

**EPPING FOREST  
DISTRICT LOCAL PLAN  
EXAMINATION**

**MATTER 12:  
EMPLOYMENT**

**ID: 19LAD0121**

**HEARING STATEMENT**

## CONTENTS

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<b>Matter 12 – EMPLOYMENT</b>	<b>1</b>
Introduction	1
Matter 12: Employment	1

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## MATTER 12 – EMPLOYMENT

### Introduction

- 1.1 This Matter 12 Statement has been prepared by Carter Jonas LLP on behalf of Pigeon Investment Management Ltd (Pigeon) to respond directly to the Inspector's questions for this Matter. The Statement only responds to the Inspector's Questions which are relevant to Pigeon's interests. Representations were submitted to the Epping Forest District Local Plan 2011-2033 (EFDLP) on behalf of Pigeon (Id. 19LAD0121). Pigeon are promoting land East of Epping for a residential-led mixed use development for around 400 dwellings (or greater)(Site Ref. SR-0153), which is generally consistent with the 2016 draft EFDLP (Regulation 18) which proposed at least 930 homes shared between South (not the Regulation 19 South) and East, but with East having a frontage onto Stewards Green Road included to provide independent access to East Epping and south being land east of the railway line. Pigeon has also promoted a more extensive area of land at East Epping based on Garden Settlement principles, replacing the allocation of 950 homes South of Epping. Alternatively, East Epping could in full or part supplement the South Epping preferred allocation.
- 1.2 East Epping has been promoted as a site that could deliver a mix of uses providing added benefits for Epping, including: a range of housing typologies including a high proportion of bungalows and self-build plots; a high quality mixed use community hub which could include a local convenience store and doctor's surgery and car parking to serve the local facilities and nearby tube station; a C2 Care Village; Primary School site; potential leisure centre with sports pitch provision; and an Eastern link road between Steward's Green Road and Stonards Hill which would assist in reducing traffic having to travel through the Town Centre.
- 1.3 The employment related representation relevant to Matter 12 is Rep Id. 19LAD0121–12.

### MATTER 12: Employment

#### Issue 1: Are the requirements of Policy E1 justified, particularly in respect of financial contributions?

*3. Are the requirements of Part A(iii) concerning contributions to local employment training and small business growth programmes justified by reference to the tests in paragraph 204 of the NPPF? In particular, would they be justified in cases where an applicant had successfully demonstrated that there is no reasonable prospect of the site being used for employment purposes?*

- 1.4 Policy E1 A (iii) states that 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. Paragraph 204 of NPPF1 sets out the tests for seeking planning obligations, which are: necessary to make the development acceptable in planning terms; directly related to the development; and, fairly and reasonably related in scale and kind to the development. It is considered that the requirement for a financial contribution towards local employment training and small business growth would satisfy none of these planning obligation tests. A planning application for development that involves the loss of employment space would already need to demonstrate that the site is no longer viable for these uses, and as such it would already have been assessed as acceptable in planning terms. A development for residential use (or any non-Class B employment use) would have no direct relationship with any local employment training or small business growth, and a contribution towards these matters cannot be justified. It is not clear how the planning obligations for training and business growth would be calculated, but it is unlikely that they would be related in scale and kind to any residential or non-Class B employment use. In any event, residential development would be subject to separate and specific planning obligations. Furthermore, most large construction companies involved in the residential sector already support training and apprenticeship schemes and engage with local businesses and contractors, and therefore they already contribute towards training and small business growth.
- 1.5 It is requested that Criteria (iii) is deleted from Policy E1 A.

