

# Explanatory Note on Proposed Modifications to Policy EC5: Employment and Skills & the Local Plan Planning Obligations Annex

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## Introduction

- At the Crawley Borough Local Plan Examination Hearing (Matter 4, Issue 4) held Wednesday 22 November 2023, regarding Local Plan Policy EC5 (Question 4.33), the council agreed to consider points raised by Gatwick Airport Limited (GAL) and Gatwick Green Limited (GGL). This focused on two specific areas:
  - That the formula for calculating the Employment & Skills contribution from commercial development should use the ‘employment self-containment rate’ (percentage of those living and working in Crawley as a percentage of total jobs), rather than the ‘resident self-containment rate’ (proportion of people living and working in Crawley as a percentage of Crawley’s working population). This was suggested by GAL in its Matter 4 Hearing Statement (REP-056-002).
  - That accompanying guidance to the policy does not suggest flexibility in how the objective of the policy could be achieved in lieu of a financial contribution. This was suggested by GAL in its Matter 4 Hearing Statement (REP-056-002) and by Savills on behalf of GGL, also in its Matter 4 Hearing Statement (REP-008-001).
- As requested by the Inspectors, this Explanatory Note details the council’s position on the issues raised. Having considered the points raised, the council agrees that modifications are necessary to the Policy EC5 supporting text and Local Plan Planning Obligations Annex. The proposed modifications are set out in the Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e). Corresponding amendments will be made to the Employment & Skills Guidance Note (Submission Document Reference EGSM/EG/10).

## Education and Skills Formula

3. As set out at the hearing session, the council acknowledges that the Employment and Skills contribution formula for commercial development, as set out in the Submission Crawley Borough Local Plan, does erroneously refer to the 'resident employment self-containment' rate rather than the 'employment self-containment' rate. CBC agreed that it would be prepared to amend the formula, provided that this would not impact upon whole-plan viability through increasing the overall financial contribution for developers beyond that tested through the Crawley Local Plan Review Viability Assessment Update December 2020 (Submission Document Reference DS/VA/01a). The council also noted that the updated 2021 Census figures were due to be published, and that if available, these should feed into any revised formula.
4. The council can confirm that the relevant Census data set, *Origin-Destination data, England & Wales Census 2021*, has been published. This sets out that of the total number of residents aged 16 and over and in work (including students), 25,156 are working from home or no fixed workplace, and 19,179 are working in Crawley. That makes for a total of **44,335** people who live and work in the borough.
5. The Nomis (ONS Business Register & Employment Survey) confirms that as of April 2021, there were a total of **85,000** employees (jobs) in Crawley.
6. The council notes that these figures were recorded at the time of the Covid-19 pandemic, and this may have influenced the total number of people recorded as working from home, and also the total number of jobs in Crawley which is lower than the 100,000 jobs referenced in the Local Plan. However, the 2021 Census data represents the most up-to-date data available, and is likely representative of the post-pandemic situation where more people are working from home, and more widely the impacts of the pandemic on Crawley's economy as it works towards recovery. Therefore, the council considers the 2021 Census data to represent an appropriate basis for figures used in the Employment and Skills contribution formula.
7. Based on these figures (44,335 as a percentage of 85,000) provides an 'employment self-containment' rate for Crawley of 52%. This is lower than the 65.7% 'resident self-containment' rate figure erroneously included within the Submission Local Plan formula, and has the effect of reducing the financial contribution sought, thereby improving whole plan viability overall. Given that the amendment addresses an error and also supports viability, the council proposes to amend the formula to use the employment self-containment figure of 52%.
8. This amendment necessitates several modifications to the Local Plan. These are detailed later in this note and in the Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e).

## Flexibility in lieu of a Financial Contribution

9. Both GAL and GGL have suggested that there is not sufficient flexibility within the Local Plan to achieve the objectives of Policy EC5 through means in lieu of a financial contribution. The council acknowledges that in some cases, particularly where

development is of a strategic scale, scope may exist to contribute more effectively to employment and skills development in the borough through alternative measures other such as the provision of on-site training and facilities.

10. Part ii of Policy EC5 requires major development to make *'a proportionate financial contribution towards employment and skills initiatives in Crawley'*. The policy text then sets out that *'The requirements of parts i. and ii. above should be satisfied in accordance with the Local Plan Planning Obligations Annex'*.
11. On this basis, the council does not consider it necessary to propose modifications to the wording of Policy EC5 itself, as it is the Local Plan Planning Obligations Annex that provides detail as to how Part ii of Policy EC5 is satisfied. Therefore, CBC suggests that that new text is included in the Local Plan Planning Obligations Annex, and this flexibility is also referenced in the Reasoned Justification to the Policy. The following would be added as a new second paragraph to the section: *Commercial Development, including as part of Mixed Use Development* (page 283):

Suggested new paragraph for Planning Obligations Annex:

*Where it can be clearly demonstrated that measures in lieu of the financial contribution would achieve greater benefits in delivering employment and skills initiatives to help Crawley residents access employment opportunities, this will in principle be supported, subject to negotiation and agreement with the council. Such measures would be expected to go beyond those identified in the Employment & Skills Plan. This may include for example on-site training provision or other interventions. Any such measures would be secured by way of a legal agreement.*

12. This amendment necessitates modifications to the Local Plan, as detailed later in this note and in the Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e).
13. Corresponding amendments are proposed to the Employment & Skills Guidance Note (Submission Document Reference EGSM/EG/10).

## Proposed Modifications

14. As discussed, the council proposes modifications to the Local Plan in order to address points made regarding 1.) the employment and skills contribution formula and 2.) the scope for flexibility in the application of Part ii of Policy EC5.
15. For clarity, the proposed modifications to the Policy EC5 supporting text and the Planning Obligations Annex are set out in Appendix A and B of this Explanatory Note.
16. They are also set out in the Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e).

## Appendix A: Proposed Modification to Policy EC5: Employment and Skills Development

### Employment and Skills Development

- 9.65 Crawley is a place that is changing and growing, as more people choose to come to the borough to live and work. It is well established as a key employment destination, and is home to around 4,000 active businesses which generate over ~~100,000~~ **85,000** jobs. Despite its strong economic performance, there is a recognised disparity between the on average lower level of qualifications and income achieved by people that live in Crawley and those of the in-commuting workforce which are on average higher. This is reflected in Crawley's position close to the bottom of social mobility rankings published in the 2016 State of Nation report, where Crawley ranks 304<sup>th</sup> out of 324 local authorities.
- 9.66 Addressing the skills gap is vital to enabling Crawley residents to access higher skilled employment, creating the right conditions for career opportunities for those living within the borough. It is important that Crawley offers the right skills profile to cater for the needs of current and future employers. Through the council's own research, it is estimated that £49 million GVA per annum is lost through skills shortages; working to address the longstanding skills gap will help Crawley in continuing to attract inward investment as a preferred location for business.
- 9.67 The original Crawley Employment and Skills Plan, launched in 2016, introduced flagship projects including the borough having achieved Construction Industry Training Board (CITB) Skills Academy status, introduction of the Developer and Partner Charter, and the creation of Employ Crawley. In supporting different routes to education and higher value jobs, it has helped empower some of Crawley's most disadvantaged residents and has promoted and enhanced the council's commitment to making Crawley a Living Wage zone. Through its successor, the Crawley Employment and Skills Programme 2019-2024, the council is continuing to support Crawley residents in accessing education and job opportunities within the borough.
- 9.68 However, more needs to be done. A challenge facing Crawley is the need to improve education, skills, employment and social mobility outcomes. Crawley's people, location and assets make it an attractive investment and regeneration area, and the opportunities and proceeds of growth, regeneration and housing can be used to raise aspirations and reduce inequality. It is appropriate that development contributes to improving social mobility in the borough, supporting access to training and learning and access to the job market for those residents who require support.

### Policy EC5: Employment and Skills Development

Major developments will be required to contribute to meeting objectives set out in the most up-to-date Crawley Employment and Skills Programme. This will be achieved through:

- i. Committing at the Planning Application stage to prepare and submit a site-specific Employment and Skills Plan, the content of which must be agreed by the council prior to the commencement of development. This will detail how the development, through its construction and (for commercial development where there is a known occupier) end user phases, will support initiatives identified in the Crawley Employment and Skills Programme. This commitment will form part of the

obligations on a planning permission and will be secured by way of a S106 legal agreement.

- ii. The making of a proportionate financial contribution towards employment and skills initiatives in Crawley.

The requirements of parts i. and ii. above should be satisfied in accordance with the Local Plan Planning Obligations Annex.

### **Reasoned Justification**

- 9.69 *There is a recognised disparity between the skills levels obtained on average by Crawley residents, and those of the in-commuting workforce. Compared with the South East England (41.4%) average, and also those of neighbouring Horsham District (42.3%) and Mid Sussex District (46.3%), Crawley (33.2%) has a lower proportion of residents with higher-level qualifications (equivalent to NVQ4+). This is also shown in the proportion of Crawley residents (7.6%) who have no formal qualifications, which whilst comparing favourably to the South East England (10.5%) average, is significantly higher than corresponding figures for both Horsham District (3.8%) and Mid Sussex District (4.2%)<sup>1</sup>.*
- 9.70 *This means that Crawley residents are less likely to access higher paid jobs. Reflecting the skills profile, average weekly earnings for Crawley residents (£558.70) are significantly lower than those for residents living in Horsham (£649.80) and Mid Sussex (£645.40), and remain below the South East England (£614.50) average. The average wage for someone working in Crawley (£632.80) remains higher than the average wage (£558.70) for someone living in the borough, again demonstrating the practical issues arising from the skills gap in Crawley<sup>2</sup>.*
- 9.71 *Through the Employment and Skills Programme, identification and creation of apprenticeships, training and job opportunities for local residents remains a key objective. A key priority is helping local people and businesses benefit from the opportunities arising from development. This can be supported through the funding of skills, training and employment programmes and local employment and training obligations. Crawley Borough Council is committed to ensuring that growth is inclusive and sustainable for all. The aim is to support local residents, young and old, into employment and raise the skills of the workforce so that they can access the new jobs being created across the borough.*
- 9.72 *As outlined by the Economic Recovery Plan (2021), Crawley was among the areas most affected by the economic impacts Covid-19. Whilst the local economy continues to recover, there remains a need to provide the support and training to enable impacted residents to access new opportunities arising from economic diversification.*
- 9.73 *The NPPF is clear that planning policies should help create the conditions in which businesses can invest, adapt and expand, with significant weight placed on the need to support economic growth and productivity, taking account of local business needs. It goes on to set out that the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. The Gatwick 360° Strategic Economic Plan<sup>3</sup> identifies pockets of lower skills, specifically referencing Crawley, as a barrier to growth, and establishes the need to create skills for the future as one of its eight economic priorities.*

<sup>1</sup> Source: ONS/Lichfields analysis, Northern West Sussex Economic Growth Assessment (2019)

<sup>2</sup> Source: ONS/Lichfields analysis, Northern West Sussex Economic Growth Assessment (2019)

<sup>3</sup> Strategic Economic Plan Gatwick 360° (2018) Coast to Capital Local Enterprise Partnership



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- 9.74 Significant forecast job growth in Crawley presents an opportunity to maximise skills development and employment opportunities for local people through securing contributions from development. A better skilled local workforce can provide a pool of talent to both developers and end occupiers. This will also reduce the need to import skills, and in doing so reduce congestion and less sustainable travel to work journeys and reduce carbon emissions. Conversely, an inability to effectively improve local skills levels potentially inhibits economic growth, failing to address a recognised economic weakness for Crawley.
- 9.75 Therefore, Policy EC5 requires all major development, including residential and employment uses, to contribute to addressing the skills gap in Crawley. This will help to support the social mobility of Crawley residents and meet the requirements of business in providing local access to a more highly skilled local workforce. The approach supports appropriate social infrastructure through provision of employment and training initiatives on major development sites at demolition and construction stages, and for commercial sites where there is a known occupier, the end user phases. A site specific Employment and Skills Plan should be prepared and submitted by the applicant, in liaison with the council, to demonstrate how development will support initiatives identified in the Crawley Employment and Skills Programme. This will be secured through a S106 agreement on a planning permission.
- 9.76 A developer contribution will be sought for all major residential and employment applications. This will normally be a proportionate financial contribution that will be used to support Employ Crawley in the borough wide coordination of training and employment schemes supporting local people in gaining access to the job market. Where it can be clearly demonstrated that measures in lieu of the financial contribution would achieve greater benefits in delivering employment and skills initiatives to help Crawley residents access employment opportunities, this will in principle be supported, subject to negotiation and agreement with the council. Contributions will be agreed by the council and developer and secured through a S106 legal agreement.
- 9.77 Further information on the preparation, content and outcomes required from part i, the Employment and Skills Plan, is set out in the Employment and Skills Provision Guidance Note<sup>4</sup>. The Planning Obligations Annex sets out detailed guidance on the requirements of Strategic Policy EC5, part ii. relating to the calculation and payment of a developer contribution towards employment and skills development, or the achieving of the Policy EC5 objectives through other measures. Both parts of Policy EC5 should be satisfied in accordance with the Planning Obligations Annex.

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<sup>4</sup> <https://investercrawley.co.uk/employment-and-skills/employments-and-skills-programme> [www.investcrawley.co.uk](http://www.investcrawley.co.uk)

## Appendix B: Proposed Modifications to the Crawley Local Plan Planning Obligations Annex

### **Policy EC5: Employment and Skills Development**

This section relates to Policy EC5 (Employment and Skills Development). It explains how Crawley's Employment and Skills Programme 2019-2024 (and any subsequent updates)<sup>5</sup> will be delivered through the planning process, detailing the obligations and developer contributions that will be sought from major development in order to help improve social mobility, inclusion and address the existing skills gap.

#### Policy Context

Crawley is an economically successful borough at the heart of the Gatwick Diamond, home to around 4,000 active businesses and over **85,000** ~~100,000~~ jobs. However, local residents' average earnings are below those of in-commuters, and they are less likely to access higher-skilled, higher-paid jobs. In a recent social mobility report, State of the Nation, Crawley was ranked 304<sup>th</sup> out of 324 local authorities for low social mobility.

Policy EC5 takes a pro-active approach to addressing what is an identified economic weakness for Crawley, requiring qualifying development to contribute towards addressing the skills gap and improving social mobility.

This is to be achieved through two obligations that will be required from all major development:

- i) Committing at the Planning Application stage to prepare and submit a site specific Employment and Skills Plan, the content of which must be agreed by the council, prior to the commencement of development.
- ii) The making of a proportionate financial contribution towards employment and skills initiatives in Crawley.

For all major development, developers will be required to satisfy parts i.) and ii.) of the Policy. The following guidance explains to how this can be achieved.

#### Part i) Employment and Skills Plan

At the planning application stage, the applicant will be asked to commit to preparing a site-specific Employment and Skills Plan (ESP) relating to the development. This commitment will form part of the obligations on a planning permission, secured by way of a Section 106 Agreement. The ESP should be prepared by the applicant, in liaison with the council, and must be submitted to and agreed by the council prior to the commencement of development. An advice note has been prepared by the council on the process and content of an ESP (<https://investcrawley.co.uk/employment-and-skills/employments-and-skills-programme>).

#### Requirements of Part (ii): Developer Contribution towards Employment and Skills

All major residential and employment developments will be required to make a proportionate financial contribution towards employment and skills initiatives to support those sections of the Crawley workforce who face challenges in accessing employment. The financial contributions will be used by Employ Crawley to fund workplace coordination, training and tailored support that enables individuals to better access employment opportunities, including those arising from development at either the construction or end user phase. This will normally focus on people that have been out of work for a long period of time, or that may possess a lower level of skills who might struggle to access employment or training opportunities without extra support.

<sup>5</sup> Crawley Employment and Skills Programme 2019 – 2024

Where it can be clearly demonstrated that measures in lieu of the financial contribution would achieve greater benefits in delivering employment and skills initiatives to help Crawley residents access employment opportunities, this will in principle be supported, subject to negotiation and agreement with the council. Such measures would be expected to go beyond those identified in the Employment & Skills Plan. This may include for example on-site training provision or other interventions. Any such measures would be secured by way of a legal agreement.

The following approach will be used to calculate the financial contribution sought from development. The calculation methodology takes account of local circumstances relating to the employment market and, as appropriate, residential occupation assumptions to ensure that the financial contribution sought is locally specific and proportionate to the type and quantum of development proposed. Please note that the method set out below is the same as that shown in the Employment and Skills Provision Guidance Note.

Where major development incorporates a mix of different uses, the contribution will be calculated on the basis of the individual uses that make up that development. For example, for a mixed use office and residential development, the contribution will be calculated on the basis of both the commercial and residential elements. In all cases, the financial contribution will be secured by way of Section 106 Agreement to be paid upon the commencement of development.

Based on Department for Work & Pensions data, £6,500 is the minimum cost for training, preparing and placing into sustainable employment an unemployed person claiming Employment Support Allowance. This figure is used to inform the amount that would be required by Employ Crawley to provide the necessary training to help support a long-term unemployed individual to access employment, and feeds into the calculation for both commercial and residential developments.

#### *Residential Development, including as part of Mixed-Use Development*

For residential development, including residential components of mixed-use development, the contribution required is calculated as shown below.

#### **Employment and Skills Contribution from Residential Development**

The Employment and Skills contribution from residential development, including residential components of mixed use development, is based on the following parameters:

- minimum cost for supporting an individual to access employment (£6,500);
- number of dwellings proposed;
- expected adult occupancy rate for those dwellings, these being; 1 adult per studio/1 bed unit; 2 adults per 2/3/4+ bed unit;
- proportion of Crawley's working age population with no (or other) qualifications (7.6%)

It is calculated as: **(a x b x c x d) / 2**, this being:

$$\mathbf{(\pounds 6,500 \times \text{number of dwellings proposed} \times \text{expected adult occupancy} \times 0.076) / 2}$$

For example, for a development of 10 x 1-bedroom flats and 5 x 2-bedroom flats, the financial contribution would be calculated as:

$$\mathbf{(\pounds 6,500 \times 10 \times 1 \times 0.076) / 2 = \pounds 2,470 + (\pounds 6,500 \times 5 \times 2 \times 0.076) / 2 = \pounds 2,470 = \pounds 4,940}$$

#### *Commercial Development, including as part of Mixed-Use Development*



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For commercial development, including commercial components of mixed-use schemes, development that would involve a net increase in gross internal area in excess of 1,000sqm will be subject to a proportionate financial contribution towards employment and skills.

The contribution required is based on the following parameters:

- a) Net increase in Gross Internal Area;
- b) Standard Occupancy;
- c) Crawley's resident employment self-containment rate;
- d) Proportion of Crawley's working age population with no (or other) qualifications;
- e) Minimum cost for supporting an individual to access employment (£6,500)

Standard Occupancy (b) should first be calculated to feed into the commercial employment and skills calculated. This will vary according to the type of commercial development that is proposed, and should be calculated on the basis on the Standard Occupancy Calculations set out below. For hotel development it will first be necessary to calculate the total number of staff based on a 'per room' assumption. This figure is then divided by the Gross Internal Area to feed into the next part of the formula. Sui Generis development does not have a standard occupancy, and the financial contribution required for Sui Generis development will be subject to negotiation with the council on a case-by-case basis.

#### Standard Occupancy for Commercial Development

Standard Occupancy for Commercial Development is calculated on the basis below:

Offices (Class E)	1 FTE job per 11sqm
Industrial (Class B2 or E)	1 FTE job per 36sqm
Warehouse & Distribution (Class B8)	1 FTE job per 80sqm
High Street Retail (Class E)	1 FTE job per 19sqm
Food Superstore (Class E)	1 FTE job per 17sqm
Comparison Superstore/Retail Warehouse (Class E)	1 FTE job per 90sqm
Financial & Professional Services (Class E)	1 FTE job per 16sqm
Restaurant & Café (Class E)	1 FTE job per 18sqm
Hotels (Budget) (Use C1)	1 FTE job per 3 bedroom
Hotels (General – 3 Star) (Class C1)	1 FTE job per 2 bedroom
Hotels (4/5 Star) (Class C1)	1 FTE job per 1.5 bedroom
Cinemas (Sui Generis)	1 FTE job per 90sqm
Amusement and Entertainment (Class E or Sui Generis)	1 FTE job per 70sqm
Sports Centres and Private Clubs (Class E or Class F2 or Sui Generis)	1 FTE job per 65sqm

~~As identified in the Northern West Sussex Economic Growth Assessment 2020, Crawley has a total working population of 55,676 people, of which 36,583 people live and work within the~~

borough<sup>6</sup>. This figure, 65.7%, represents ~~(c) the resident employment self-containment rate.~~

At the time of the 2021 Census, there are 85,000 jobs in the borough. Crawley has a total working population of 58,737 people, of which 44,335 live and work within the borough. Expressing the number of people who live and work within the borough as a percentage of Crawley's total jobs provides the employment self-containment rate (c). For Crawley, the employment self-containment rate is 52%.

In relation to **residential qualification levels (d)**, 92.4% of Crawley residents of working age are qualified to at least NVQ1 or above. This means that 7.6% of Crawley's working age population have no (or other) qualifications. It is these people that are most likely to face challenges in accessing sustainable employment, and who will require support in accessing the training or the employment market.

### Employment and Skills Contribution from Commercial Development

The Employment and Skills contribution from commercial development, including commercial components of mixed use development, is based on the following parameters:

- Net increase in Gross Internal Area;
- Standard Occupancy;
- Crawley's ~~resident~~ employment self-containment rate (~~65.7~~ **52**%);
- Proportion of Crawley's working age population with no (or other) qualifications (7.6%);
- Minimum cost for supporting an individual to access employment (£6,500)

The contribution required should be calculated according to the type of development, on the basis below:

#### Commercial Development (excluding Office and Hotel uses)

$(a/b) \times c \times d \times e$ , this being:

$(\text{Net increase in Gross Internal Area} / \text{Standard Occupancy}) \times \del{0.657} \mathbf{0.52} \times 0.076 \times \pounds 6,500$

For example, for a Class B2 industrial development of 1,000m<sup>2</sup> net increase in gross internal area, the financial contribution would be calculated as:

$(1,000 / 36) \times \del{0.657} \mathbf{0.52} \times 0.076 \times \pounds 6,500 = \del{\pounds 7,135.55} \mathbf{\pounds 9,015.50}$

#### Office Development

The equation applied for offices is the same as that used for commercial, though for reasons of viability, the final output is halved. The equation is therefore:

$(a/b) \times \del{0.657} \mathbf{0.52} \times 0.076 \times \pounds 6,500 / 2$

For example, for a Class E office development of 1,000m<sup>2</sup> net increase in gross internal area, the financial contribution would be calculated as:

$(1000 / 11) \times \del{0.657} \mathbf{0.52} \times 0.076 \times \pounds 6,500 / 2 = \del{\pounds 11,676.36} \mathbf{\pounds 14,752.63}$

#### Hotel Development

For hotel development, it is first necessary to identify the anticipated number of staff, which is calculated on a ratio of staff per room, depending on the type of hotel. This is calculated on the basis of:

$(\text{Number of Rooms} / \text{Standard Occupancy}) = z$

$(a / z) \times \del{0.657} \mathbf{0.52} \times 0.076 \times \pounds 6,500$

For 150 bedroom budget hotel development of 1,000m<sup>2</sup> net increase in gross internal area, the financial contribution would be calculated as:

$(150 / 3 = 50 \text{ staff})$

$(1,000 / 50) \times \del{0.657} \mathbf{0.52} \times 0.076 \times \pounds 6,500 = \del{\pounds 5,137.60} \mathbf{\pounds 6,491.16}$

<sup>6</sup> Source: ONS census [2021](#) ~~2011~~/Lichfields analysis