

CONSULTATION ON ADDITIONAL EVIDENCE IN SUPPORT
OF THE FYLDE LOCAL PLAN TO 2032

August 2017

This is the consultation response of A.L. Guest of [REDACTED] Warton.

The response is set out as follows as follows:

Summary Comments

Section A addresses the Fylde Council document: Consultation on Additional Evidence in Support of the Fylde Local Plan to 2032, August 2017.

Section B addresses the Fylde Council document: The Objectively Assessed Housing and Economic Development Needs and the Fylde Local Plan to 2032.

Section C addresses the Fylde Borough addendum (to the SHMA): Fylde Addendum 3 Analysis of the OAN in the light of the 2014-based SNPP and SNHP (Turley, May 2017).

Section D addresses the Amion Consulting document: Independent Assessment of the Economic Prospects of Fylde, May 2017.

In each of the above sections the paragraph references relate to the document being addressed in that section. To avoid repetition some comments will refer to responses in a different section.

Appendix 1 is an e-mail exchange relating to development of the Warton EZ.

Appendix 2 covers points raised at the EiP regarding employment land.

A.L. Guest

15 September 2017

Summary Comments

I spent half a working lifetime as an engineer engaged in collecting, interrogating and interpreting data and using models to predict complicated behavior in an industry where the accurate prediction of performance and safety boundaries was critical. I spent the second half of my career negotiating and drafting demanding IT service agreements. As a result, I developed a profound respect for numbers and words: what they represent and how they should be used.

It is therefore frustrating to be faced with planning documents that scatter words like 'robust' and 'objective' around the text without apparently understanding what those words mean. The planning documents in general, including this further evidence, use statements in a way that is more consistent with a sales brochure than a plan. To say that the Local Plan will 'significantly boost the delivery of housing' is actually delusional. For the last quarter of a century developers have failed to build in Fylde anywhere near the number of houses for which permissions have been granted in Local Plans, even during the 'moratorium' period. The number of houses built will be dictated by real demand, not imagined demand.

Even more distressing is the way that evidence and data is selected and used to model the future, whether assessing employment change or housing need. None of the normal processes and checks that one would normally associate with a competent and professional objective assessment appear to apply. At every turn evidence and data is selected and used to generate a raised housing requirement 'for the sake of prudence' rather than to objectively assess the need. It is not clear what is prudent about overestimating the housing requirement year after year, Plan after Plan. It is an abnegation of planning. Past errors are never recognized or corrected. Instead they are crystallised as a shortfall and carried forward into the next Plan.

Fylde Borough Council is principally responsible, together with its consultants, for this Plan and its failings but it would be unfair not to recognise the baleful influence of central government that ensures that true objectivity is very difficult to achieve whether through the deficiencies in the affordable housing calculations, the polyanna advice on changing headship rates, or the general presumption in favour of development.

On any objective basis, this Local Plan is unsound. The additional evidence presented here by Fylde, far from improving the quality of the Plan, has revealed it to be even less soundly based than was apparent before.

It is profoundly to be hoped that this Plan will be rejected by the Inspector. The planning implications of a rejected plan may not be pretty but the longer-term consequences of accepting a Plan of such poor quality as if it was sound are even worse.

Section A

Consultation on Additional Evidence in Support of Fylde Local Plan to 2032

Para 2.2 The SHMA Addendum 3 has not provided sound evidence supporting an OAN of 410-430dpa. The selection and use of data to derive this figure is flawed and no credible justification is provided for selection of OAN-critical data beyond an implied justification that it will lead to a larger OAN, (to be prudent). Please see my comments on Addendum 3 in **Section C**.

Para 2.3 The job growth issue is covered in **Section D**; suffice it to say here that the quoted job growth estimate does not derive from an objective consideration of the information available.

The market signals show no pressure on housing at either end of the housing market. Summary presentation of the market signals in table 5.8 of Addendum 3 is highly misleading. The base data show little housing pressure and falling rents. A fuller account of these issues is covered in **Section C**.

Para 2.6 The Local Plan cannot 'significantly boost the delivery of housing' or contribute to 'a significant uplift on the long term historic rate of delivery'. These results are driven solely by the housing market, over which the Council has no influence.

In each of the last 20 years and more, even during the much quoted moratorium period of the JLSP, there have been vastly more permissions signed off for houses to be built than the builders have actually built (from Fylde Borough Council's own figures). Builders have also consistently delivered at slower rates than were quoted when they applied for planning permission. The Council has regularly reduced the target proportion of affordable housing to a fraction of the figure required by the Council's then relevant planning policy.

The Council has repeatedly demonstrated that it is powerless to dictate how many houses will be built and of what sort. You might argue that it doesn't matter because in the end builders will only build houses they think they can sell. You would be wrong because every time the Council overestimates how many houses are needed in its Local Plan, the excess is hung around the neck of the next Local Plan as a shortfall. Not recognized as a mistake made by planners with a long history of serially overestimating the requirement, but a shortfall. The effect is to grossly distort the planning process.

- 2.8 The affordable housing need is addressed more fully in **Section B**. It is enough to say here that, for all practical purposes, the need for affordable housing is addressed significantly in Fylde by the private sector with the result that the affordable housing backlog (as set out in the SHMA) is very low (representing a requirement for 4 new affordable dwellings p.a. over 5 years). The Government's approved calculation of affordable housing requirement excludes private sector contribution and therefore does not reflect the position in Fylde. The misrepresentation, of affordable housing need significantly distorts the planning process.
- 2.9 The conjunction of the expressions 'degree of uncertainty' with 'reasonable to assume that' in this paragraph sums up many of the problems with this Plan. **Section D** addresses the issue of jobs growth prediction. Suffice it to say that the main issue in Fylde over the coming Plan period is to mitigate job losses.
- 2.10 The statement in this paragraph (suggesting that the Enterprise Zones will drive employment growth to the upper end of the imagined employment growth range) is inconsistent with the statement in 2.11. which says their effect should be ignored. The reference to 'historic economic profile of Fylde' is also bizarre as an apparent indicator of jobs growth since the major sectors have shown long-term job losses.
- 2.11 See above. This paragraph perpetuates the misunderstanding about the role of the Enterprise Zones. To be clear: the purpose of the Enterprise Zones is to create jobs to mitigate known and planned significant job losses. Their purpose is not to contribute to employment growth but to reduce employment loss. The current failure of the EZs (in particular the Warton EZ) to generate target job growth does not represent a failure to create job growth in the Borough, it represents a failure to mitigate job losses. The failure of the Warton EZ alone (a matter of record) has a negative impact of the same order over the plan period as the Amion Report's (unsupported predictions) of job growth.

All the evidence suggests that, at best, (if the Enterprise Zones perform to meet their targets) the Borough might be able to mitigate its long trend of job losses but none of the evidence presented shows how that might happen or what the Local Plan can do to impact it.

- 2.13 The target set out in the legislation creating the Lancashire Enterprise Zone did not just have a long-term goal to create 4-6000 jobs across the two sites. It also had a stated short/medium term goal to create 1200 jobs (which were assumed to be split more or less equally across the Samlesbury and Warton sites). In considering job loss mitigation (let alone job growth) in the Borough it seems dishonest to ignore the failure to achieve short/medium term job goals. This is hard evidence and should be treated seriously.

- 2.15 Contrary to the assertion of ‘maturing proposals’ contained in this para, the evidence obtained by Warton parish councillors from the Lancashire Enterprise Partnership representative (the LEP is responsible for the Lancashire Enterprise Zone) is that there are no current plans at the LEP or BAeS to progress the Warton Enterprise Zone. See **Appendix 1**.
- 2.18 This paragraph misrepresents the position. The Enterprise Zones have been set up to reduce the extent of job losses in the Borough (and there is no evidence yet that they will) not create net additional jobs.
- 2.19 This paragraph states that, on the basis of ‘robust’ assumptions the higher level of job growth predicted by Amion (itself a fanciful projection in the circumstances) could be met by 325 dpa, and then:
- 2.20 This paragraph says 415dpa provides a significant level of headroom (indeed it does nearly 30%).
- 2.21 This paragraph correctly states that the Housing Requirement figure of 415 dpa *represents a step change in historic housing delivery and provides a significant uplift from the demographic starting point...and.. adjusted demographic starting point..* One would think that such departure from historic housing delivery (ie hard historic evidence) and demographic projections (reasonably firm evidence) would only be contemplated on the basis of equivalently hard/firm evidence that significant change is at hand. Nothing presented by the Council or its consultants remotely meets this simple test.
- 3.15 This paragraph asserts that previously developed sites ‘are not widespread in the Borough’. This is not true and exposes once more the Council’s failure to comprehend what is happening to the Borough’s employment land. Overall, despite the large secure aircraft and nuclear sites being understandably inflexible about reducing employment land as the workforce reduces (although it does happen, as in the case of the BAeS “Marconi site”) it is the case that the total amount of land used for (industrial and business) employment in the Borough is progressively reducing. New employment sites are opened each year but a larger amount of land is released from such employment use. This is classic previously developed (or brownfield) land. The Borough produces it and much of it is suitable for housing. It is difficult to identify plots in advance but the records show that the quantity of it materially exceeds the take up of new employment land.

If one takes the Council’s prediction of new employment land required over the plan period of 61ha (ignoring the notional Blackpool requirement) it is implied that some 70ha of previously developed land will be released from employment use as previously developed land during the plan period. **Appendix 2** explains, in terms of the discussions at the EiP why this figure is too high.

Section B

Objectively Assessed Housing and Economic Development Needs, Fylde LP

- 4.1 The Amion Report cannot be regarded as a genuinely independent piece of technical evidence. Please see **Section D** for comment on the Amion Report.
- 4.4 A more objective analysis of the historic trends, predictions and Enterprise Zone performance would indicate, at best, flat levels of employment with a greater likelihood of continuation of continued decline in employment levels. As explained in **Section A** (response to para 2.11), the failure of the EZs to meet their targets crystallises the planned job losses they were set up to mitigate.
- 5.1 The population and household projection baseline and modification assumptions made are flawed. The numbers quoted in this section are therefore wrong. Please see **Section C**.
- 5.2 The figures quoted in this section are wrong please see **Section D**. It is interesting that, while modeling was roundly rejected (for apparently producing the wrong numbers) in the case of employment land requirement, it is fully embraced for the task of predicting employment growth.
- 5.3.2 The statement in this paragraph that no robust challenge was made to the calculated need for affordable housing during the EiP is wrong. The affordable housing numbers were strongly challenged in at least two respects:
- i) It was noted that, in the SHMA calculation of affordable housing need, the starting point (ie the backlog of affordable dwellings at the start of the Plan period) was just 20 dwellings. In the subsequent calculation of need this backlog was assumed to be recovered over a period of 5 years at just 4 affordable dwellings p.a.. The question raised at the EiP, which still remains unanswered, was how did we end up with a backlog of just 20 dwellings when during the previous decade the published annual affordable housing requirement averaged around 400dpa (it peaked at around 600dpa) and far fewer than 10% of this number were ever delivered? If the adopted affordable housing requirement numbers were correct, we should now have a backlog of several thousand affordable homes. The disparity is extreme and, since it has a dramatic effect on planning strategy a robust, detailed and evidenced explanation of that disparity is required.
 - ii) The issue of private rented sector provision of affordable housing was also raised at the EiP. Paragraphs 9.35 to 9.41 in the SHMA show that a greater proportion of the Borough's affordable

housing need is met by the private rented sector (renting to tenants in receipt of housing benefit) than is met by social housing providers. The SHMA provides sufficient detail to allow one to amend the affordable housing calculation by including private rented provision. If one assumes the same level of churn in the affordable private rented stock as in the social housing (not an unreasonable assumption) to generate dwellings availability, then the amended calculation shows that rather than there being a shortfall of over 200 affordable homes per year, there is an excess of over 100. There needs to be an explanation of why the Council is putting forward numbers that ignore the private sector contribution.

Affordable housing comes at a cost. The cost is that it raises the price of all other open market dwellings through its subsidy mechanism (driving more people into the affordable housing sector). The continued failure of the Council to secure from developers the levels of affordable housing contribution set out in planning policies also suggests that the quoted affordable housing need is not viable. This is unsound planning.

- 5.4 The data on which these conclusions are based have been cherry picked and misrepresented. There is no sign of material market pressure and, in some areas, signs of market slackening. The idea that a random 10% should be added to the OAN on the basis of these data is troubling. Please see **Section C.** for further review of these issues.
- 5.5 Declaring a figure to be objectively established does not make it so. The derivation of the proposed OAN range has been based on such a selective, and incomplete consideration of the available data that it can have little credibility.

Section C

Fylde (SHMA) Addendum 3, Turley May 2017

This addendum reaches conclusions regarding employment growth based on the report by Amion. The conclusions are wrong for the reasons covered in **Section D**. Other issues do need to be covered.

- i) In considering population growth Addendum 3 starts from the position that ONS/DCLG serve to underestimate the projected housing need for Fylde. This position is undermined by the fact that the ONS declared a UPC (unattributable population change) to correct its previous estimate of Fylde population with a material reduction (890). Addendum 3 assigned this UPC to migration (without any evidence) although the ONS had themselves declared it unattributable.
- ii) The paper uses a 12 year base to establish population trend growth rather than the recommended 10 year base to include an additional year with high population growth ('for the sake of prudence') Figure 3.1 Addendum 3. This data manipulation is not an isolated example and undermines any notion that the OAN is objectively assessed.
- iii) Headship rates for young adults have been assumed to recover to previous levels, despite a long term trend reduction and recent changes to the benefit system that will tend to drive them further down. The effect of this assumption is to increase estimated household formation rates without the slightest evidence that these headship rate trends will reverse.
- iv) The Addendum assumes a level of inward migration set at the historic maximum rather than the historic average level. Projecting the maximum level (especially of a feature that fluctuates extremely year on year) is a serious misuse of the data (Fig 4.2). The effect of this error is to increase population and housing projections.
- v) The Addendum uses the lowest recorded value of unemployment in the Fylde (3.3%) as its predicted average rather than the actual average or trend figure. As in the case of iv) above this is a misuse of the data.
- vi) The addendum uses the upper end of the Amion jobs growth scenario despite it being based on very poor data (see **Section D**), flying in the face of all historic trends and the manifest and long-term failure of interventions (the Warton and Blackpool EZs). The Addendum repeats the error seen elsewhere of failing to recognise that, even if the EZs were successful (and the evidence is against it) they would partially reduce job losses at BAeS and Blackpool International Airport not provide additional jobs.

- vii) By virtue of the above assumptions (and others like market signals), none of which appears well evidenced, the Addendum raises the 'objectively assessed annual housing requirement number' from 274 to in excess of 400. The overriding impression is that every opportunity is taken to raise the housing requirement rather than establish a well evidenced figure. Objectivity does not shine through the process.

While the above processes seem at best disrespectful of evidence and data, the Addendum's review of Market Signals also needs some close examination. In particular the presentation of the market data on a ranking basis (Table 5.8) leads to some misleading presentation of the underlying data.

- viii) The figures for house price changes show that price levels in Fylde are relatively high on a regional basis but have followed trends that are similar to its neighbouring boroughs, i.e. reflecting a reduction since 2008 (Fig 5.1 Addendum 3) although, apparently rising in the last couple of years. This is consistent with the long-term character and population profile of the Borough.
- ix) Rents have been flat or fallen slightly, suggesting that accommodation pressures are very low.
- x) It should be noted that in its selected market signals summary, Table 5.8, Turley presents Fylde as number 3 (out of 6) for lower quartile rent changes (on a scale where 1 is highest market pressure and 6 is lowest). This amounts to misrepresentation since all the regions are recorded in Fig 5.3 as having the same value of 0% increase apart from Preston (4%) and England (5%). So Fylde should be shown as 6 along with the other 0% regions.
- xi) Fylde is shown to have the highest reduction in affordability in Table 5.8. However a look at the data (Fig 5.4) shows that it is very random and very sensitive to the trend period selected. If one took the period from 2000 to 2015 the affordability change would be 55% rather than the 82% shown for the period from 2001 to 2016. This would put Fylde at 5 in Table 5.8 rather than 1, as shown. In the year from 2015 to 2016 house prices and salaries did not change significantly in the borough. So the data need to be treated carefully.
- xii) If we look at the data on overcrowding, homelessness and concealed families we see we can see that compared to the wider region and nationally Fylde has substantially lower housing pressure markers.
- xiii) The only outlier signal was the price of building land. This, as the report admits, was information provided on the basis of a single sale that was completely at odds with the land price assessments made by local stakeholders and experts and appears, rightly, to have been discounted.

In summary the market signals are relatively benign both in absolute terms and in comparison to national and regional trends. The decision to use these signals to justify a 10% uplift in the OAN defies all logic. One of the most powerful indicators of housing availability is expressed in rental prices, which are flat/falling in the evidence gathered. This key evidence, along with other benign indicators seems not to have been properly weighted in the bizarre decision to apply an uplift to the OAN.

Looking at the Addendum as a whole, it does not use the available evidence in an objective and balanced way. Instead, each area of study is scoured for extreme data points. Maxima and minima are carried forward as averages. Benign or moderating factors are ignored. A long history of over-estimated housing need has not caused anyone to stop and think about previous failures in methodology. In no serious field of endeavor where life or business survival was at stake would any responsible, and moderately numerate, person accept the methodologies in this Addendum as an objective assessment of need, within the normal meaning of those words.

Section D

Amion Report

This report, by Amion Consulting is an attachment to the Fylde (SHMA) Addendum 3 covered in **Section C**. There are a number of points to be made about it.

- i) Firstly it needs to be recognized that this cannot reasonably be called an independent piece of technical evidence or an independent assessment of Fylde's economic prospects. It has been commissioned to review an existing body of work (by Turley) within a tight timescale. It appears to be entirely reliant on the information gathered and selected for that previous body of work and no provision appears to have been made for extensive re-working of the previous report by Turley had the Amion report raised material criticism of its approach. Indeed both Addendum 3 and the Amion Report were presented to the Inspector together in response to queries raised during the Local Plan Examination and, without wishing to criticise either party, working as they were against tight timescales, it is difficult to see how they could not have interacted at a level that would certainly stretch my definition of 'independent piece of technical evidence'.
- ii) It is very clear from the data presented in this report and from previous studies that employment is difficult to predict. The natural inclination seems to be to predict increases in employment. In 2006, based on economic modeling by Cambridge Econometrics, GVA Grimley's 'Employment Land Review' for FBC predicted employment growth of 4,650 jobs by 2015 (despite acknowledging a trending fall in employment upto 2005). The SHMA tells us that between 2001 to 2012 there was a 1.2% fall in employment. The perception 'on the ground' is that in addition to a serious downturn in manufacturing jobs, the large regional offices that used to be based in Fylde (typified by Land Registry and Guardian and banks) have disappeared as technology has allowed businesses to shrink back from the regions. Replacing these large employers will be difficult and it is clear that the Enterprise Zones are not performing as promised (the promise being that they would mitigate a proportion of the job losses – not increase employment).
- iii) The Amion Report shows that even the historic record of employment levels in the Borough cannot be represented by the different consultants used and ONS BRES (Business Register and Employment Survey – which covers the historic record) in a consistent way. Cambridge Econometrics, Oxford Economics and BRES broadly agree on the historic shape of the employment change trends (fig 2.3, fig 2.4, Amion Report) but differ quite significantly on actual values at specific points. Experian does not even reflect the same trends as the rest.

More seriously, in the case of Experian, its trend characteristic differs significantly from the other three. In particular, and critically, it systematically fails to register any of the significant falls in employment, apparently as a result of its smoothing process. The result is that at the end of any given estimation period, Experian assessments of employment are always higher (because they haven't properly reflected falls in employment). This is even more apparent in fig 3.3 of the Amion report combining historic and forecast employment in Fylde, where the Experian forecast is significantly adrift from that of Oxford Economics and Cambridge Econometrics. The latter show virtually no net growth in employment between 2015 and 2031 (steep fall followed by slow growth) while Experian shows a growth of over 3000 jobs. Given that Experian fails to reflect the ONS-BRES trends and clearly fails to reflect the historic record, its use leads to significant flaws in the estimation process.

- iv) In paragraph 3.5 of the Amion report it is stated that all forecasts appear equally valid. This statement cannot credibly be reconciled with the substantial difference between Experian, the other forecasters and ONS - BRES in terms of both employment history and forecasting. The Experian methodology is demonstrating a clear and systematic failure to take account of job losses (even those we know to have occurred) and is not, in its present, form representing the Fylde economy sufficiently robustly. In all modeling, a model is always checked against its representation of known events (history) to ensure a sufficient match before being used to predict the future. Until the Experian model is capable of adequately representing known history it should be rejected. The reference in paragraph 3.5 to the South Worcestershire Inspector's judgement on averaging makes sense in the context of a range of data scattered around broadly similar trends. Indeed it is clear from reading that Inspector's report that this statement by the Inspector was not airily pronounced as a principle but concluded following a very close look at the data and the modeling by himself. When he said that all the forecasts were valid, he had looked at the forecasting and reached that conclusion in that case. It is clear that the Experian data, with its systematic errors, is clearly outside the scope of any sensible averaging process and there is no reason to believe that the South Worcestershire Inspector would not himself have rejected it on scrutiny. The true job growth forecast between 2015 and 2031 as indicated by the averaging of the Cambridge Econometrics and Oxford Economics data is close to zero, not the 1584 quoted in para 3.5.
- v) The Amion report introduces some sectoral analysis in section 3.2. This compares the relative strength of a sector in the Borough with the situation nationally as an indication of the sector's competitive strength. The manufacturing sector (principally BAeS) has a high 'location quotient' representing a high competitive advantage implying that it will do better than its sector will do nationally.

Unfortunately, while this approach may have a theoretical elegance, it quickly collapses in the face of the local facts on the ground:

- a) the BAeS Warton site has one unique, locational strength; it is an airfield;
- b) the site's major weakness is its distance from the M way network;
- c) much of BAeS' capability, including manufacture of major aircraft sub-assemblies, has been transferred to its Samlesbury site next to the M6 motorway;
- d) the principal reason that BAeS has continued to use the Warton site is to undertake final assembly and flight testing of its military aircraft. Beyond the contracts for delivery of its current Typhoon model that will be concluded in the next few years (certainly less than half way through the Local Plan period), there will be no more final assembly at Warton. Even maintenance and major aircraft upgrades have been moved from Warton to RAF sites as a cost saving measure.
- e) critically, when some years ago, the UK entered the joint development programme for the next generation of military aircraft (the F35) with the U.S and Europe, it did not insist that final assembly and flight testing of the aircraft to meet the UK and European requirement should take place in the UK (at Warton) so those tasks went to Italy. As a result, after delivery of the final batches of its existing Typhoon models, with no new aircraft programme to follow on, final assembly and flight testing will cease at Warton. This might have been a good business decision for BAeS who will continue to manufacture F35 components at Samlesbury, but it is a disaster for manufacturing in Fylde. BAeS and the UK aircraft industry can and will thrive nationally and even in Lancashire at the same time as there is a steep decline in manufacturing in Fylde through the plan period.
- vi) The Amion report mentions the Enterprise Zone at Warton and makes the point that the AECOM Employment Land study 'recognized this as a key intervention' .

When the BAeS EZ was set up (on both the Warton and Samlesbury BAeS sites) it was with the intention of offsetting the planned BAeS job losses. According to the LEP (Lancashire Enterprise Partnership) that sponsored it, the combined EZ was expected to attract 1200 new advanced manufacturing jobs in the short to medium term and 6000 in the longer term. The jobs were expected to be split equally between the Warton and Samlesbury sites. So 600 new jobs at Warton in the short term leading on to a total of 3000 (to replace jobs lost from the BAeS business). That prediction was made 6 years ago and FBC have made much of it in their planning strategies (without apparently looking too closely at outcomes).

I have attached as **Appendix 1** a recent exchange between a Warton parish councilor and a member of the LCC who is also the interface to the LEP. A total of 27 jobs have been created on both sites over the 6 years. The split between Warton and Samlesbury is not available (information generally on EZ progress or lack thereof has always been difficult to acquire). We must assume that the jobs created at Warton will be in single figures since interest in the Samlesbury EZ has been much higher than for the Warton EZ due to its better M-way links. In fact Fylde Borough Council have stated, in this additional evidence, that no jobs have been created in the Warton EZ. The exchange attached as **Appendix 1** seem to make it quite clear that there are no existing plans to develop the EZ at Warton.

- vii) The approach taken to estimating the amount of employment land required was to use the long term average (following rejection of a range of job modeling exercises based on Oxford Economics forecasting). A similar approach to predicting employment levels seems justified. Over the period 1991 to 2015 Cambridge Econometric data show a Jobs compound annual growth rate (CAGR) of -0.1%; the comparative Oxford Economics CAGR is 0.1% (para 2.3 of Amion report), which averages out at 0. This would imply that the large declines we are seeing in employment by large employers will be compensated for by growth in other areas. Once again the Experian data exhibit the same failure to embody employment falls and should be ignored in the averaging process.
- viii) The data predominantly show that there will be little or no jobs growth in Fylde in the coming plan period. There is no credible evidence that it will be 'at the top end of the range 55-91 jobs p.a.'

Appendix 1

E Mail from Chris Dyson, LEP contact, regarding Warton Enterprise Zone

----- Forwarded message ----- From: "Dyson, Chris" [REDACTED] To: "[REDACTED]"
Cc: "Dyson, Chris" [REDACTED] Subject: RE: Warton Enterprise
Zone Date: Thu, 27 Apr 2017 16:26:12 +0100

Mike,

Thank you for your email and apologies for the delay in responding.

BAE Systems Warton Site along with the Samlesbury Site was awarded Enterprise Zone status by Government in 2012 following the submission of an application by BAE Systems, which was endorsed by the Lancashire Enterprise Partnership (LEP), and which set out a strategic vision to establish the two sites as an Enterprise Zone.

As you may be aware the Warton EZ site is owned by BAE Systems and forms part of the company's operational footprint. BAE Systems commissioned a masterplan for the Warton Site which identified options to re-configure their estate and any consolidation opportunities to allow delivery of the EZ including the provision of remodelled former BAE Systems buildings which could be available for occupation for companies looking to locate onto the EZ. Two tenant companies are now in occupation, Accenture and Trescal.

At present BAE Systems have suggested that the total number of employees at the two sites amount to circa 27 employees with no envisaged significant change in numbers for these companies in the foreseeable future.

The LEP and the County Council has not been made aware at this point in time that BAE Systems, as site owner and EZ sponsor, has any significant plans to accelerate delivery of the EZ or that they have live discussions underway with a number of potential occupiers.

Regular discussions take place between the LEP, the County Council with BAE Systems with regard to the wider advanced manufacturing agenda in Lancashire and specifically the delivery of the two EZ sites at Warton and Samlesbury.

We are keen to see the delivery of both sites and whilst the focus has been on the delivery of infrastructure at the Samlesbury Site it is now timely to engage with BAE Systems on their plans for the delivery of the EZ at Warton. The EZ offer forms part of the LEPs vision to deliver high value jobs growth across Lancashire and the LEP remains keen to ensure the site's potential is achieved.

In your previous email you included a number of points in relation to Thunderbolt Avenue and EZ access. We have referred these comments to colleagues in the Highways Department and will respond in due course.

Regards

cont

Chris

Chris Dyson Programme Manager - Strategic Sites Strategic Development Economic Development Services

Lancashire County Council T: [REDACTED] W: www.lancashire.gov.uk

Appendix 2

Points raised by A. Guest regarding Employment Land Requirement at the EiP

- i) Mr Guest pointed out that FBC's estimate of a basic requirement of 46ha was based on a very long-term average and did not recognise the strongly reducing trend. A sounder interpretation of the data would result in a figure of around 23ha.
- ii) The addition of 14ha to allow for the Blackpool requirement was not logically sensible (since Blackpool's requirement for employment land in Fylde was already built into the historic average methodology). Mr Guest recognized, however, that this error is probably beyond correction at this point.
- iii) The addition of 15ha to the total to account for land lost to employment and industrial use since the notional start of the plan period was logically and mathematically nonsensical (Section 9.12, Table 3 of the Local Plan refers). The methodology is based on using the historic take up of new employment land and this has always run in parallel with land lost to employment use as Mr Smith of FBC confirmed. The development of new industrial and employment sites has continued without any restriction through the start of the plan period to the present day (there is no restriction on land currently available for such use). Attempting to add further land to a calculation based on the annual average figure stops it being based on an annual average figure. When Mr Smith said that it was normal practice to add shortfalls from the start of the plan period he was presumably referring to the normal practice of making adjustments (e.g. to housing numbers) when the changes introduced by a new plan have not been implemented from the notional start of the plan period or there is a backlog. In this case however, new employment land has been available and has continued to be commissioned (and the new plan does not seek any change in the rate of commissioning – since it is based on the historic average) so the correction is unnecessary. If a correction had been necessary it would have been to allow for any difference in the rate of allocation between the new plan and the old plan and in this case there is no such difference and no backlog.

Of those three points: point iii) is a logical and mathematical fact.; point i) is a judgement but the data are very clear and a failure to reflect this judgement in some measure is to misuse of the data in the context of this exercise; point ii) is an error but probably unavoidable at this stage following approval of the Blackpool plan. However correction of errors relating to points i) and iii) would substantially reduce the amount of land to be set aside for employment use.

