



# **The Plan for Stafford Borough Part 2**

## **Examination Statement – Issue 6 – Protected Employment Areas**

**June 2016**

## **Issue 6: Protected Employment Areas**

### **6.1 Does policy SB3 strike the right balance between focus and flexibility?**

- 6.1.1 The adopted Plan for Stafford Borough (P2-C1) (herein referred to as the adopted Plan), provides a sustainable framework for delivering economic growth that is considered appropriate for the future of Stafford Borough. Adopted Spatial Principle 2 (SP2) promotes economic growth and sustainable development, and Spatial Principle 5 (SP5) shows the broad distribution of employment across the Borough, with Stafford Town accommodating 56% of new employment; Stone 12% of new employment land and the rural areas to provide 32%. The supporting text to Spatial Principle SP5 states that further provision of employment land will be guided by the criteria set out in Spatial Principle 7 (SP7).
- 6.1.2 The Adopted Plan identifies specific locations for development in the form of Strategic Development Locations (SDLs) at Stafford (Policies Stafford 1,2,3, and 4) and Stone (Policies Stone 1 and 2). Furthermore Policy E1 seeks to support all types of businesses by encouraging new services, up-skilling the traditional workforce and promoting a more balanced sustainable economy. In addition, adopted Policy E1 proactively drives and supports the economic development that is required for the Borough.
- 6.1.3 Existing allocations and expiring permissions for employment land were reviewed as part of the Examination into the adopted Plan (see paragraph 6.75 of the adopted Plan). The Employment Commitments as at 31<sup>st</sup> March 2016 (P2- L20) shows that within Stafford there is shortfall of 2 hectares, although the adopted masterplan for Stafford Policy 3 (P2-J19) provides up to 6 hectares of mixed use development. Therefore it is vital that the existing employment sites and those identified in the SDLS are protected, and Policy SB3 seeks to protect existing employment sites such as Brookmead Industrial Estate in Stafford and Whitebridge Industrial Estate in Stone, as well as the proposed new employment allocations that formed part of the SDLs in the adopted Local Plan.
- 6.1.4 The Stafford Settlement Boundary Map (P2-A2) and Stone Settlement Boundary Map (P2-A3) identifies the land to be protected by this policy. The extent and the boundaries of the SDL employment land as identified on Policy Maps P2-A2 and P2-A3, is the same as the adopted Policy Map 4 Development to the North of Stafford Town; Map 8 Development to the East of Stafford; and Map 11 Development to the West and South of Stone (contained within P2-C1). To ensure that there is sufficient flexibility in future provision, as explained at paragraph 6.57 of the Adopted Plan, additional capacity has been identified at the SDLs.

- 6.1.5 The land identified for employment in the SDLs is currently in agriculture use, and following a representation received on the Plan for Stafford Borough Part 2- Proposals (P2- G1), the wording of Policy SB3 was amended to provide flexibility so that proposals for development related to the existing agriculture use, prior to the strategic allocations coming forward, could be assessed under Policy E2 of the adopted Plan.
- 6.1.6 A representation has been received with regard to allocating additional land to the south of Stone Business Park (approximately 1.65 hectares). During the Examination of the adopted Plan (P2-C1) changes were made to the boundary of the Stone Business Park, and the adopted Policy Map identifies 20 hectares of land at this Location through Policy Stone 2. The boundary at this location is the same as the Adopted Policy Map for Stone (P2-C3). Therefore the Council does not consider it necessary to change the boundary.

## **6.2 Are the Recognised Industrial Estate (RIE) boundaries drawn appropriately?**

- 6.2.1 Stafford Borough has a number of significant rural employment concentrations, and adopted Plan Policy E3 and Policy E4 (P2-C1) designate these as Recognised Industrial Estates (RIEs). Adopted Policies E3 and E4 proactively encourage sustainable development through the expansion of economic activity within the RIE's, and help to deliver the development strategy in the adopted Plan (P2-C1). Furthermore the expansion of the RIE's helps to support the Sustainable Settlement Hierarchy outlined in adopted Policy Spatial Principle SP3, which encourages growth for the local economy in sustainable locations within the rural areas.
- 6.2.2 The supporting text at paragraph 9.13 of the adopted Plan (P2-C1) states that the formal boundaries will be identified in the Site Allocation Plan, with the exception of Ladfordfields and Raleigh Hall RIE's. However to provide clarity in terms of the relationship between the existing employment area and the new Rural Employment Location in the Adopted Plan (P2-C1) as shown on adopted Plans for Raleigh Hall (P2- C5) and Ladfordfields (P2-C4), Part 2 has included an RIE boundary for Raleigh Hall (P2-A18) and Ladfordfields (P2-A16).
- 6.2.3 The Council considers that the RIE boundaries, based on the principle of supporting development within but not outside, have been appropriately drawn to deliver the proportion of development required through Spatial Principle 5, together with the objective of Spatial Principle 6 promoting a sustainable rural economy.

6.2.4 Paragraph 4.6 of Part 2 (P2-A1) sets out the methodology for establishing the Recognised Industrial Estate boundaries. The Council considers that these boundaries are appropriately defined.

6.2.5 P2-L20 sets out the most up to date figures on the employment provision for the Borough. The total requirement established in Part 1 of the Plan of employment land during the Plan period 2011- 2031 is 160 hectares. Completions to date from the start of the Plan (2011) are 14 hectares, and the commitments with planning permission are 97 hectares, with a residual commitment intended to be met at the Strategic Development Locations of 50 hectares. Therefore the land identified within the Recognised Industrial Estate boundaries (which includes the additional land at Ladfordfields and Raleigh Hall that was allocated in the adopted Plan), alongside the employment development at Stafford and Stone, will deliver employment requirements. This is based on the proviso that the planning consents granted will be built out, as listed in P2-J10 to P2-J12 and P2-J17 to P2-J18.

**Are any of the proposed RIE boundaries inadequately defined or inappropriate in principle?**

**(a) Hixon RIE 1**

6.2.6 A description of the boundary drawn for Hixon RIE is provided at paragraph 4.8 of Part 2 (P2-A1). No representations have been received in respect of the proposed RIE boundary at Hixon. The Council does not consider it necessary to amend the boundary for Hixon RIE.

**(b) Hixon Airfield RIE 2**

6.2.7 A description of the boundary drawn for Hixon Airfield RIE is provided at paragraph 4.9 of Part 2 (P2-A1). A representation has been submitted to significantly expand Hixon Airfield RIE by a further 12.9 hectares for a science and technology park. An outline planning application has been submitted and is pending consideration. The site forms part of the former RAF airfield and is adjacent to the railway line.

6.2.8 Spatial Principle SP5 sets out the hierarchy for employment growth distribution across the Borough, with the reason for the proportions set out in paragraph 6.55 of the adopted Plan (P2-C1). This emphasises the need for an appropriate amount of development to take place at each level of the hierarchy to reflect the level of services and facilities available whilst still meeting the Council's growth aspirations. It is important that new development in the lower levels of the hierarchy is not allowed to significantly exceed the proportional split set out in adopted Policy SP5 as this would

distort the intended growth pattern, seriously undermining the adopted Local Plan (P2-C1) which is not in accordance with the genuinely plan-led approach advocated in paragraph 17 of the National Planning Policy Framework (P2-F1). As set out in paragraph 6.2.4 the Council has identified sufficient employment land in the preparation of the RIEs.

6.2.9 The Council considers that the proposed RIE boundary has been adequately defined and is appropriate, in principle. Therefore there is no requirement for amendments to ensure any greater capacity to deliver the employment requirements of the adopted Plan, which are already adequately met. The Council does not consider it necessary to amend the boundary for Hixon Airfield RIE.

**(c) Ladfordfields RIE 3**

6.2.10 A description of the boundary drawn for Ladfordfields is provided at paragraph 4.10 of Part 2 (P2-A1). A representation has been received which supports the boundary (P2-A16) and methodology used in defining the boundary of the Ladfordfields RIE. The Environment Agency (EA) has commented that part of the land within the site includes an area of historic landfilling. However the EA has no issue with the proposal to including the historic landfill.

6.2.11 The Council does not consider it necessary to amend the boundary for Ladfordfields RIE.

**(d) Moorfields RIE 4 (Stafford)**

6.2.12 Moorfields is a Major Developed Site in the Green Belt, where adopted Policy E5 (P2-C1) supports limited infilling or the partial or complete redevelopment of the site for employment purposes. The adopted Plan Inset Map 7 (P2-L26) identifies the extent of the developed site. Any further expansion of the RIE site beyond the boundary already identified on the adopted Plan would be contrary to Green Belt policy.

6.2.13 The Council considers that the proposed RIE boundary has been adequately defined and is appropriate, in principle. Therefore there is no requirement for amendments with sufficient capacity to deliver the employment requirements of the adopted Plan.

**(e) Pasturefields RIE 5**

- 6.2.14 A description of the boundary drawn for Pasturefields is provided at paragraph 4.11 of Part 2 (P2-A1). A representation has been received to include an additional 6.1 hectares of employment land at Pasturefields RIE, north of Pasturefields Lane and is bounded to west by the railway line.
- 6.2.15 Policy SP5 sets out the hierarchy for employment growth distribution across the Borough. The reason for the proportions is set out in paragraph 6.55 of the adopted Plan (P2-C1). This emphasises the need for an appropriate amount of development to take place at each level of the hierarchy to reflect the level of services and facilities available whilst still meeting the Council's growth aspirations. It is important that new development in the lower levels of the hierarchy is not allowed to significantly exceed the proportional split set out in adopted Spatial Principle SP5 as this would distort the intended growth pattern, seriously undermining the adopted Local Plan (P2-C1) which is not in accordance with the genuinely plan-led approach advocated in paragraph 17 of the National Planning Policy Framework (P2-F1).
- 6.2.16 The Council considers that the proposed RIE boundary has been adequately defined and is appropriate, in principle. Therefore there is no requirement for amendments and as there is sufficient capacity to deliver the employment requirements of the adopted Plan. The Council does not consider it necessary to amend the boundary for Pasturefields RIE.

**(f) Raleigh Hall RIE 6**

- 6.2.17 A description of the boundary drawn for Raleigh Hall is provided at paragraph 4.12 of Part 2 (P2-A1). A representation has been received which supports the boundary (P2-A18) and methodology applied in defining the boundary of the Raleigh Hall RIE.
- 6.2.18 The Council does not consider it necessary to amend the boundary for the Raleigh Hall RIE.

### **6.3 Is there a need for a policy to address the future of Trentham Gardens?**

- 6.3.1 By way of policy history the Stafford Borough Adopted Plan 2001 had two policies specifically in relation to Trentham Gardens, namely Policy RLT19 and RLT20 (P2-L30). This was because at the time of preparing the adopted Stafford Borough Local Plan 2001, the Trentham Gardens Estate was not meeting its full recreational potential and was in need of regeneration. Policy RLT19 – Accommodating New Development at Trentham Garden Estate, provided a set of criteria to guide development, including conservation of the natural and historic environment, enhancing leisure and recreation facilities, economic benefits, effects on the Green Belt and highway implications. Policy RLT20 supported appropriate infill uses at Trentham Gardens Estate. However since that time, significant re-development of the Trentham Gardens Estate has successfully taken place leading to a significant leisure and recreation resource not just for the local area but regionally and nationally.
- 6.3.2 A representation has been received which seeks a specific policy to deliver new development within this heritage asset rather than by relying on Policy N9 of the adopted Plan (P2-C1). The Council feel it is simply not necessary to include a separate site-specific policy to support new development at Trentham Estate. New development proposals can adequately, clearly and comprehensively be addressed by the economic and environmental policies in the adopted Plan (P2-C1), taken together. In relation to tourism development, Policy E6 supports new development by promoting enjoyment of the rich and historic natural landscape; new and existing recreational activities; preservation of attractive features. Proposals for new development at Trentham Estate could also be assisted by Policy E2, which helps facilitate tourism to achieve rural sustainability. Both these policies conform to the NPPF and consider protecting development in Green Belt. In environmental terms, any development will need to satisfy Policies N8 and N9, which will ensure that the environment of Trentham Estate and Gardens will be protected, conserved and enhanced.
- 6.3.3 As is evident from the successful regeneration of the Trentham Estate and Gardens in recent years it is possible to deliver high quality new development at this Registered Park and Garden within the North Staffordshire Green Belt.