

EPPING FOREST DISTRICT COUNCIL: Examination of the District Local Plan, 2011 – 2033



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PRE-HEARING STATEMENT ON BEHALF OF CPRE

MATTER 12 – EMPLOYMENT

MATTER 12: Employment

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

1. There are serious shortcomings, inconsistencies and conflicts within Policy E1 (and, in consequence, the employment sections of Policies SP2 and Policies P1-P15). In particular, the substantial scale of new development sites on Green Belt land for B8 use is disproportionate and far outweighs other employment land use.
2. There appears to be no justification within the Local Plan for this change of policy. As an example the selection of B8 use for the WAL.E8 site appears to be in response to lobbying on behalf of the landowner. The Local Plan does not explain their change of policy in encouraging B8 use when it was discouraged in the current Adopted Local Plan. No account has been taken of the damaging nature of such a development in terms of the environment and local business.
3. Based on the current Adopted Local Plan it is stated that B8 warehousing is considered inappropriate on the grounds that the larger distribution facilities have a low employment density and such developments would not be in accordance with the intentions of the Plan.¹
4. According to the Local Plan submission the components of employment land requirement over the period 2011-2033 are: 2 to 5 ha for Employment land (B uses) required 2016-2033 for offices; and 14 ha for Employment land (B uses) required 2016-2033 for offices: total of 16 to 19 ha remaining requirement to be provided.² The reference to “offices” is assumed to be a typo and likely to include all B class uses. The actual area of land allocated in the Local Plan is a total of 23 ha of which over 90% is allocated to B8 use³ (including over 10 ha at the WAL.E8 site located within 1km of the Epping Forest SAC).
5. The evidence base of the Local Plan states that B8 use at a development density of 40% would achieve 120 - 180 jobs per 2.3 - 3.3 hectares of land (9,400 - 13,300 m² floor space)⁴ equating to around 1 job per 74 - 78 m². This is in fact a vast over estimate of job creation and the Next plc planning application for the WAL.E8 site states an estimate of 175 - 325

¹ EB116 Epping Forest District Adopted Local Plan, para 10.46

² Local Plan Submission version, Table 2.5

³ Local Plan Submission version, Table 3.1

⁴ EB600 Economic and Employment Evidence to Support the Local Plan and Economic Development Strategy - Hardisty Jones, 2015, para 7.3.3

jobs (including seasonal jobs and drivers) for a development of 57,267 m² on 10 ha equating to range of 1 job per 176 – 327 m².⁵

6. The Local Plan refers to a need for over 10,000 jobs to be generated over the course of the Plan period and potential development sites of 16-19 ha of land for B class uses were identified to achieve this.⁶ On further analysis it is apparent that the majority of the employment allocation (around 20 ha) has been allocated for B8 use which, based on the council projections in paragraph 5 above, is only likely to achieve a maximum of 1,090 jobs i.e. 90% of the employment land allocated to B8 use will create 10.9% of job growth. Clearly this is an inappropriate use of precious Green Belt land resources.
7. The substantial allocation of land to B8 use in the Local Plan is not justified and is in conflict with the evidence base that states “*B1a Use Class is forecast to experience the greatest net additional employment growth*”.⁷ In addition B8 space is already the highest proportion of employment land in the district with over 55%⁸ yet the Local Plan fails to provide any justification of why additional land allocation is required. In contrast, according to the Economic and Employment Evidence there was a “*projected decrease in employment*” for Use Classes B1b, B1c, B2 and B8 (industrial and warehousing).⁹
8. The disproportionate nature of B8 land allocation is evident when considering that 55% (88 ha) of employment land in the district already allocated to B8 use and an additional 20 ha is identified in the Local Plan for B8 use. This represents an increase of over 22% land allocation that has very low density job creation. Clearly alternative uses have not been seriously considered for the sites selected for B8 use.
9. The Local Plan states a need for additional space to serve employment markets in the south of the District, including at Loughton and Waltham Abbey.¹⁰ However, the evidence base does not support a case that there is a demand for employment in the Waltham Abbey area. With regard to employment, 79% of the residents aged 16-74 are economically active. This is in line with the District average (79%) and higher than the average for England and Wales (77%).¹¹ Responses to the Community Choices Consultation indicate that the local community is generally opposed to employment land/jobs growth projections. There is a view

⁵ Application EPF/1413/18, Quod Planning Statement, May 2018, para. 4.8

⁶ Local Plan Submission version, para 3.43

⁷ EB603 Employment Review, Hardisty Jones, 2017, para 6.3 Recommendations

⁸ EB603 Employment Review, Hardisty Jones, 2017, Table 5.1 Employment Land by Use Class

⁹ EB600 Economic and Employment Evidence to Support the Local Plan and Economic Development Strategy - Hardisty Jones, 2015, Executive Summary, pg v

¹⁰ Local Plan Submission version, para 2.73

¹¹ EB801 Arup Report on Site Selection (2016), Appendix C, pg C57

within the community that there is too much evidence of empty units, shops and other outlets in Waltham Abbey already.¹²

10. The allocation of land to B8 use in the Local Plan is not justified and in conflict with the Local Plan policy on providing sustainable employment sites accessible by means other than the car.¹³ The largest proposed employment site (WAL.E8) is isolated and not served by public transport. The Next plc planning application for the site requires a minimum of 275 parking spaces.¹⁴ The nature of the B8 development involves a substantial number of HGV movements (over 700)¹⁵ causing traffic congestion, deterioration of air quality and making local roads unsafe for cyclists.
11. The Local Plan Policy E1 is not in accordance with the requirements of the NPPF to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.¹⁶ The amount of proposed B8 employment sites with associated HGV use is not consistent with the NPPF requirement for the Local Plan to support reductions in greenhouse gas emissions and reduce congestion¹⁷ and does not promote the use of sustainable transport modes for the movement of goods or people.¹⁸
12. The Local Plan has failed to take account of the negative impact of B8 employment use developments. Typically they require large parcels of land, low employment density and high volumes of HGV traffic. To comply with the Climate Change Act and reductions in greenhouse gas emissions the government has stated its intention to reduce road freight and increase sustainable alternatives such as rail freight.¹⁹ The NPPF contains a requirement for Local Plans to safeguard bulk transport by rail²⁰ yet there appears to have been no consultation or assessment on this matter by EFDC.
13. The B8 demand arising from the shift of trade from High Street to online is damaging to the local economy and ultimately causes net job losses. The current online retail business model growth as a result of low taxation is unsustainable and the industry has called on the government for reform.²¹ The B8 development proposed for the WAL.E8 site is in fact a

¹² EB801 Arup Report on Site Selection (2016), Appendix C, pg C62

¹³ Local Plan Submission version, para 4.162

¹⁴ Application EPF/1413/18, Quod Planning Statement, May 2018, para. 4.7

¹⁵ Application EPF/1413/18, Quod Environmental Statement, May 2018, 8.6.25

¹⁶ National Planning Policy Framework, 2012, paragraph 17

¹⁷ National Planning Policy Framework, 2012, paragraph 30

¹⁸ National Planning Policy Framework, 2012, paragraph 35

¹⁹ Department of Transport, Rail Freight Strategy, Sep 2016

²⁰ National Planning Policy Framework, 2012, paragraph 143

²¹ British Retail Consortium press release 1 April 2019 "Action needed to protect shops and jobs"

relocation for Next plc who have confirmed they will close existing depots in Thurrock and Hemel Hempstead once the new highly automated development is complete²² resulting in net loss of jobs overall.

14. The Local Plan evidence base does not take account future trends in employment. In particular the impact on warehouse employment that automation is already predicted to have with over 20% of jobs at potential risk by late 2020s.²³
15. With regard to financial contributions B8 employment uses are typically low paid (at or near minimum wage). Whilst EFDC efforts to increase allocation of land for employment use should be encouraged it is clear that B8 use is inappropriate in an area that already suffers from lack of social housing. The salaries on offer from B8 employment would prohibit the workers from either buying or private renting accommodation in the Epping Forest district and they would be wholly reliant on social housing. Further burdens on the local council arise from the need for childcare for the influx of employees for the proposed development and objections have been raised by Essex County Council stating that there are insufficient places to meet the demand.²⁴
16. The Local Plan is not consistent with the requirements of paragraph 28 of the NPPF to support the diversification of rural businesses.
17. In summary the Local Plan is considered to be unsound in relation to the Employment Policies and the disproportionate allocation of land for B8 use.

²² Quod letter to Epping Forest District Council, 23/02/2018

²³ PWC Key Findings: impact of automation (<https://www.pwc.co.uk/services/economics-policy/insights/the-impact-of-automation-on-jobs.html>)

²⁴ Application EPF/1413/18, Essex County Council letter to EFDC, ref: 30214, 27 June 2018