

Further Responses of A. Guest to Inspector's Matters and Issues Regarding Independent Examination of the Fylde Council Local Plan

This is not intended to be a full response to the MIQs but I would like to provide some relevant attachments that do not appear to be in the record with some associated comments.

Attachment 1 Joint Statement by Local Groups in Fylde Borough – Declaration of Unsound Planning Consultation

This touches on Matter 1 and Matter 2. The original document was signed by representatives of the bodies listed at the bottom of the statement and sent to Fylde Borough Council on or around the date shown.

Attachment 2 Fylde Employment Land and Premises Study 2012 Briefing Note from Vince Sandwell of BE Group together with cover letter from Mark Sims of FBC (dated 13 Oct 2014).

This touches on Matter 2 and Matter 3. The document from BE Group is a response to my own paper 'A Brief Critical Review of Fylde Borough Employment Land Studies' that was submitted to Fylde Borough Council in May 2014 and is an attachment to the 'Minority Report on Employment Land and Premises' that I believe has already been submitted to your office.

Comments on Attachment 2

The attachment is helpful in providing some useful background to the calculation methodologies. It seeks to refute the conclusions of my own review and show that there are many factors that can render such models less accurate (his sections 2.27 and 2.28). I have little argument with the points he makes and am familiar with modeling as a process of understanding the problem rather than producing a precise and accurate number (I did considerable mathematical modeling earlier in my own career). However when a range of models reaches a broadly similar conclusion it is worth taking notice.

His attempt to demonstrate the error of the models on a historic basis (his section 2.29) contains the same egregious flaw that informs the original review and the conclusions drawn from it. That is to say, that his table 3 makes no allowance for the land lost to employment over the same period. The properly equivalent figure he should use to compare the historic record with the results shown by the jobs model should have been the net historic land take-up (new employment land taken up in the period less land taken out of employment use in the period). Both sets of figures, for equivalent land categories, are published by Fylde. I don't have the precise figures for the period he picked (2001-2011) readily to hand but from the figures I do have, I am reasonably confident his

figure of 25.8 Ha would have changed to a negative number. The number would certainly not have been as low as the jobs model predicted because a the major element of the job losses would have been in manufacturing with a large footprint per employee and from BAeS and Toshiba Westinghouse that are both on large restricted sites. These large special sites absorb rise and fall in employee numbers for long periods until changes reach a very significant level (as in BAeS Marconi site, BAeS EZ, and BAeS future plans to withdraw its northern boundary and release land during the Plan period).

There is no question that employment land use trends do not instantly reflect employment numbers. However, the models do represent (to the extent that the employment forecasts themselves are correct) a useful and reasonable indicator of long-term land use trends. Attempting to compare the models with the gross historic land take-up trends is simply wrong. The correct comparison is with what I have described as the net historic land take-up trends. In my own paper (Table 3.5.10) I use the historic net employment numbers (from Fylde's own records) in the same way that BE Group used the gross figures to provide a prediction of net employment land change over the period 2013 to 2030 and the result falls into the range -9Ha to -20.4Ha. These numbers sit comfortably within the range provided by the various models. This confirms, overall, a reasonably robust assessment of employment land change (reducing employment land requirement).

The gross land take-up trends are of course an important record and should inform planning in the proper context. Allowance must be made for some new employment sites. However to ignore that they largely represent employment moving to new sites (at a reducing rate) and releasing old sites (rather than representing additional employment land) is the very opposite of planning. And yet this appears to be the conclusion of Fylde Council and its consultants.

Elsewhere in his paper Mr Sandwell sets out BE Group's experience in the field and I would not take issue with this. At the Call In meeting they attended they made the additional point that nobody had ever queried their results in the past. On this point I would say that the analysis and I undertook was very onerous and I don't find it difficult to believe that such analysis is very infrequent.

He also refers to BE Group's qualitative market appraisal based on vacancy rates and surveys. I believe Government advice on the conduct of employment land and premises studies specifically advises against using these appraisals as the basis of predicting long-term employment land requirements.

Having considered Mr Sandwell's paper, I believe the conclusions of my own paper (attached below for completeness) are sound.

Attachment 3 A Brief Critical Review of Fylde Borough Employment Land Studies - May 2014

A.L.G. March 2017