21</u>	10	10	0