Main Matter 3

Objectively Assessed Need for Employment and Employment Land Requirement (Policy SS2)
Main Matter 3 – Objectively assessed need for employment and employment land requirement (Policy SS2)

Issue – Does the plan appropriately identify the objectively assessed quantitative and qualitative need for employment as required by the Planning Practice Guidance?

Question 3.1
Does the plan area represent an appropriate functional economic area for the purposes of assessing the need for employment land?

Council’s Response:

3.1.1 An analysis has been undertaken in both the 2013 Employment Land Projections Study [ELPS, EB-EMP1] and the 2017 Employment Land Review Update [ELRU, EB-EMP2] to understand whether North East Derbyshire District could be considered a self-contained Functional Economic Market Area [FEMA]. The (former) Practice Guidance\(^1\) provides advice on how a FEMA can be defined. It states that commercial property market geographies should be thought of in terms of market requirements for the location of premises and spatial factors used in analysing demand and supply. The Practice Guidance\(^2\) goes on to state that since patterns of economic activity vary from place to place, there is no standard approach to defining a FEMA. However, FEMAs can be defined by taking account of factors including travel to work areas and housing market areas [HMAs].

3.1.2 The ONS defines labour market areas as those areas where the bulk of the resident population also work within the same area. Defining labour market areas requires an analysis of commuting patterns to identify Travel to Work Areas [TTWAs] for local economies. A commonly accepted approach to defining TTWAs is that generally around 75% of an area's resident workforce work in the area (the first test) and at least 75% of the people who work in the area also live in the area (the second test). However, for areas with a working population in excess of 25,000 (NE Derbyshire District’s was 47,132 in 2011), self-containment rates as low as 66.7% are accepted to define a TTWA\(^3\) as part of a limited “trade-off” between workforce size and level of self-containment.

3.1.3 Both the 2013 Employment Land Projections Study [ELPS EB-EMP1] and Section 3.0 of the Employment Land Review Update [ELRU, EB-EMP2] analysed these issues in detail. EB-EMP2 reported that the ONS 2015 TTWA Analysis considered that North East Derbyshire was almost entirely contained within a larger 'Chesterfield' TTWA that also took in other local authorities including Chesterfield, parts of Derbyshire Dales and Bolsover. Furthermore, Lichfields’ analysis of commuting data indicated that North East Derbyshire experienced a high net loss of commuters on a daily basis (-15,412), with high levels of out-commuting to Sheffield (8,742) and Chesterfield (8,375).

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\(^1\) Practice Guidance Reference 2a-012-20140306
\(^2\) Ibid
\(^3\) ONS (September 2016): Travel to work area analysis in Great Britain: 2016
3.1.4 Table 3.2 in EB-EMP2 presents an analysis of commuting data and indicates that just 39% of NEDDC’s resident workforce work in the area, whilst 58% of the people who work in the District also live there. The evidence suggests that North East Derbyshire cannot be said to represent a TTWA and therefore it is unlikely to be a FEMA in isolation. Table 3.2 of EB-EMP2 also demonstrates that the combined authorities of North East Derbyshire and Chesterfield have an employment market that is broadly self-contained, based on the second FEMA test at least (with 74% of people working in the area also living there). The report concluded that these two districts could be broadly acceptable as a TTWA (particularly given the broadly rural nature of North East Derbyshire in particular). There are clearly strong links also with adjoining Sheffield and to a lesser extent Derbyshire Dales and Amber Valley that also need to be considered however, reflecting the dominant role of Sheffield in the Sub-Region.

3.1.5 In terms of the implications for plan-making, the Framework (NPPF) is not as prescriptive regarding addressing business needs in full across FEMAs as it is regarding the need to meet housing needs across a HMA. Paragraph 160 of the (2012) Framework requires LPAs to have a “clear understanding of business needs within the economic markets operating in and across their area”. To achieve this, they should:

“work together with county and neighbouring authorities and with LEPs to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and

work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.”

3.1.6 Furthermore, advice provided to Local Planning Authorities by the Planning Advisory Service and Local Government Association in 2016 states that “single authority evidence bases are ok” in those instances where a joint study across a wider FEMA is not practical due to plan timetables.4

3.1.7 The Plan Area forms part of larger areas which themselves can be considered as FEMAs, and the duty to co-operate with neighbouring authorities is especially important given the close economic relationship and commuting patterns with neighbouring authorities. However, the independent advice in EB-EMP2 indicates that the Plan area itself can be considered an appropriate area for which to plan for employment land: “Pragmatically, it is also vital that NEDDC considers the supply and demand for employment space within its own District boundaries.” (para 3.24)

3.1.8 This relationship has led to the conclusion, in research for the Sheffield City Region LEP, that some local authorities are likely to see a significant number of their residents taking up employment opportunities created elsewhere in the city region, highlighting North East Derbyshire, where residents are expected

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4 [https://slideplayer.com/slide/10853485/](https://slideplayer.com/slide/10853485/)
to take up 3,250 of new City Region jobs created [2014-24], whereas only 1,900 additional jobs are expected to be created in the District (see Employment Topic Paper para 2.1.8 ED8). Thus there is a need to improve local people’s ability to access employment, principally in Sheffield, a factor particularly important in the Northern part of the District.

3.1.9 The duty to cooperate with neighbouring authorities is especially important given the District’s economic relationship and commuting patterns with surrounding areas, namely Sheffield and particularly Chesterfield. In this context the District has been active in the Sheffield City Region economic forecasting work, and the Strategic Housing Market Area work for the North Derbyshire and Bassetlaw HMA also draws on sub-regional economic forecasting. This is accounted for implicitly in both the evidence base modelling/forecasting, and reflecting the SCR Local Enterprise Partnership’s Strategic Economic Plan & evidence.

3.1.10 NEDDC has therefore continued to undertake close discussions with Chesterfield and Sheffield to ensure their economic strategies and emerging development plan policies align. Whilst this has ensured that the employment land needs and economic growth prospects within the wider FEMA are addressed, NEDDC has also pragmatically sought to ensure that the District meets its full employment land needs within its own plan area as a failure to do so would risk higher levels of unsustainable net out commuting.

**Question 3.2**
What are the implications of the District’s links with the wider functional economic area of the Sheffield City Region and the Derby, Derbyshire and Nottinghamshire Local Enterprise Partnership area for meeting employment needs in the plan area?

**Council’s Response:**

3.2.1 Also refer to the response to Main Matter 3 Question 3.1.

3.2.2 The implications of the wider FEMAs may be understood in terms of the contribution the District makes to the wider Sheffield City-region (SCR) and to a lesser extent, the Derby, Derbyshire and Nottinghamshire Local Economic Partnership area (D2N2 LEP). North East Derbyshire is the smallest of the Sheffield City Region (SCR) local authorities in employment terms and is expected to provide around 3% of new employment opportunities in line with its role of providing a greater proportion of resident workers, many of whom commute to Sheffield and Chesterfield. There are weaker relationships with other parts of the D2N2 LEP area.

3.2.3 As summarised in our response to Main Matter 3, Question 3.1 above, North East Derbyshire District has strong economic relationships with a number of adjoining authorities, with an inflow of 13,447 workers commuting into the District on a daily basis against 28,859 out-commuters, giving a net total outflow of 15,412. The District has high levels of out-commuting to Sheffield.

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ED8 This excludes those commuting out of the Borough to work overseas

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(8,742), Chesterfield (8,375) and to a far lesser degree, Derbyshire Dales (1,637) and Amber Valley (1,605). As a result, the District has a low job density figure of 0.54 compared to 0.80 for the East Midlands region as a whole. There is therefore a clear need to provide new job opportunities in the District itself, as to continue to rely on Chesterfield and Sheffield for employment risks exacerbating the significant commuting flows, contrary to the objectives of the Plan.

3.2.4 For Sheffield City Region, above baseline growth would derive from the Strategic Economic Plan (SEP), which aims to facilitate increased job growth across the City-Region (which NED residents would continue to benefit from), and local job growth, described below at Main Matter 3, Question 3.4. Apart from the Markham Vale Enterprise Zone (shared with Bolsover & Chesterfield) neither LEP identifies major job growth locations within North East Derbyshire.

3.2.5 Apart from identifying sectoral and skills-related priorities, the D2N2 LEP SEP identifies North Eastern Derbyshire (Bolsover, Chesterfield & North East Derbyshire) as a geographical area where an infrastructure package will focus on “improving connectivity and tackling infrastructure risks to unlock new employment land at strategic sites in Chesterfield and along the A61 Growth Corridor” (areas include towards Markham Vale and towards Clay Cross). Brief details of the strategies are found in the Employment Land Review Update (EB EMP2) s.2.

Question 3.3
Is the assumption of 3000 jobs growth 2014 – 2035 under the Regeneration Scenario set out in the Employment Land Review report (EB EMP2) and Employment Land Review Update (EB EMP3) justified and robust? Why was this scenario selected in preference to the baseline job forecasts from Oxford Economics and Experian and how does it compare to historical rates of jobs growth?

and

Question 3.4
Which sectors are expected to deliver an ‘uplift’ in jobs growth compared with baseline projections, why and is this based on robust evidence?

Council’s Response:
NOTE: The documents referenced in Question 3.3 appear to be incorrect:
- the Employment Land Review report is EB-EMP1 not EB-EMP2
- the Employment Land Review Update is EB-EMP2 not EB-EMP3, and
- the Employment Land Review Update - Economic Growth Analysis is EB-EMP3.

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6 Source: ONS jobs density 2016. Note: The density figures represent the ratio of total jobs to population aged 16-64. Total jobs includes employees, self-employed, government-supported trainees and HM Forces.
3.3.1 The assumption of job growth under the Regeneration Scenario is considered to be justified and robust. Not only was the scenario based upon conservative and realistic growth rates, as set out in the Employment Land Review Report and the 2017 Update (EB-EMP1 & EB-EMP2), more recent work validates that growth. However, it is important to point out that the Council is seeking to establish a long-term and realistic rate of growth, recognising the relative volatility of annual (and quarterly) economic forecasts. This accords with the National Planning Policy Framework [paras 28 & 161] which state that LPAs should use an adequate, up-to-date and relevant evidence base about the economic prospects of the area to assess needs for “all foreseeable types of economic activity over the plan period”.

3.3.2 The original ELPS (EB-EMP1) analysed the economic factors driving the demand for employment land in the District, including the relationship between jobs and economically active population. The ELR Update (EB-EMP2) analysed a number of potential future scenarios in order to provide a framework for assessing future B-class employment space requirements in North East Derbyshire District over the 20-year period to 2034 in accordance with the PPG. This included a series of baseline employment forecasts (labour demand), using Experian’s Local Market Quarterly Forecasts for September 2016; plus an alternative, ‘Regeneration’, scenario focusing on growth in key industrial sectors prioritised by NEDDC’s Planning and Economic Regeneration Officers. The report also modelled a labour supply scenario incorporating Oxford Economics job growth data provided by GL Hearn for their March 2017 SHMA Update model run.

3.3.3 EB-EMP2 recognised that all of these approaches have their own individual strengths and limitations. In order to be robust, the District’s economic growth potential (and the likely demand for employment space) needed to be assessed under a variety of future scenarios that reflect alternative growth conditions that could arise over the study period. In reconciling the various scenarios, consideration was given to how appropriate each was to the particular circumstances and aspirations of the Council.

3.3.4 During the production of EB-EMP2, NEDDC Officers considered that the 1,800 net job growth projected by Experian’s ‘policy off’ baseline was insufficiently strong to accurately reflect likely investment and job prospects for the District, and that it was overly suppressed by ongoing manufacturing restructuring. This conclusion is shared by the consultants who prepared the SHMA, who stated: “the [Oxford Economics] baseline forecasts expect relatively modest employment growth across the HMA relative to … regional and national employment growth rates” (Employment Topic Paper (ED8) section 3.2).

3.3.5 Work undertaken by Ekosgen on behalf of the Sheffield City Region LEP concludes that jobs growth of 70,000 is expected across the City Region between 2014 and 2024, with 1,900 of the additional jobs to be located in North East Derbyshire (see Employment Topic Paper 2.1.8 ED8). Table 3.1 of EB-EMP3 projects this forward over the plan period, yielding job growth
of 3,800 (2014-2034). This would suggest that the 1,800 jobs projected by Experian’s baseline also understates the District’s ability to contribute towards employment growth at the City Region level, as well as the economic aspirations of the Sheffield City Region LEP.

3.3.6 Experian and Oxford Economics are industry specialists in providing robust and credible estimates of job growth at a local level despite methodological differences between both sets of forecasts. Such forecasts are, however, ‘policy neutral’ at the local level. By focusing primarily on the baseline scenarios, therefore, realistic adjustments to certain key growth sectors can be justified on the basis of significant known investment and economic initiatives that would not have been reflected in past trends alone.

3.3.7 Following discussions with NEDDC Officers; by making reference to the North East Derbyshire Economic Development Strategy 2008-2013 (which identifies several ‘core growth sectors’ that should be promoted and supported in District); and mirroring the methodology used in the earlier ELP Update, a judgement was made to uplift job growth in certain core priority growth sectors in the District: Digital and Creative Industries; Advanced Manufacturing; Food and Drink; Construction and Environmental Industries; and Social Enterprises.

3.3.8 Council officers considered that growth in these sectors could be anticipated at rates close to the East Midlands’ regional growth rate identified in the Scenario 1 Experian job growth projections. If this was higher than North East Derbyshire District’s forecast growth between 2014 and 2034, then the East Midlands rate was applied to the relevant SIC sectors. This resulted in a net workforce job growth of 2,828 between 2014 and 2034, some 1,028 jobs above the Experian baseline.

3.3.9 Of these five broad sectors that were expected to deliver an uplift only three, Advanced Manufacturing, Construction and Environmental Industries, and Social Enterprises showed growth in the District lower than the East Midlands Region and had growth rates increased in the Regeneration scenario.

3.3.10 In the light of new data and studies undertaken since the ELR Update was originally completed, an Economic Growth Analysis was produced [EB-EMP3] in January 2018. This revisited the justification behind the ‘Regeneration Scenario’ modelled in the ELRU (EB-EMP2) and tested the realism or otherwise of the c.3,000 net job growth in the current economic climate.

3.3.11 Section 3.0 of EB-EMP3 provides a detailed analysis of the 5 target growth sectors that were adjusted for the Regeneration Scenario and concluded that the rate of change for the growth sectors was generally validated by the latest December 2017 Experian projections (see Appendix 1), or as is the case of the adjustments made to the 3 construction sectors, the level of growth is very modest compared to that forecast by either Oxford Economics or Ekosgen. In particular:
• The Regeneration Scenario appears to be the most closely aligned with the overall average, although it does forecast a modest growth in manufacturing jobs whilst the others project a decline.

• The Regeneration scenario perhaps most strikingly shows a very strong growth in public services, but all of the growth will be in either Health (+307) or Residential Care and Social Work (+824). Given that North East Derbyshire’s population has a strongly ageing profile, this does not appear to be unreasonable, and is reflected in the Ekosgen and OE projections.

• The only other Regeneration Scenario figure adjusted from the Experian baseline relates to the broad ‘construction’ sector, with a projected growth of 540 jobs (net), higher than the 110 decline for Experian but closely aligned with the overall average growth of 506 jobs (net). It also reflects the Council’s economic and housing strategies.

3.3.12 The Council, as advised by its consultants, acknowledges that there are complexities in long term economic forecasting and that such forecasts should be treated as indicative only. This is reflected in the Planning Practice Guidance which states that there is no one methodological approach or use of a particular dataset that will provide a definitive assessment of development need. The Practice Guidance also states that local planning authorities may adopt an approach that reflects their particular local circumstances. However, EB-EMP3 concluded that there was sufficient evidence to support the ‘regeneration scenario’ modelled in the ELRU as being a ‘realistic’ forecast of how the local economy may change.

3.3.13 EB-EMP3 concluded (s.4.0) that there were a number of reasons that support the regeneration scenario as being a justified and robust approach:

• The Government’s Green Paper: ‘Building our Industrial Strategy’ outlined support and public investment to all five target sectors identified by NEDDC as underpinning the regeneration scenario, demonstrating confidence in the growth of these key target sectors in the future.

• The Practice guidance states that as part of the approach to be taken to assessing housing and economic development needs, plan-makers should “make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate”7. In this regard, long term past trends for North East Derbyshire District are volatile and depend on the source (and time period) used. With this caveat in mind, over the 16 years (2000 to 2016), ONS job density statistics suggest that the total number of jobs in North East Derbyshire District grew by 4,000, at a compound average growth rate of 0.81% annually (this includes the recessionary figures in 2008/09). This compares with average annual net job growth of 0.70% for Ekosgen; 0.29% for the September 2016 Experian projections; and 0.18% for Oxford Economics. The Regeneration Scenario annual growth rate, of 0.45%, is just over half of the level of job growth.
growth that has been achieved in the recent past in the District, demonstrating that it is readily achievable;

- When comparing the various econometric job projections provided by Experian, Oxford Economics and Ekosgen, it appears that the Ekosgen projections appear to be most out of sync with the overall mean. The Regeneration Scenario appears to be more closely aligned with the overall economic prospects for the District, and in particular with key target growth sectors such as manufacturing and construction.

- The (then) latest Experian Economic projections (released in December 2017) for North East Derbyshire further justify the appropriateness of the Regeneration Scenario. The December 2017 Experian projections indicate a level of net job growth of 2,700 over the 20-year plan period, which is very similar to the 2,827 projected by the Regeneration Scenario. Furthermore, the sectoral level breakdown underpinning the Regeneration Scenario remains a reasonably close match to the latest Experian data.

3.3.14 Fundamentally, The Council considers that this demonstrates that the Regeneration Scenario is validated by the latest Experian projections and comprises a justified and robust modelling approach in the current economic climate when compared against past trends.

**Question 3.5**

*What interventions by public sector bodies and partners would be necessary to deliver the Regeneration Scenario and how likely are they to be achieved?*

**Council’s Response:**

3.5.1 It is not anticipated that any significant interventions will be needed to deliver the Regeneration Scenario. However, several initiatives are in place, as described below.

3.5.2 At LEP level, the Government has agreed Growth Deals with both LEP’s. The Sheffield City Region Growth Deal will address investment in key transport, infrastructure, skills and business support projects, including some in North East Derbyshire. The D2N2 Growth Deal will invest in a number of projects in the LEP’s priority sectors – including advanced transport engineering and life sciences. In total these represent around £470 million of funding from 2015 to 2021. Further information on the LEP Strategic Economic Plans is in the Employment Land Review Update (EB-EMP2 s.2.29-2.42).

3.5.3 Throughout the preparation of the Local Plan the Council has engaged with the other authorities within the Sheffield City Region, through the Sheffield City Region Planning Officer’s Group and the South Yorkshire/Sheffield City Region Heads of Planning meetings (Duty to Cooperate Compliance Statement: Submission Version (SD5b)). This has ensured cross-boundary understanding of economic planning and alignment of forecasts.
3.5.4 Both the 2017 SHMAA (EB-HOU4) and the Sheffield City Region employment analysis described above paid particular attention to employment growth and its relationship with the HMA and City-region context, including the LEP strategies. The work also included ensuring alignment between employment and housing. Further reports were commissioned to confirm the basis for North-East Derbyshire’s economic growth as originally derived to inform the SHMAA; this work was shared with those other HMA authorities.

3.5.5 No formal requests have been made for North East Derbyshire to accommodate any unmet employment needs from the other SCR authorities, including Sheffield and the three HMA authorities.

3.5.6 In terms of the Plan’s evidence base the targeted consultation undertaken for the Employment Land Review report (EB EMP2) and Employment Land Review Update (EB EMP3) involved a number of key stakeholders including the Sheffield City Region LEP and the Derbyshire Economic Partnership.

3.5.7 North East Derbyshire District Council’s joint Housing and Economic Development Strategy (2015) (CD-CSF2) outlines the Council’s priorities for achieving economic growth and securing access to a range of good quality housing for its residents. The Strategy identifies strategic objectives including these concerning the economy:
- Supporting enterprise: maintaining and growing the business base
- Maximising employment, skills and training opportunities
- Unlocking the potential of major employment and housing sites
- Town Centres: realise the vitality and viability of town centres
- Supporting the rural economy, including tourism

3.5.8 The Council’s Growth Strategy (2014) included initiatives such as:
- to establish a business support programme by engaging with the Local Enterprise Partnerships,
- through a LEADER Approach support job creation,
- support young people to raise their employability skills
- provide pre-employment activities to unemployed residents,
- identify with partners, a plan to bring forward site development at principal employment growth locations.

3.5.9 The Council’s Economic Development Unit is monitoring employment land and premises in order to better respond to local business growth and inward investment opportunities. This includes the land to be brought forward in the Local Plan.
**Question 3.6**

*Does the plan’s Regeneration Scenario have any implications for neighbouring authorities in terms of the labour market, commuting patterns and delivery of their economic strategies and local plans?*

**Council’s Response:**

3.6.1 No, this is described in the response to Main Matter 3, Question 3.5 (paras 3.5.4 – 3.5.5). In addition the Plan’s evidence does not rely on any changes in the relationship with neighbouring authorities, for example, in terms of changing commuting patterns. The level of employment land identified is sufficient to provide a sufficient uplift in jobs to align with the Council’s Regeneration Growth Strategy, and this in turn aligns with the housing need identified in the SHMA *(EB-HOU4)*. Whilst NE Derbyshire is currently a net exporter of labour to adjoining areas, it is not anticipated that the increase in employment land would radically impact the delivery of their economic strategies and Local Plans.

3.6.2 Shifts in the labour market will take place, and should the District become more successful at retaining or attracting a more highly skilled workforce, for example, this is not expected to depart greatly from the sectoral forecasts described in the Economic Growth Analysis *(EB-EMP3)*, and thus not impact upon the scale of employment.

3.6.3 The Council is not seeking to meet the B-Class employment land needs of any of the districts adjoining North East Derbyshire, and it not expecting them to meet any of its needs. Paras 2.32-2.69 of *(EB-EMP1)* draw upon a review of development plan policy and stakeholder consultation to understand the employment land position within the surrounding authorities. This identifies that: “None of the surrounding local authorities require North East Derbyshire to provide any employment land allocations to meet their needs” (para 2.69(5) *(EB-EMP1)*). The scale of employment land associated with the Regeneration Scenario has been discussed with adjoining Councils as part of the Duty to Co-operate *(SD5a)* and there have been no objections to the Regeneration Scenario from any of the adjoining Councils, who support that approach.
**Question 3.7**

*Would the jobs created be likely to meet the requirements of the District’s working age population? Are there any identified skills shortages?*

**Council’s Response:**

3.7.1 In quantitative terms, a housing provision of 330 dwellings per year and the job growth of around 3,000 over the Plan period both align with the Regeneration Scenario. The SHMA OAN Update (EB-HOU4) shows that for North East Derbyshire the growth in economically-active residents to support the Regeneration Scenario would be 3,823 (Table 29). The level of housing need linked to that change in the resident labour-supply would be 332 homes per annum (Table 31). The higher housing provision in effect assumes that that level of job growth would need to be supported by people moving to the area. The calculations involve assumptions over the links between workplace jobs, resident workforce, population and households in the District (and HMA), described in more detail in the SHMAA, Chapter 3.

3.7.2 The District does experience skills shortages. The Employment Land Review Update (EB-EMP 2) describes: “the low level of employment in the more knowledge-intensive services such as media, professional services, finance, insurance and pensions, in both relative and absolute terms, which may reflect the lower skills base of North East Derbyshire’s labour force. Additionally this is exacerbated by outwards commuting of high-skilled workers to Chesterfield and Sheffield.”

3.7.3 The latest ONS Annual Population Survey data for 2017 indicates that just 27.3% of the District’s resident population are educated to NVQ4 level and above (e.g. HND, Degree and Higher Degree level qualifications or equivalent), compared to 32.5% for the East Midlands and 38.6% for Great Britain as a whole.

3.7.4 Such shortages are not directly influenced by the Plan and are expected to be addressed through initiatives arising from the two LEP SEPs and the Council’s Housing and Economic Development Strategy (CD-CSF2), which has an objective of maximising skills and training opportunities.

3.7.5 That said, there is a clear need to promote growth in high value employment roles/jobs that require a skilled workforce in North East Derbyshire (and which align with the North East Derbyshire Target Growth Sectors) and that meet the aspirations of resident workers. Therefore whilst the Plan has no direct role, nor objective to create highly skilled jobs, employment allocations can serve to respond to the conclusion in EB-EMP2 that “the Council will need to make choices in the emerging Local Plan about which employment sites to protect or allocate for employment [to] take account of …. [inter alia] … the need to promote growth in higher value employment roles in North East Derbyshire that meet the aspirations of resident workers and reduce levels of net-out commuting to Chesterfield and Sheffield, which can meet the Council’s objective of maximising employment, skills and training opportunities.”
Issue – Is Policy SS2 which makes provision for 41 hectares of employment land soundly based?

Question 3.8
How has the OAN for employment been translated into a requirement for floorspace and land? Are the assumptions in relation to the following factors clear and are they realistic and justified by the evidence:

- Site coverage/plot ratio – 40%
- Loss of employment land to other uses – 1 hectare per year
- Margin for choice – 3.9 hectares over the plan period
- Assumptions for job densities in the following sectors:
  - B1 (offices, research & development, light industry)
  - B2 (general industry)
  - B8 (storage and distribution)?

Council’s Response:

3.8.1 The objectively assessed need for economic development in land and floorspace terms is considered appropriate and effective on the basis of up to date, robust evidence which supports the approach and demonstrates that it is deliverable. The primary evidence base documents comprise EB-EMP1 and EB-EMP2, whilst the Employment Land Review Update Economic Growth Analysis (EB-EMP3) is also relevant.

3.8.2 The original Employment Land Review Study, 2013 (EB-EMP1) was intended to form part of the evidence base for NEDDC’s emerging Local Plan; assist the delivery of employment sites (with specific information provided on office sites in the town centres); and aid the formulation of a clear economic strategy. The Study concluded that a range of between 35ha and 75ha (gross) of employment land would be appropriate over the 20-year plan period 2011 to 2031. Lichfields was subsequently asked to update this study in the light of new data published since the time of the previous study. This new report in 2017 (EB-EMP2), includes commuting data contained within the 2011 Census; the latest (post-Brexit) Experian projections; and, to align the employment needs with the emerging Strategic Housing Market Assessment [SHMA]. EB-EMP3 was produced in January 2018 to revisit the justification behind the Regeneration Scenario and test the realism of the c.3,000 net job growth.

3.8.3 In doing so, the three documents were conducted in full accordance with the Practice Guidance. A key input into the process was consultation with various organisations with an interest in the supply of employment land including surrounding local authorities, local agents with a knowledge of North East Derbyshire’s economic development property market, and the Local Economic Partnerships.

3.8.4 Section 5.0 of EB-EMP2 examined the B-class employment space requirements for NEDD for the period 2014-2034. To estimate the broad scale and type of additional employment land required, a number of different...
indicators and factors were considered. A series of scenarios were developed based upon forecast employment growth in the main B-class sectors, and the consideration of population forecasts and future growth of local labour supply and the amount of jobs and employment space this could support in line with the Practice Guidance.

3.8.5 These included the following scenarios:

- **Employment forecasts (labour demand),** using Experian’s baseline Local Market Quarterly Forecasts for September 2016; plus an alternative, Regeneration, scenario focussing on growth in key industrial sectors prioritised by NEDDC Planning and Economic Regeneration Officers;
- **Estimated growth in the local labour supply** – and the jobs and employment space that this could be expected to support – having regard to analysis presented as part of the District’s Strategic Housing Market Assessment [SHMA]; and
- **Consideration of past take-up of employment space** based upon monitoring data provided by NEDDC and how these might change in future.

3.8.6 All of these approaches have their own individual strengths and limitations. In order to be robust, however, the District’s economic growth potential (and the likely demand for employment space) needs to be assessed under a variety of future scenarios that reflect alternative growth conditions that could arise over the study period. In reconciling the various scenarios, consideration was given to how appropriate each is to the particular circumstances and aspirations of NEDDC.

**Job Growth Scenarios:**

3.8.7 The baseline September 2016 Experian Job Growth Projections for North East Derbyshire (Scenario 1) projected a net workforce job growth of 1,800 over the 20 years to 2034, with particularly strong growth in residential care and social work, followed by the production of food, drink and tobacco, retail, professional services and health. The largest reductions in employment were projected for the manufacture of metal products; other private services and the manufacture of computer and electronic products. These figures indicated a modest increase in the level of net workforce job change of +524 workforce jobs in the B-use classes in North East Derbyshire District over the 20-year period to 2034, with B1a/b sectors seeing a cumulative increase of +397 jobs, a decrease in B1c/B2 manufacturing employment (-158), and an increase in B8 distribution (+285).

3.8.8 Scenario 2, Past Trends Job Growth, indicated that over the past 15 years (2000-2015) the District lost a total of 500 jobs, equating to a compound annual growth rate of -0.11%. Trending this rate of decline forward suggested that the District could lose a further 622 workforce jobs between 2015 and 2034.

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8 2a–032–20140306
3.8.9 Scenario 3, the Regeneration Job Growth scenario, has been explored in depth in our response to Q 3.3, but essentially uplifts job growth in several core growth sectors from the Experian baseline, which results in a net increase of 2,828 workforce jobs, of which 1,015 are related to B-Class employment.

3.8.10 Scenario 4, the labour supply scenario, is based on the job growth outputs from the Long Term Migration Demographic Scenario (10 year Migration trends, 2005-15) in the Council’s SHMA. Over the period 2014-34, this results in a growth of 6,050 residents, 4,447 households and 2,794 dwellings (140 dpa). This level of housing growth can sustain a working age population of 58,070, a net growth of 2,073. Given the level of net out-commuting and low unemployment, this equates to a net increase of 1,181 jobs based in the District over the next 20 years (it should be noted that subsequent modelling in the SHMA has resulted in a higher housing OAN figure that aligns with the upper end of the employment land range and which supports the 330 dpa figure in Policy SS2 of the Publication Draft Local Plan).

3.8.11 Scenario 5 trends forward past completion rates of employment floorspace. This equates to 0.95 ha net, plus 1 ha for the replacement of losses (i.e. 1.95 ha in total). This equals 39 ha (gross) over the 20-year period 2014-34.

Assumptions for Job Densities:

3.8.12 Employment densities (as recommended in the latest HCA (November 2015) Employment Densities Guide third edition, were used to translate the resulting B-Class job figures into employment land projections. Based on this guidance, and translating the data from Full Time Equivalents [FTEs] to workforce jobs, it was assumed that:

- One B1a/b general office workforce job requires 12.5 sqm of employment floorspace [Gross External Area, or GEA];
- One B1c light industrial workforce job requires 53.5 sqm of employment floorspace [GEA];
- One B2 industrial workforce job requires 36 sqm of employment floorspace [GEA];
- A combined B1c/B2 factor of one workforce job per 45 sqm was obtained by taking an average of the aforementioned B1c/B2 GEA equivalents; and
- One warehousing/distribution FTE job requires 65 sq. m. of employment space [GEA].

3.8.13 The HCA Guidance takes account of recent trends in terms of the changing use of employment space, the main change being the more efficient utilisation of office space due to increased flexible working and hot-desking.

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Given that the majority of B8 warehousing has been low bay warehousing in recent years, the 'small' warehousing jobs ratio of 1 workforce job per 65 sqm has been used from the HCA guidance as agreed with Council Officers.
3.8.14 An adjustment was also made to reflect the fact that vacancy rates in North East Derbyshire are currently low, at around 3.4% for office floorspace and around 4.2% for industrial/warehousing floorspace. On the basis that a figure of 10% better reflects ‘normal’ market conditions, the model assumed that there is a need for slightly more B-class floorspace to help bring the market back to something approaching equilibrium by 2034. Furthermore, where a reduction in industrial jobs is forecast in the latest modelling, the associated negative floorspace is halved, to reflect the fact that not all of this employment space is likely to be lost. This approach has been adopted in recognition of the complex relationship between (industrial) job change and floorspace change in the District (see EB-EMP2, para 5.17 and Figure 5.1).

Site Coverage / Plot Ratio

3.8.15 The former PPG notes that having translated employment into floorspace, a plot ratio ‘based on industry proxies’ should be applied to translate floorspace to site area. A plot ratio is the total building square footage (building area) divided by the site size square meterage (area of the plot). Therefore, a plot ratio of 150% would indicate that the total floor area of a building is 1.5 times the gross area of the plot on which it is constructed.

3.8.16 The ‘industry proxies’ referred to in the PPG are unspecified. However, the former ODPM Guidance Note on Undertaking Employment Land Reviews (December 2004) noted plot densities typically ranged from 0.25 – 0.40 for Business Parks; from 0.35 to 0.45 for Industrial land; from 0.40 and 0.60 for warehousing; and from 0.41 to 2.00 for Town Centre office.

3.8.17 It is common practice in Employment Land Studies to apply a general rule of thumb 40% plot ratio (i.e. 4,000 sqm would occupy a 1 hectare site) to out-of-centre office space, industrial space and warehousing. Higher plot ratios of perhaps 200% would be applied to high density town centre office blocks, which are not found in NEDD. On balance it was considered that a 40% plot ratio was appropriate to apply in the case of NE Derbyshire District for the purposes of EB-EMP2.

Loss of employment land to other uses

3.8.18 To convert the net requirement for employment space into a gross requirement (the amount of employment space or land to be allocated), an allowance is also typically made for some replacement of losses of existing employment space that may be developed for other, non B-Class uses in future. This is a widely accepted approach in planning for future employment land needs.

3.8.19 At the time of drafting EB-EMP2, there were a number of extant approvals by NEDDC for an A1 retail store (Aldi) at Littlemoor in Eckington (0.75 ha loss of B1/B2/B8 land); the redevelopment of the Derbyshire County Council Works...
Depot in Clay Cross (0.75 ha loss of B1/B2/B8 land); the loss of offices at Littlemoor House for an educational facility (0.53 ha B1 loss); and the loss of B-Class land at Renishaw for a 60-bed nursing home (0.4 ha loss). This equates to a potential loss of 4.01 ha that has emerged over the past 4 years, or a rate of just over 1 ha annually. This is lower than the 1.6 ha recommended in the 2013 ELPU, which was primarily based on a spike of losses primarily attributable to the Avenue and former Biwaters sites. However more recent data suggests that the level of losses has continued to tail off in recent years and as such a lower rate of replacement is considered appropriate in this instance.

3.8.20 Taking this as a reasonable basis for going forward would suggest the need to replace around 1.0 ha of B-Class land annually, although this is considered to be on the conservative side and will be monitored by the Council over the next few years and adjusted as necessary.

Margin for Choice

3.8.21 To estimate the overall requirement of employment space that should be planned for in allocating sites and to allow some flexibility of provision, it is normal to add an allowance as a safety margin for factors such as delays in some sites coming forward for development. This margin is a contingency factor, providing a modest additional land buffer so that supply is not too tightly matched to estimated demand, and so that shortages of land do not arise if future demand turns out to be greater than the forecasts. Such flexibility is sensible given the uncertainties in the forecasting process and the scope for delays in developing employment space.

3.8.22 The South East England Planning Partnership Board [SEEPB] guidance on employment land assessments recommends an allowance that is equivalent to the average time for a site to gain planning permission and be developed, typically about two years. For North East Derbyshire District, on the basis of the 0.95 ha net take up analysis set out in the Past Take Up Scenario plus a 1.0 ha annual allowance for losses, a 2-year safety margin of 3.9 ha was added for B-Class uses.

3.8.23 Please note that there was a minor error in the EB-EMP2 report. The aforementioned flexible margin of 2 years’ supply was 3.9 ha, whereas a single annual figure of 1.95 ha was actually applied. Therefore the figures in the Table below relating to the demand-led range of gross land requirements to 2034 have been increased by 1.95 ha to address this error.

3.8.24 The new B-Class employment land range, of between 30 – 43 ha, appears more conservative than the range in EB-EMP1 but should be seen in the context of an uncertain economy, very low rates of losses in recent years and a fall in B-Class completions generally, albeit within the context of very low vacancy rates for both commercial and industrial floorspace.
### North East Derbyshire Gross Employment Land Comparisons 2014-34

<table>
<thead>
<tr>
<th></th>
<th>B1a/b</th>
<th>B1c/B2</th>
<th>B8</th>
<th>TOTAL</th>
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<td><strong>1) Experian Baseline</strong></td>
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<td></td>
<td>30.92</td>
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<td><strong>5) Past Take Up Rates</strong></td>
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<td>2014-2034 (net)</td>
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<td>2014-2034 (gross)</td>
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<tr>
<td>+ Flexibility factor</td>
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<td>42.90</td>
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**Question 3.9**

*Overall, will the plan meet the objectively assessed quantitative and qualitative need for employment land over the plan period?*

**Council’s Response:**

3.9.1 The Council considers that the Plan will meet the objectively assessed quantitative need for employment land over the Plan period.

**Quantitative:**

3.9.2 The Council’s response to Question 3.8 above and the Employment Topic Paper (ED8), explain that the Publication Draft Plan seeks to accord with Government planning policy to support realistic economic growth. The level of growth reflects the positive aspects of employment growth for the District and this appears to be realistic in the latest evidence (The Employment Land Review Update - Economic Growth Analysis, **EB-EMP3**), but is not overly ambitious. The process also seeks to reflect market factors as Government requires, in this instance it is noted that there are constraints on existing and prospective land.

3.9.3 In terms of land requirement, the recommendation of the Employment Land Review Update (ELRU – **EB-EMP2**) was that B-class employment land would require a net increase of 18.75 ha to deliver the growth anticipated under the Regeneration Strategy. Once losses and flexibility were estimated and accounted for provision recommended on the basis of the regeneration scenario was 40.71 ha. This has now been adjusted to 42.66 ha following the correction of the minor error (paragraph 3.8.23 above) relating to the aforementioned margin of choice.

3.9.4 The Publication Draft Plan makes provision for 46.44 ha of employment land, which gives greater flexibility over provision than that estimated in the ELRU (**EB-EMP2**). In reaching this figure the Plan makes an allowance for restructuring and losses but does not de-allocate any employment land. Some prospective employment sites offer opportunities for de-allocation, but these are all within settlement boundaries and adjoin existing well-occupied employment areas, and are to be retained as employment allocations. The loss of B-class uses to deliver the requirements of other (non-B-class) employment uses are also accounted for in the employment land provision. Policy WC3 allows for this on certain sites, fulfilling the recommendations of the ELRU (**EB-EMP2**).

3.9.5 This illustrates the way in which objective D1 is being met; “To facilitate development and ensure sufficient land is made available that will support the growth of the local economy” The Plan provision is retaining land where possible, and making additional land available for development where that is feasible. Taking a flexible policy approach also aims to facilitate development and support existing business.
Qualitative

3.9.6 The ultimate judgement regarding the level of employment need that NEDDC is planning for has not simply been shaped by a consideration of quantitative analysis. Rather, a number of qualitative factors have also been taken into account. These factors, have been identified through an analysis of economic and market conditions, as well as previous consultations with economic stakeholders, commercial agents and local businesses, and have influenced the employment space requirements that need to be planned for and must be considered alongside the modelled scenarios.

3.9.7 For example, the majority of industrial space in North East Derbyshire is provided on a range of industrial estates of varying quality, almost wholly on former (secondary) mining and industrial land. The now re-used industrial land is mostly on purpose-built industrial estates developed with public investment, but a significant number of local employers are also accommodated in sub-standard premises on un-improved sites.

3.9.8 Distribution across the District: The Local Plan aims to direct new growth, including employment land to the most sustainable (Level 1) settlements and on Strategic Sites that will promote mixed uses and the re-use of previously developed land. While constrained by existing commitments, the available sites broadly reflect the distribution of population and housing across the district; about 30% in the North and 60% in the South, with the remainder in the East. Of the new employment land, other than the strategic sites of the Avenue, former Biwaters, and Markham Vale, three quarters is located within the four main towns.

3.9.9 The provision in the South of the District helps to narrow the gap between the more deprived and more affluent areas. It will also help the economic revival of Clay Cross and deliver employment on former employment land at the Avenue and Biwaters sites. In the North sites close to the identified pockets of deprivation are identified (Norwood and Renishaw). Employment land provision in the towns of Dronfield, Eckington and Killamarsh, will help meet demand in the northern part of the District, but recognising the broader context of the relationship with Sheffield (see also the Council’s response to Main Matter 3, Question 3.2). In the East of the District provision helps capitalise on the proximity to the M1 motorway and Markham Vale in line with the conclusions of the Employment Land Update (EB-EMP2).

3.9.10 The needs of local business have also been taken into account in line with the evidence, which indicates a large proportion of indigenous businesses. Provision aims to retain local sites and support non-B-class uses where these support local business. Examples of these are the sites at Morton, Stonebroom and in Clay Cross.

3.9.11 Certain commercial aspects of the employment land market are also pertinent (see ERLU EB EMP2), for example:
In market terms North East Derbyshire District has a much lower level of commercial floorspace than nearly all of its neighbouring authorities, the vast majority of this related to industrial/warehousing floorspace.

Prime locations in the District are those with good accessibility to the A61 and M1.

The shortage of employment sites and land for development in surrounding areas affects the market in North East Derbyshire by keeping industrial vacancy rates low.

Industrial and logistics uses are driving the commercial property markets in the wider commercial property market area, focused outside the District (except for Markham Vale).

Local employers lead demand within North East Derbyshire District, predominantly local SMEs looking for small industrial space; demand is exacerbated by poor existing property and a shortage in supply.

There is a shortage of more modern and affordable premises for local businesses to expand or move into. As a result they are looking for new build and secondary premises.

The Coney Green Business Park in Clay Cross is the only site in the District where any take-up has taken place. Even so, non-employment uses are sought there.

The majority of office space supply in North East Derbyshire comprises small units and second-hand Grade B stock.

New office development demand is in North East Derbyshire is likely to be occupier-led rather than speculative.

Vacancy figures are low, which suggests that supply of premises in the District is limited and hence available properties are occupied quickly.

3.9.12 Where the points above relate to the quality of premises it is anticipated that these will be able to be addressed through redevelopment on existing and provision of new employment land. In this regard it is pertinent to note the nature of commercial development in the District. As outlined in the response to Main Matter 9, Question 9.21, in North East Derbyshire local business expansion and accommodation requirements drive some economic land development. New premises may be directly commissioned that meets such needs so that the business faces less risk and therefore requires rather less profit, this helps to reduce costs and makes development more viable.

3.9.13 As set out above, the Local Plan has sought to respond to the recommendations in Chapter 6 of the 2017 Employment Land Review Update (EB-EMP2) (s4), of which paragraphs 6.12-6.15 are considered most relevant. And in particular the following points:

- The future growth reflects both the indigenous growth needs in North East Derbyshire as well as a degree of footloose demand that operates within a wider sub-regional market
- The local economy is not unduly constrained over the plan period, but policies also recognise the issues around land supply.
- The delivery of B-class employment land can be prioritised in particular areas and for particular uses
• Deliver inward investment opportunities, in particular utilising those provided by the MEGZ and other, large, strategic sites (such as the Avenue, the former Biwater site, Coalite site and Callywhite Lane) with good access to the strategic road network.
• Consider the where existing legacy estates and sites could be better placed to support non B class employment uses in the future, which may also generate benefits to the North East Derbyshire economy.
• The portfolio of allocations and other development opportunities can show delivery of new space over the short, medium and long-term, to demonstrate a five-year rolling supply of employment land.

3.9.14 The Plan’s overall provision exceeds the recommendations in the Report (EB-EMP2), to allow flexibility and recognise pressures from other land uses. Some provision is in more accessible and attractive locations but no additional sites are considered suitable or necessary as this would produce excessive provision, with resultant need to account for the implications for housing. In view of low past delivery rates, uncertain constraints on certain sites and flexibility within the level of provision it is not considered necessary to demonstrate a rolling supply of land.
### Employment Change by Industrial Sector

#### Appendix 1

**Table 1 Employment Change by Sector for North East Derbyshire – Comparison**

<table>
<thead>
<tr>
<th>Sector</th>
<th>Net Job Growth 2014-34</th>
<th>Experian September 2016</th>
<th>Regeneration Scenario</th>
<th>Experian December 2017</th>
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<td>Agriculture, Forestry &amp; Fishing</td>
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<td>208</td>
<td>208</td>
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<td>Printing and Recorded Media (manufacture of)</td>
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Taken from Table 3.4 of Lichfields’ report in January 2018: “Employment Land Review Update Economic Growth Analysis”

Source: Experian (September 2016 / December 2017), Lichfields analysis

Note: cells highlighted in red are more than 200 jobs higher/lower than the December 2017 Experian data release.