

East Staffordshire Local Plan Review

Employment Round Table Session (RTS) 10.00am on Thursday 13 January 2005

Venue: Dove Room, Town Hall, Burton upon Trent

Participants:

John Bagshaw	Inspector
Mike Hale	Planning Officer – Planning Inspectorate
Graham Machin (GM)	East Staffordshire Borough Council (ESBC)
Philip Somerfield (PS)	East Staffordshire Borough Council (ESBC)
Jonathan Imber	East Staffordshire Borough Council (observing)
Tony Lovett	Staffordshire County Council (SCC)
David Tucker	David Tucker Associates
Jane Worsley	Higham & Co
Philip Gratton	Hulme Upwright Manning
Simon Chadwick	RPS
Richard Wood	Wood Frampton
Jonathan Wren	JMW Planning
Jonathan Harbottle (JH)	Howard Sharp & Partners
Robert Wickham (RW)	Howard Sharp & Partners
Mike Timmins	St Modwen Developments

Agents are identified by their company name. They are not identified by who they represent for this session, to avoid confusion where more than one representative was present for each developer.

Apologies:

Simon Chadwick (pm only)

Although not a verbatim account, this note generally follows the sequence of the RTS, summarising the views expressed. Many of the questions asked by the Inspector are similar to those in the questions and issues paper, prepared in advance by the Inspector to aid the discussion.

1.0 Inspector's introduction & opening remarks

1.1 **The Inspector** welcomed participants and thanked them for their position statements, which were taken as read. He outlined the proceedings and explained that the purpose of the RTS is to seek an updated overview of employment land requirements and sources of employment land supply. He also explained that it is not intended to explore the detailed merits of particular sites, as such matters will be dealt with separately, however some sites may be referred to in support of general points that are made during the session.

1.2 **The Inspector** explained his intention to initiate the discussion by asking a series of questions of SCC about the basis of the Structure Plan requirements for employment land provision.

2.0 **The Structure Plan requirements**

2.1 **The Inspector** sought clarification on several points relating to SCCs methodology used to calculate their Structure Plan employment land requirements, outlined in their position statement (89/ERTS/1). In particular why the explanation at 1.4 contains no mention of take-up rates, which are explained in some detail at 10.2 of the Appendix. Also why the differing approach to the Panel whose figures were based on past allocations not take up rates. The Panels approach resulted in a lower suggested level of employment land provision (230 ha - 8% less than SCC recommended).

2.2 **The Inspector** sought to identify the main purpose of the Structure Plan provision. In other Structure Plans the general aim of employment provision was to meet the site expansion and relocation requirements of existing and new local industries and to accommodate those businesses wishing to move into the area.

2.3 **SCC** confirmed that this was their approach.

2.4 **The Inspector** asked what development is included in the SCCs figures for past take up rates.

2.5 **SCC** explained they have figures, which go back to the 1980's and that they became more sophisticated as time progressed.

2.6 **The Inspector** asked if the information included land take up rates for the industries mentioned earlier on new but not on existing employment sites.

2.7 **SCC** confirmed that the figures do not include redevelopment of former employment land or that of firms developing within their own site.

2.8 **The Inspector** commented that this was confirmed at 3.1 of the SCC position statement (89/ERTS/1). Clarification was then sought as to whether the data excluded conversions by new industries of existing employment premises.

2.9 **SCC** stated that essentially only development on new land is included.

2.10 **The Inspector** asked if the figures included redevelopment by new industries of derelict/vacant sites.

2.11 **SCC** stated it did not.

2.12 **The Inspector** asked if figures were available for conversions/rebuilding on previously developed land.

2.13 **SCC** confirmed there were no figures available for conversions. Figures were available for redevelopment of previously developed land but these tended to be on the small side.

- 2.14 Given the increasing scale of former employment brownfield land **the Inspector** queried, whether a distinction between redevelopment for housing and employment after use was now logical.
- 2.15 **SCC** confirmed that brownfield land did not count towards the requirement for employment land provision but did so for housing. The Structure Plan starts from a base and employment plan provision is to meet forthcoming requirements.

3.0 Employment retention

- 3.1 **The Inspector** commented that local authorities have limited powers to retain employment uses premises considered redundant or unsuitable.
- 3.2 **SCC** suggested that despite this, retention of a site for employment land is important as well as any practical help an authority can give.
- 3.3 **The Inspector** asked the basis for a 10 year period before land previously used for employment could count against provision as indicated in para. 3.2 of position statement 89/ERTS/1.
- 3.4 Whilst accepting the 10 year figure was arbitrary, **SCC** explained the figure was a guide and allows for the Local Plan Review process.
- 3.5 **The Inspector** asked what criteria led to sites meriting retention in employment use for such lengthy periods and whether such periods were of concern.
- 3.6 **SCC** confirmed they considered in broad terms the appropriateness of retaining certain uses.
- 3.7 **The Inspector** asked for further explanation of the employment base they were working from.
- 3.8 **SCC** confirmed they did not use calculations based on past trends to provide the basis of their figures although they continually work to refine the methods. Instead SCC take a pragmatic approach, acknowledging the needs in broad terms, whilst accepting that previously employment land has not come forward quickly enough.
- 3.9 **The Inspector** sought SCC's attitude to a landowner with a site unsuitable for their present employment needs wishing to dispose of it to another for redevelopment for a new employment use.
- 3.10 **SCC** confirmed they would not object.

4.0 Land portfolio/take-up rates

- 4.1 **The Inspector** sought clarification of the SCC position that they cannot require land to be developed for employment purposes within the Structure Plan period. This view was indicated in their P.S. para. 4.1 of 89/ERTS/1.
- 4.2 **SCC** confirmed the base is informed by past development rates and that past evidence suggests all land for employment is unlikely to be

taken up. Therefore they were hopeful a more realistic level of provision could be suggested through refinement to their methods.

- 4.3 **The Inspector** indicated that past experience suggested that large employment sites (30 ha+) could take in excess of 10 years to develop from start to finish. This tended to be caused by the difficulties in matching the qualities of individual plots with the precise requirements of industries at a given point in time.
- 4.4 **SCC** agreed with this experience. Large sites tend to leave residual land that remains undeveloped for sometime after the majority of a site is occupied and in use. They were also of the view that despite this, larger sites were more likely to be able to offer the variety of plots required although any portfolio would usefully contain a mixture of plot sizes.
- 4.5 **The Inspector** suggested that the timescale for developing large sites leading to their continuation beyond the Structure Plan period might suggest that greater employment land provision is required.
- 4.6 **St Modwen Developments** also stated it would be dangerous to assume that employment allocation E2 could start immediately.
- 4.9 **St Modwen Development** considered that the time taken from commencement to completion of such developments was generally increasing.
- 4.10 On take up rates **RPS** agreed they could be slow, giving the example of the Nottingham Business Park where after 8 years only around a 1/3 of the plots were occupied.
- 4.11 **The Inspector** asked if SCC accepted that it was unlikely that all the employment land provision in the Structure Plan would be taken up within the Structure Plan period.
- 4.12 **The Inspector** also asked SCC what if any additional provision should be made to allow for difficulties in meeting the required employment land provision.
- 4.13 **SCC** stated that they considered adequate extra allowance had been made for the rate of employment land coming forward and would discourage any overprovision.
- 4.14 **The Inspector** requested SCC to produce a note that explains their past development rates (this was produced and distributed pm entitled '**ANTICIPATED TOTAL DEVELOPMENT OVER THE STRUCTURE PLAN PERIOD AT PAST RATES**').
- 4.15 **The Inspector** sought further views on take up rates.
- 4.16 **David Tucker Associates** gave the example of Centrum 100 with 4 vacant plots. It was accepted that a proportion of plots on a site would not be taken up in the Plan period and that this should be allowed for.
- 4.17 **The Inspector** referred to Brighthouse as an example of a supposedly unfavourable site being able to attract local employers to occupy plots.

- 4.18 **Howard Sharp and Partners (RW)** stated that the completion of legal /Section 106 agreements slowed a start on sites. On average they take up to 2 years and Branston took 3-4 years.
- 4.19 **Wood Frampton** stated they had come across an example of agreements alone taking 8 years, where there were problems relating to surface water/drainage issues.
- 4.20 **The Inspector** queried why SCC rejected the view of the Panel who sought to reduce the Structure Plan provision (to 230 ha) whilst accepting the 2nd deposit version of the Local Plan provision at a similar level (236 ha).
- 4.21 **SCC** explained that the Panel recommendation (of 230 ha) was reported by Officers to members as acceptable. Prevailing land take encouraged the members to go for a higher level provision. It was still appropriate to issue a general Statement of Conformity for the 2nd deposit version of the Local Plan in relation to the Structure Plan.
- 4.21 **ESBC (GM)** confirmed that currently local plans can still progress even if a Statement of Conformity is withheld.
- 4.22 **The Inspector** explained that SCC could maintain objections to the 2nd deposit version of the Local Plan despite issuing a Statement of Conformity.

5.0 Loss of employment land to other uses

- 5.1 **ESBC (PS)** do not understand the reasoning presented in the RPS position statement (para. 3.1 75/ERTS/1) about the need to increase the number of allocations due to the likely loss of employment land to housing. In particular they query the calculation that 7% of employment land was diverted to other uses 2001 -2004 leading to a loss of 16.52 ha from the allocation in the 2nd deposit version of the Local Plan.
- 5.2 **RPS** agreed to go through the basis of calculations in detail with ESBC, whilst making the general comment that house builders have been targeting employment land.
- 5.3 **SCC** agree with RPS that the loss of employment land to housing is a concern and was not previously allowed for or monitored.

6.0 Use of Greenfield land for employment

- 6.1 **The Inspector** asked for comments on policy PA6 of RSS11. His interpretation was that its expectation was for most employment development to take place on brownfield land with greenfield development being a last resort (at B. iii).
- 6.2 **SCC** explained their concerns about the broad nature of policy PA6. As this policy does not indicate quantities of employment land it is not possible to identify the circumstances when greenfield development

may be appropriate. In the conurbation most of the employment land needs can be found on brownfield land but this is not so much the case elsewhere. The Regional Planning Body (RPB) is in the early stages of producing figures for employment land at sub-regional level. These will take into account differences within the region and the rural/urban division. It is the intention of the RPB to have partially reviewed RSS11 by the end of the year.

- 6.3 **The Inspector** could foresee problems caused by the RSS11 partial review. If the approach to employment land reflects that for housing then the majority of provision could be focussed on the major urban areas, perhaps reducing the ESBC share.
- 6.4 **SCC** expected to see employment land figures in RSS11, but did not know how these would be expressed and if provision broken down to District level would be included. RSS11 was much less precise about employment land than housing land. Participants were reminded of the statutory status of RSS.
- 6.5 **The Inspector** commented that the past RPG had been quite specific about some strategic employment sites.
- 6.6 **SCC** confirmed that the Structure Plan had been prepared in line with RPG. RPG11 contained site specific guidance on major development especially hi-tech, B1 uses (Birmingham Business Park).
- 5.10 **Howard Sharp & Partners (JH)** commented that the Structure Plan contained policies (D1 & D3) that suggest poor quality brownfield land, including contaminated land should be used before greenfield land.

6.0 Consultation on allocations

- 6.1 **The Inspector** acknowledged the limitations of the guidance contained in RSS and queried to what extent the RPB had been consulted about the main employment allocations in the 2nd deposit Draft Local Plan and recent planning applications.
- 6.2 **ESBC(PS)** confirmed the RPB had been consulted on the main allocations, but had only responded on the allocations for Uttoxeter. CD/A26 gives the response of the West Midlands Regional Assembly (RPB) in full in their letter of 30 September.
- 6.3 **SCC** explained that ESBC were at the time not obliged to refer major applications to the RPB. Since then the Planning and Compulsory Purchase Act 2004 has been implemented and it is now a requirement to consult with the RPB.

7.0 Retention of employment land

- 7.1 **The Inspector** asked ESBC what para. 13 of the Employment chapter was trying to achieve.
- 7.2 **ESBC** stated that this issue was historical and is contained in their adopted Plan. It is related to the policy IMR1 contained in the

Implementation, Monitoring and Review (IMR) chapter of the 2nd deposit version of the Local Plan.

- 7.3 **The Inspector** questioned whether the presence of this safeguarding Policy in the IMR chapter was confusing.
- 7.4 **ESBC** considered that it does not sit easily with the Employment chapter either.
- 7.5 **The Inspector** queried whether the criteria in IMR1 applied to all derelict and vacant premises. He also sought clarification of the meaning of criteria (b). concerning optimisation of employment opportunities of sites. He considered criteria (b) and (c) may be considerable hurdles.
- 7.6 **ESBC(PS)** admitted the policy had not been tested in the 10 years it featured in the adopted Plan.
- 7.7 **The Inspector** asked for the definition of strategic in relation to criteria (c) of policy IMR1.
- 7.8 **ESBC** stated size was the most important factor in defining sites of a strategic nature at criteria (c) but no specific threshold applied. The preference was to retain employment land where possible.
- 7.9 **The Inspector** asked if the intention was to provide a further hurdle to housing replacing employment uses.
- 7.10 **ESBC** confirmed it was and concluded that the issue will occur again (referring to the Pirelli site).
- 7.10 **The Inspector** drew comparison to the higher level policy E8 of the Structure Plan which gives a general intent to preserve employment land subject to the tests at policy E2.

8.0 Definitions

- 8.1 **The Inspector** sought clarification from ESBC on their stated need to attract inward investment at para. 5 of the Employment chapter.
- 8.2 **ESBC(PS)** confirmed that the purpose was largely to attract investment from outside the County, referring to para. 10 of position statement ESBC/ERTS/1. There are no general figures available giving levels of inward investment, although there is some detail available for the Centrum 100 development.
- 8.3 **JMW Planning** confirmed that about 2/3 of Centrum 100 consisted of what could be considered inward investment both from within the region and international. Details of the companies involved are contained at Appendix 3 of Higham & Co position statement.
- 8.1 **The Inspector** sought clarification of the definition 'ease of access to transport corridors' also referred to at para. 5 of the Employment chapter.

- 8.2 **ESBC** indicated that, as set out in their position statement (ESBC/ERTS/1), that this meant being adjacent to trunk roads in the Borough (A38 for Burton and A50 for Uttoxeter).
- 8.3 **The Inspector** commented that actual surveys had found that accessibility to a suitable workforce was more important to potential occupiers. Many occupiers being quite content with up to about 10 min drive times via good quality roads, avoiding residential areas, to a motorway junction or a trunk road.
- 8.4 **ESBC** explained both Burton and Uttoxeter sit alongside major 'A' roads and that such drive times would extend beyond urban areas into open countryside.
- 8.5 **RPS** queried whether ESBC had a register of inquiries for inward investment and what employment, if any was lost to other authorities.
- 8.6 **ESBC** confirmed there was limited information available and not all queries were relevant or serious.
- 8.7 **RPS** explained they had come across examples of ESBC being unable to match employers to sites.
- 8.9 **The Inspector** asked whether frustrating local development is a more important issue than that of inward investment. He also asked about the locational priorities of clients.
- 8.10 **St Modwen Developments** commented that the price of land was high on the list of employers priorities for choosing sites and that few developers would require accommodation within a specific local authority area. The example of Screwfix, firstly targeting Stafford and locating elsewhere was given. It was suggested that this situation was common place. Finally the need to quickly become operational was given.
- 8.11 **The Inspector** inquired if employers sometimes choose not to grow.
- 8.12 **St Modwen Developments** suggested this would not happen if the local authority could offer land that could be developed quickly.
- 8.13 **JMW Planning** reminded participants that a major objective of both RSS and Structure plan policy was to diversify the economy and therefore inward investment was important.
- 8.14 **The Inspector** asked what the meaning of diversity was in this context referring to the number of new distribution depots in the Borough.
- 8.15 **JMW Planning** suggested that in the Borough diversity meant adding to the present brewing/manufacturing base and achieving more of a balance of employment types including new service sector industry.
- 8.16 **ESBC** stated diversity in Uttoxeter would mean a shift away from the current reliance on its two main employers and asked JMW Planning to what extent the Borough had lost opportunities.
- 8.17 **JMW Planning** confirmed they considered ESBC had lost potential opportunities.

9.0 Lead in times

- 9.1 **The Inspector** sought views on lead in times for greenfield development.
- 9.2 **Howard Sharp & Partners(RW)** expressed the view that they were all different, with legal agreements being one of the primary factors effecting length of lead in times. Generally, 3 – 4 years could be considered an average lead in time although it could take longer. Branston South which is the subject of judicial review has already taken 4 years.
- 9.3 **The Inspector** asked if other issues such as infrastructure and negotiations with other agencies were problematic.
- 9.4 **Howard Sharp & Partners(RW)** agreed explaining there were over 10 subject areas in any application. The agencies concerned with each issue would all need satisfying. 2 – 6 years could be considered the broad range to achieve this.
- 9.5 **Wood Frampton** agreed and suggested that Branston South was not particularly complex.
- 9.6 **David Tucker Associates** suggested that sheer scale of sites can equate to longer lead in times beyond 6 years.
- 9.7 **Howard Sharp & Partners(JH)** commented that some sites under consideration in the 2nd deposit version of the Local Plan were already part way through the timeframes being discussed.
- 9.8 **RPS** emphasised the need for certainty in allocations to help reduce lead in times.
- 9.9 **The Inspector** asked if lead in times for redevelopment of brownfield sites were longer than those for greenfield sites.
- 9.10 **RPS** considered the lead in times were similar (long), but for different reasons.
- 9.11 **Howard Sharp & Partners(RW)** considered land ownership to be an important factor in lead in times on previously developed sites.
- 9.12 **Hulme Upright Manning** considered that transport issues were always a significant factor in lead in times including negotiations with both the Highways Agency and the highway authority.
- 9.13 **ESBC** gave the example of the site at Wellington Road, Burton (B&Q site) for long lead in times on previously developed land.
- 9.14 **The Inspector** asked if the after use (employment or housing) made a difference to the lead in times on previously developed land.
- 9.15 **RPS** considered the redevelopment of previously developed land for housing was quicker than for employment due to the greater certainty over finance.
- 9.16 **Wood Frampton** commented that often brownfield sites did not receive preferential treatment and were thus not always easier to progress.

- 9.17 **The Inspector** queried if contamination was an issue of equal concern in both housing and employment redevelopment.
- 9.18 **Wood Frampton** stated that whilst the investigations involved were the same, the remediation was more thorough for housing.
- 9.19 **St Modwen Developments** agree and consider treating contaminated ground to be a significant factor effecting lead in times.

10.0 Brownfield opportunities

- 10.1 **The Inspector** inquired of ESBC as to what brownfield opportunities existed in addition to those allocated in the 2nd deposit version of the Local Plan.
- 10.2 **ESBC(PS)** indicated there were several sites available and agreed to prepare a full list for the Inspector to consider:
- The 8 ha site at Wellington Road, Burton including clearance of the William Cook's Foundry.
 - Hawkins Lane, Burton, a small (2 ha) site also requiring clearance
 - The JCB complex, Uttoxeter
 - **JMW Planning** added the former Royal Airforce base at Fauld Camp which will be considered at a site specific hearing. They criticised the lack of choice for small local industries having to relocate quickly.
 - A further former military base, Marchington Camp was also due to be the subject of a site specific hearing.
- 10.3 **JMW Planning** sought clarification as to whether Wellington Road or Hawkins Lane were included in the 2nd deposit version of the Local Plan figures
- 10.4 **ESBC(GM)** confirmed those sites were not included in the figures.

11.0 West of Uttoxeter

- 11.1 **The Inspector** inquired about the justification for holding back 15 ha West of Uttoxeter (policy E3) and if the first 10 ha (policy E2) was likely to be developed by 2011.
- 11.2 **ESBC(PS)** consider it to be a matter of appropriate scale of development and attracting investment for the long term. The West of Uttoxeter extension is considered a first reserve should others fail.
- 11.3 **Participants** agreed to defer further discussion to the site specific session for this site.
- 11.4 **ESBC** clarified that 9.4 (not 8.3) of Employment Topic Paper CD/A28 in addition to para. 16 of their position statement ESBC/ERTS/1 contain the justification for the West of Uttoxeter allocation and the deletion of Spath and Lawns Farm.

12.0 **South of Branston**

- 12.1 **ESBC(PS/GM)** confirmed that the size of this allocation was set out in their response to the Inspectors question /issue 18.
- 12.2 **The Inspector** sought clarification that South of Branston allocation was different to the site known as Barton.
- 12.3 **JMW Planning** confirmed Barton was an objection site to be dealt with through written representations.

BREAK

13.0 **New Documents**

- 13.1 A map was distributed and explained by **David Tucker Associates** showing employment sites in ESBC at Burton in relation to proposed employment development in neighbouring South Derbyshire District. The Walton by-pass, subject of a current planning application spanning the two authorities' areas, was also shown.
- 13.2 **SCC** produced the requested figures (see 4.14).
- 13.3 **The Inspector** asked if the new figures presented by SCC for development rates were declining.
- 13.4 **SCC** suggested that the figures fluctuate with high figures for the earlier period 2000 – 2001.

14.0 **Drakelow /south of Branston and cross border issues**

- 14.1 **The Inspector** inquired about the report produced by the Inspector for the South Derbyshire District Council Local Plan. His understanding was that it recommended the deletion of the allocation for (38 ha) of employment land at Drakelow (the middle site of three indicated on the distributed map annotated 'Allocated Employment Land'.
- 14.2 **Wood Frampton** confirmed that the Inspectors report, recommended deletion due to uncertainty over the deliverability of the site. However some issues have been overcome with South Derbyshire District Council and appropriate wording incorporated into the Modifications (currently undergoing consultation until 18 February 2005) concerning this site and the adjoining allocation at the Drakelow Power Station. Relevant Modifications are 40 and 63 which acknowledge the long term potential of the former Drakelow Power station site. Although the redevelopment for employment purposes is dependent on provision of improved infrastructure, it is possible that an application could come forward almost immediately on this site.
- 14.4 **Wood Frampton** confirmed the power station was no longer operating.
- 14.5 **The Inspector** sought clarification about the proposed Walton by-pass indicated on the map that was distributed.

- 14.6 **Wood Frampton** explained the Walton by-pass related to problems experienced by an existing business (Roger Bullivant Ltd).
- 14.7 **David Tucker Associates** added that Roger Bullivant Ltd were restricted by such factors as weight and height restrictions and that this led to the by-pass proposal. To further clarify it was explained that the by-pass was a separate proposal to the A38 to A444 strategic link.
- 14.8 **The Inspector** inquired if the Walton by-pass proposal would take place regardless of any new development at Drakelow and if so what was the likely cost.
- 14.9 **Wood Frampton** confirmed the severe restrictions on the current Roger Bullivant Ltd business justified the by-pass. **David Tucker Associates** estimated the cost at around £2½ million for a single carriageway 6.75m road, with about £1 million for a new bridge.
- 14.10 **ESBC** explained that the situation is further complicated by the judicial review of the consent for the South Branston proposal with its new access to the A38; the first part of the yet to be studied A38/A44 link
- 14.11 **The Inspector** inquired if the Branston South proposal relied on the whole package, including the access to the A38.
- 14.12 **Howard Sharp & Partners (RW)** confirmed the proposal did rely on the 'whole package' with employment to come forward initially and the rest following. It was their view that achieving this will safeguard opportunities for the future.
- 14.13 **David Tucker Associates** offered further explanation of the A38/A44 link road. The West Midlands to East Midland Multi Modal Study (October 2002) only recommended further study of the route in 2026 not the building of this link road. Such a proposal would not necessarily be a trunk road. In contrast the Walton by-pass is a local road scheme and a private application related to the activities of Roger Bullivant Ltd.
- 14.14 **Wood Frampton** disagreed with Howard Sharp & Partners and were of the view that should Drakelow be developed the bridge included in the Walton by-pass could adequately serve the development. Referred to para 7.4CD/A28
- 14.15 **ESBC** confirmed the Walton by-pass is a 'live' application, currently before ESBC and SDDC. **St Modwen** have objected due to the capacity of the Barton junction.
- 14.16 **The Inspector** asked if the Walton by-pass was capable of handling additional traffic from new development to that which Roger Bullivant Ltd and other existing development already generated.
- 14.17 **David Tucker Associates** indicated the Walton by-pass had ample capacity to take traffic in addition to that generated by Roger Bullivant Ltd. However some local improvements may be required.
- 14.18 **The Inspector** asked why Branston South was originally considered to be a brownfield site.
- 14.19 **ESBC** confirmed that misinterpretation of PPG3 led to this conclusion.

15.0 Derby Road, Uttoxeter

- 15.1 **The Inspector** asked questions relating to the situation of the Derby Road, Uttoxeter allocation (RPS who challenged this site were not present – see apologies). The Inspector asked if a cordon sanitaire was in place at the WTWs site and if there was a problem locally.
- 15.2 **ESBC(PS)** indicated that although there is a cordon sanitaire in the 2nd deposit version of the Local Plan, Severn Trent Water do not have one in place.
- 15.3 **St Modwen Developments** explained that this issue was not a problem and that the racecourse hotel was built about 500m from the WTWs. Further applications on the WTWs access road, included fast food restaurants, did not suggest a problem; the cordon sanitaire is historical. Residential development might be more sensitive.

16.0 Rural Employment

- 16.1 **The Inspector** asked (Wood Frampton) if any further problems were evident in the rural employment policy section of the Employment chapter of the 2nd deposit Draft Local Plan.
- 16.2 **Wood Frampton** considered policy E18 to be particularly problematic, giving two reason. They were unsure as to the meaning of the revised text at clause (a) of E19 and considered there were too many barriers to small scale local employment contained in the policy generally.
- 16.3 **The Inspector** asked what constituted ‘transport other than private motor vehicle’ in clause (a) of E18.
- 16.4 **Participants** agreed it included public transport, walking and cycling as per the definition in PPG13.
- 16.5 **ESBC** pointed out the policy E18 contained in clause (a) the criteria ‘if considered appropriate’ with reference to modes of transport which could allow flexibility for smaller employers or small scale development.
- 16.6 **The Inspector** inquired if there was a threshold below which travel plans would not be required of new employers and **JMW** commented that small employers lacked the resources.
- 16.7 **ESBC** stated there was no threshold, nor a definition of small scale local development contained in the 2nd deposit version of the Local Plan.
- 16.9 **ESBC** confirmed Marchington Camp contained only refurbished units.

17.0 Uses for former employment sites

- 17.1 **The Inspector** asked for comment on methods of distinguishing priority between developing different brownfield sites.

17.2 **Wood Frampton** agreed to work with ESBC on criteria for assessing priorities between brownfield sites.

18.0 Design

18.1 **Participants** raised no issues in addition to those contained in their position statements on this matter.

SESSION CLOSED

Mike Hale

26 January 2005