

CHELMSFORD DRAFT LOCAL PLAN EXAMINATION

HEARING STATEMENT - AQUILA DEVELOPMENTS LTD

RELATING TO EMPLOYMENT ISSUES :

Matter4 : Objectively Assessed Economic Development Need

Context

Aquila's submissions at the regulation 19 stage express concern as to the adequacy of the Plan's employment allocations. This has been reinforced by updated material produced by the Council in the interim, as explained in this and an associated Statement, which supplement the original submissions with specific reference to the Inspector's questions.

Matter 4: Soundness of OAEN

Is the Plan clear in defining what the OAEN is ?

Aquila note the 725 jobs requirement set out in the Plan & can only assume that the Council consider that this represents the OAEN, sourced from the East of England Forecasting Model.

It is also assumed this represents a net figure which allows for variation between employment sectors but which cannot sensibly be disaggregated on a sector specific basis.

How has the jobs figure been converted to floorspace/ justified?

In this respect EB080 from June 2018 only provides a partial answer and warrants further detailed commentary. Thus:

- The Tables at 1.5 and 5.2 of EB080 clarify that in the Council's mind the strategic employment & retail allocations in S8 together amount to some 5349 jobs overall, or 233 per annum over the plan period, with the balance of the target attributable to other sources.
- The conversion of jobs to floorspace embodied in the allocations needs to be scrutinised on this basis but is intrinsically linked to the calculations made to estimate the contributions which these other sources make to the jobs total.

It is helpful that the Council append the HCA Employment Density Guide since application of the figures in this expose the nature of the assumptions which have been made about job creation and reinforce the lack of robustness in the Council's position:

- Despite the statement in S8 that allocations relate to 'business employment floorspace', in reconciling floorspace & jobs all of the B Class employment allocations are estimated to provide office floorspace delivering the maximum employment potential (at a ratio of circa 1 employee per 12 sq m). This is manifestly at variance with the reference to wider business use or indeed with any reasonable expectation in the real world since Chelmsford will simply not support that scale of pure out of town offices but will, rather, cater for a range of B class & sui generis uses in any large business park location. (with the existing Chelmsford Business Park already being an example of this), as detailed in the ELR. If R&D/ 'High Tech 'or light industrial ratios are included in the mix, overall employment generation will be much lower.

If B8 were to be included in addition (as is likely to happen in practice) figures will fall further still.

- Equally the 'existing commitments' elements of the equation is largely made up of Greater Beaulieu Business Park, to which an office ratio of 1/12 sq m is again applied despite this having been promoted / assessed at application stage simply as B1. Quite aside from deliverability considerations (as noted elsewhere) its contribution to employment growth is clearly overestimated.
- The same pattern of overestimation continues when the employment potential of existing vacancies is assessed. For example under retail, retail warehousing vacancies comprising a significant portion of the vacant stock are attributed ratios associated with high street retail.
- For new retail much of the job growth comes from the application of the 11500 sq m floorspace figure in Policy S1 which simply represents an expression of the total convenience retail requirement. Whilst it is anticipated that some proposals to meet this need will come forward (as detailed in separate submissions) there are no proposed allocations linked to this and as such inclusion of the whole figure to meet job targets is clearly questionable .

On this basis it is readily apparent that at every opportunity the most optimistic assumptions possible have been made in order to reconcile floorspace & jobs targets: both with reference to the existing baseline & to new allocations. This is plainly not a sound basis on which to plan, particularly when considered in tandem with deliverability constraints.

Does the OAEN reflect the economic growth ambitions of the area?

Based on the Evidence Base to date it is difficult to fully understand the relationship between the stated OAEN and growth ambitions and in the interests of transparency the Council or its consultants clearly need to explain this more fully. This should include a recognition of the need for flexibility in the derivation and application of job targets to cater for all relevant employment sectors.

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