

**South Somerset district Council Hearing Statement issue 3; Supplementary statement requested by Inspector;
Economic Prosperity and Employment provision; Critique of Messr's Fysh and hartley Issue 3 Statements**

Annex 1; Fysh Critique

This supplementary document sets out the District Council's critique of the further statement submitted from Councillor Marcus Fysh to Issue 3 of the Examination Hearing into the Proposed Submission south Somerset Local Plan.

Statement paragraph number	Marcus Fysh Statement – Points to refute (highlighted)	South Somerset District Council's Response & Evidence Base Reference																																																																											
Inspector's Question 3.1																																																																													
3.1.1	<p>SSDC's new position that the higher choice of the two economic scenarios provided to it by Baker Associates is unrealistic, is accepted, and as referred to in Issue 1 this is consistent with the revocation of RSS. But the move to a "mid-point" between the two "scenarios" is not justified and not consistent with the latest government household projections.</p>	<p>Cllr Fysh has submitted no evidence to substantiate his claim that the move to the middle-point between the two scenarios is not justified, and not consistent with the latest government household projections.</p> <p>The household projections are trend data only and based on just 5 years growth. As this is reflective of a period of intense recession, these projections should be treated with caution, as the plan covers the period to 2028, it is anticipated that the economy will recover and start to grow during the plan period. Using a mid-point target has consideration of the past 5 years whilst still planning positively for future growth in line with the requirements of the NPPF.</p> <p>The move to the mid-point is detailed in the Housing Provision Review Paper which was approved by PMB19 on 26th October 2012 [PSSSLP CD 117] and in the Housing Topic Paper (CD14). In brief, given the ongoing recession, which is evidenced by the Office of Budget Responsibility (OBR) revisions of the UK economic growth prospects the move to the mid-point between the positive growth scenario and the slower, faltering scenario is considered to be realistic whilst still reflecting the strong economic potential of the District.</p> <p>The OBR revised their growth projections downwards in March 2013: <i>"We expect the economy to grow by 0.6 per cent this year and 1.8 per cent in 2014, down from 1.2 and 2.0 per cent respectively in our December forecast." "Our view on medium-term growth prospects is unchanged from December. We expect the economy to grow by 2.3 per cent in 2015, 2.7 per cent in 2016 and 2.8 per cent in 2017."</i></p> <p>This is further illustrated by the graph from the ONS which emphasises the points made above regarding the length and breadth of the recession.</p>																																																																											
<table border="1"> <caption>Approximate data from the ONS Index (2009=100) graph</caption> <thead> <tr> <th>Year/Quarter</th> <th>Total</th> <th>Production</th> <th>Services</th> <th>Construction</th> </tr> </thead> <tbody> <tr> <td>2000 Q1</td> <td>85</td> <td>115</td> <td>78</td> <td>100</td> </tr> <tr> <td>2001 Q1</td> <td>88</td> <td>115</td> <td>80</td> <td>100</td> </tr> <tr> <td>2002 Q1</td> <td>90</td> <td>112</td> <td>82</td> <td>105</td> </tr> <tr> <td>2003 Q1</td> <td>92</td> <td>110</td> <td>85</td> <td>110</td> </tr> <tr> <td>2004 Q1</td> <td>95</td> <td>112</td> <td>88</td> <td>120</td> </tr> <tr> <td>2005 Q1</td> <td>98</td> <td>110</td> <td>90</td> <td>115</td> </tr> <tr> <td>2006 Q1</td> <td>100</td> <td>110</td> <td>95</td> <td>115</td> </tr> <tr> <td>2007 Q1</td> <td>102</td> <td>110</td> <td>98</td> <td>120</td> </tr> <tr> <td>2008 Q1</td> <td>105</td> <td>112</td> <td>100</td> <td>120</td> </tr> <tr> <td>2009 Q1</td> <td>100</td> <td>100</td> <td>100</td> <td>100</td> </tr> <tr> <td>2010 Q1</td> <td>102</td> <td>102</td> <td>102</td> <td>110</td> </tr> <tr> <td>2011 Q1</td> <td>103</td> <td>102</td> <td>103</td> <td>110</td> </tr> <tr> <td>2012 Q1</td> <td>103</td> <td>100</td> <td>103</td> <td>100</td> </tr> <tr> <td>2013 Q1</td> <td>103</td> <td>98</td> <td>103</td> <td>98</td> </tr> </tbody> </table>			Year/Quarter	Total	Production	Services	Construction	2000 Q1	85	115	78	100	2001 Q1	88	115	80	100	2002 Q1	90	112	82	105	2003 Q1	92	110	85	110	2004 Q1	95	112	88	120	2005 Q1	98	110	90	115	2006 Q1	100	110	95	115	2007 Q1	102	110	98	120	2008 Q1	105	112	100	120	2009 Q1	100	100	100	100	2010 Q1	102	102	102	110	2011 Q1	103	102	103	110	2012 Q1	103	100	103	100	2013 Q1	103	98	103	98
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		<p><i>"GDP increased by 0.3% in the first quarter of 2013. The largest contribution to the increase came from the services sector, which increased by 0.6% in the first quarter of 2013. This followed a flat Q4 2012 figure, which was affected by increased output in Q3 2012 due to the Olympic and Paralympic games. In the latest quarter there was widespread growth, with increases in most service sector industries.</i></p> <p><i>There was an upwards contribution from the production sector, which grew by 0.2%. These increases were partially offset by a downwards contribution from the construction sector, which fell by 2.5%.</i></p> <p><i>Coming out of the recession in 2008-09, the rate of GDP growth has been slower compared with the early-2000s, owing to weaknesses in the domestic and global markets. Services have continued to grow steadily from 2009, and ended 2012 above pre-recession levels seen at the start of 2008. Production began to decrease from the start of 2011 following a mild recovery in 2010, as increased inflation and slower wage growth began to reduce households' real income. Compounding this subdued demand was the development of the euro area sovereign debt crisis, which affected business sentiment in the EU, a key export market for the UK. Construction activity saw a more marked increase than that of production in 2010. However, this was not sustained with activity falling from the final quarter of 2011 due to a deteriorating economic outlook. Construction returned to growth in the final quarter of 2012, following five quarters of negative growth. This was short-lived, however, and construction has returned to negative growth again in Quarter 1 2013".</i> <u>Source: Office for National Statistics</u></p>
3.1.2	It is logical to match a move away from the higher growth scenario to a lower growth one that is consistent with latest DCLG demographic projections, to a target of around 12,200 homes. This is the housing requirement figure derived from the latest Household projections from DCLG. I detail my workings on this in Issue 4 below.	<p>Cllr Fysh has submitted no evidence to substantiate his claim that it is logical to match a move away from the higher growth scenario to a lower one that is consistent with latest DCLG demographic projections. Household and population projections are used to inform the final housing provision figure.</p> <p>As advised by DCLG, the household projections are trend data only and are based on assumptions that the trend of the period 2006-2010 will continue over the next 10 years. They have no consideration of any policy changes that have not yet occurred, nor those that have yet had an impact on observed trends. They reflect the stagnation in the housing market since 2008 and have no regard for recent government initiatives such as the new buy guarantee scheme and the first time buyers initiative (see the District Council's repose to the Inspector's Question 5: Household statistics). It is unrealistic to place too much reliance on the household projections at this time.</p> <p>The explanation for the move from the positive growth scenario (higher growth) is articulated above under 3.1.1.</p>
3.1.3	Such an approach would be consistent with many recent Planning Inspectorate reports in which demographic projections are given clear primacy over economic or job projections and forecasts, when deciding what level of housing growth to plan. This figure is somewhat lower than the recommendations I made in my previous submission, which were based on my understanding of the state of the South Somerset economy and declining migration numbers.	<p>Cllr Fysh has presented no evidence to back this assertion up in relation to recent Planning inspectorate reports. The two recent Inspectors reports into neighbouring Somerset Local Planning Authorities Core Strategies (Taunton Deane and Sedgemoor) have both been supportive of an employment led approach. (para 12 of the Inspector's report into Taunton Deane's Core Strategy 2011 – 2028 states " it is concluded that the employment led approach to the Core strategy is based on soundly researched evidence" -)</p> <p>There is no established methodology for identifying a housing provision figure, Baker Associates explain in their Housing Requirement for South Somerset and Yeovil report [PSSSLP CD 30] that the approach it is a matter of taking into account what should be considered, using the best evidence available, in order to contribute to informed discussions amongst the decision takers. The methodology is explained in section 4.0 of the Housing Topic Paper [PSSSLP CD 14], and this approach has not been objected to in general terms but rather the specific assumptions and figures that have been used in the approach have been queried. The District Council chose the economic-led approach as it accorded with the Council's core aims and the NPPF, but within that approach it also considered the wider implications of population and household projections.</p> <p>The Baker Associates methodology has been applied elsewhere and has been found to be a sound approach. Other local authorities that have used this approach include our neighbouring authority Sedgemoor District Council.</p> <p>ONS data has shown there are comparable rates for fertility and mortality within South Somerset and population growth has been attributed to net migration. The change in population between 2001 and 2011 averaged at 1030 pa. The interim 2011 sub national population projections show an annual increase for South Somerset of 1,000 persons p.a. attributed to net migration. Cllr Fysh has not evidenced within his submission why he considers there to be declining migration numbers.</p>
3.1.4	Employment needs and employment distribution in South Somerset are not properly understood in the Plan, as I referred to in Issue 1 and my previous submission. The historic pattern of employment	This view is unsubstantiated, and the use of ABI/BRES and APS data is explained fully in this critique.

	growth as stated in the Plan's evidence base is erroneous.	
3.1.5	Both SSDC and its consultants have failed to apply recommended ONS adjustments to historic BRES and ABI figures, which makes basing the Plan on the currently stated figures unsound because it is not realistic or up to date or evidence based, and is contrary to the NPPF and therefore unsound.	<p>There are 4 instances of discontinuity that require adjustment to the ABI/BRES data between 2006 and 2011.</p> <p>2006 Cllr Fysh previously raised issues of discontinuity (email on 15th September 2011) stating that there was a statistical change between 2006 and 2007, making the data incomparable and suggesting greater employment growth than considered to have happened in reality.</p> <p>The view of ONS was sought (email from Jo Manley 21 October 2011), and they stated that the abnormal increase between 2006 and 2007 (64,800 to 67,500 including an increase of 3,000 in Yeovil) was due to two specific companies. The returns were queried and they were confirmed, the unusual circumstances do not make pre and post 2007 data incompatible.</p> <p>2008 BRES introduced in 2008, as the new basis for producing annual employment estimates. The introduction results in a discontinuity when comparing BRES estimates to its predecessor ABI in 2008 because of changes to the questionnaire and estimation methodology (making BRES more accurate than ABI).</p> <p>Overall UK discontinuity estimated to be 317,000 employees in an upward direction, ie. BRES estimates 317,000 employees more than ABI estimate for the same year.</p> <p>ABI for District recorded 67,000 employees in 2008 and BRES recorded 67,400 employees in 2008 – the Council has addressed the discontinuity in its analysis presented below, by using the revised data from NOMIS which takes the discontinuity into account. It should be noted that the 400 difference results in a 1.0% difference upwards and not the 1.2% cited by Cllr Fysh and does not effectively change the outcome of the calculations.</p> <p>2009 The first real BRES estimate was in 2009 because the 2008 BRES estimate on NOMIS is based on 2008 ABI data run through the BRES methodology to enable users to have a common year of comparison.</p> <p>In 2009, the BRES estimate included a change to farm agriculture worker estimates which are collected from DEFRA (the figures only included commercial holdings as opposed to all holdings). This did not affect District figures as BRES does not contain agricultural data at a District level, and therefore the revision did not apply to SSDC calculations.</p> <p>2011 - Working Owners discontinuity Email from Stephen Taylor, BRES, ONS (29 April 2013) explains this discontinuity and states that there are two datasets on NOMIS 1) 2008-2010 consistent with earlier years (unrevised for working owners discontinuity), and 2) 2008-2011 (revised for working owners discontinuity). The 2008-2010 data has not been revised to take the discontinuity into account, the 2008-2011 has for 2010 and 2011, but not 2009. There are no plans to revise the 2008 data.</p> <p>On the 28th September 2012 NOMIS released BRES data for 2011 and revised data for 2010. On the 14th December 2012 the 2010 BRES data was adjusted further to remove the discontinuity between the 2010 and 2011 data – this replaced the 2010 data released on 28th September 2012. On the 7th February 2013, the previous unrevised 2010 data was restored for time series purposes. This timeline demonstrates the reason why there are various figures referred to by Cllr Fysh and others.</p> <p>In terms of the growth figures contained in the PSSSLP it is not considered necessary to further revise the jobs projection identified in Policy SS3 as the allowance for discontinuity between 2010 and 2011 (working owners discontinuity) is already made as explained in the bullet points below:</p> <ul style="list-style-type: none"> • The unrevised recorded BRES figure for 2010 is 64,000 employees (released 28 September 2012). The Council added and additional 1,000 to this figure for agricultural workers = 65,000 employees (cited in Appendix 3 of PMB 19 paper "Housing Review Paper" [PSSSLP CD 117]) • The revised BRES figure for 2010 (released 7 February 2013) which takes into account the working owners discontinuity, recorded a figure of 65,200 employees (1,200 extra employees than the Council recorded for that year). If an additional

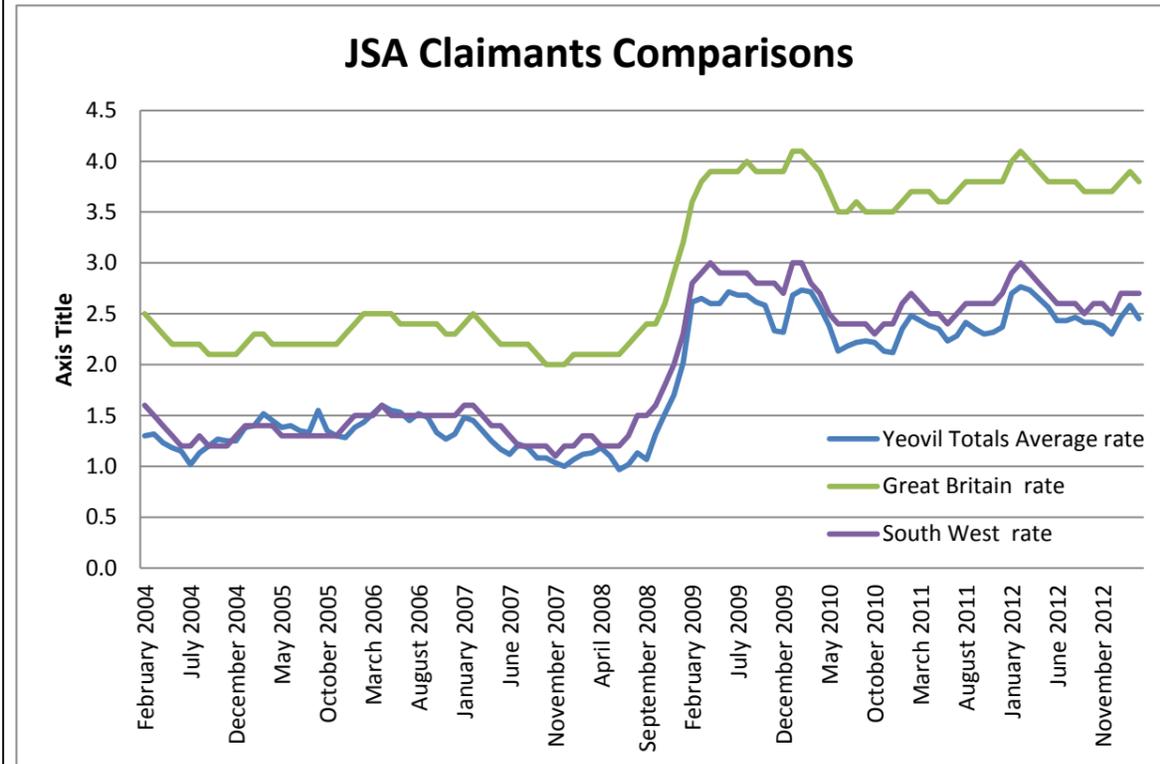
		<p>1,000 were added to that figure for agricultural workers, 2010 should read 66,200 employees.</p> <ul style="list-style-type: none"> The revision of the BRES data for 2010 illustrates that the Council may have underestimated the number of employees in 2010, and therefore rather than the District generating 1,600 new employee jobs between 2010 and 2011, the figure is more like 400 jobs. These figures are however somewhat irrelevant as the revised basedate for the PSSSLP jobs growth projections is 2011. Clearly the evidence still demonstrates that jobs were being created rather than lost as is suggested by Cllr Fysh and others. The 2011 BRES figure remains unchanged at 65,600 employees (released 28th September 2012) + 1,000 agricultural workers = 66,600 employees (same figure cited in Appendix 3 of PMB 19 paper "Housing Review Paper" [PSSSLP CD 117) and the housing growth associated with jobs growth calculations uses these figures. Whilst the discontinuity has been taken into account at 2010 it has not been applied backwards to ABI data for 2006 the Plan start date. It is felt that the error likely to apply by applying the data correction to a different data renders such application inappropriate. In summary, whilst there is a difference of + 1,600 employees between the unrevised and revised 2010 figure, the revised 2011 figure is the same figure used by the District Council and so the figures used by the Council are correct and the 2011 discontinuity is effectively taken into account.
3.1.6	<p>According to ONS, who are the authors of the data, BRES discontinuity adjustments must be applied to prior years in 2010/11 (+2.0%), 2008 (+1.2%), and 2006 (+1.6%) with the effect that employee growth over the last 7 years is overestimated by about 5% if the raw data are used as Ekosgen and SSDC have done. This happens because the way the employer survey questions are asked and the data is collected changes from time to time, and backward adjustments need to be made so as to compare "apples with apples".</p>	<p>The discontinuity in the data is explained above, as is the Council's approach to dealing with it.</p> <p>Cllr Fysh is statistically incorrect in his assumptions that the discontinuity for each year results in an overall 5% overestimation of jobs in the District and Yeovil, because from a statistical perspective, the adjustment should be made each year and not cumulatively. Cllr Fysh has multiplied discontinuity correction factors rather than added them</p>
3.1.7	<p>Services are also flattered in 2003 by the effect from taking head offices out of their sectors and counting them through the services sector.</p>	<p>The 49:51 split between Yeovil and the Rest of the District looked at ABI data from 2003 – 2008 and BRES data from 2008 onwards. If the ABI calculation only looked at 2006 onwards, Yeovil's percentage of growth increases by 1.12% from 46.33% average to 47.45%.</p> <p>The historical performance of the District is covered in the District Council's response to 3.1.4 above.</p>
3.1.8	<p>Proper account has not been taken of MoD reductions including of HM Forces personnel, and the reductions in agricultural workers over the period, again with the effect that growth over the last 7 years is flattered because the prior years are not picking up the falls.</p>	<p>Email on the 01 November 2011 from ONS [Council's Mid Hearing Document H013] confirms that HM Forces are included in APS data, but the District Council has only used the self-employed element of the APS data and therefore HM Forces rightly so, are not included in the Council's calculation of housing need (other than the 300 allowance made and explained in the Housing Topic Paper and illustrated by the Council's mid hearing statement H007). Civilian workers based at Yeovilton or Merryfield are included in BRES employee data, and changes will have been taken into account through BRES analysis. Evidence provided by Mr Barry Hartley in his statement on issue 3 appendix D from a Freedom of Information request to Royal Navy Navy Command shows service personnel at Yeovilton increasing to 2016 and the reduction in civilian employment to have substantially occurred by now with very little further job loss projected to 2016/17.</p> <p>Likewise in consultation with ONS, as identified in email on 17 November 2011 [Council's Mid Hearing Document H009], DEFRA data has been used and added to BRES data to inform the job numbers.</p> <p>Appendix 1 to this document provides the DEFRA data used by SSDC in our calculations, it is clear that between 2007 (when farms data was included in ABI records – see ONS email 17 November 2011 as above) and 2010 that there has been a reduction in farm labour by 5% in South Somerset. In 2010, there were 1,030 full time and part time salaried managers and regular workers recorded for South Somerset (full and part time farmers, partners, directors and spouses were not included to avoid potential double counting with APS self-employed data). The reduction has been accounted for by using the 2010 data.</p> <p>Additionally, as a method of double checking, APS agriculture and fishing data 2004-2012 was used to compare against the DEFRA data (as there was no more up-to-date DEFRA data than 2010). Appendix 2 provides the APS data used by SSDC and illustrates that on average 2,100 persons are employed in the agriculture and fishing industry in South Somerset, and that an</p>

		<p>addition of 1,000 persons to the BRES data is logical, and accounts for the self-employed persons, so avoids double counting with APS.</p> <p>To be clear, ABI included farm labour, BRES does not, and that is why the additional 1,000 persons have been added to the BRES data.</p> <p>In summary, growth over the last 7 years has not been flattered as is suggested by Cllr Fysh.</p>																		
3.1.9	<p>SSDC has also taken a new position since consultation of erroneously adding small sample, personal survey APS self – employment data, to much larger sample, employer survey BRES data. This approach is actively discouraged by ONS as likely to lead to error. The error inflates SSDC’s employment figures and causes double counting.</p>	<p>Cllr Fysh is incorrect, the methodology used by the District Council is the same methodology used in the Baker Report. The approach has consistently added APS self-employment data to BRES employee data and this is not a new approach since consultation.</p> <p>Combining two different data sets which stem from different sample sizes is not an issue, as both are valid samples.</p>																		
3.1.10	<p>The following Table shows employment distribution for South Somerset and for the areas as per the Settlement Hierarchy, prepared from BRES and ABI according to the methodology recommended by ONS, adjusted for HM Forces and Agricultural workers, and adjusted to include the self-employed without double counting, as recommended by ONS:</p> <table border="1"> <thead> <tr> <th colspan="3"><u>South Somerset Employment</u></th> </tr> </thead> <tbody> <tr> <td>District</td> <td>75,500</td> <td>100%</td> </tr> <tr> <td>Yeovil</td> <td>32,300</td> <td>42.7%</td> </tr> <tr> <td>Market Towns</td> <td>19,400</td> <td>25.7%</td> </tr> <tr> <td>Rural Centres</td> <td>8,700</td> <td>11.6%</td> </tr> <tr> <td>Rural Settlements</td> <td>15,100</td> <td>20.0%</td> </tr> </tbody> </table>	<u>South Somerset Employment</u>			District	75,500	100%	Yeovil	32,300	42.7%	Market Towns	19,400	25.7%	Rural Centres	8,700	11.6%	Rural Settlements	15,100	20.0%	<p>These figures are the 2011 figures derived from Cllr Fysh’s erroneous methodology (as opposed to the average for the period 2006 – 2011 although there is little difference in fact from the 20110 figures). The errors are set out specifically in annex 5 to this report</p>
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3.1.11	<p>Using this methodology over the 5 years to 2011 shows that growth in employment was anaemic for the overall district, with employment growing most strongly in the rural settlements, and rural centres disappointing:</p> <table border="1"> <thead> <tr> <th colspan="2"><u>South Somerset Employment Growth per annum 2006-2011</u></th> </tr> </thead> <tbody> <tr> <td>District</td> <td>0.10%</td> </tr> <tr> <td>Yeovil</td> <td>0.30%</td> </tr> <tr> <td>Market Towns</td> <td>0.41%</td> </tr> <tr> <td>Rural Centres</td> <td>-2.80%</td> </tr> <tr> <td>Rural Settlements</td> <td>1.15%</td> </tr> </tbody> </table>	<u>South Somerset Employment Growth per annum 2006-2011</u>		District	0.10%	Yeovil	0.30%	Market Towns	0.41%	Rural Centres	-2.80%	Rural Settlements	1.15%	<p>The methodology underlying these figures is in error and this is set out in annex 5 to this report.</p> <p>Furthermore, Cllr Fysh has chosen a very specific 2006 to 2011 timeframe, one of double-dip recession, to suggest low levels of annual Employment Growth.</p> <p>Objective assessment, such as that employed by SSDC and its consultants, would not support the selection of such a restricted and unrepresentative recession period upon which to forecast economic growth.</p>						
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3.1.12	<p>This shows that employment performance in South Somerset has not in fact “bucked the trend” and that Yeovil’s performance has been somewhat patchy rather than a driver of growth. It fits more with anecdotal evidence of retail closures and deprivation and must call into question the soundness of the economic development strategy associated with the Plan.</p>	<p>South Somerset</p> <p>Between 1995 and 2008, South Somerset outstripped both the South West and GB, delivering an increase in new jobs of 19.93% compared to 14.17% and 12.02% respectively (ONS Annual Business Enquiry Data 2009). This is clear evidence of trends being bucked. Even taking into account the recent recession, with 12,800 additional jobs over the last decade, the South Somerset labour market grew at a faster rate than in the South West and the UK. Whilst business services in the South West grew by almost 50%, it more than doubled in South Somerset. This evidence is at odds with the opinions offered by Cllr Fysh.</p> <p>Looking back even further, the Yeovil Economic Assessment (2010) provided a summary of employment change from 1984 to 2008 showing an increase of 46% in South Somerset, above the regional 44% and significantly above the national 28% increase. Since 1984, the district has also increased its share of employment in Somerset, delivering 20,395 new jobs to 2008. This is consistent with the findings of Baker Associates (2010), who report that in the 19 years between 1991 and 2010, 17,718 new jobs were created in South Somerset.</p>																		

Such consistent findings confirm that regional and national projections are not independently useful in devising economic projections for South Somerset. Bakers Associates considered the national projections for employment growth and tailored a methodology for compiling growth projection data that is more representative of Yeovil's unique industrial base & economy. This approach included a robust series of interviews with a representative sample of the district's major employers in 2010 to get a clearer picture of their actual growth plans.

Recent Employment Performance

Employment performance is reflected not only in job growth but in JSA statistics (that conversely show the unemployment trends). Historic JSA figures (tracked from Mar 2013 back to Feb 2004) show that Yeovil has consistently run well below the national average and below the Regional Average. Upward and downward movements in the statistics are mirrored in the three data sets, but Yeovil continually showing a lower JSA claimant level. This is clearly not 'patchy performance'.



3.1.13 It is not analytically sound to take job growth baseline figures from data for 1991, as SSDC does, because Britain was then in the teeth of its last great recession with higher interest rates and widespread foreclosures, and Somerset was economically and from a house price perspective, much further off the pace of the South East of England than it is now.

The Baker report used data from 1998 not 1991. This data was used to analyse trends at a national, regional and local level to inform the future economic scenarios.

The Baker report used the draft Yeovil Economic Assessment by Ekosgen to inform the scenarios. The baseline data used for the employment statistics in the Ekosgen report analysed the period 1984- 2008. This is a 24 year period taken to capture the economic fluctuations likely to be encountered over the protracted timeframe of a plan period. This historic analysis included the recession of the 1990s. Each decade since the 1950s has seen a recession, though they have varied in depth and impact. The 1990-92 recession 'bottomed out' at 2.5% reduction in GDP (compared to 1981 at 5.8% reduction or the mid-70s at 3.9% reduction in GDP).

Please note, the 19 years between 1991 and 2010 saw 17,718 new jobs created in South Somerset (Baker report, 2010). ABI & BRES data review has shown around 50% of these to have been delivered in Yeovil since 2003 (See Appendix 3).

3.1.14 Statistically to do so would not be sound either, since survey questions have changed dramatically, and ONS notes contain serious health warnings on data back in the 1990s. SSDC may not robustly rely on long discredited data from a different era, to promote a strategy out of kilter with the latest government projections and

The Council's analysis of ABI/BRES and APS data is robust and we disagree with this statement for the reasons evidenced in this critique and in annex 5 to the main report.

	robust analysis of recent trends.																									
3.1.15	Detailed public evidence via the Office of Budget Responsibility of the industry average assessment of the current reality of recession/flat economic growth, combined with a move back to the SSDC/Baker Associates higher growth scenario after 2016, and using the same methodology to convert jobs into homes as SSDC does, would suggest an overall figure of 9,600 jobs and 11,800 houses for the Plan period on a positively prepared basis.	<p>This statement is again full of assumptions that have not been explained or evidenced as opposed to our appraisal which has been fully explained in both the Housing Topic Paper [PSSSLP CD 14], and this critique.</p> <p>The outlook for growth now is stronger than it was in the last recession. “In the early nineties recession, small firms were in debt for over four years. This time small firms have had money in the bank throughout” (Report on growing micro businesses; Lord Young, May 2013).</p> <p>Taking Cllr Fysh’s projection of 9,600 jobs and using SSDC methodology to convert jobs into homes (as explained by Cllr Fysh) results in the need for 14,700 homes not 11,800 homes cited by Cllr Fysh – see table below.</p> <table border="1"> <tr> <td>a. Economically active 2006 (APS)</td> <td>77,700</td> </tr> <tr> <td>b. Population 2006 (ONS mid-year estimates)</td> <td>156,700</td> </tr> <tr> <td>c. Households (ONS mid-year estimates)</td> <td>68,000</td> </tr> <tr> <td>d. Net gain of jobs 2006-2028 (Cllr Fysh’s figure)</td> <td>9,600</td> </tr> <tr> <td>e. Net increase in unemployment 2006-2028</td> <td>400</td> </tr> <tr> <td>(Total Unemployment in 2028)</td> <td>(2,700)</td> </tr> <tr> <td>Calculation = 77,700 + 9,600 = 87,300. 3% of 87,300 = 2,619 or 2,700. Unemployment in 2006 = 2,300. 2,700 is a 400 increase.</td> <td></td> </tr> <tr> <td>f. Economically active 2028 (f = a + d + e)</td> <td>87,700</td> </tr> <tr> <td>g. Total population 2028 (g = f x 2.02) 2.02 is the assumed economic activity rate Calculation = 87,700 x 2.02 = 177,154 or 177,200</td> <td>177,200</td> </tr> <tr> <td>h. Private household population 2028 (h = g – 2%) 2% is the assumed communal living rate (Census update) Calculation = 2% of 177,200 = 3,544 or 3,500. 177,200 - 3,500 = 173,700</td> <td>173,700</td> </tr> <tr> <td>i. Total number of households 2028 (i = h/2.1 persons per household) 2.1 persons per household is the assumed rate. Calculation = 173,700/2.1 = 82,714 or 82,700</td> <td>82,700</td> </tr> <tr> <td>j. Number of additional homes 2028 (j = i-c)</td> <td>14,700</td> </tr> </table> <p>Cllr Fysh has contested the communal living rate and the number of persons per household, and it is assumed, given the lack of methodology in his statement that he has used his figure to identify the additional homes needed in the District to 2028. The Council does not accept Cllr Fysh’s assumptions for the following reasons.</p> <p>The Council’s figure for communal occupancy rate (2%) is based on 2011 census data for South Somerset (therefore a revision of the 2.2% used in the Baker report [PSSSLP CD 30]). This is outlined in the Council’s Response on the 17.4.13 to the Local Plan Inspector’s Question 4.</p> <p>The Council’s figure for household occupancy rate has been retained (from the Baker report) at 2.1 persons per household on the basis that we consider it is too early to assess whether the declining fall of the rate of occupancy is a long term change in household composition or a blip as a result of the recession. This was discussed during Examination Hearing Issue 4 and is set out in the Council’s response to the Inspector’s question 5 regarding household statistics (1.5.2013).</p>	a. Economically active 2006 (APS)	77,700	b. Population 2006 (ONS mid-year estimates)	156,700	c. Households (ONS mid-year estimates)	68,000	d. Net gain of jobs 2006-2028 (Cllr Fysh’s figure)	9,600	e. Net increase in unemployment 2006-2028	400	(Total Unemployment in 2028)	(2,700)	Calculation = 77,700 + 9,600 = 87,300. 3% of 87,300 = 2,619 or 2,700. Unemployment in 2006 = 2,300. 2,700 is a 400 increase.		f. Economically active 2028 (f = a + d + e)	87,700	g. Total population 2028 (g = f x 2.02) 2.02 is the assumed economic activity rate Calculation = 87,700 x 2.02 = 177,154 or 177,200	177,200	h. Private household population 2028 (h = g – 2%) 2% is the assumed communal living rate (Census update) Calculation = 2% of 177,200 = 3,544 or 3,500. 177,200 - 3,500 = 173,700	173,700	i. Total number of households 2028 (i = h/2.1 persons per household) 2.1 persons per household is the assumed rate. Calculation = 173,700/2.1 = 82,714 or 82,700	82,700	j. Number of additional homes 2028 (j = i-c)	14,700
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3.1.16	This objectively and positively assessed need from an economic point of view would therefore be amply met if the Plan provided for around 12,200 houses.	On the basis of the statement made by Cllr Fysh in 3.1.15, why does Cllr Fysh then add an additional 400 houses onto his evidenced figure of 11,800 homes (which is incorrect) – there is no explanation of this approach.																								
3.1.17	As foreshadowed in Issue 1 and as evidenced above, a robust assessment of the percentage of South Somerset’s employment that	The figure of 42.7% has not been evidenced as is claimed.																								

is in Yeovil is 42.7%.

The Council approach to the split of jobs between Yeovil and the rest of the District is evidenced in the Employment Topic Paper [PSSSLP CD 11]. PSSSLP Policy SS3 attributes 49% of jobs growth to Yeovil on the basis of its past economic performance as evidenced in ABI/BRES data.

A review of ABI/BRES data was presented orally to PMB workshop 9 as evidenced in the notes of the meeting [PSSSLP CD 117]. Appendix 3 to this report which supported this oral update demonstrates that the average growth in jobs between 2003-2010, was 49% in Yeovil and 51% elsewhere in the District. Cllr Fysh has criticised this approach, as it combines analysis of two different datasets and in response to that criticism, ONS were contacted to establish whether the approach taken to time series data (averaging it out) was logical. The email from the ONS 29 April 2013 states that “the surveys were not designed to be used as a time series and strictly speaking we do not recommend this, although we recognise that users do indeed do so”.

In light of this, and to further substantiate the Council’s position that 42.7% is not the correct percentage of jobs to attribute to Yeovil, a further analysis of ABI and BRES data has been undertaken using each as self contained data sources(and reflecting revisions in the case of BRES data). This is undertaken by way of corroboration of the Council’s main approach and is presented below:

The analysis looks at the following:

- ABI data 2003-2008
- ABI data 2006-2008 (to exclude years outside the plan period)
- Unrevised BRES data 2008-2010
- Revised BRES data 2008-2011

The summary of these findings are as follows:

- ABI data 2003-2008 - 47%
- ABI data 2006-2008 (to exclude years outside the plan period) - 48%
- Unrevised BRES data 2008-2010 - 48%
- Revised BRES data 2008-2011 - 48%

(1) ABI data 2003-2008

	2003 Total	2004 Total	2005 Total	2006 Total	2007 Total	2008 Total	Average
SSDC Total (rounded to nearest 100)	62,300	64,500	65,400	64,800	67,500	68,300	
Bruton							
4	700	700	800	700	700	900	
% of South Somerset Total	1.12	1.09	1.22	1.08	1.04	1.32	1.14
Cary							
Total (rounded to nearest 100)	1,100	1,100	1,100	1,000	1,100	1,100	
% of South Somerset Total	1.77	1.71	1.68	1.54	1.63	1.61	1.66
Somerton							
Total (rounded to nearest 100)	1,300	1,300	1,300	1,300	1,300	1,300	
% of South Somerset Total	2.09	2.02	1.99	2.01	1.93	1.90	1.99
Langport and Huish							
Total (rounded to nearest 100)	1,000	1,400	1,300	1,300	1,200	1,200	
% of South Somerset Total	1.61	2.17	1.99	2.01	1.78	1.76	1.88
Wincanton							
Total (rounded to nearest 100)	2,900	3,000	3,100	2,900	2,700	2,600	
% of South Somerset Total	4.65	4.65	4.74	4.48	4.00	3.81	4.39
Ivelchester							

Total (rounded to nearest 100)	1,400	2,600	2,700	2,600	1,900	2,400	
% of South Somerset Total	2.25	4.03	4.13	4.01	2.81	3.51	3.46
Milborne Port							
Total (rounded to nearest 100)	300	400	400	400	400	400	
% of South Somerset Total	0.48	0.62	0.61	0.62	0.59	0.59	0.58
Martock							
Total (rounded to nearest 100)	800	900	900	800	800	800	
% of South Somerset Total	1.28	1.40	1.38	1.23	1.19	1.17	1.27
South Petherton							
Total (rounded to nearest 100)	700	700	800	700	700	800	
% of South Somerset Total	1.12	1.09	1.22	1.08	1.04	1.17	1.12
Hamdon							
Total (rounded to nearest 100)	200	200	200	200	200	200	
% of South Somerset Total	0.32	0.31	0.31	0.31	0.30	0.29	0.31
Yeovil							
Total (rounded to nearest 100)	28,800	29,200	29,600	30,100	32,700	33,000	
% of South Somerset Total	46.23	45.27	45.26	46.45	48.44	48.32	46.66
Ilminster							
Total (rounded to nearest 100)	1,900	1,900	2,000	1,900	1,900	1,900	
% of South Somerset Total	3.05	2.95	3.06	2.93	2.81	2.78	2.93
Crewkerne							
Total (rounded to nearest 100)	2,600	2,700	2,600	2,800	2,700	2,800	
% of South Somerset Total	4.17	4.19	3.98	4.32	4.00	4.10	4.13
Chard							
Total (rounded to nearest 100)	6,000	6,200	5,900	5,500	5,300	5,500	
% of South Somerset Total	9.63	9.61	9.02	8.49	7.85	8.05	8.78
Rest of District							
Total (rounded to nearest 100)	49,700	52,300	52,700	52,200	53,600	54,900	
% of South Somerset Total	12,600	12,200	12,700	12,600	13,900	13,400	19.70

(2) ABI data 2006-2008

	2006 Total	2007 Total	2008 Total	Average
SSDC Total (rounded to nearest 100)	64,800	67,500	68,300	
Bruton				
Total (rounded to nearest 100)	700	700	900	
% of South Somerset Total	1.08	1.04	1.32	1.14
Cary				
Total (rounded to nearest 100)	1,000	1,100	1,100	
% of South Somerset Total	1.54	1.63	1.61	1.59
Somerton				
Total (rounded to nearest 100)	1,300	1,300	1,300	

% of South Somerset Total	2.01	1.93	1.90	1.95
Langport and Huish				
Total (rounded to nearest 100)	1,300	1,200	1,200	
% of South Somerset Total	2.01	1.78	1.76	1.85
Wincanton				
Total (rounded to nearest 100)	2,900	2,700	2,600	
% of South Somerset Total	4.48	4.00	3.81	4.09
Ivelchester				
Total (rounded to nearest 100)	2,600	1,900	2,400	
% of South Somerset Total	4.01	2.81	3.51	3.45
Milborne Port				
Total (rounded to nearest 100)	400	400	400	
% of South Somerset Total	0.62	0.59	0.59	0.60
Martock				
Total (rounded to nearest 100)	800	800	800	
% of South Somerset Total	1.23	1.19	1.17	1.20
South Petherton				
Total (rounded to nearest 100)	700	700	800	
% of South Somerset Total	1.08	1.04	1.17	1.10
Hamdon				
Total (rounded to nearest 100)	200	200	200	
% of South Somerset Total	0.31	0.30	0.29	0.30
Yeovil				
Total (rounded to nearest 100)	30,100	32,700	33,000	
% of South Somerset Total	46.45	48.44	48.32	47.74
Ilminster				
Total (rounded to nearest 100)	1,900	1,900	1,900	
% of South Somerset Total	2.93	2.81	2.78	2.84
Crewkerne				
Total (rounded to nearest 100)	2,800	2,700	2,800	
% of South Somerset Total	4.32	4.00	4.10	4.14
Chard				
Total (rounded to nearest 100)	5,500	5,300	5,500	
% of South Somerset Total	8.49	7.85	8.05	8.13
Rest of District				
Total (rounded to nearest 100)	12,600	13,900	13,400	
% of South Somerset Total	19.44	20.59	19.62	19.89

(3) Unrevised BRES data 2008-2010

	2008 Employees (BRES)	2009 Employees (BRES)	2010 Employees	2011 Employees	Average
Total (rounded to nearest 100)	67,400	66,300	64,000	65,600	
Bruton					
Total (rounded to nearest 100)	900	900	1,000	1,000	
% of South Somerset Total	1.34	1.36	1.56	1.52	1.44
Cary					
Total (rounded to nearest 100)	1,100	1,200	1,200	1,200	
% of South Somerset Total	1.63	1.81	1.88	1.83	1.79
Somerton					
Total (rounded to nearest 100)	1,400	1,400	1,400	1,400	
% of South Somerset Total	2.08	2.11	2.19	2.13	2.13
Langport and Huish					
Total (rounded to nearest 100)	1,200	1,300	1,100	1,400	
% of South Somerset Total	1.78	1.96	1.72	2.13	1.90
Wincanton					
Total (rounded to nearest 100)	2,700	3,100	2,900	2,700	
% of South Somerset Total	4.01	4.68	4.53	4.12	4.33
Ivelchester					
Total (rounded to nearest 100)	2,300	1,600	1,700	1,700	
% of South Somerset Total	3.41	2.41	2.66	2.59	2.77
Milborne Port					
Total (rounded to nearest 100)	300	400	300	300	
% of South Somerset Total	0.45	0.60	0.47	0.46	0.49
Martock					
Total (rounded to nearest 100)	800	700	700	800	
% of South Somerset Total	1.19	1.06	1.09	1.22	1.14
South Petherton					
Total (rounded to nearest 100)	700	600	500	600	
% of South Somerset Total	1.04	0.90	0.78	0.91	0.91
Hamdon					
Total (rounded to nearest 100)	300	300	200	300	
% of South Somerset Total	0.45	0.45	0.31	0.46	0.42
Yeovil					
Total (rounded to nearest 100)	33,400	32,000	30,400	31,200	
% of South Somerset Total	49.55	48.27	47.50	47.56	48.22
Ilminster					
Total (rounded to nearest 100)	2,000	2,100	2,000	2,100	
% of South Somerset Total	2.97	3.17	3.13	3.20	3.12
Crewkerne					
Total (rounded to nearest 100)	2,800	3,000	3,000	3,300	

% of South Somerset Total	4.15	4.52	4.69	5.03	4.60
Chard					
Total (rounded to nearest 100)	5,400	5,000	5,300	4,800	
% of South Somerset Total	8.01	7.54	8.28	7.32	7.79
Rest of District	12,100	12,700	12,300	12,800	
Total (rounded to nearest 100)	12,100	12,700	12,300	12,800	
% of South Somerset Total	17.95	19.16	19.22	19.51	18.96

(4) Revised BRES data 2008-2011

	2008 Employees	2009 Employees	2010 Employees	2011 Employees	Average
Total (rounded to nearest 100)	67,400	66,300	65,200	65,600	
Bruton					
Total (rounded to nearest 100)	900	900	1,000	1,000	
% of South Somerset Total	1.34	1.36	1.53	1.52	1.44
Cary					
Total (rounded to nearest 100)	1,100	1,200	1,200	1,200	
% of South Somerset Total	1.63	1.81	1.84	1.83	1.78
Somerton					
Total (rounded to nearest 100)	1,400	1,400	1,400	1,400	
% of South Somerset Total	2.08	2.11	2.15	2.13	2.12
Langport and Huish					
Total (rounded to nearest 100)	1,200	1,300	1,100	1,400	
% of South Somerset Total	1.78	1.96	1.69	2.13	1.89
Wincanton					
Total (rounded to nearest 100)	2,700	3,100	3,000	2,700	
% of South Somerset Total	4.01	4.68	4.60	4.12	4.35
Ivelchester					
Total (rounded to nearest 100)	2,300	1,600	1,700	1,700	
% of South Somerset Total	3.41	2.41	2.61	2.59	2.76
Milborne Port					
Total (rounded to nearest 100)	300	400	300	300	
% of South Somerset Total	0.45	0.60	0.46	0.46	0.49
Martock					
Total (rounded to nearest 100)	800	700	700	800	
% of South Somerset Total	1.19	1.06	1.07	1.22	1.13
South Petherton					
Total (rounded to nearest 100)	700	600	600	600	
% of South Somerset Total	1.04	0.90	0.92	0.91	0.94
Hamdon					
Total (rounded to nearest 100)	300	300	300	300	
% of South Somerset Total	0.45	0.45	0.46	0.46	0.45

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		<p>This revised approach demonstrates that by analysing the data separately, Yeovil consistently achieves 48% of the employee jobs growth. Much of the criticism of Cllr Fysh has related to the Council's methodology in developing a time series of data on employment. If the Council had just used the Plan start date percentage of employment provision in Yeovil (47%) from the ABI or the 2011 update date percentage (47%) from the BRES then a comparable percentage would emerge without concerns in relation to making the time series information consistent. The original Bqakers report did just this in determining a 50% split from the 47% identified as Yeovil employment from the ABI in 2006 which Baker's rounded up to 50%. The simplicity and robustness of this approach contrasts with the overly precise criticism's being pursued by Cllr Fysh.</p> <p>The point which could be lost in the debate over the statistical analysis of the past economic performance of Yeovil is the vision for Yeovil going forward to 2028. Yeovil is already the District's largest settlement and is the main focus for employment and shopping. The Council's Plan (2012-15) recognises Yeovil's regional role as a manufacturing centre and seeks to focus on that for job creation. Both the District Council's Economic Strategy and the emerging Local Plan illustrate its role as a prime economic driver. Additionally, the Somerset Economic Strategy promotes Yeovil alongside Taunton and Bridgwater as key growth centres, as did the draft RSS. The vision for Yeovil is one of growth, a settlement which is a major focus for development, and the 49:51 split will help to realise that strategic, spatial vision going forward.</p>																																																																																											
3.1.18	Given that this is higher than the percentages of existing population and the District's population growth in Yeovil, it is logical and robustly evidenced for 42.7% of the housing to match that 42.7% of employment, which would mean around 5,200 homes. On this robust logic and evidence, Yeovil's housing and employment needs are met by existing allocations and development within the urban fabric of Yeovil. Urban extensions or multi-site options and the consequent environmental damage are unnecessary and would not be balanced as per the NPPF if pursued.	This statement is not accepted for the reasons outlined in the Council's response to 3.1.17 above.																																																																																											
3.1.19	NPPF paragraph 21 is not satisfied because the Plan's economic strategy is erroneous and not clear and does not clearly relate to the reality in South Somerset. The Plan encourages growth that is not necessary or sustainable, in places such as the Yeovil area which have substantial and sensitive sustainability constraints that are recognised in the NPPF and are to be accorded great weight under it.	The Council's responses at 3.1.4, 3.1.15 and 3.1.16 above address this point raised by Cllr Fysh. The Local Plan strategy is based on the Baker report and review of past jobs growth and further supported by the economic appraisal (informed by literature review, baseline data, workshops, consultation and issues papers generated) by Ekosgen in 2010. They are consultants specialising in economic appraisals and are recognised as such at different levels of government. Datasets provided by Ekosgen have been used across Somerset and thus provide good comparative analysis of Economic Growth for the whole county.																																																																																											
Inspector's Question 3.2																																																																																													
3.2.1	I have seen no up to date work on the current viability and demand	Interest in employment sites remains strong in Yeovil and indeed across the District. A quick 'stock-take' of enquiries for Yeovil																																																																																											

	for sites in the business parks, but anecdotally and as per the last time I spoke to the economic development team at SSDC I understand there is no demand and has not been for the last 2 years.	<p>made to the Economic Development Team in the last two years reveals at least 20 enquiries made by medium to large employers. 8 of these were seeking development land, whilst 12 of these were looking at existing premises that would have required reinstatement or improvement. Four of these enquiries resulted in relocations. Not all enquiries go through Economic Development- in fact most are channelled through Estate Agents and SSDC does not necessarily learn of them or record them.</p> <p>Somerset's inward investment agency, Into Somerset received 16 enquiries specific to South Somerset between April 2012-2013. These enquiries alone resulted in 61 jobs being produced or secured in the district.</p> <p>The ED Officer has also noted, in coverage of Issue 7, that permission was recently granted (March, 2013) on the final 2 remaining plots of the Business Park in Chard, South Somerset's second largest settlement. We would suggest that this is evidence of demand for employment sites in the District.</p> <p>The comment at 3.2.1 is indeed anecdotal but may refer to enquiries at Lufton phase 3. This site has recently had infrastructure and services built in to the site. Enquiries to that point, in this specific location would naturally have been low.</p>
3.2.2	Despite this the new sites at Lufton and Bunford have high capacity for exactly the type of diversification growth that SSDC says it wants for Yeovil, and they are well located, especially Bunford with its more direct access to the A303.	
3.2.3	The option to integrate a residential element to a larger mixed use development including the business park site with site WECO11 (cf. Exhibit O) should be examined as it might enable business attraction to increase. The PMB assertion that such an option is ruled out because of the Flight Safety Zone is patently false because it is not in the proscribed area, therefore the ruling out of that option is unsound process. New development in scale at Alvington was given permission directly under the flight path so the precedent is in fact that development can happen even under the flight path.	<p>PMB19 report on potential amendments to Yeovil considered the wider area and ruled it out due to adverse landscape and historic environment impact. In addition, the meeting notes added the flight safety zone issue, which only applies to the area indicated as the flight safety zone.</p> <p>AgustaWestlands did raise concerns relating to excessive noise and possible damage from down drafts on application 08/04357/FUL for 40 dwellings at Alvington; but this was not considered to be a determining reason for refusal because the principle of developing the land had been established by a previous extant planning permission on the site.</p>
3.2.4	Currently Bunford is held back to some degree by SSDC's insistence on a high parking standard. This is an example of well-intentioned sustainability measures making the offer different to the historic pattern, and experience would suggest that expecting consumer behaviour to change (in this case the business consumer) just because such a change is directed can be futile. This demonstrates how it is unlikely that a "sustainable" urban extension loaded with commensurate costs would be seen as an attractive place to set up a business, and therefore become a risk to delivery of a housing strategy.	According to applications made by the prospective developers with Somerset County Council to the Regional Growth Fund (2011), Growing Places Fund (2012) and Pinch Point Funding (2013), development of the Bunford Site is stalled because of the highway infrastructure improvement costs on the Western Corridor Route. These costs would be recovered from 106 agreements, but need to be forward funded to enable progress through positive cash flow. No reference is made in the bids to parking standards –this comment is not evidenced and not substantiated
3.2.5	The Lufton 2000 site is in very close proximity to the Yeovil Innovation Centre, which is a strategic initiative of SSDC for housing of start-up businesses, to the north of Yeovil Town Football Club. It is well located to house businesses that might progress from there, and to spin small business out to there	SSDC have no control over tenants who leave the Innovation Centre. The tenant's own needs and market will determine where they relocate. YIC de-risks new business enterprises through the operation of licensed tenancy rather than leased tenancy and YIC also provide business support advice to tenants. YIC tenants would most likely use the service regardless of location (within reason)
Inspector's Question 3.4		
3.4.1	Rural business needs in terms of employment are disadvantaged by the over-allocation of housing to Yeovil, and under-allocation to rural areas. Construction industry is larger in rural areas than in Yeovil, so this, along with CIL, could have a very negative effect on employment prospects and lead villages to hollow out.	<p>Policies SS2 and 3 of the PSSSLP are supportive of rural business as are Policies EP4, 5 and EP8, which enable expansion and growth of appropriately scaled business activities. The statement that there is an over allocation of housing to Yeovil is not accepted, the housing growth proposed for Yeovil will support the Council's vision for Yeovil as the prime economic driver in the District.</p> <p>The job growth targets for rural areas are based on an assessment of past performance when a more relaxed approach towards rural growth was taken locally.</p>
3.4.2	Rural centres have already suffered greatly from large format	Economic growth is invariably linked to the expansion of a company's market or product offer. It does not generally follow that

	businesses in the towns attracting their customers. They need more rural population with higher incomes to encourage new business offers into their space, and rural broadband may offer them an opportunity to compete, and to create employment locally.	<p>growth in a rural population, or that higher incomes, will generate additional local trade. With the exception of well-used, convenience services such as village shops or public houses- there is no guarantee that increased population automatically increases trade. Market forces determine the fate of local services and the Council need to protect the 'draw' and sustainability of our town centres.</p> <p>Rural broadband may benefit those who work from home, but it is not expected to be a pre-cursor to major economic growth in rural centres. Notwithstanding the benefits of faster broadband, the majority of rural centres already have broadband connectivity and only a minority of business require a superfast broadband (SFBB) service. There is a clear difference between improved superfast coverage, and actual take-up. In Greater London, SFBB coverage is 86.1% and take-up just 10.6%. (ofcom.org.uk). There is no data available to inform speculation on the level of increased employment in rural settlements through improved broadband. What we do know is that the only two BT exchanges to have been upgraded to superfast in the district are Yeovil and Ilminster. This has been a priority given their commercial viability. Improvements will come to rural settlements, though no delivery plan currently exists.</p>
Inspector's Question 3.5		
3.5.1	Infrastructure for growth has only been analysed through the Infrastructure Delivery Plan, which has now been renamed the Infrastructure Plan. It strikes me that the irony of having a Plan named a Delivery Plan, which could not be delivered, was noticed, hence the change of name.	
3.5.2	It is entirely unclear to me when or how most of the infrastructure described in that IP will be delivered. Now that it has apparently become a "living document" it is even less clear what impetus there will be to see its elements delivered, with priorities and emphasis no doubt shifting and being decided some years hence, with a funding schedule that is wholly uncertain, so far set at a completely unrealistic level, and not prepared in parallel with this Plan.	<p>The 'Living Document' relates to on-going review which is considered to be good practice. The NPPF places a strong emphasis on the provision of infrastructure to support development and therefore on-going review of the IDP enables the Council to have an up-to-date understanding of infrastructure requirements to assist in the delivery of appropriate infrastructure to help deliver sustainable growth.</p> <p>Paragraph 7 of the NPPF discusses the three dimensions of sustainable development and under the 1st bullet point (economic role) makes reference to the "need to identify and coordinate development requirements, including the provision of infrastructure" which also demonstrates that infrastructure provision is a key element of sustainable development, and therefore having an up-to-date picture of infrastructure requirements will help the council to coordinate its delivery in line with development proposals.</p>
Inspector's Question 3.8		
3.8.1	As previously submitted, MoD employment in the area has fallen consistently over recent years, including HM Forces personnel. There is likelihood that this continues, notwithstanding that units may be deployed into Yeovilton from time to time.	See Council's response to 3.1.8 above.
3.8.2	Addition of housing for Yeovilton is not evidence based and fails to acknowledge large HM Forces reductions over the Plan period. HM Forces personnel in South Somerset has reduced by a further 170 in the period post-2011 in which SSDC's extra addition is made.	Cllr Fysh has not substantiated this statement and as explained in 3.8.1 above, the Council has evidence to the contrary.
Inspector's Question 3.10		
3.10.1	Heritage tourism is not properly understood (cf. Exhibit F). Value of East Coker in that respect is ignored, yet it has deep and permanent pull internationally, and used well as part of a comprehensive offer based on real understanding of the interconnected heritage assets of the area it could be a great draw to all of South Somerset's assets. SSDC has failed to recognise and promote this business opportunity, and in fact through the Plan would destroy it.	The value of East Coker has not been evidenced. The evidence presented by the east Coker Preservation Trust (Richard Burgess) on Issue 6 was rebutted at the Hearing Session. There is no evidence of a significant tourism impact of East Coker either in business or GVA terms.

List of Appendices submitted with this critique

Appendix 1: DEFRA data used by SSDC in housing provision calculations.

Appendix 2: APS data used by SSDC in housing provision calculations.

Appendix 3: ABI/BRES analysis presented to PMB 9 to justify Yeovil's 49% share of new jobs to 2028.