

EAST STAFFORDSHIRE BOROUGH COUNCIL

LOCAL PLAN REVIEW

LOCAL PLAN INQUIRY 2005

TOPIC PAPER : EMPLOYMENT

1. Introduction

- 1.1 This topic paper deals with the main issues relating to the Employment Chapter of the East Staffordshire Local Plan Review and objections received to the policies and proposals in that chapter. Separate proofs of evidence will be prepared for individual objections.

2. Key Policy Objectives

- 2.1 The key objectives relating to employment are listed on page 14 of the Community Strategy (A9). These objectives are set within the national context of ensuring the maintenance of high and stable levels of economic growth and development. They include:
- Diversifying the local economy and increasing the proportion of growth sector industries.
 - Ensuring an appropriate supply of good quality sites, premises and supporting infrastructure.

3. Wider Policy Context

- 3.1 Government policy on employment is set out principally in PPG 4, Industrial and Commercial Development and Small Firms (C4).
- 3.2 Key features of this guidance includes the need to:
- Ensure there is sufficient land available which is readily capable of development and well served by infrastructure.
 - Encourage continued economic development in a way which is compatible with the Government's stated environmental objectives; economic growth and a high quality environment have to be pursued together.
 - Adopt a plan-led approach with clear policies for different types of industrial and commercial development.

- Encourage new development in locations, which minimise the length and number of trips, especially by motor vehicles.
 - Identify vacant and under-used land in urban areas, previously used for industry and encourage its optimum re-use.
- Weigh the need to sustain the rural economy, with the need to protect the countryside.
- 3.3 PPG3 Housing (C3) also contains relevant advice on employment land. It encourages local planning authorities to consider whether land allocated for employment and other uses might be better used for housing or mixed- use development.
- 3.4 PPG3 Housing (C3) states in paragraph 42 that some local planning authorities have employment allocations, which cannot realistically be taken up during the lifetime of the Plan. It advocates the re-allocation of unsuitable employment sites to meet housing needs and thus reduce demand for additional greenfield housing sites.
- 3.5 The 'Planning for Housing' Statement by the Minister of State for Housing and Planning, Keith Hill (July 2003) emphasises that it is 'unneeded employment sites' that should be brought back into active use through actively considering residential development. The thrust of the statement is to enable the provision of sufficient new homes in the right place at the right time, not to undermine the supply of employment land. Annex A of the Planning Statement sets out a proposed change to paragraph 42 of PPG3. (C3) This states that local authorities should consider planning applications favourably for housing development on land allocated for industry and commerce, which is no longer needed for such use... unless this would lead to an over-provision of new housing.
- 3.6 PPS 7 Sustainable Development in Rural Areas (C6), was published earlier this year. Many of its policies reproduce, or are closely based upon, policies in PPG 7. The key points of the new statement are:
- Planning authorities should support a wide range of economic activity in rural areas, particularly where traditional, rural-based industries are in decline;
 - People who live or work in rural areas should have reasonable access to a range of services and facilities;
 - Local planning authorities should be particularly supportive of the re-use of existing buildings within or adjacent to country towns and villages, for business or community uses, or to provide housing in accordance with the policies in PPG 3 where this would meet a specific need and not conflict with other criteria
 - Local authorities should set out the criteria to be applied to applications for farm diversification projects;

- Local authorities should be supportive of well-conceived farm diversification schemes for business purposes that are consistent in their scale with their rural location and do not result in excessive expansion and encroachment of building development into the countryside.

4. Regional Guidance

- 4.1 RPG 11: Regional Planning Guidance for the West Midlands (June 2004) (C22) encourages the maintenance of high and stable levels of economic growth as a key element of the overall strategy for sustainable development (paragraph 7.5).
- 4.2 Paragraph 7.31 of RPG 11 (C22) acknowledges that should there be insufficient sites on previously developed land of sufficient size, quality and location, to support the diversification and modernisation of the Region's economy, some Greenfield development for employment purposes may be necessary.

5. Staffordshire and Stoke on Trent Structure Plan (B5)

- 5.1 Policy E1 of the Staffordshire and Stoke on Trent Structure Plan (B5) makes provision for 1245 hectares of employment land throughout Staffordshire, of which 250 hectares are allocated to East Staffordshire.
- 5.2 Policy E3 lays down the criteria according to which new employment allocations should be considered. These criteria include:
- Access to the strategic highway and rail networks for the distribution of goods and services;
 - The presence of a nearby potential workforce;
 - The capability of being served by public transport;
 - The availability of pedestrian and cycle links between the site and adjoining residential areas
 - The capability of existing services being able to be extended or improved to allow for future site expansion, when and if appropriate.

The principle underlying the policy is the reconciliation, as far as possible, of the needs of modern employment and developers with the imperative that development should not compromise the ability of communities to develop sustainably.

- 5.3 Policy E8, which safeguards strategic employment uses, is pertinent to some Local Plan Review objections, which seek the allocation of employment land for housing. It states that development which would lead to the loss of business or general industrial land considered to be necessary to meet market requirements and provide a diverse local portfolio of employment opportunities, will be resisted, subject to the provisions for review contained in Policy E2. The issue of loss of

employment sites to residential use is considered in more detail in paragraph 6.7 of the Housing Topic Paper.

6. Evolution of the East Staffordshire Local Plan Review

Issues Paper (A3)

6.1 The East Staffordshire Local Plan Review Issues Paper 2000 (A3) stated that the Council would help to develop the local economy and increase employment by:

- Supporting the development and growth of local business
- Supporting the training and development of people in East Staffordshire
- Developing a more general awareness of Information Technology and the ability to use it.

6.2 The paper acknowledged that, in planning terms, development of brownfield sites would be preferable to development of Greenfield sites. However, the paper recognised that the requirements for the commercial development sector are somewhat different from those in the past, with larger sites more accessible to the transport network, particularly the A38 and A50, being a prerequisite of attracting inward investment. This unfortunately generally involves the use of green field sites.

6.3 The paper also noted the possible need for additional employment land in Uttoxeter.

First Deposit Draft 2001 (A7)

6.4 East Staffordshire Local Plan Review First Deposit Draft was published in 2001. This reflected national guidance, the Structure Plan and the thrust of the responses to the Issues Paper. It included 29 policies relating to employment.

6.5 876 representations were received referring to the policies and the text of the Employment Chapter of the First Deposit Draft. Additional site-specific representations concerning the employment allocations on the Proposals and Inset Maps were also received. However, these include supporting representations and duplication where objections to the text and policies were submitted in support of site-specific objections.

The Revised Deposit Plan 2004 (A17)

- 6.6 This included changes to the text and policies of the Employment Chapter in response to the representations and objections received to the First Deposit Draft.
- 6.7 55 representations were received concerning the Employment Chapter and its policies, of which 44 were objections, and 9 supported the changes made.

7. Borough Provision

- 7.1 Structure Plan Policy E1 makes provision for an increase of 250 hectares of employment land for business, industry and warehousing between 1996 and 2011. This would equate to an average indicative development rate of 16.66 hectares per annum. Actual net rates of development have been lower; 95.53 hectares of net employment land have been developed for B1/B2/B8 uses between 1996 and March 2003. This is equivalent to an average of 13.64 hectares net per annum. It should be noted that the Panel report into the Structure Plan Inquiry recommended that the Borough's employment allocation should be reduced from 250 hectares to 230 hectares. However, the County Council decided to keep the figure of 250 hectares.
- 7.2 At 31 March 2003 there remained a total gross supply of 140.54 hectares of employment land available for development, including sites allocated in the East Staffordshire Local Plan Review. This would be the equivalent of an indicative supply for 10 years at recent building rates. Alternatively, this could support an average annual development rate of 15.61 hectares for the remainder of the local plan period.
- 7.3 The distribution of available employment land within the District is indicated in the Table below.

Location	Gross Land Availability as 31.03.03 including additional sites proposed in the local plan review 2004 (Hectares)
Burton on Trent	67.73
Uttoxeter	22.40
Barton under Needwood	33.79
Rural Areas	15.02

- 7.4 As can be seen from the Table, the highest provision is in Burton on Trent, with 67.73 hectares of land available. 13.4 hectares of this is accounted for by commitments at the Centrum 100 Business Park. In order to ensure a continuing supply of land for employment uses, the Plan allocates 40 hectares of land to the south of Main Street, Branston. This is a site of regional significance, which was listed as a major opportunity site in the securing of Objective 2 funding from the European Regional Development Fund (ERDF). Given that the Inspector's report into the South Derbyshire Local Plan Review recommends deletion of the

proposed employment site at Drakelow, it is especially important to ensure that the site south of Branston is developed to meet employment demands in the area within the short to medium term. However, the Inspector's report acknowledges the longer term potential for Drakelow and calls for the South Derbyshire Plan not to be "silent on the matter". What remains unresolved is the infrastructure to serve that scale of development. The site South of Branston with the A38 interchange is the first step to providing that highway infrastructure. Preliminary findings of the Economic Forecasting Study acknowledge the potential of the site, and suggest that B8 development is limited to help safeguard the site for a more mixed-use development including a substantial amount of B1 space. There are 35.39 hectares of employment land available at Barton under Needwood. However, the supply of employment land at Uttoxeter is more limited and the Plan therefore allocates two 10 hectare employment sites, one at Derby Road, and one to the west of the town. Some rural sites committed by planning permission remain. In addition to these, the plan allocates 0.5 hectares at Bramshall Industrial estate, since the development boundary in the adopted plan bisects an industrial unit.

- 7.5 The Uttoxeter Plus Business Premises Study (March 2003), carried out by consultants on behalf of the council identified a lack of modern, purpose built commercial and industrial property in the town, and its surrounding area. The lack of quality small business premises in the town is specifically mentioned. The study noted an increase in enquiries regarding potential development sites in the town since the improvement of the A50 and the opening of the Town Centre Bypass.
- 7.6 The Burton on Trent Managed Workspace Study, prepared on behalf of the County Council, identified a significant gap in the market for units between 2,000 sq ft and 5,000 sq ft. It stated "many businesses having started in 600 sq ft/1,000 sq ft (units) are finding it increasingly hard to locate not only within Burton upon Trent but the general area". Such units could be provided on the site South of Branston, as suggested by the preliminary findings of the Economic Forecasting Study.
- 7.7 Although the total employment land supply identified in the Plan is slightly below the provision in the Structure Plan (although it is greater than the provision suggested for the Borough in the Panel report into the Structure Plan Inquiry) it is considered that adequate provision has been made for the employment development needs of the District on the basis of past development rates, and will allow for a choice of sites and premises. It is not considered that there is a significant shortfall requiring any action to increase the supply of employment land, beyond the new allocations in the review plan.

8. Rural Employment

- 8.1 In rural areas of the Borough, a high proportion of the population is employed in manufacturing. However, most manufacturing employers tend to be based in urban areas. It follows, therefore, that people in rural areas tend to commute to urban centres. Since many of the Borough's rural areas are relatively poorly served by public transport, those

residents who do not have access to a car may find it difficult to find employment. This, coupled with a national decline in agricultural employment, can lead to higher unemployment figures in the more remote areas of the Borough.

- 8.2 The Draft East Staffordshire Rural Strategy (A23) acknowledges that the functioning of the planning system is an important influence on rural businesses. The Local Plan Review Second Deposit accordingly has several policies encouraging rural employment through farm diversification schemes, extensions to existing premises and tourism developments. For reasons considered in paragraph 10.4 below, The Council does not wish to encourage large concentrations of employment uses in areas remote from settlements.

9. Key Issues Raised by Objectors

- 9.1 A number of objections, which were duplicates or which have been met by the changes set out in the Revised Deposit Plan, or the Pre-Inquiry Changes, have been withdrawn.
- 9.2 The majority of objections received can be divided into three key areas:
- Employment strategy and land supply objections (Policy E1)
 - Employment site allocations (Policy E2)
 - Extensions to employment site allocations (Policies E3, E4 and E5*)

** First Draft Deposit*

Employment Strategy and Land Supply Objections

- 9.3 100 objections were made to Policy E1 at First Deposit Stage. The majority of these objections stated either:
- The reference to meeting infrastructure needs of future development should be deleted as this is a matter for future local plan reviews; or,
 - The policy should specify that the Structure Plan requirement should not be exceeded.

However, this policy was not amended at Second Deposit Stage for the reasons considered in Section 9 of this paper.

Employment Site Allocations

- 9.4 Approximately 500 objections were received to Policy E2. At First Deposit stage, most of these objections related to the allocations at Spath, west of Uttoxeter and Lawns Farm. Allocations at Spath and Lawns Farm were deleted at Second Deposit Stage for reasons considered in the Key Sites Report (A11a), namely that the site at Spath had been rejected during the previous Local Plan Inquiry, and that the site at lawns Farm is no longer required given that the site south of

Branston is now employment only, rather than employment and residential as proposed at First Deposit stage. At Second Deposit stage, counter-objections to the removal of these sites were lodged. Several objections were received proposing additional or alternative allocations, including land at former military sites throughout the rural areas of the Borough.

Extensions to Employment Site Allocations

- 9.5 Approximately 180 objections were received to the Plan's reference to potential extension of employment sites at Lawns Farm (including land west of the A38) and west of Uttoxeter.

10. The Council's Response to Key Issues

Employment Strategy and Land Supply Objections

- 10.1 The reference to meeting infrastructure needs of future development in Policy E1 is defended. If infrastructure is not provided as part of development early on then land suitable for development may be sterilised.
- 10.2 Since allocations at Lawns Farm and Spath have now been deleted, the slight over allocation at First Deposit Stage has become a slight under allocation. It is not felt, therefore, that amending Policy E1 to specify that the Structure Plan requirement should not be exceeded is necessary.

Employment Site Allocations

- 10.3 The allocation West of Uttoxeter is defended. An allocation of 10 hectares is of a scale in keeping with the principle of Policy PA6 of RPG 11 (C22). The site is considered to be preferable to the site at Spath which was deleted at Second deposit stage for the reasons highlighted in paragraph 8.3.
- 10.4 The deletion of allocations at Spath and Lawns Farm is defended in accordance with the reasons highlighted in paragraph 8.3.
- 10.5 The lack of allocations on former military sites in rural areas (with the exception of 0.5 hectares at Bramshall Camp) is defended. Such allocations would be contrary to Policies D1 and E3 of the Staffordshire and Stoke on Trent Structure Plan since they are relatively isolated from urban areas and as such do not tend to be well related to a potential workforce and do not tend to be well served by public transport. Furthermore, such allocations would be contrary to the thrust of PPG 13.

Extensions to Employment Site Allocations

- 10.6 Reference to potential expansion of the Lawns Farm site (including land west of the A38) was deleted at Second Deposit Stage along with the parent allocation. However, The Council still considers it necessary to

allow for potential expansion of the employment site west of Uttoxeter. A 10 hectare site would be unlikely to justify the relatively high infrastructure costs associated with bringing the site forward for employment use. It is therefore considered necessary to allow for potential expansion in order to ensure that the allocated 10 hectare site is developed and the Structure Plan requirement is met.

Site Specific Objections

10.7 Site specific objections will be considered in more detail in individual proofs

11. Conclusions

11.1 It is an important objective of the Plan to ensure that adequate employment land is available to meet the needs of the Borough. The employment allocation in the Local Plan Review is sufficient to meet the Structure Plan provision for the expansion of existing firms and introduction of new employment. It is important that employment sites are retained and brought forward, to improve the balance between housing and jobs in the Borough and to reduce out-commuting.