



**FDC/Matter 6**

**FENLAND LOCAL PLAN CORE STRATEGY  
DEVELOPMENT PLAN DOCUMENT**

**EXAMINATION**

**FENLAND DISTRICT COUNCIL STATEMENT**

**MATTER 6: EMPLOYMENT, TOURISM, COMMUNITY FACILITIES  
& RETAIL**

**Fenland District Council**  
Fenland Hall  
County Road  
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PE15 8NQ

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[www.fenland.gov.uk](http://www.fenland.gov.uk)

## **Fenland District Council Statement in response to Matter 6: Employment, Tourism, Community Facilities & Retail**

### **ISSUES and QUESTIONS**

#### **Q1 – Is the jobs growth target set out in Policy CS6 together with the consequential provision of employment land derived from the most up-to-date evidence based and an objective assessment of the economic forecasts in the area?**

FDC is confident that its jobs growth target and provision of employment land are derived by up-to-date evidence based and objective assessment of the economic forecasts in the area. Core Document CD022 (Employment Evidence Report) has a detailed explanation as to how the jobs growth target and provision in the plan has been derived.

The population, housing and employment forecasts technical report produced by the Cambridgeshire research group sets out the detail of the latest forecasting data. The forecasting models, namely the East of England Forecasting Model (Spring 2012 Economic Outlook) and The Local Economy Forecasting Model (LEFM) (Spring 2012 Economic Outlook), have been the best available information during the preparation of the Core Strategy. Importantly, like housing, this research was prepared jointly with the other Cambridgeshire districts.

As covered in Matter Statement 1, FDC believes that the creation (and loss) of jobs, is in a constant flux, and almost entirely in the hands of the market and national economic position. The measurement of current jobs is difficult, with forecasting them even more challenging. However by using these forecasts, alongside neighbouring authorities, it is considered that FDC's target of 7,200 provides an appropriate basis for meeting development needs to achieve economic growth, as set out in the NPPF.

Again, accurately translating jobs growth target into the provision of employment land is challenging. Core Document CD022 has detailed explanation as to how the amount of employment land has been derived from the forecasting. FDC has sought to take tried and tested assumptions in terms of developable area and job density (i.e the number of employees) to provide an indication of the likely amount of land required for employment use. The resulting land requirement has then been compared against historic trends, both in terms of losses and gains to establish an employment land target of 85ha.

Whilst we are aware of a limited number of representations relating to job growth and land for employment, there has been little evidence submitted which justifies an alternative method or approach to calculating either job growth or employment land requirements.

The Council is therefore confident its approach is robust and sound.

#### **Q2 – What constitutes an appropriate marketing exercise for the purposes of Policy CS6?**

Paragraph 2.6.25 provides further details on the format of the marketing exercise. Specifically, written evidence that attempts have been made to market the property/facility for a minimum period of 12 months, including advertisements in appropriate trade publications and websites.

FDC considers that this is sufficient level of detail for the Core Strategy. CS6 has not sought to introduce minimum requirements as FDC considers that the exercise should be proportionate to the site and the economic climate at the time of the request.

As such, in such cases the applicant should contact the Council to determine the appropriate scope of the marketing exercise. To assist in this approach the Council intends to prepare an informal guidance note, to be placed on the relevant web pages, to provide examples of marketing exercises and relevant contact details.

To reflect this emphasis the Council proposes the minor amendment:

*“3.6.25 ... The marketing exercise should include advertisements in appropriate trade publications or websites relating to the particular circumstances of the proposal. In certain circumstances a viability assessment may also be required. Applicants are encouraged to contact the Council to discuss the scope of the marketing exercise.”*

**Q3. Is the retention of high quality land and premises currently or last in use for employment purposes consistent with the NPPF, in particular paragraph 22?**

FDC considers policy CS6, including the reference to the retention of employment land, is consistent with the NPPF.

Specifically, the wording in policy CS6 is deliberate “The Council will **seek** to retain for continued use high quality land and premises currently...” [Emphasis added]. This does not amount to the “long term protection of sites allocated for employment use” referred to in the NPPF paragraph 22. The use of the word ‘seek’ establishes the starting position of FDC; namely that as a starting point, in principle, the council seeks to retain high quality employment land and premises in order to support existing business sectors and encourage sustainable economic growth, particularly in areas where existing businesses may look to expand. This is a position consistent with NPPF paragraphs 18-21.

FDC in both the CS and its Economic Strategy acknowledges local economic growth may be slow in the short to medium term, putting pressure on existing sites to come forward for other uses. It is therefore important that, in order to meet the economic goals and the aforementioned paragraphs of the NPPF, that the lack of available sites in and around established employment areas (due to their loss to other uses), does not become a barrier to growth.

However, having established this starting position, FDC acknowledge that there is a balance. It does not dispute that as technology and business sectors evolve, sites may become unattractive as employment locations. As such, the policy goes on to state that sites will be retained unless “it can be demonstrated through a marketing exercise that there is no longer a need to retain sites in these uses”. This is entirely consistent, and indeed seeks to quantify, the ‘no reasonable prospect’ part of the NPPF paragraph 22 which in context states “where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits...”. The approach in the Core Strategy fully provides the opportunity for interested parties to demonstrate why a site should be considered for alternative uses, and therefore does not constitute ‘long term protection’.

To make this alignment with the NPPF paragraph 22 clearer, FDC proposes a Proposed Modification MPC/3/014 to the third paragraph of Policy CS6 as follows:

*“The Council will seek to retain for continued use high quality land and premises currently or last in use for B1/B2/B8 employment purposes, unless it can be demonstrated through a marketing exercise that there is ~~no longer a need to retain sites in these uses~~ no reasonable prospect for the site being used for these purposes.”*

The Core Strategy policies have been prepared to be flexible enough to accommodate needs not anticipated in the plan and to allow rapid responses to changes in economic circumstances. The majority of employment land will come forward as part of the master-planning of the strategic allocations and will balance housing and new jobs locally. However, in parallel to this

is the need to protect the established businesses in Fenland and provide opportunities for them to grow. As such, the approach undertaken by FDC is considered to be consistent with the principles of NPPF, including paragraph 22.