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THE PLAN FOR STAFFORD BOROUGH - EXAMINATION IN PUBLIC 23rd OCT - 1st NOV 2013

6 ECONOMY (Policies E1 – E8)

Key Issue:-

Does the Plan set out a clear economic strategy which positively and proactively encourages sustainable economic growth, and are the policies for the local and rural economy, tourism and canals, town, local and other centres soundly based, effective and appropriate for Stafford Borough, supported by a robust, credible and up-to-date evidence base and consistent with national policy?

6.2 SUSTAINABLE RURAL DEVELOPMENT, INCLUDING DEVELOPMENT WITHIN RECOGNISED INDUSTRIAL ESTATES AND MAJOR DEVELOPED SITES IN THE GREEN BELT (Policies E2 - E5)

1 Introduction

Paul Sharpe Associates LLP act for Stan Robinson (Stafford) Ltd (SRL) regarding 6 ha of land adjacent to the Ladfordfields Industrial Estate near Seighford. The land is proposed for allocation for employment purposes under Policy E4.

- 2 Ladfordfields Industrial Estate is a well established industrial estate with a range of employers serving the employment needs of part of the rural area of the Borough west of, and with good access to, the M6.
- 3 SRL occupies about 70% of the area of the Estate but the Estate is now fully developed.
- 4 SRL is a logistics company and one of the largest employers in Stafford. About 240 people are employed at Ladfordfields with a total of 345 people nationally. Ladfordfields is the focus of the company's UK operation with specialist warehouse facilities built to accommodate the complete out sourced logistics functions of household named companies such as Bostik, Evo-Stik and Wickes.
- The company continues to expand at Ladfordfields. Much of the land now proposed for allocation under Policy E4 is set to accommodate those expansion needs. Whilst speculative employment development is not ruled out, in the main, the land is required to accommodate the expansion needs of the company.
- b(i) & (ii) Generally, SRL is supportive of the approach to employment development in the rural area adopted by the Council which, in our view, is consistent with the advice in NPPF para 28. The (so called) Recognised Industrial Estates (RIE) are well distributed through the rural parts of the Borough including the North Staffordshire Green Belt. Nearly all these Estates are based on former MOD sites, being former Second World War airfield service buildings or accommodation for military personnel, many characterised by "H" blocks. Over the years, these buildings have been converted and reused on a piecemeal basis, generally for employment purposes. Mainly for rent, and spearheaded by commercially minded single owners, some landlords have played a mentoring role and sometimes "business angel" role in the development of enterprising small businesses.
- By providing relatively inexpensive accommodation on easy terms, the RIE's have been a seed bed of enterprise, innovation and new small business creation in the Borough over the last 45 years.

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- At some RIE's this role continues. At others, small businesses have flourished and expanded and "H" blocks and other former MOD buildings have been replaced by modern buildings. Such is the case at Ladfordfields and Raleigh Hall which are now fully developed.
- 9 However, for those existing successful companies, mostly family run businesses such as SRL with a loyal and settled local workforce, relocation would be disruptive to the continuity of the business and, in any event, would be prohibitively expensive. It is vitally important that these successful companies are able to continue to respond to market forces and to expand thereby sustaining their role in underpinning employment supply in the rural area.
- The type of employment provided by the RIE's is also important. Most tend to be manual and blue collar-type jobs ("real" jobs as many might say). Bearing in mind the high proportion of public sector jobs in the Borough and the likely continuing jobs losses in that sector the supply of alternative private sector jobs at the RIE's is crucial to diversifying the employment base.
- SRL support in particular the singling out of the Ladfordfields and Raleigh Hall Industrial Estates for allocation to cater for impending expansion needs rather than delaying the process to an Allocations DPD. SRL hope shortly to come forward with expansion proposals for the company on part of the land proposed for allocation.
- The Council's approach to employment allocation in the rural area responding to the RIE's in greatest need in a flexible way is a pragmatic one and will help to secure economic growth and a strong and competitive rural economy. The flexible approach to allocation displayed by the Council will provide SRL with the flexibility it requires in satisfying its land needs at Ladfordfields.
- With regard to Policy E4, in principle, SRL support the policy but object to some of the detailed wording of the policy itself where there are ambiguities, inaccuracies and some duplication. Before doing so we first make some key points about the location and address some of the local concerns expressed about the proposed allocation.
- Land proposed for allocation at Ladfordfields is wholly owned by Stan Robinson Group.

 Ladfordpool Farmhouse is also owned by the company and the house and land are currently let on a short term business tenancy. Although agricultural in character, the land is not part of a substantive agricultural holding and is not of best and most versatile quality. Consequently, it's potential loss from agriculture would not be material or significant.
- The land for allocation is located at the end of Ladfordfields Industrial Estate a cul-de-sac off the B5405 and not being designated for its landscape, historic or wildlife value its location is visually and functionally discrete. In addition, there is sufficient land to appropriately mitigate any environmental impacts.
- With regard to traffic generation, Creswell Parish Council's concerns about traffic on the B5405 and A5013, thereby challenging the statements in para 9.16, are noted.
- However, these roads are A and B Class roads, ie part of the primary and secondary highway network onto which highway policy would seek to direct development related traffic.
- Also, the volume of existing traffic using these roads, whilst giving access to Junction 14 of the M6 and thus not lightly used, are not excessively used and simple observation demonstrates that they operate well within their practical and environmental capacitites.

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- 19 At Great Bridgeford, (for B5405) and at Creswell (for A5013) residential development fronts these routes. However, the scale of residential development in each case is not particularly extensive and certainly SRL vehicle drivers are mindful of their responsibilities for good neighbourliness and for maintaining the good name of the company.
- Although minor local highway enhancements are always desirable, the Ladfordfields Industrial Estate has indeed good links to the M6 motorway and the national route network and business expansion at the Estate is not constrained by highway issues.
- 21 **Criterion (i)** rather than "reduces impacts" we suggest the text be amended to **"minimise or appropriately mitigate impacts on the surrounding area and landscape"**. This, we believe, to be a more practical and workable form of words. Conceivably, it may not be possible to "reduce" impacts and therefore mitigation may then be appropriate.
- **Criterion (v)** neither Raleigh Hall nor Ladfordfields (RIE's) are particularly close to any "existing settlement". Indeed, in part, this is a factor in their success as industrial estates, ie in the Ladfordfields case the estate is "near" Great Bridgeford and "near" Seighford but not "close" and certainly not within easy walking distance. We suggest therefore that the first sentence be amended as follows:-
 - "An access, transport and travel plan strategy, which identify appropriate access points between the site and the local highway network."
- In the second sentence of criterion (v) reference is made (at the end of the sentence) to "as well as deliver local transport network measures". We are unsure what is meant by "measures" in this case but in any event we believe that this reference is duplicated by criterion (x). We recommend therefore that "as well as deliver local transport network measures" be deleted from criterion (v).
- 24 Criterion (vii) it stands to reason that any development at Ladfordfields will need to take account of existing easements associated with the existing water main crossing the site. Attached at Appendix 1 is a report on Flooding and Drainage prepared by PFA Consulting. This demonstrates that only the eastern parcel of land for allocation at Ladfordfields is affected by the flood plain but nevertheless can be developed without adverse impact on that flood plain. Also, the slope of the land gently down towards the water course would facilitate the use of SUDS.
- As far as the water main is concerned, again, in practice the presence of this infrastructure affects only the eastern part of the proposed allocation. Despite the need for a 6m easement, parking and/or landscaping over the line of the pipeline is not precluded and localised diversion would be an option.
- The representations now made by the Water Company suggest that the requirement to reinforce the water supply at Raleigh Hall is no longer relevant and so this reference can be deleted from the text of Criterion (vii). We recommend therefore that criterion (vii) be redrafted as follows:-
 - "(vii) Safeguard the water main crossing the Ladfordfields site."
- Criteria(viii), (ix), (x) and (xi) it is by no means certain that these infrastructure requirements (for electricity, drainage, highways and gas) are essentially required to serve any future development that may take place at Ladfordfields. Much will depend on the nature and composition of any particular proposal. We recommend therefore that "if necessary" be added to the text of each of the criteria (viii), (ix), (x) and (xi) either as a prefix or suffix.