

Matter 12: Employment

This statement considers:

- Retail etc. as employment generators;
- Retail, town centres, sustainable transport and Active Travel;
- Lack of planning for retail, not in accordance with Government policy, contrasted with provision at H&GGT and South Epping, also Epping Forest Shopping Park;
- Job:workers balancing –an imbalance
- Changes to provide a better balance, and viability, of employment areas
- Over-supply of employment

Retail and other defined main town centre uses

Retail and other “main town centre uses” as defined in NPPF can be significant employment generators.

Their town centre nature usually makes their locations easily accessible and sustainable. So a Plan which is meant to be furthering sustainability should make sure it makes allocations accordingly, as well as suitable policy.

The Plan instead concentrates on ‘B’ Class uses for offices and industrial employment.

Paragraph 3.53 sets out estimated retail need over the Plan period and makes an assumption about the proportion of the 39,700sqm (after pipeline development) that should be met outside the District: 40%.

There seems no evidence of the Duty to Co-operate about that provision of that 40% outside the District and where this would be located. Nor what type/s of retail this might be; for anyone to judge whether the 40% assumption of new retail floorspace being met outside the District is appropriate. This should be stated in the Plan.

The Plan also fails to even identify what proportion of the remaining 60%, 23,820sqm. (nearly 2.4ha.) retail floorspace (plus parking where dedicated to the retail floorspace, if not shared parking) should be convenience or comparison. This should also be in the Plan.

Neither does Policy E2 (or any other strategic policy), nor Places policy for a significant town in the District like Epping (with the largest housing allocation); make any land allocations for this retail floorspace, even though both NPPF and NPPG state that anticipated retail need should be identified and met in full in plans (in the same way that OAN for housing should).

In paragraphs 3.33-3.55 the Plan mentions some National policy requirements including:

- Integrating with other policy elements (3.33)

- Holistically assess needs for land or floorspace (3.33)
- Allocate sites to meet a range of uses/needs (3.34)

Despite this, the Plan identifies housing and employment sites, but not retail and other main town centre uses sites; despite laudable intentions to enhance town centres, which retail etc. allocations would do significantly. A lack of allocations for estimated demand is likely to lead to unplanned out-of-town developments as at Langston Road Loughton (Epping Forest Shopping Park) since the last Local Plan and Local Plan Alterations. This is a failure of planning, as is the following about making the right allocations for available sites.

Retail sites need to be considered alongside the allocations the Plan proposes; to ensure that those uses are on the best sites and that the most useful potential sites for retail aren't allocated for another, less appropriate, use. For example the Bakers Lane and Cottis Lane car parks in Epping are proposed for housing and retained parking; whereas their use for retail would greatly benefit the adjacent town centre, far more than just some more housing units (which could more easily be located a little further away- they don't have to be town centre, edge of centre, and can be out of centre/town). Doing that would:

- reduce the need to travel for shoppers (and shop workers);
- provide opportunities for linked shopping and work-shopping trips (where employees work in or near the town centre);
- reduce harmful emissions;
- encourage Active Travel with its health non-congestion benefits; and
- through potential shared-use parking make the best of available parking space and urban (non-greenbelt) land.

The employment potential of retail, and other defined main town centre uses, should be recognised:

- as an employment source in addition to B Class office and industrial employment; and
- providing local employment to new residents whose homes will be on new land allocation sites; helping the jobs:workers balance and thus reducing the need for resident workers to travel, c.f. to out-of-town stores, or other towns. It would also help new residents as customers/consumers.

Even where there is a clear opportunity for allocating retail space the Plan misses it. The Plan refers to the St. John's Road site in Epping; and to the brief that mentions an unspecified amount of retail there. However, this is not a Plan allocation and given some thought has obviously been given to retail at that site it should be specified and allocated in the Plan.

Retail, especially where car parking is dual use / shared with other uses, need not be land hungry. Also, retail over ground and mezzanine floors has been accepted now by the industry in new buildings (whereas previously retail developers resisted more than one storey buildings). And housing above retail has become far more common (so single use retail sheds are no longer a requirement).

Inconsistencies in planning for retail, and other main town centre uses

A) The Plan makes much of the provision of (very) local facilities, including retail in the new housing allocations comprising parts of Harlow and Gilston Garden town (H&GGT) and the benefits of comprehensively co-locating these sustainably, making places. Retail is specifically mentioned in both SP4xiv and SP5B..

But the Plan fails to make provision for retail allocations elsewhere. It does not show how the amount of retail, it assumes the need for which won't be met outside the District, will be provided; nor give the amounts of convenience and comparison retail space predicted over the Plan period. The Plan doesn't even set out how much of the predicted retail demand will be met in H&GGT and Masterplan Areas, i.e. where it is making provision for retail etc..

B) The Plan also requires a new neighbourhood centre in the South Epping Masterplan Area to include retail use (Policy P1 K.ii).

But it doesn't allocate any retail sites in Epping Town Centre ("one of the District's two Town Centres" (para. 5.8).

C) The Plan (5.11) mentions St. John's Road site in Epping, including a brief which "will provide increased retail" (amount unspecified). However, this is not a Plan allocation: it should be, especially given the lack of retail allocations elsewhere in the Plan. Instead EPP.R4 is allocated for housing! Para.5.21 states the town centre's retail offer will be enhanced: but how, if the Plan can't even allocate some of the predicted retail need to "one of the District's two Town Centres"?

D) The Plan praises the 'virtues' of Epping Forest Shopping Park, even though it is acknowledged as out-of-town (Plan paras. 5.26 & 5.28) and out-of-centre. According to the Plan, the Shopping Park "represents a significant positive opportunity... providing a broader retail offer with larger scale comparison shopping opportunities than currently offered elsewhere in Epping Forest District" (para. 5.28).

These show complete inconsistency in planning for retail and other "main town centre uses" provision over the life of the Plan.

One can see that an absence of retail allocations would allow the Council as a landowner (or others) to make planning applications for money-spinning out-of-town developments: as with Epping Forest Shopping Park. The Plan says (para.5.39) that "Loughton... benefits from Epping Forest Shopping Park as an out-of-town Retail Park" (my emphases). Plus, paragraph 5.28 quoted above does say better "opportunities than currently offered" (my emphasis). And the Plan isn't doing anything better than that "currently" when it could Positively Plan to do so: meeting Objectively Assessed Need (OAN) for retail in the same way as it is expected to meet OAN for housing (as per Government guidance).

Even where the council has a brief, including retail, for a site within its control (St. John's Road, including Council Depot), the Plan is silent in making an allocation.

The Local Plan Alterations didn't include new retail allocations, nor for housing or other employment, due to awaiting the outcome of the then Regional Plan. It has taken the years until

now for a plan to come forward with new housing and employment requirements (and sites), but while identifying retail need figures it doesn't apportion these or make allocations for them.

Jobs: workers balancing – an imbalance

A jobs:workers balance seems to be an overall aim of the Plan in terms of new homes and job numbers, although with some extra employment over housing provision. But any such balance hasn't been applied to local areas/towns. While it may be the case that some current residents commute out of the District to work and that some workers employed in the District commute in from homes outside it; nevertheless it makes long-term sustainability sense to make provision for a balance of employment premises and homes in the District, to reduce the NEED to travel. This is accepted wisdom. Also, as travel routes are likely to become more congested, and the costs of travel if anything also to increase (both financial and environmental) planning for this future will make the District's residents better off, more productive, and healthier.

Most current employment sites, whether in active use at the moment or not, should be retained in places like Epping to provide jobs for the occupants of the extra housing the town will get under the Local Plan. But the Plan only proposes to retain some current employment sites, other going for housing, obviously adding to worker numbers: adding to the jobs:workers imbalance and thus the need to travel; such travel being over distances so additional car use (with more congestion and pollution) will result.

While spreading new housing sites around settlements in the District, the Local Plan's approach is to provide major new employment land at Waltham Abbey and North Weald. Thus new residents are likely to have to travel, mainly by car. This will add to currently already bad road congestion; and to pollution which the Plan knows is already harming trees in the forest (particularly the SAC).

Even if commuting can be by relatively sustainable means (like bus or Underground/rail), that is still not as sustainable as reducing the need to travel; an aim of Government planning and sustainability policy.

Walking or cycling to work, short distances e.g. along relatively quiet roads in Epping, will be: generally more sustainable (environmental, social, and economic aspects of sustainability); better for health, exercise and well-being; quicker, giving more time for community/social activities and better looking after children (or neighbours/the elderly); less polluting; producing less congestion (which helps everyone, including those who have to drive!), etc.. Where Active Travel is possible, it should even help increase productivity, a known problem with the UK economy, and raise net personal income levels. What's not to like?

It is true that the Plan envisages redevelopment of protected employment sites to achieve a higher jobs density, but this seems doubtful for such sites in Epping. It seems that the modern and intensive offices at Falconry Court, which are allocated as retained for employment, might be instead lost to housing under permitted development. One site ripe for redeveloped for a more intensive employment use would be the Epping Laundry site at Bower Vale (EPP.R9); but that isn't being protected.

It is the case that the Plan, for example, says in its Vision for Epping that “New commercial and employment uses will be encouraged...” (Vision, page 115). But that is just a vision: there are no policies to achieve this; which if realised could improve the jobs:workers balance. Instead, what the Plan actually does in its policies (not vision) for Epping is to allocate existing employment sites (jobs) for housing (more workers) and a major new allocation for homes (workers) without one for employment (jobs). That is even though the South Epping Masterplan Area is anticipated to include a neighbourhood centre etc.: the number of jobs in which will be comparatively few.

Changes to provide a better balance, and viability, of employment areas

Achieving a better jobs:workers balance locally for settlements in the District doesn't mean fewer homes allocated in the Plan. Housing allocations, e.g. the Bower Vale site, could instead be made on sites (or parts of sites) allocated for employment in a part of the District where homes for more local workers would reduce commuting / travel by unsustainable means. I know from the Arun Local Plan Inquiry Statements that landowners of new employment sites favour some housing as part of mixed use development (which they could plan so it is near to new B1 premises, at the edges of employment areas, not near disruptive B8). Their argument is that some housing makes an employment allocation more viable and more likely to be brought forward (e.g. generating money for roads and services connections). They also say that employers increasingly see the benefits of having homes close to jobs as it makes life easier for their workers. So they see the advantages of balancing jobs and workers, even if the Plan doesn't. And they also see the benefits of what EFDC calls active travel.

Over-supply of employment

The Plan deliberately provides for an unquantified over-supply of employment land (para. 2.71, page 30), without any more of a convincing reason than it should do for an oversupply of housing. This contrasts with a complete undersupply of retail: a lack of any allocations.

Assuming it is achieved, that will lead to greater demand for growth in housing and employment in plan reviews/future plan periods; such is the way OAN /need calculations are arrived at. In effect it 'bakes-in' growth into future requirements. This will inevitably result in further Green Belt land take.

The employment oversupply in the current Plan does however allow some room for manoeuvre in balancing jobs and workers (housing provision) to make a more sustainable Plan. I.e. some employment land allocations could be exchanged for housing; both to help meet the high housing requirements and to better balance jobs and workers in settlements.

Such a loss of employment allocations is not essential to obtaining a better jobs:workers balance; swapping them around would help. But if circumstances dictate, e.g. achieving a sensible housing supply trajectory, it provides an option for a way forward.

An oversupply of employment land allocated in the Plan, together with the marked absence of retail etc. allocations, can be expected to lead to out-of-town/out-of-centre planning applications for retail. Epping Forest Shopping Park provides a recent example. This would obviously contradict Government 'town centres first' policy. But the Plan sets up this situation by its failure to plan properly.

Instead, the Plan could have: allocated retail etc. to designated town centre sites, instead of adding housing allocations there; moved the housing allocations to existing or new employment sites (or parts of them, as above) not near town centres; with employment 'lost' in this way coming instead from the new retail provision (or some loss being accepted as there is oversupply).